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Attention Jo Dowling
London Borough of Barnet
Re: Planning Application **H/04017/09**

Mill Hill East Development Site NW7

Mill Hill East application by the Inglis Consortium 2009 H/04017/09

Review in MHPS Committee after Outline Application made 2009

INTRODUCTION: There is no doubt that the developer and his design team have put in a tremendous effort to bring the scheme to Outline Proposals. However, the Mill Hill Preservation Society who, having invited the developer to present at our Winter Meeting and having since examined the proposals submitted to the London Borough of Barnet in Committee, has not been swayed by the designs we have examined. We are not prepared to endorse this scheme for approval at Outline stage.

In previous consultations we started out by commenting that the scheme was overdeveloped to an exceptionally high density – effectively ‘urban in character’ – being applied to a suburban site, in reality, verging on rural. This has not changed.

The proposals and drawings we have examined do not change our opinion on this issue. We have no intention of being negative – but we feel the only people to gain out of this development will be the developers and the local authority. The long term residents of the area will suffer. It is a scheme totally against the ‘grain’ of the area.

The imposition of a very high density leads to a loss of green space. This is borne out when measured against the normal standards applied to similar developments for green space versus residents. Since the very first consultation, the areas of green space have been eaten away, until now we have a scheme that is even less well provided for than the proposals put forward for the Examination in Public by Mr Machin. This is simply not acceptable.

The erosion of the basic safeguards embodied in the planning process – aimed at protecting the minimum standards of environment for the future residents – are being ignored. In reality the next slums of tomorrow are being proposed today in the name of ‘sustainability’. This is a totally false claim being wrapped up in current jargon and is something the Mill Hill Preservation Society does not wish to endorse.

The Mill Hill Preservation Society believe there will be too many people, on too small a site, with too little green space, and too few facilities - for both young and old – to enable this scheme to blend into the existing suburban environment and stand a chance of being a great place to live on a long term basis.

When our Committee looked at the new elevation to Bittacy Hill – figure 6.26 on page 71 of the Design Principles Document - we realised we were deeply sceptical about the attractiveness of the scheme. The elevation has nothing to do with Mill Hill East.

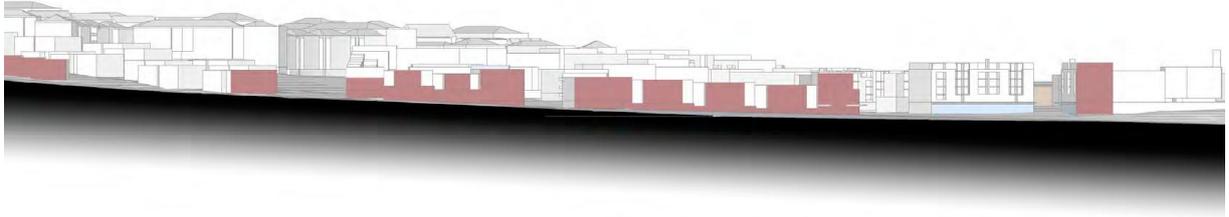
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When we looked at this drawing and realised that the largest existing elements were the smallest elements of the new elevation - it simply showed how over developed the scheme would be – even when viewed from adjacent roads. There is a huge loss of green space and an obviously high density that is simply not going to work.

We do have comments on the proposals, but none of these should be construed as acceptance of the basic tenets of the proposals, which we find deeply offensive. We have tried to make our comments in line with previous consultations.

OVERALL DENSITY: The problems arise with the overall density and the retention of a large area of generally moderate MoD flats by the Notting Hill Housing Trust, which takes a nasty bite out of the opportunity to present a cohesive development. This has the knock-on effect that lower part of the site is very dense, and the middle area looks too lumpy and dense for a genuinely suburban location and feel. Our reading of the proposal is that the 'urbanisation' – instead of being restrained round the lower part of the site – is pushing up the hill. This is with a view towards pushing the density up to the top of the density range. MHPS has looked at this in more detail ...

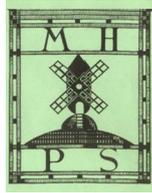
FURTHER DENSITY CONSIDERATIONS: At a national level, the average density of housing development increased from 33 dwellings per hectare in 2003 to 39 dwellings per hectare in 2004. Using the Campaign for Rural England figures, the average density of new homes 2002 - 05 for Barnet was 66 dwellings per hectare.

