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Mill Hill Preservation Society The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH
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Patron: Lady Hobson OBE JP President: David Welch MA FCIS Chair: John Living AAdip CMdip RIBA

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For the attention of Harriet Beattie
London Borough of Barnet
Development Management & Building Control Service
Barnet House
1255 High Road
London N20 0EJ
22nd August 2016
Ref: 16/4545/FUL JL/jl/MHPS planning/end

Dear Sirs

TOWN AND COUNTRY PLANNING ACT 1990

SITE: National Institute For Medical Research, The Ridgeway, London, NW7 1AA

PROPOSAL: Redevelopment of the site to provide 462 new residential units following demolition of all existing buildings. New residential accommodation to consist of 450 self-contained flats within 19 blocks ranging from three to nine storeys with basement car parking levels and 12 two storey houses with lower ground floor levels. Associated car and cycle parking spaces to be provided. Provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Reconfiguration of the site access and internal road arrangements and provision of new publicly accessible outdoor amenity space. New associated refuse and recycling arrangements. The application is accompanied by an Environmental Statement. (AMENDED DESCRIPTION) - APPLICATION: 16/4545/FUL

The Committee of the Mill Hill Preservation Society (MHPS) have examined the application on the LBB planning website and we have met the developer's design team in committee on a few occasions to discuss various issues related to the development of this site. The Society was represented throughout the Cruciform Competition process held in 2015. The Society commented by letter on the Draft Planning Brief 5th February 2016, and the Scoping Application submitting details 3rd March 2016. The Society was consulted concerning the Artists Competition. The Society has also been represented on the ongoing developer led 'NIMR Transport Working Group' where issues related to transport on site have been discussed in addition to issues related to Burtonhole Lane, The Ridgeway and the surrounding area.

In view of the large number of documents to be reviewed (over 290) in such a relatively short space of time, we have concentrated on the Design and Access Statement (D&AS) prepared by Hawkins/Brown and dMFK dated June 2016. Information from other sources has been included as appropriate and from our previous experience with the project.



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1. Site Description

a. The NIMR is situated to the north of The Ridgeway in Mill Hill, in the London Borough of Barnet. The NIMR site is located in the Green Belt, and also within the Mill Hill Conservation Area. It is within the area to be included in the Mill Hill Neighbourhood Plan.

b. The Draft Planning Brief under Clause 3.8(c) states the application site is considered 'brownfield land' with constraints as to how this should be developed. The Society are concerned that the 'red line' denoting the application boundary is currently taken around the whole plot area including the areas to be set aside as green spaces and for sports use. The concern is that at some future date this general designation as 'brownfield land' may be used to allow further development in the Green Belt. We feel the situation should be prevented by way of a condition in the Planning Consent, if granted, limiting any such possibility.

2. Green Belt

a. The Draft Planning Brief sets down the parameters as to how the site could best be developed and generally these stipulations seem to have been met. The designation of the land as 'brownfield land' (see above) has ensured that the site has no more development proposed than is currently present.

The National Planning Policy Framework (NPPF) Section-9 'Protecting the Green Belt' under clause 89 states:

"A local Authority should regard the construction of new buildings as inappropriate in the Green Belt. The exceptions are...

The Replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces."

The Planning Statement under item 8.48 including Table 8.1 on page 38 states that the existing sq. m is 42,000 whereas the proposed is 58,064 an increase of 16,064 sq. m or +38% increase. This excludes the basement space. We include a copy of the table here:

Metric	Existing (sq. m)	Proposed (sq. m)	Difference (sq. m/%)
Developed Land	93,970	58,040	-35,930 (-38%)
Building Footprint	15,040	13,890	-1,150 (-8%)
Hardstanding (southern part of site)	26,390	20,120	-6,270 (-24%)
Open Space free from built development (southern part of site)	145,040	152,460	+7,420 (+7%)
Habitable floorspace	42,000	58,064	+16,064 (+38%)



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There are no special circumstances given as to why this significant increase can be justified. Whilst the Society agrees a change of use is necessary this does not imply that the NPPF requirements should be laid aside. This increase is therefore unacceptable and points to the fact that the proposal represents an overdevelopment within the Green Belt purely for pecuniary gain. This is an unacceptable increase in development in the Green Belt.

