

## Background

Meadow Partners bought the Pentavia Retail park site for £27.8m in September 2013. The site has been designated for retail use (A1 with a small A3 restaurant) for many years.

The site is bounded on the west by the M1 and main-line railway and on the east by the A1/A41 trunk routes. Vehicle entry and exit is very limited on the northbound only side of the A1/A41. Pedestrian access is also from the Northbound A1/A41 Watford Way with steps down to Bunns Lane at Bunns Bridge. Additionally there is pedestrian access from the site via a bridge over the M1 then through a footpath under the railway to Grahame Park Way.

Initially in early 2015 Meadow Partners submitted a planning application to Barnet Council to update the site with a new retail offering encompassing upgraded and new buildings with some reconfiguration of the site, while still retaining the same A1/A3 mix. There followed a further application along similar grounds which additionally sought to reclassify some of the built footprint from A1 to D2 Classification for a Trampoline Gym. These two applications are believed to still be live and both received support from the Mill Hill Neighbourhood Forum.

Towards the end of 2015 Meadow Partners then submitted new plans to build c.700-800 flats on the site. Following a public exhibition of the plans and negative feedback from many groups and residents a revamped scheme has been proposed and exhibited in May 2016.

The current Meadow Partners plans still propose 700-800 flats in blocks between c. 6-10 storeys, with a maximum height discussed at the exhibition of c.33 metres. There would be a small amount of community and retail facilities as well.

No formal planning application has been submitted to Barnet Council by Meadow Partners, though this is expected shortly.

Any submitted plans will be the subject of review by residents and community groups. The Mill Hill Neighbourhood Forum has looked at the exhibited plans and identified a number of issues where it thinks the current proposals do not comply with current planning rules.

## MHNF preferences for the Pentavia site

As stated the Committee was generally in favour of the plans to refurbish the site, maintaining much of the existing A1 classification space and reconfiguring the current A3 space, but we are wholly against the development of the site for residential C3 purposes. We accept that there is a housing shortage in London and we are actively supporting the right developments in the right places in Mill Hill, but this site is wholly inappropriate for housing, being relatively small between the Mainline railway/M1 Motorway and the A1/A41 Trunk route on the other side, with limited real access to public transport.

The configuration as A1/A3 with perhaps some D2 Gym-Skating Rink etc. could be contained within the existing built footprint and the current vehicular access and car park, would cope well with expected visitor volumes. That said Barnet Council's Local Plan only supports the development of such amenities within the designated Town Centres. We believe that Mill Hill and the immediately surrounding areas, which are expanding rapidly, mostly need leisure and

retail facilities and this site is ideally suited to supply such amenities, serving a very wide and growing catchment area.

## Height of buildings

We do feel that a key argument against their scheme is that it falls outside the Regeneration and Growth Areas defined in the Local Plan (p28 & 34) that are clearly held to the Colindale and Grahame Park side of the M1. Once this density and height crosses the boundary set by the Local Plan the suburban nature of Mill Hill will change to urban. Policy CS1 (p42-43) is about consolidating growth to provide stronger protection for the suburbs and enhance the quality of neighbourhoods. Policy CS5 (p69) states that tall buildings (8 stories / 26m or more) may be appropriate in specific strategic locations that include the Colindale AAP. Importantly, Mill Hill is not one of these locations. The policy states that 'Outside of these specific locations, proposals for tall buildings will not be supported'.

The Colindale AAP (<https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/colindale-aap/colindale-area-action-plan.html>) has a more precise alignment of the growth area which clearly states 'the M1 forms the eastern boundary of the AAP area' (p10 / para 1.7.1). Policy 5.3 (chapter 5, p53) states that taller buildings (in excess of 6 stories) will only be located close to Colindale Station. An adjacent plan actually shows that buildings mainly between 1-2 storeys, and nearby up to 5 storeys, would be appropriate on the boundary at M1, but nothing higher.

Therefore the Pentavia scheme contravenes local planning policy, is not only outside the designated growth area but currently proposes building heights that are even in excess of those shown on the other side of M1 and within the Growth Area of the AAP.