With PPG3 directing that new homes should be built in the density range of 30 of 50 dwellings per hectare (dpha), and at higher densities for sites that are well served by public transport and/or close to town centres, The Campaign to Protect Rural England (CPRE) has collected data with which councils are complying. The minimum density needed to support a viable bus service is around 40 dpha.

It is possible to build family houses with gardens at 70 dwellings per hectare? - this is a medium density. Densities in parts of London, such as Kensington and Chelsea, are in excess of 150 dwellings per hectare. Parts of Barcelona and Paris are around 400 dwellings per hectare.

CPRE has praised those councils whose planners – working with developers – are leading the way in breathing new life into our towns and cities and sparing our countryside from the bulldozer, with, for example, increases in density of completions in Barnet of 55 to 103 dwellings per hectare.

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It is important to dwell on this subject, as it is fundamental to our opposition. Some other density figures are as follows;

Peterborough	- 9.5 dwellings per hectare
Bath city centre	- 36 dwellings per hectare
Freiburg city centre, Germany	- 46 dwellings per hectare
Primrose Hill London	- 48 dwellings per hectare
Bedzed Sustainable Housing UK	- 50 dwellings per hectare
Coin Street scheme Central London	- 60 dwellings per hectare
Ciboga Groningen, Netherlands	- 112 dwellings per hectare
Notting Hill London	- 164 dwellings per hectare
Amsterdam	- 200 dwellings per hectare
Greenwich UK	- 292 dwellings per hectare
Parts of central Barcelona & Paris	- 400 dwellings per hectare

(Figures from Urban Density Housing by Arup)

Now, with this information as background, let us look at the figures included in this application:

- a. **We have the Green Belt Edge - the zone most like the areas adjacent to the site - at 20 – 70 dwellings per hectare i.e. an average of 40 dpha (just over Bath city centre average)**
- b. **We have Central Areas at 25 – 100 dwellings per hectare i.e. an average of 62.5 dpha (just over the Coin Street development in central London)**
- c. **We have the Southern Hub at 70 – 200 dwellings per hectare i.e. an average of 145 dpha (just under the level for Notting Hill, central London)**
- d. **We have new Community Zone at 250 – 720 dwellings per hectare i.e. an average of 485 dpha (higher than central parts of Barcelona and Paris)**

So to summarise: These densities are above the average national increases; they are well above the average density for new homes in Barnet; they are above the requirements of PPG3 including the minimum requirement for viable bus services; half the site area is at high densities where it is not possible to provide gardens - whereas most of the dwellings in the adjoining areas have gardens; the Community Zone has the most high densities being higher than central Paris and Barcelona.

For these reasons we believe the site densities are far too high and the site is significantly overdeveloped in relation to its suburban/rural location.

GREEN OPEN SPACE: On the early consultation the original AAP design plan is shown with a green park to the north of Panoramic Park – that disappears on the design development drawings and it is claimed that Panoramic Park is correspondingly larger to compensate. In fact, on scaling the drawings the 'latest' Panoramic Park is smaller than shown on the AAP drawings and, in addition, we have lost the northern park. Also the Urban Park is smaller than the original AAP central park and Eastern Park is smaller than the original AAP eastern park. We keep losing the green space at the expense of built area!

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In our submission to the AAP examination in public, the MHPS stressed – along with other bodies – that the open space standards were not up to the National Recommendations. We said ...

“Based on the National Playing Fields Association (NPFA) standards of 2.43 ha of public open space per 1,000 population, there would be a requirement for an additional 10+ hectares of open public space within the AAP boundary” but that this is not provided as it would ‘place a considerable constraint on the deliverability of the density targets and objectives. If you take the 2,500 dwellings proposed at say 3 people per dwelling then the total residential population would be 7,500 – and at 2.43 per 1,000 people the total open space requirement would be nearer 18 hectares. We believe that as the required open space cannot be provided the AAP site is overdeveloped.”

The area currently shown as school playing field, woodland, and scout camp field will not be open to the general public as free open space. Under the new Safeguarding Regulations these areas will have to be protected in the best interests of the children using them. This will further reduce the ‘real’ area of green space available to the public. They may indeed need to be fenced.

