



OPEN Letter - To whom it may concern:

The Mill Hill Neighbourhood Forum's Committee of local Mill Hill & Hale Ward residents has considered this major application carefully and now writes to oppose it on the following grounds:

(1) The application does not comply with policies in Barnet's Local Plan (September 2012).

Barnet's Local Plan is framed by the Three Strands Approach which seeks protection, enhancement and consolidated growth across the Borough (p13). This includes the protection of Barnet's suburbs and historic areas and concentrating growth within defined areas. The Key Diagram (Map 2, p33) identifies Colindale as an area for Regeneration and Development, the boundary for which is to the west of the M1 Motorway and rail corridor. This is clearly shown on Map 4, p39. The Pentavia site is outside this boundary. The proposals extend the Colindale area of consolidated growth into established low-density suburbs, thus contravening the Local Plan policy. Specifically, Policy CS1 seeks to consolidate growth in clearly defined areas, whilst protecting and enhancing the historic suburban environment. Policy CS5 defines the requirement to respect the local context and distinctive local character, including the natural landscapes of Barnet.

(2) The application does not follow guidance within the Tall Buildings Study of London Borough of Barnet (2010).

Policy C5 provides clear guidance on tall buildings (considered to be 8 storeys or more) but does not include the Pentavia site in the list of strategic locations as the site falls a long way outside the Colindale Avenue Corridor of Change (Colindale AAP, Figure 4.2, p32). Specifically, the policy states that 'Outside these specific locations, proposals for tall buildings will not be supported'. Barnet's Tall Building Study (figure 6, page 20) and the Local Plan (Map 8, page 67) identify the four key view corridors in the borough. The first is from Mill Field towards Harrow-on-the-Hill and the proposed Pentavia development would fall within the foreground for this view. The Local Plan seeks to ensure that development is compatible with key view corridors 'in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not be acceptable if it obstructs important local views or skylines'. The Tall Building Study indicates three clusters of tall buildings within the borough (Figure 8, p24). The Pentavia site falls outside these clusters. The Tall Building Study also identifies that the site has a low PTAL (Public Transport Accessibility Level) rating for access to public transport between 1a, 1b and 2 (Figure 3, page 14). It states that there should be a general presumption against tall buildings or other very dense forms of development where the PTAL level is low.

(3) The application is outside the Colindale Regeneration Area (March 2010)

The Area Acton Plan (AAP) for Colindale clearly states 'the M1 forms the eastern boundary of the AAP area' (p10, para 1.7.1). Building heights are set by Policy 5.3 (p53) where 'taller buildings (in excess of 6 storeys) will only be located in the most sustainable locations which benefit from good access to public transport facilities and shops and services. The area immediately around Colindale Underground station will become the most sustainable location within the AAP'. Para 5.4.3 also notes that 'buildings should have regard to surrounding buildings and be designed to respect the height of existing nearby buildings'.



(4) The application disregards principles and requirements in the Draft Pentavia Planning Brief (September 2016)

The application takes little if any guidance from the draft planning brief (which does not appear to have been issued as a formally adopted version on the council's website). Discussions at the Policy and Resources Committee on the draft planning brief (1 December 2016, item 13) resolved to agree an amendment 'to further emphasise that the proposed densities and design proposals for the site should respect surrounding suburban housing typologies, including that of the properties opposite of the site along the A1/A41 Watford Way'. The submitted proposals fail to respect the specific amendments to the planning brief requested by the Committee. Furthermore, this requested amendment does not appear to have been incorporated in the draft planning brief available on the council's website. The draft planning brief references the Local Plan, stating that tall buildings 'should be restricted to strategic locations within the borough' and that 'Pentavia Retail Park is not one of these locations' (para 3.20). It also describes adjacent properties principally consisting of two-storey terraced and semi-detached houses, that would be 'sensitive to matters of building height and massing' (para 5.5). It also notes that particular consideration should be given to the visual impact on the Mill Hill and Watling Estate Conservation Areas as the elevated site is highly visible from these areas that are described as a 'low rise landscape' (para 6.18). The submitted proposals clearly fail to comply with the principles and requirements of the planning brief.

