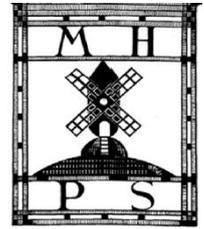


Mill Hill Preservation Society founded 1949

Patron: Lady Hobson OBE JP
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...making change worthwhile

Andrew Dillon, Planning Manager, Major Project Team

London Borough of Barnet
Planning and Building Control
2 Bristol Avenue
Colindale
London NW9 4EW

21st January 2021

Your reference: 20/6271/FUL

Our Reference MHPS / JL / planning group / 20/6271/FUL

Sent only by email to Andrew Dillon (andrew.dillon@barnet.gov.uk)

Dear Andrew Dillon,

TOWN AND COUNTRY PLANNING ACT 1990

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

PROPOSAL: Alterations to the basement, lower ground, upper ground and first floor of the existing Block A Building to provide 16 new residential units, a gym, and a café, including associated alterations to landscaping and car parking.

REFERENCE: 20/6271/FUL

1.0 Background

Planning permission was granted for a residential-led mixed use scheme to provide 460 new residential units across 19 blocks and 12 houses at the application site in December 2017 under planning permission ref. 16/4545/FUL (the 'original consent').

On 23 November 2020, full planning permission was granted under ref. 20/1893/FUL for alterations to five of the approved blocks to provide 189 homes, an uplift of 52 additional homes over the original consent.

The Society does not consider this application a 'non-material amendment' as the registration code indicates. It is considered that the current application which seeks a further uplift of 16 dwellings at the site will lead to cumulative issues and other additional concerns in respect of the following:

2.0 Density

Recently approved application 20/1893/FUL has already allowed an 11.3% increase in housing numbers over those originally approved on this Green Belt site. The current application would increase the housing numbers from the original 460 to 528, this representing a further increase of 14.8%.

The original permission had a density of 49 dwellings per hectare (dph) (460 dwellings across 9.5ha developable area). The recent 2020 permission increased this to 54 dph and the current proposal increases this again to 56 dph.

The Applicant appears to be submitting continued applications for incremental increases in housing numbers and the density of development that begins to have a cumulative impact upon the intensity of the use on this Green Belt site. This also affects provisions such as car parking, traffic and sustainability which are explored in more detail below.

A further clear indication of overdevelopment is that four of the 16 new homes will not have any access to private amenity space due to design limitations. This is particularly problematic as the applicant claims that the scheme will "*introduce additional family sized homes into the development*" (including 8 no two-beds and 6 no three-beds). Providing '*family sized homes*' without private amenity space delivers a poor quality of housing for future occupiers and does not accord with adopted or emerging planning policy.

Lessons should also be learned from the current COVID-19 pandemic and the importance of access to private amenity space, from a health and well-being perspective, delivering family homes without any private amenity space will exacerbate people's need to move outside the private home environment for their own physical and mental health.

The applicant has also stated that the affordable housing provision associated with the 16 additional units will only be an offsite provision of shared ownership "for practical reasons" owing to not being able to provide a separate stair core. This reduces the social mix and diversity of the scheme which is an important characteristic of sustainable communities.

Practical design reasons do not justify departure from policy and demonstrates the inability to deliver the appropriate provision of onsite affordable housing. This is reflective of a scheme seeking to 'shoehorn' additional dwellings into an already dense development. Alternatively, there appears to be no legitimate reason why the lower ground and ground floor flats could not be provided with their own independent access arrangements, without reliance on the stair cores as their primary means of accommodation.

3.0 Car Parking

The original development had a total of 544 residential parking spaces, 50 visitors' parking spaces and 19 commercial parking spaces. The Society has always maintained, since consultation on the original application, that this provision was not sufficient and has been especially concerned that there will be inadequate visitor parking provision for the café.

We understand that the proposal reallocates 16 of the 19 commercial spaces to residential and retains an allocation of just three spaces to be shared by the café and/or gym. No additional visitor parking spaces are proposed, which the Society considers totally unacceptable.

The café is now proposed for expansion, which is supported, but no additional car parking is allocated to this commercial unit. Previously, the 19 commercial spaces were shared between the office/café/gym. Three spaces to serve a café and a gym will be wholly insufficient for operational and staff parking needs and will create further pressure on the already limited visitor parking, which are also likely to be used by the additional residential properties.

Additionally, overspill cars from the first phases of the development have already begun parking permanently on The Ridgeway. To date this has been during lockdown and COVID-19 pandemic, but once schools get back to full operation this will result in a serious highways issue which will only be exacerbated as further phases are completed and if further dwellings are approved on the site.

The applicant should be required to undertake a parking survey to demonstrate how ineffective the parking strategy is already, without further development exacerbating it.

4.0 Loss of Employment

The Planning Brief for the site was clear that the site affects a "*wide range of constraints including Green Belt and the Conservation Area*" but that redevelopment was considered appropriate as there was "*a significant opportunity to transform the site into a residential-led, **mixed use development** that is sensitive to and enhances its surroundings and is planning policy compliant*" (our emphasis).

As part of this, five clear objectives were set out, the fourth of which was:

"To provide opportunities for employment creation, ensuring the continued contribution to innovation and growth through provision of workspace for small to medium enterprises."