Following an extensive survey of local residents our emerging Neighbourhood Development Plan will stipulate that buildings should be no higher than 4 possibly 5 storeys high (where the topography supports such) in NW7, to remain in keeping with their surroundings. Mill Hill is characterised by mainly semi & detached family homes that occupy ground and first floors and many have loft extensions. People move to Mill Hill typically from a flat in London to buy a house and start a family in a great, predominantly green, landscape that is still close enough for commuting. The proposal of a development, massing to 10 storeys, will be totally out of scale with surrounding properties. The proposal does not seem to understand the nature of NW7 and the impact such tall buildings would have on the general character of the area. The impact particularly on residents of Bunns Lane and in particular the newly created development at Churchill Place would be overwhelming.

Clearly should such a tall structure be built this will have a great impact on views across the Mill Hill area. The protected view from the Millfield and others from the Ridgeway (Notably at the pathway to Rushden Gardens) towards Harrow on the Hill would be dominated by enormous close-in tall buildings without merit. However no drawings have been supplied to demonstrate the impact for the current exhibited plan.

## Density of buildings

## Pentavia Park, Mill Hill - Comments on current proposals.

The density of the exhibited plans appears to be very high at c.250 units per hectare. From the chart below we can see that Meadow Partners seem to have assumed “Central” based densities at the highest PTAL rating, when Mill Hill is a suburban area, predominately made up of family houses with gardens. The Pentavia Park Site is currently rated PTAL 1a/1b. The London Plan density level for such a site in Mill Hill would be expected to be in the range of 50-75 units per hectare or 150-200 habitable rooms per hectare in a PTAL 0-1 site. Even with the highest PTAL rating the site should only have about half the proposed number of units if it was to conform to the suburban density matrix below.

**Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)**

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
<b>Suburban</b>	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
<b>Urban</b>	<b>150–250 hr/ha</b>	<b>200–450 hr/ha</b>	<b>200–700 hr/ha</b>
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
<b>Central</b>	<b>150–300 hr/ha</b>	<b>300–650 hr/ha</b>	<b>650–1100 hr/ha</b>
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

### Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes
- suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

## Massing of the buildings

The current exhibited proposals would result in a set of buildings similar in mass to Beaufort Park in the Colindale regeneration area. However not only is the Mill Hill area suburban in nature, the proposed buildings would be within a few hundred metres of green belt parkland resulting in deterioration in the visual amenity enjoyed by residents from Mill Hill and the surrounding areas. The recent (12/15) publication (Advice Note 4) from Historic England offered the following views which seem eminently sensible and highly relevant in the context of Mill Hill.

## Pentavia Park, Mill Hill - Comments on current proposals.

*“Towns and cities evolve, as do their skylines. Individually, or in groups, tall buildings can significantly affect the image, character and identity of towns and cities as a whole, and over a long period. In the right place well-designed tall buildings can make a positive contribution to urban life. Past examples show us that they can be excellent works of architecture, and some of the best post-war examples of tall buildings are now listed.*

*However, if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility can also seriously harm the qualities that people value about a place. What might be considered a tall building will vary according to the nature of the local area? A ten-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not. One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character. There have been many examples of tall buildings that have had a lasting adverse impact through being unsuitably located, poorly designed, inappropriately detailed and badly built and managed.”*

Quite separately much research points to the fact that children do not develop well and thrive in Tall Buildings.

### Impact on road infrastructure

As has already been stated the site currently has very limited vehicle access. We understand that Meadow partners may be seeking to buy the old M1 slip road from Highways England and use this to gain new vehicular access to Bunns Lane.