The Society requires the Council to ensure that the built area of the new buildings should not significantly exceed the existing built area on the site, that the NPPF requirements are met, and therefore the proposed overall density is reduced.

b. The proposals are unclear on how the sports fields might be used – where team players would change, and where parking would be located for players or spectators. These issues will impact the Green Belt and the surrounding roads and the intentions should be made clear as part of this application.

3. Conservation Area

a. The site stands in the Conservation Area and how best the design should respond to this is not obvious. The main issues seem to be the contribution to The Ridgeway and the relationship with Burtonhole Lane on the edge of the area. Taking Burtonhole Lane first the scale of the new buildings in the area called 'Woodland Cluster' seem commensurate with the scale of the original buildings (the Collaborative Centre) that they replace.

b. The cruciform building is more challenging. The Draft Planning Brief calls for the existing building to be retained, but the result of the design competition suggested that it could be retained and converted with some degree of reconfiguration of the wings 'deconstructed' from the main building to allow more permeability from The Ridgeway. The Society agreed the outcome of the Design Competition. However, the application submitted has the cruciform building being rebuilt as new so that better use of the floor space can be made. The Society is not against this approach as long as the original detailing is reflected in the design, the landmark roof is reconstructed, and the height does not exceed the original.

The Society believes the work being done to recreate the original building has merit and the studies showing the attention to detail are encouraging. However, we do have concerns about the deconstructed wings as they do not seem to follow the same design principles as the main building and therefore some of the design continuity has been lost. We feel the existing wings do not follow the window proportions, the detailing around the windows and so forth. Whilst we are not suggesting the wings should be exact copies, they are not consistent proportionally with the main building. The design of these elements should be



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reconsidered, particularly blocks C1 and C2 that are more visible from The Ridgeway. Section 5 page 67 is relevant and Section 8 page 89 of the D&AS clearly illustrates our concerns. (see image below from D&AS)



c. The final issue we have with contribution to The Ridgeway is the massing of the buildings in the south-west corner of the site (Ridgeway Courtyard). The elevation drawing 1623-DWG-PL-00-170 shows the whole development elevation to The Ridgeway, but at the south-west corner the buildings are obscured by trees on the drawings. However the roof line looks like it continues at 4 storeys close to the boundary with Rhodes Farm. The Society feels that the new development should step down as it approaches this corner so that more appropriate massing is provided next to the adjoining existing buildings and that the block D1 should appear to be predominately 3 storeys high. The sketch in Section 7 – page 85 does indicate that there is a 3 storey element to the block but it is facing into the courtyard rather than onto The Ridgeway and not adjacent Rhodes Farm. The Society suggests this block is reconsidered.

4. Design Comments

a. In addition to the above the Society has other design comments. We can find no reference to affordable housing in the D&AS although the Draft Planning Brief called for LBB policy to be met – i.e. the provision of 40% affordable housing on the site. The Society feels that some acknowledgement of affordable housing should be made either within the site or by S.106 Agreement in connection with any planning approval granted.

Page 4 of 14





1949

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b. The Society welcomes the suggested commercial space provision of 1951 sq. m within the lower floors of the cruciform building, although in our view not enough use has been made of the site potential to facilitate alternative needs, especially when considering this is an employment site changing to residential. The provision of a Café (A3) and a gym (D2) on the lower ground floor, and office units (B1) on lower ground, ground and first floors are well located for access by the community without interfering with the residential aspects of the development. The Society is especially concerned that there will be inadequate visitor parking provision made for the café so it is easily accessible to the neighbourhood as opposed to just the users on site. Similarly, the gymnasium. Currently the plans do not show any such parking.