5) We note that new properties built along the side of Grahame Park way which is immediately to the west and parallel with the Pentavia site are limited to 2-5 storeys maximum in accordance with the Grahame Park Supplementary Planning Document (SPD) as defined for the "Northern Character Area" of this site. This SPD was published only in May 2016.

Its statement of key outcomes is listed below:

"The new neighbourhood will be constructed around a traditional network of streets, reflecting successful Victorian and Edwardian suburban areas as typical of London streets. The buildings will be low scale, generally no more than 6 storeys with some taller elements to mark key corners, edges and community uses.

vi. New housing should be available in a mixture of tenures, providing some new replacement social rented accommodation, shared ownership and additional social housing where viable, along with enabling private sale housing.

vii. All housing should be built to up-to-date standards in terms of internal space and energy efficiency. There is an opportunity to deliver a large proportion of the new housing as family units, either as maisonettes or as terraced townhouses.

This will help with current overcrowding issues on the estate, as well as contributing to a more balanced mix of unit types across the Colindale area."

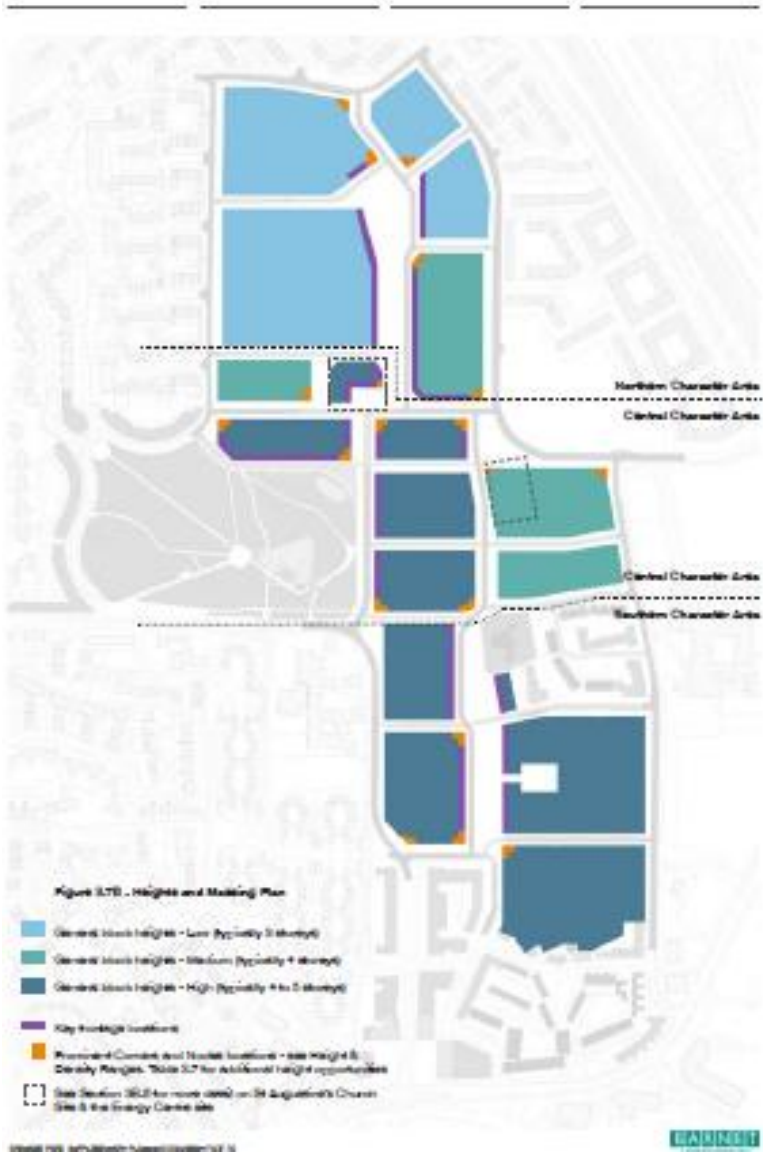
We take this to indicate two key points of planning principle: The SPD recognises that Colindale is mainly flats in dense formation less suited to family living, and as you move from Colindale to Mill Hill the height of buildings needs to reduce to best match the character of Mill Hill. Further the Pentavia site sits higher than Grahame Park topographically.