So in these new proposals the area of open space has been reduced still further. This reduction is something the MHPS objects to in the strongest terms.

LANDSCAPE: Now the site is out of ‘Crown’ control, we believe it is appropriate for a blanket Tree Preservation Order to be applied to the whole of the site, so that each tree has to be considered individually before any action is taken. We also feel that hedges are important. There have already been some ancient hedgerows destroyed and we wish these to be limited so that no more are lost. We also feel that it is important to maintain hedges during the planning and design process so that they retain their shape and form.

WILDLIFE: MHPS accept there are wildlife corridors running east/west – but no clear routes north/south. Given the site is almost surrounded by green space used by wildlife then the north/south routes are just as important, if not more so, than the east/west ones. We are sure other groups have raised this issue, and will again.

BITTACY PARK: Pedestrian access to Bittacy Park will not be easy as the design stands, even though a route to the Park has been allowed for in the design. The access path does not seem to relate well to the proposed footpath layout. The existing residents use the park and, with the influx of a large population, this park will become overused and will suffer accordingly.

COMMUNITY PARK: MHPS have some reservations about the park at the top of the ‘urban’ development area where it is proposed to have a grassed theatre. There will be traffic noise from ‘Bray Road’, and the formality urbanises it. However, it is imaginative, and might work as a focus for activities in the summer months. Outside this time the use will be limited and the space provided on plan will be difficult to use.

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HOUSING MIX: MHPS did not see any figures showing the make up of the preferred housing mix. The distribution between *affordable v private* and *flats v houses* is important. Also we would like family units – especially in the Green Belt Edge – to be 3 / 4 bedroom houses moving towards 1 / 2 bedroom flats in the Southern Hub. No percentage of affordable housing is mentioned in the document but our understanding is that the mix will be 30% (affordable) to 70% (private).

The original mix of 50%-50% under Mayor Livingstone has been abandoned. We question whether a community can be founded over the long term with such high density, whatever the mix.

GREEN BELT EDGE ZONE: The top part of the site is probably as good as MHPS could expect to get. This part of the site is most like what you might find in this part of Mill Hill. We were surprised to read that the 'Green Belt edge' zones only had a requirement for maximum of 3 storeys. We believe that a maximum two storeys would be more appropriate for the 'greenbelt edge'.

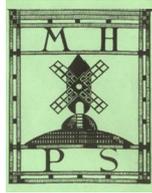
CENTRAL SLOPES ZONE: The middle area of the site – especially alongside the undistinguished Notting Hill part – looks as though it will end up like a semi-urban 'no-man's-land'. It looks higher density than on the AAP proposal and the decreased area of green space really starts to make itself felt here. On the AAP scheme – going up the site – there was Central Park – then a block of housing – then there was Panoramic Park – then another block of housing – then there was Northern Park – then the Green Belt Edge housing. The current proposal is much denser than that. Given that we thought the AAP plan was too dense – you can well see that we think this proposal has taken density issues to another level.

The Central Slopes have other issues. There is much play made of views out of the site, as the form of development does not facilitate this other than from penthouse flats. Why could the building not be built down the slopes (rather than with the contours) so as to give many more flats views out over the site and surrounding areas. In addition the design guide now shows the option of pitched roofs, which will, in fact, deny horizontal views across the site from flats higher up the site.

SOUTHERN HUB ZONE: MHPS were not desperately impressed with the shopping street at the lower end of the site. It will still not be at all cohesive with Kelly's Corner and the Waitrose area. We would like more clarity about the locations and types of proposed retailers – MHPS would like real shops rather than betting shops, estate agents and pubs/bars. The AAP plan showed the shopping street with much more clarity than the present proposals do. It has to be sufficiently attractive to encourage people to visit through the site without using their cars. In our opinion the current proposal has gone backwards on this issue. Also, the detail given of the Civic Square is limited. To have this area working properly, the existing roadway up to the small industrial units would ideally have to be closed, or at least altered or moved.

IMPACT ON ADJOINING AREAS: It is clear that the Southern Hub is going to impact on the lower Bittacy Hill area in a way that the other perimeter boundaries will not be impacted. Various heights are shown on the presentation ranging from 4 to 6 storeys. The problem is that these buildings are on the other side of the road from 1 or 2 or 3

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storeys. These proposals will be out of character with the existing buildings on the west side of Bittacy Hill. MHPS would like the design to be adjusted to compensate for this.