c. We would like to say a few words on the housing mix. We commented on this in our notes on the Draft Planning Brief and we do so again here. For market housing, which the NIMR project is, LBB Policy DM08 calls for homes with 4-bedrooms as the highest priority, and homes with 3 bedrooms as a medium priority. However, Barnet Housing Strategy 2015-2025 has a slightly different interpretation. This analysis calls for the provision of 30% 1-bedroom homes, 46% 2-bedroom, 18% 3-bedroom, and 6% 4-bedroom. The currently proposed mix is 32% (146) 1-bedroom homes, 42% (220) 2-bedroom, 18% 3-bedroom (84), and 3% (12) 4/5 bedroom. In order to meet the requirements of LBB policy then the housing mix should be:

30% 1-bedroom would give 139 units
46% 2-bedroom would give 212 units
18% 3-bedroom would give 83 units
6% 4-bedroom would give 28 units
Total 462 units

We have already commented that we feel the built area is too high and does not meet the requirements of NPPF (see 2.a above) and therefore the number of residential units will need to be reduced to meet the correct built area figure. This fact, together with the inadequacies of the housing mix outlined above, indicate that the whole matter of density and housing mix should be reconsidered giving more emphasis to larger, family-sized homes. The Society therefore believes the proposed housing density and mix is flawed.

d. We wish to comment on the density issues. The Council Design Brief under clause 2.5 states that... "Collectively these buildings represent approximately 42,000 sq. m of development and, therefore, there is significant scope for the re-use and redevelopment within the Green Belt and the Conservation Area." The Society understood (as outlined in clause 2.a) above that the new development would be close to this floor area.

Page 5 of 14





1949

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The Planning Statement June 2016 Under Section 11 Housing Density and Mix, Clause 11.3 states the following:

“The site has a PTAL rating of 1b and is within a semi-rural area of low density development. The character of the area is therefore ‘suburban’ as defined by table 3.2. The density matrix sets a guideline of 150-200 habitable rooms per hectare and 35-75 units per hectare for a PTAL of 1 in a suburban location.”

The Society feels that it is inappropriate to use density tables from the London Plan to evaluate density in this situation. The design brief has stated the area of built form and the role of the developer must be to produce the best possible scheme utilising this floor space. We believe that the process followed is flawed and has led to an unacceptable increase in development in the Green Belt.

5. Transport and Parking

a. The site has a semi-rural location with challenging public transport connections – as a result it has a PTAL rating of 1b (‘very poor’). It is recognised that there is likely to be a high car dependency on this site – with critical levels of residents parking required, along with adequate visitor parking and the need to avoid overflow parking on the surrounding residential roads. Accordingly there should be no in or out access onto Burtonhole Lane especially as the lane is quite narrow and already carries significant residents’ traffic and transport to various activities including the Finchley Nurseries, the Green View Venue, the Mill Hill Village Sports Club, Old Camdenians Sports Club, a farm and livery stables and ASM – the Amenity and Sports Management Ltd depot. The residents have made it clear to us that they do not wish to see the level of traffic and parking increased.

b. The D&AS shows a road link onto Burtonhole Lane serving the Woodland Cluster on various diagrams in the document. This road is referenced more directly in Section 10, Access & Movement, Sub-section 10.6 ‘Fire Tender Access’. It is stated that there will be an additional Emergency Access with bollarded entrance from Burtonhole Lane. The residents of Burtonhole Lane are very concerned that this access might come into to general use and request that, if permission is granted, its exact role is set down in the planning conditions.

We note the adopted Barnet Council design brief makes the following statement re vehicle access. “Clause 3.39: The site has existing vehicular access points on both The Ridgeway and Burtonhole Lane. Burtonhole Lane has a distinctive semi-rural character which contributes towards the residential amenities enjoyed by local residents. The redevelopment of the Burtonhole Lane Cluster could give rise to additional traffic. Therefore the existing vehicular



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access points should be utilised and the creation of new vehicular access points is unlikely to be supported. Careful consideration needs to be given to vehicular movements from Burtonhole Lane and in particular the noise and disturbance that may arise from such movements.”