The extract below is taken directly from this SPD:



Table 3.7 - Height & Density Ranges

Comprehensive Redevelopment	Density Range (U/ha)	Minimum Height (storeys)	Maximum Height (storeys)	Prominent Corners maximum height (storeys)
Southern Character Area	130-160	4	6	8
Central Character Area	100-130	3	6	8
Northern Character Area	50-100	2	4	5



⊗
 Pentavia is here on the “wrong side of the tracks”.



The height and mass of the proposed development of Pentavia would completely over shadow the Northern Character Area of Grahame Park Estate, and the new properties in Churchill Place, Bunns Lane next to the Bright Little Stars nursery, together with the older houses in Bunns Lane, Brancaster Drive, and Longfield Avenue on the other side of the A1/A41.

6) The London Plan section 7.7 talks about Tall Buildings and in 7.25 says:

“Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline¹⁴ or are larger than the threshold sizes set for the referral of planning applications to the Mayor. Whilst high density does not need to imply high rise, tall and large buildings can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the London Plan, particularly in order to make optimal use of the capacity of sites with high levels of public transport accessibility. However, they can also have a significant detrimental impact on local character. Therefore, they should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations, are able to enhance the qualities of their immediate and wider settings, or if they make a significant contribution to local regeneration.”

We consider that the buildings proposed in this application, are “substantially taller than their surroundings (on both sides of the tracks) and they will make a significant change to the skyline including protected views from the Mill Field and from Sunnyhill park. This proposal will have significant detrimental impact on local character. The site is not highly accessible (PTAL 1b) and they will damage rather than enhance the qualities of their immediate and wider suburban settings.

7) Mill Hill is already undergoing considerable growth as will be seen from the latest GLA Intelligence figures quoted below showing the population figures from 2011 and their predicted rise through 2018 to 2028.

2011 (census)	18523
2018	21277 (growth of 15%)
2028	27589 (growth of 49% since 2011 and 30% over 2018)

The supporting infrastructure is simply not in place to cope with the current pace of growth. Notably Mill Hill needs, urgently, more secondary school spaces, and it is taking weeks to get an appointment with a General Practitioner. The Northern Line to & from Mill Hill East is a shuttle service outside of peak times and typically one has to wait 12-15 minutes for a train and change at Finchley Central. Although TfL will not admit it, the service is overloaded at peak times with scarcely a seat available as each train leaves the station for a journey south. The 240-bus service is in the top 10 of TfLs worst routes for reliability and punctuality.

While the Thameslink service has been poor in recent months we are encouraged that the new rolling stock will be both more reliable and comfortable and more frequent. So radial journeys into London are not too bad if overcrowded, but orbital journeys are appalling around North London with roads heavily congested in all directions, notably at peak times. Recently it has been taking 20-25 to traverse Mill Hill from Hale Lane along Bunns Lane to Pursley Road a distance of 1.5miles and walking or cycling are not always the answer!



