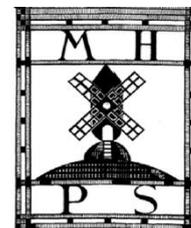


Mill Hill Preservation Society founded 1949

Patron: Lady Hobson OBE JP
President: Dr Michael Worms BSc PhD
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Hon. Architect: John Living AAdip CMdip RIBA
Hon. Solicitor: Robert Cottingham MA
Hon. Treasurer: Wendy Living BA ACA JP
Administrator & Membership Secretary: Kim Thompson



...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

29th May 2020

Your reference: 20/1893/FUL

Our Reference MHPS / JL / planning group / 20/1893/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: Full Planning Application for the construction of 5 buildings of between 5 - 8 storeys in height, with associated basement, comprising up to 189 residential units and provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Associated car and cycle parking, refuse storage and amenity space

REF: 20/1893/FUL

1.0 Introduction: This application is essentially for the provision of 52 additional homes in Blocks A, B and C, but within the same building mass of the originally approved scheme. The Committee of the Mill Hill Preservation Society (MHPS) has examined the application on the LBB planning website. We have previously met the developer's design team in committee in February 2019 in respect of application 19/3208/S73, and due to the coronavirus outbreak we did not do so again in 2020 to discuss the current application. This application is not for the variation of previously approved buildings, but for five new blocks to replace the originally proposed blocks. The application relates to Block A, the replacement cruciform building, Blocks B1/B2 and C1/C2. Our comments given below relate to the current application.

2.0 Overview: When MHPS commented on the original application in our letters 22nd August and 7th September 2016 we raised many objections related to overdevelopment in the Green Belt, building designs not conducive to the Conservation Area (with the exception of the competition result for the cruciform building), too many flats with inappropriate housing mix, inadequate parking provision and transport challenges related to The Ridgeway,

compromised views from the Totteridge Valley and construction impact on the surrounding area. We still believe that our main conclusions (see below) are appropriate to refer to again: *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.*

3.0 Density and Housing Mix: MHPS feel the proposal to increase the density of flats on the development is unacceptable. This proposal is only made possible by changing the housing mix that already included too many smaller flats. The original plans for blocks A/A1, B1/B2 and C1/C2 comprised...

- 40 x 1-bedroom units
- 80 x 2-bedroom units
- 17 x 3-bedroom units
- 0 x 4 and 5-bedroom units

Total: 137 units

What is proposed now for these blocks makes the following changes:

- + 28 x 1-bedroom units
- + 29 x 2-bedroom units
- 5 x 3-bedroom units

Total: 52 extra units in addition to the 137 above.

Policy HOU02 'Housing Mix' of the Barnet Draft Local Plan (Reg 18) January 2020 sets down priorities for dwelling sizes. The highest priority listed for market homes for sale or rent is 3-bedroom properties with 2 or 4-bedroom dwellings as a medium priority; 2-bedroom flats (with four bed-spaces) are the highest priority for Affordable Rent and Low Cost Home Ownership dwellings. Policy HOU01 'Affordable Homes' refers back to policy HOU02 in term of housing mix. Therefore the Society sees it as unacceptable to increase the number of 1-bedroom units at the expense of having fewer 3-bedroom flats. What is the point of having local policies if the Council does enforce them at planning stage?

4.0 Block A (the replacement 'Cruciform' block): The main issues the Society raised originally, that of the design of the cruciform building elevations and roof, have been addressed. The Mayor's office has agreed to waive the requirement for balconies in the interests of this historic building facade. The roof windows into the copper roof are more in keeping with the competition-winning design and the original application.

The main variation on the front elevation is that of the decorated brick panels. Ground and 1st floor levels are similar to the approved scheme (planning permission 16/4545/FUL) as are 6th and 7th floors. However in the original design there were five decorated vertical brick panels at 4th and 5th floor levels, four of which extended down through the 2nd and 3rd floors. On the current design these have been reduced to three decorative panels, only two of which extend down to 2nd and 3rd floors. The effect is that the design does not have the poise of the original proposal.

On balance the current cruciform elevational design is a reasonable proposal and whilst it will change the mix, this will not overpower the previously approved scheme. We are very concerned that the cruciform building is built correctly to the design standards set out in the previous approval 16/4545/FUL that had a wealth of detail included that we would not like to lose. Maintaining the copper roof design of the cruciform building is important. The Society would not wish to be obstructive over minor changes to the south elevation which, on balance, seem acceptable.

5.0 Blocks B1/B2 and C1/C2: To solve the additional parking required the application proposes enlarging the basement of the Cruciform Cluster (Blocks A - C) to provide 52 additional car parking spaces and pro-rata increase in affordable housing, cycle parking, and refuse storage. MHPS has a number of concerns around this proposal, namely the increase in the size of the basement extension (1724 sq. m) would be up by a third, more than normally acceptable in the Green Belt. In our letter 7th September 2016 we noted that the general increase in floorspace being proposed was an unacceptable 38% over and above the original buildings, and now the larger basement area increases the over-building still further. The buildings as proposed are materially larger than the buildings they are replacing. This is contrary to National Planning Policy Framework (NPPF).

Changes to the floor plans in Blocks B–C would disturb the integrity of the external elevations of the original design in terms of fenestration.

6.0 Traffic and Transport: the proposal would add to the density of the development and because of its relative isolation would lead to additional traffic whose exit from the site would be onto The Ridgeway which we know is already notoriously busy.

The Society believes that an access from the site onto Burtonhole Lane should in no circumstances be allowed. The proposal also does nothing to address the poor provision of parking for residents on the site that will lead to overspill parking on surrounding lanes.

7.0 Contamination: The opportunity to comment on this application prompts us to ask for confirmation that all necessary tests for asbestos and chemical contamination had been correctly carried out on the earlier parts of the project and correctly signed off. There has been considerable concern about these issues amongst local residents and businesses.

8.0 Conclusions: On the basis of the above, the proposal represents inappropriate development and is harmful to the Green Belt. The NPPF states... "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." In this application as no very special circumstances have been demonstrated the application is therefore contrary to the NPPF and on this basis alone should be refused. We believe the application is driven by the need to meet market demands and not by planning issues. As set out in previous letters, to which we refer, the density of the site is too high for the locality and the addition of extra flats adds further to the weight of our previous arguments. The loss of 3-bedroom units is something that we cannot support. The building designs are not sufficiently sensitive to the needs of the Conservation Area.

We trust the planning authority will take these crucial points into consideration when evaluating the scheme and recommend refusal.

Yours sincerely

John Living

John Living - Honorary Architect
On behalf of the Mill Hill Preservation Society Planning Group