c. The scheme is for 462 new residences, with 496 car parking spaces provided for residents and 19 spaces for commercial purposes. Amazingly, as the site is on top of a considerable hill, there is provision for 842 cycle spaces, including commercial and visitor cycle spaces. This seems like overkill. There is the provision of 3 car spaces for each of 12 houses. This leaves a balance of 460 parking spaces for 450 flats. In view of the low PTAL rating and the semi-rural nature of the surrounding area we consider this to be an inadequate distribution and would prefer that every dwelling had 2 parking spaces allocated. This has been achieved on other local projects. However, from statistics in the Traffic Report it seems that 34% of Barnet households have 2 or more cars. The low PTAL does indicate a particularly difficult area for access and it seems likely that households with 2 people will tend to own 2 cars and their visitors will come by car.

d. The general text is slightly misleading about the provision of visitor parking in that it says that such parking is to be within the carriageway circa 5% (25 spaces) to 10% (50 spaces) and therefore no specific parking bays have been allocated for visitor parking and the exact number has not been determined. The Society finds the solution to parking issues to be flawed and one that will lead to excessive overflow parking on adjoining roads. We wish to draw attention to the clause from the London Plan in Clause e where it is highlighted...

In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.

This flexibility should apply on this site.

e. On transport issues the Mill Hill Neighbourhood Forum have commented to us: “The traffic issues on the Ridgeway are significant notably during school drop off & collection times. Additionally heavy construction traffic will need to be restricted by condition from travelling through the Village as many of the properties are old, listed, with minimal foundations and there are 6 schools that traffic would need to navigate if allowed to turn right out of the NIMR site. MHNHF notice also that with 450+ homes your provision of car park spaces is on the low side before allowing for users of any commercial facilities on site. The site is classified as being PTAL 1b. The new London Plan residential parking standards are provided below and



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indicate as highlighted that in outer London areas the borough should consider higher levels of provision, especially to address "overspill" parking pressures.

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards *Parking for residential development*

Maximum residential parking standards

number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:

All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site³

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.

It would be unacceptable if this development created overspill parking on The Ridgeway or nearby side roads. In Barnet Council's own development of 120 Flats at The Fairway a ratio of 1.26 car park spaces per unit was deemed to be the minimum acceptable (where 40% were designated affordable) when the plan was recently approved, and on the NIMR site where the properties will be of a higher value, occupants will typically have more vehicles."

f. There is considerable concern locally about the additional traffic that the development will cause to The Ridgeway – an already busy thoroughfare especially during school activities. The existing NIMR organisation has a total of 415 cars plus commercial traffic and service vehicles. The Society is not surprised that the traffic engineering reports show that any increase will be 'negligible' – the phrase 'they would say that wouldn't they' comes to mind. However, an increase of 81 cars coming and going over two entrance/exit points does not seem excessive. Nevertheless, at times there is undoubted congestion on The Ridgeway, mostly caused by poor parking and the development does provide an opportunity to re-examine parking provision, bus stop location, pedestrian crossing points and other related matters to ensure adequate traffic flow and safety for pedestrians especially school children. Our report suggests in Clause 2a that the scheme represents overdevelopment in the Green Belt and any reduction in the level of development would only help all the transport issues.

6. Materials

a. The D&AS gives under Section 2 – page 16 Sub-section 2.5 Area Context, page 33 Sub-section 2.18 The Vernacular Material Palette and page 37 Sub-section 2.22 Analysis of Local Vernacular gives a plethora of local images which seem to be included as a guide to a possible material palette of the buildings. Leaving aside the cruciform building and its



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deconstructed wings that we have discussed elsewhere (see clause 3b), the remaining buildings do not seem to relate to the local vernacular. For instance, most of the buildings illustrated have pitched or undulating roofs, and use brick, boarding and white render and are soft and gentle in their feel. The blocks in this scheme seem angular and mathematical.



Lower Belvedere Pavilions

b. To be more succinct the proposed house types seem relatively sensitive as do blocks in the Woodland Cluster namely J1, J2, J3, K1 and K2. The units facing The Ridgeway namely D1 and D2 seem especially banal. The remainder of the block could be found in any development from here to Timbuktu and, in spite of all the fine words and analysis, bear little relation to being in the Mill Hill Conservation Area.