Additionally, the Brief specifically recognised that the NIMR was a major employer within Barnet (employing some 600 people) and the Council sought "*to mitigate its loss when it relocates to St Pancras*" through the re-provision of office space on site.

The current application now seeks the removal of all 1,867 sqm of the permitted office floorspace at the development. As such, the development will no longer accord with the planning brief or strategic aims of the regeneration scheme.

The applicant states that the Local Planning Authority advised, via pre-application engagement, that the loss of offices will need to be justified against market evidence to satisfy the requirements of Policy DM14 and mitigated by way of a financial contribution within a S106 agreement. It is not considered that the market evidence sufficiently demonstrates that no commercial uses are viable and whilst a financial contribution could be obtained, where would this money be spent? Clearly the need to apply the CIL 122 tests would be essential to ensure monies benefit the people of Mill Hill.

The Employment Study which supported the original application concluded that the site is suitable for small scale employment uses and that around 2,000sqm of B1 accommodation would be viable. Whilst there would have been some changes in viability since this was produced, it cannot be unviable to provide any office use at all at this site. The pandemic has only served to demonstrate the importance of homeworking and locally based office and employment space which is a further indicator of sustainable communities.

Additionally, recent change in the Use Classes Order has revoked Class B1(a) and offices now fall within the more flexible Class E classification covering 'Commercial, business and service' uses. The Applicant should be required to demonstrate that this 1,867sqm of floorspace is not viable for all potential Class E uses.

The updated Employment Study by Avison Young does not take this legislative change into account. Nevertheless, it still finds that flexible/managed office space will recover from the impacts of the COVID-19 pandemic first and continue to be an expanding sector of the market. In spite of the fact that some 600 NIMR staff managed to find their way to work, the report goes on to claim that the site is not an appropriate location for such space because of the relatively poor public transport access. Clearly this is a departure from the opinion when they sought to obtain planning permission in the first instance and wanted to offer as much variety as possible to obtain officer and member support. To accept that this is not a suitable location for flexible office now would be completely undermining the Council's determination procedure in the first instance.

Moreover, a site with over 500 dwellings is highly likely to generate demand for some flexible office space, likely bolstered by more flexible office/home working arrangements and people benefitting from 'hot-desk' or daily office space rentals, for example. This is similarly not a factor taken into consideration in this report.

In assessing the suitability of the site for office space the report concludes that it is possible that the quality of office environment and a low rent may attract parties. Given that the site was originally earmarked for small to medium enterprises, such provision should be progressed, not ignored in favour of more dwellings that generate more income for the developer but provide no benefit for the surrounding community.

Overall, the updated Employment Study does not sufficiently demonstrate that no Class E commercial uses are viable on the site and so Policy DM14 is not satisfied.

5.0 Café and Gym

The café and gym proposed were supposed to be accessible to the general public and not solely for residents of the development. Certainly, this would make them more viable and less susceptible to a future application to convert that space to further flats. The relocation of the facilities to the ground floor, previously located on the lower ground floor and directly accessible, are now not accessible to the general public.

This we consider totally unacceptable as this results in the overall scheme no longer being a mixed-use proposal, but an elite residential development with its own private gym and café.

Whilst it may be speculation by the Society, if the gym and café do not remain on the lower ground floor and accessible to all members of the public, a fresh application to convert these spaces into further flatted accommodation will follow, citing the unviability of a private café and gym facility.

6.0 Sustainability

The loss of commercial provision at the site also has sustainability implications. The dual location of employment and residential uses as part of a comprehensive mixed-use scheme promoted sustainable development at the site.

With removal of opportunities for a 'mixed-use' scheme, the development mix is becoming less sustainable and will add more pressure to the local transport infrastructure and subsequently, carbon emissions and global warming. Mill Hill East underground already has insufficient capacity and local parking is becoming more of an issue, which will only worsen as all residents have to travel in and out of the development for work.

7.0 Design of the Cruciform Building

The Planning Brief for the site identified a key opportunity for the site as "*To improve, retain, re-use or re-build as per the original the distinctive Main Building, in whole or part*". The originally approved cruciform building design was subsequently selected after a design competition.

The applicant is now incrementally degrading the design quality through amendments and alterations to accommodate additional residential development. This puts profit above design quality, which given the history of the site, is an inappropriate way to approach the development.

The Planning Brief recognised the iconic stature of the building and its historic importance and stated that the Council was keen to ensure that any new development respects that history and incorporates within the scheme markers to the past. The proposed design amendments should be carefully assessed to ensure they are considered to maintain the original design intention for this landmark building and these markers to the past.

8.0 Public Engagement

The applicant states that the public were informed of the proposals via a newsletter posted to 392 addresses on 16 December 2020 and no responses had been received yet. The application was submitted five days later on 21 December 2020. This is not sufficient public engagement and the proposal has not been considered in light of local residents' considerations. We ask that officers take the opportunity to understand any issues raised by the local community and ensure that the application adequately responds to them.

9.0 Conclusions:

On the basis of the above, the application represents inappropriate development and a scheme that is becoming more remote from the original design brief and local planning policy. We trust the planning authority will take these crucial points into consideration when evaluating the proposal and recommend refusal.

Yours sincerely

John Living

John Living - Honorary Architect
on behalf of the Mill Hill Preservation Society Planning Group
In conjunction with Barker Parry, Planning Consultants