SUSTAINABLE COMMUNITY: It is important to take into account that there will be an increase in young people on the site. The locality is not devoid of problems with young people with nowhere to go and with this development this problem may increase without careful consideration.

There is a need for a community centre which would be adaptable and also cater for adult education, arts and some sports. Restaurants and cafés that are open in the evening would help – as would some arranging of bus stops and people movements so that public areas were 'supervised' by the general public. We accept that some of these may arise, but they are lacking as proposals in the scheme at the present.

COMMUNITY BUILDINGS: There are limited community buildings except the primary school and possibly the Officers' Mess. We hope the idea of the Officers Mess being used for the Borough's Registry Office has not been ignored as this would certainly be an improvement on the grim building in Burnt Oak – especially as a wedding venue and a 'quiet neighbour'. The proposal to use the Mess as a Medical centre has yet to be approved by the local Health Authority. We also feel the loss of the snooker room to flats is a shame. We would prefer the whole of the ground floor to be used for a mixture of community uses, and the residential element confined to the upper floor. The requirement for social facilities cannot be met by the Officers Mess alone and we feel that the provision for teenagers and younger people has been ignored. There is also a shortage of smaller meeting spaces and a Village Hall.

POLICING: It is clear that no community police office is included in the scheme. The nearest police station is miles away, and with the introduction of so many new people to the area, we think the provision of a minimum police base is a sensible requirement. This might be well located in a small part of the Officers' Mess building.

PUBLIC TRANSPORT: The tube station is the main transport hub in the area – which will probably become more important with the increased numbers of people in the Mill Hill East area. We would like the continuation of the tube to be guaranteed. It would seem logical to maintain bus routes to the station so that people can transfer between bus and train without crossing Bittacy Hill. The current bus routes – 221, 240 and 382 – should be maintained. The plans make provision for this, but in practice how well public transport will work through the various phases of the development is questionable.

TRAFFIC: We have studied the proposed road alteration in the Transport Strategy Assessment. The proposed changes look sensible given the current levels of traffic in the area – both local and through traffic. However, our comment relates to the existing level of traffic and we are not yet convinced that with the addition of so much local traffic at peak times that the proposed road network will be able to cope. It also seems a shame that wherever possible buses have not been given their own lay-by. When buses stop they will block the flow of traffic that is behind them adding to the congestion. The provision of two cross routes on the site, one direct and one circuitous, will be an improvement.

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SANDERS LANE: On the positive side these plans get rid of any hope for a straight-through Sanders Lane reopening. We are still against the opening of Sanders lane as a through route and we acknowledge this scheme makes that proposal by the LBB more of a challenge to implement.

Sanders Lane leads to a cycle track and it is important to aim to link together cycle movements throughout the area. MHPS are not convinced by the cycle track proposals and it is clear that the east/west link – Bray Road – is a considerable barrier to pedestrian and cycle movements.

CONSTRUCTION TRAFFIC: The Society is worried about the level of construction traffic that may come through the Conservation Area during the period of construction. We understand this may be for as long a period as ten years until the works is completed. It is unreasonable that the Local Authority has not prepared a Traffic Management Plan for heavy vehicles in order to protect the fragile buildings of the Conservation Area. Already heavy goods vehicle usage is unreasonable for the conservation area, and ten years of construction traffic may well destroy the last vestiges of what is meant to be an area of special environmental interest. Given that there is to be such an increase in buildings, cars and people over the next ten years in Mill Hill East it is even more imperative that the Conservation Area is given special attention over the same period.

DESIGN CONTROL: MHPS understand that there will be a strict design control guide attached to each site put up for sale. We are very much in favour of this and only regret that it does not include the Society as a body to be consulted when submitting an application. We think the design guide is sound, but is in support of a scheme that we find impossible to support.

We submit these comments in good faith, in the best interests of Mill Hill East. It is not too late to reconsider the proposals and grasp the reality of what is going to happen - an overdeveloped scheme that will be out of context with the surrounding area and which may well cause social problems for the future on a scale not previously seen in NW7. Fundamentally there is not enough balance between green space, density and traffic generation, leading to an overdeveloped proposal. We strongly urge that the outline scheme is refused and reconsidered in the light of these comments.

MHPS / 11.12.2009 / end