The Committee feel that the illustration on page 108 Section 8 Sub-section 8.5 Lower Belvedere Pavilions (Blocks G1, G2 see above) shows the blandness of the new blocks especially well. If it is not too brutal to say that this could very well be the fifties schemes we are pulling down to make way for a more acceptable scheme for this Green Belt/Conservation Area location. We admit we have moved on a little here from materials to massing, form, proportion and sensitivity but this is absolutely not vernacular Mill Hill (which is where the item started) and we feel some design elements needs to be rethought.

7. Trees, Ecology and Landscaping

a. We would draw attention to our scoping letter of 3rd March 2016 – clauses 10.2, 10.8, 10.11 and 10.17 as we are not sure if these items have been dealt with in this application.



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b. Folly Brook: We wish to emphasize the great importance of safeguarding the integrity of the Folly Brook, not simply from pollution but to ensure that the buffer zone of just 20 metres is robust, well thought out and with minimal public access, because this seemingly inconspicuous stream is an important corridor and fly line for wildlife along the valley. There should be as little disturbance from human activity as possible.

c. Planning Statement 5.14 Woodland – “In the east of the Site is currently an unmanaged area of inaccessible woodland which is unused and does not currently contribute to the amenity of the MRC or the wider area. The proposals will introduce new management of this space to create woodland which is accessible to the public and which meaningfully links into the newly created landscaped spaces within the Site and the wider area”. With respect to this woodland element we agree that it needs some management – however, it is a haven for wildlife and we suggest access to the public would be inappropriate. Some form of unobtrusive fencing is required but with openings to enable wildlife to move in and out of the area. From observation it is known to be used by foxes, owls, woodpeckers, a host of other birds including magpie, woodpigeon, crow, jay, blue tit, apart from smaller mammals such as grey squirrel, and rabbit - muntjac deer have been seen. It would not be appropriate to threaten this wildlife haven when there is so much other open space on the site.

We wish to add that of all the elements of this site, this has remained undisturbed for the longest period and that recent experience in another part of Mill Hill (Milespit Hill) has demonstrated the great value of this for ‘shy’ wildlife which flourishes where disturbance is absent or minimal. A second consideration is that this strip of habitat forms a linking corridor from the valley itself up to and across The Ridgeway to the open habitat of Drivers Hill and Arrandene open space, referred to specifically on fig 1 as habitat of principal importance, on the other side of The Ridgeway.

d. The Society has examined the landscaping proposals and the planting strategy by Liz Lake Associates and we feel what is proposed is an appropriate solution apart from the reservations set out in 7a above.

8. Views into the site from the Surrounding Area (to be drafted)

a. The council Design Brief, Clause 3.9 states the importance of views from short, medium and long distances from public viewpoints including The Ridgeway and from the Totteridge Valley. The Society has also looked at the issue of views into the site.

b. The views of the development from Burtonhole Lane seem reasonable - (see Clause 3a).



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c. The views from The Ridgeway seem reasonable with the exception of Blocks C1, C2 and D1 D2 as noted previously – (see Clause 3.b and 3.c).

d. The view from St Vincent's Lane is poor.



The image above, taken from the application documents, shows the development from St Vincent's Lane and whereas the view was of the cruciform building over a couple of houses, now the view shows a tremendous expanse of building. There is no attempt to scale down the buildings at the edge of the site. We find this an unacceptable change.

e. The long distance views from the Totteridge Valley are very important and the following image is taken from the application documents.

The image below shows the extent of the proposed new buildings as a photo montage taken from the Environmental Statement V3 – Part 8. This clearly shows that the new cruciform building will have a similar impact in the valley. It also shows that the 12 houses are well below the tree line and should not be out of keeping. However, the remaining blocks all seem to appear to be above the tree line and will be an intrusion into the landscape. This further reinforces our view that this Green Belt site will be overdeveloped if the current proposal is accepted.