This proposal would be opposed on two grounds;

a) The old M1 motorway access route should be strategically reserved for future transport solutions to relieve congestion in the Orbital links across North London. This access passes under a disused bridge under the A1/A41 and this asset must be considered as a highly strategic piece of public realm infrastructure, as to lose it, and subsequently to have to recreate similar functionality would cost 10s of millions of pounds sterling. We intend to write to the Highways Agency regarding this matter and specifically their proposal to “stop up” a length of the former link road presumably such that it could be sold to help facilitate this development. In our opinion this key infrastructure asset should be transferred to TfL if Highways England no longer require it, or see Crichel ruling comment below.

b) The distances to The Broadway Station - mainline, and Mill Hill East tube station, are outside the range considered as ‘good accessibility’ on the PTAL scale. Bunns lane is already beyond capacity and gridlocked, particularly during morning and evening rush hours. The existing road infrastructure simply cannot cope with hundreds of additional cars in the area. As is well known by local residents travelling across London, as opposed to commuting into central London, is difficult and time consuming and necessitates many people having a car. This is unlikely to be any different with the residents of the proposed flats and such an additional concentration of people and cars in an area already struggling with congestion and regular gridlock will place too much strain on the road infrastructure, and greatly inconvenience local people.

## M1 slip road ownership - Crichel rules and strategic use as a rail corridor

We believe that, if Highways England are to sell the M1 slip road and associated land, then both the Crichel rules should be applied and also the use the land as a strategic rail corridor must be considered.

The Crichel Rules state that, if the slip road land was compulsory purchased when the M1 was built, then the land should be firstly offered back to the original owner. Efforts should be made to check who that owner was and offer them the land.

Secondly, prior to the M1 being built the land was part of a railway between Mill Hill and Edgware. Much of the route still exists and given the major need for improved orbital links across north London, the use of this land for such a strategic purpose should be considered before it is used for any other use.

## Number of car parking spaces on the site

The number of car parking spaces will be 500. Whilst this might comply technically with the London Plan in an **urban** location, it does not reflect the **suburban** nature of Mill Hill and the practical difficulty of making quick journeys across London, as opposed to travelling into central London. In Mill Hill car ownership is high and the vast majority of journeys are by private vehicles. While the Mill Hill Neighbourhood Forum are keen to promote a modal shift in passenger/travelling behaviour we suspect that this will have a very gradual impact over a long time.

It is possible that there will be 2000+ people living on the site and consequently a limit of 500 cars will only mean new residents will attempt to park their cars in the adjacent suburban roads, causing issues for existing residents and further exacerbating traffic problems.

We have yet to see any additional trip generation assumptions and calculations but expect these to indicate that there will be further severe pressures on the surrounding road infrastructure. We note that Barnet Council have agreed a more realistic allocation of parking allocations in new developments in their consultations over the London Plan, and their own recent development at the Fairway (arguably a very similar site with equally poor public transport links, between the A1 & the M1 settled on 1.26 cars spaces per property (which was welcomed by TfL). A similar measure is proposed, we understand, for the Barrett-London redevelopment of the NIMR site on the Ridgeway. One particular overriding issue with the Pentavia site is that there is absolutely no possibility of cars over spilling from the site to park on adjacent roads. While the developers might suggest that their target audience of young professional renters will not usually own a car, this is a fatuous scenario, where many will have Company vehicles and if commuting across London not simply walk or cycle to a station to commute. Owning a car is aspirational for most professional people today, if not a necessity when public transport is lacking, and they have to be parked somewhere.

The London Plan states that:

*“In developing their residential parking standards in the context of London Plan policy, outer London boroughs should take account of residents’ dependency on the car in areas with low public transport accessibility (generally PTALs 0-1). Where appropriate in these locations Boroughs should consider revised standards (which could include minima) and permitting higher levels of provision there than is indicated in Table 6.2, particularly to avoid generating unacceptable pressure for on-street parking.” (Para 6.42i<sup>1</sup>)*

<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-6/policy-613-parking-0>

Accordingly for 750 flats there should at a minimum, using the 1.26 measure per unit, of 945 parking spaces in the development. The suggestion that 1200 Cycle Park spaces may be provided is to say the least strange.

## Light pollution

The height and mass of the proposed building will undoubtedly have an impact on the surrounding buildings and neighbourhood. In particular the proximity to the London University Observatory in Mill Hill could be a significant problem for the scientists and the research they conduct. Additionally the impact on properties along Grahame Park Road and the newly built homes in Churchill Place are likely to be significant.