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9. Construction Impact on Surrounding Area

a. The Traffic Report does touch on the routes for construction traffic but in our opinion does not come to the right conclusions. Clauses 7.50+ apply. It is proposed that a route through the Conservation Area for trucks would be acceptable. We disagree with this. The NIMR scheme is on the edge of the Conservation Area and so it would be sensible for construction traffic to spend as little time in it as possible – coming and going using Bittacy Hill down to Holders Hill Circus and joining the wider road network using Devonshire Road, Dollis Road or Holders Hill Road. This should be incorporated into the planning conditions as it was for the Millbrook Park development.

b. The Environmental Statement VI Chapter 5: Construction Programme and Methodology (CP&M) sets down the phasing programme for the works. The demolition and construction programme is anticipated to span a 5 year period. It is important that this programme is incorporated into the approval so as to avoid the situation at Millbrook Park where the development period has been extended unreasonably.

Page 12 of 14



1949

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c. Clause 5.12 of CP&M states that the site will be made secure with a 2.4 m high branded hoarding along the front of the development and where required. The Society request that the branded hoarding be limited to The Ridgeway as it will be an unnecessary intrusion around other parts of the site where there are residential areas, and where green spaces are meant to be kept open – including public footpaths. This comment also relates to Clause 5.53 and 5.54 as the Society considers the closure of public footpaths unacceptable.

d. Clause 5.48 of CP&M states that limited staff parking will be provided on-site during the demolition and construction phases. The Society would expect the developer to make the necessary arrangements for on-site parking for all the staff and workmen to avoid overspill parking on The Ridgeway and surrounding residential areas, especially Burtonhole Lane.

e. In respect of Clause 5.68 of CP&M Liaison with Neighbours MHPS would be prepared to contribute to regular community group meetings with the development team.

f. Near the end of the CP&M there is a project phasing plan, whilst of a preliminary nature there are a couple of principles worth discussing. Firstly, we were surprised to see that the cruciform building was down as the last phase of works, and as this is the largest element we expected this to be started first and continue through to completion of the project.

Secondly the housing alongside Burtonhole Lane is shown in the first phase, and during Phases 3 & 4 the 'emergency access' to Burtonhole Lane will be the resident access for blocks K1, K2 & J1, J2 J3 – that is for the period from June 2019 through to December 2021. This will not be a thrilling prospect for the residents who use Burtonhole Lane as their only means of access to their homes. After that time if the main site road is not available due to the cruciform building being the last phase then we can see this access being used for a considerably longer period. This scenario would be totally unacceptable to the Society.

g. Fir Island: This is part of the site tendered for by Barratt London, but this element has not been included in the current application. The Society believes that all aspects of the whole site should have been included in the application. The situation as it stands is open to exploitation in that any use could be applied for on Fir Island, and this site should be being considered as part of the whole development from the outset. For instance a use that is a high traffic generator should be considered alongside the other traffic issues under consideration. The Society finds this situation unacceptable.



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10. Conclusion

The Society firmly believes that the requirements of NPPF have not been met and that there is a significant increase in the built floor space that constitutes overdevelopment without any explanation of exceptional circumstances in support of this. The views into the site, the bulk of the buildings and the traffic issues all add support to our view that this Green Belt site is being overdeveloped. The fact that the site boundary encompasses areas that are green space in the Green Belt that have never been built upon has no bearing on the level of density that should be allowed. Alongside these points MHPS feel that the design of some of the blocks is poor and unsympathetic to the needs of the Conservation Area. MHPS, whilst not being against the development of this site following the retreat of the NIMR, does feel that the best possible proposal has not yet been put forward. This summary is not meant to dilute the other points that we have made, simply we do not wish to repeat every issue.

We trust the planning authority will take our views into consideration when evaluating this scheme, and recommend refusal unless certain aspects are reconsidered.

Yours sincerely

John Living

John Living

On behalf of the Mill Hill Preservation Society planning group

Sent to Harriet Beattie: email: harriet.beattie@barnet.gov.uk (tel: 0208 359 7131)

Also copied to John Allen, LBB, NW7 Councillors, MP and GLA representative
MHRA and MHNF