## Noise Pollution & Air Pollution

Development immediately adjacent to the railway lines and the Motorway/Trunk routes is exposed to significant levels of noise and vibration. The principle of locating noise sensitive residential properties here would require significant mitigation and design measures to meet BS8233:2014 and World Health Organisation Guidelines.

We have recently run an exercise jointly with Barnet Council and University College London to monitor air quality in three parts of Barnet, Mill Hill being one specific area of interest. Out of 60 Diffusion Tubes set out for this project, only 1 was not available for collection at the end of the exercise and this one was removed by persons unknown, alongside the Pentavia Park on the Watford Way A1/A41. Air Quality is an increasing concern for all Londoners. We suspect that this site is in a particularly poor air quality area but await the provision of full empirical data, that should not be taken at temperatures above 18C and should be sampled when the cloud layer is low. A real time assessment needs to be conducted between October & March.

## Population Growth in Mill Hill

Our population has increased greatly and is predicted to continue to rise as per the GLA’s numbers below:

<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-6/policy-613-parking-0>

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2006 Population total:	16,747
2011 Population total:	18,500
2018 Population estimate:	21,950
2023 Population estimate:	24,750
2028 Population estimate:	25,900

These numbers are based on current expected developments and do not include a residential development at Pentavia Park, which with say 2000 people living in 750 flats would increase the expected population of Mill Hill ward by a further 10% based on the 2018 projection. The fundamental infrastructure to support such additional demands for transport, medical services, schooling, etc etc is simply not being developed to cope with existing growth projections and certainly cannot accommodate the requirements of a housing development as currently proposed at Pentavia without enormous additional investment.

### Other issues

Until the formal planning application is received it is not possible to comment on many other aspects of the development. In particular we shall need to review the following to ensure that all these criteria are demonstrably fit for purpose and follow all planning rules and guideline including:

- Construction issues, including travel plans and access to site.
- Loss of employment floor space and how this is mitigated
- Proposed affordable housing percentage (whether rented or sold)

“Affordable housing” in Barnet should be at 40% for new developments and the Council should not allow a deviation from this standard if London’s Housing problems are to be addressed. The fact that a developer may have overpaid for a site in expectation of being able to force through a very elaborate scheme of over development, in order to make their viability calculations, cannot be allowed to override.

Mill Hill (as so many areas do) needs new housing notably for key workers if we are to maintain acceptable levels of Public Services, and young people who have grown up in the area, such that they can stay close to their roots and their wider family unit for support. If they are forced to move away then their parents are less able to support them when they build a family and they will not be as able to support their parents in their old age. This is a very significant issue in society today, placing great strain on Social Care budgets.

A two bedroom flat should be available to buy at £250,000 to £300,000 market value, based on realistic cost of land, latest technology building techniques and without a huge degradation in the quality of the result. A small 3 bedroom house could similarly be brought to market at £400,000. If renting the target monthly rental should be under £1000 with long term contracts offering a minimum, 3-5 year tenure. Seemingly developers have little regard for these real needs, preferring to build high specification executive style properties to maximise their profits.

There are further considerations which we would like to ensure are addressed in the Planning Application. We will engage with the Council on these matters when further detail is provided:



- Amount of community amenity space
- Overall adherence to residential space standards
- Adherence to wheelchair housing standards
- Adherence to children's play space standards
- Adherence to privacy levels - proximity to other flats/homes
- Adherence to sunlight and overshadowing standards
- The general impact on the amenity to neighbouring properties

## Final Conclusion

Residents expect their Council to apply their direction and policies robustly and consistently. We do not think this site should be granted a change of principle class use. It could be considered as a mixed use A1/A3 site maybe with B1 Office space (without residential) to help prevent Mill Hill being simply a dormitory town for Central London commuters and as such it would comply with the Local Plan. Expected Traffic volumes from such, would then not require vehicular access to Bunns Lane.