8) Air Quality & Noise. This site is in between the Midland Main Line & the M1 on one side and the A1/A41 in the other. The noise from these sources is excessive and the air quality very poor with more than 60,000 vehicles passing by on the A41/A1 each day. There will undoubtedly be a canyon effect caused by the proposed buildings. We note that the windows facing the railway & the M1 will be locked down and the scheme is designed with inward facing balconies. It will clearly not be pleasant sitting out in any of the proposed green spaces within the site. The air quality report seems to only take note of issues that the buildings will cause and while it attempts to mitigate these it doesn't seem to take into account the current dire levels of air quality. The air pollution maps for London show the A1/A41 from Mill Hill to Apex corner is one of the most polluted parts of London and there are 5 DEFRA "hot spots" that require treatment for excessive noise in the same stretch along the M1.

There is a significant risk of light pollution, from these tall structures, which will impact on the nearby scientifically important and long standing UCL Observatory.

9) Many surveys have been done about the effects of living in Tall Buildings. Extracted below are the findings from a detailed study. <http://www.gowellonline.com/>

Housing outcomes were all more likely to be worse for occupants of high-rise, compared to people in other types of dwelling. The most common problems, all of which were two-to-three times more common in high-rise, were poor condition (internal and external), poor security and poor space. The prevalence of poor neighbourhood outcomes was often no different for highrise occupants than for other residents. However, occupants of any type of flat were more dissatisfied with their neighbourhood than people living in houses. The bigger difference was that perceptions of anti-social behaviour were worse for high-rise occupants than for anyone else. Several social outcomes were worse for high-rise occupants, including lower levels of perceived community cohesion (issues of belonging and trust in neighbours), available social support and social contact. Almost three-in-ten high-rise occupants met up with relatives or friends less than once a month; such relatively low levels of social contact were twice as common among high-rise occupants compared with people living in houses. All nine psychosocial outcomes we examined were worse for occupants of flats compared with people living in houses, and some were even worse among highrise occupants compared with those in other types of flats. High-rise occupants were less likely than anyone else to derive recuperative psychosocial benefits from living in their homes (such as safety, retreat and privacy), and less likely to feel in control at home or empowered as a community.

While the proposed development will provide new facilities, unless maintenance is kept to very high standards such blocks tend to deteriorate much faster than properties that are owned and the socio-economic issues raised in the above report are likely to manifest themselves.

10) It would be interesting to assess the current numbers of cycles in the Barnet area. It might equate to the whole number of cycle spaces being allowed for in this development! But seriously cycling, walking, public transport will only be appropriate for some residents of the proposed development. We suggest that 500 car park spaces for 717 flats (0.7 per flat) will initially be grossly inadequate for residents in this suburban location with its poor PTAL rating of 1b. We accept that over the next 30-40 years car ownership may possibly decline, in which case provide at outset 1.4 (Barnet's norm for such sites) spaces per dwelling, and as car ownership is seen to decline convert the space allocated to further amenity space. Perhaps initially only 0.5 cycle spaces will be needed per dwelling but these could increase correspondingly as car ownership declines. Probably 4 cycles spaces equal 1 car space. So,



provide 359 initially instead of 1160 and this would provide an additional 200 car spaces, which approaches 1 per flat. The reality is that if sufficient parking is not provided **on the site**, to meet the needs of its Residents, they will be parking on Bunns Lane, Grahame Park Way and all roads nearby and that will be hell for current residents, resulting in a need for controlled parking. It will bring further congestion and huge levels of un-neighbourly frustration.

11) We do not believe that the proposed 35% level of “Affordable” properties will be truly affordable by those who currently need housing in the area. It is being set at a level above the existing average market rate for the area, which means it will not be possible for “key workers” to rent these properties. The concept for this development is clearly high-priced flats for professionals and in order to afford the rent you will undoubtedly see 2 couples renting a 2-bedroom flat and because of the poor location they will not stay long and add much to the local community. This site is never going to represent a “nice place to live” and as such people will not want long-tenure to set down roots. Renting here will be a grudge-purchase and a stepping stone. Tenants will probably have a long commute (as employment opportunities locally have declined dramatically in recent years) to add to high rental costs and minimal amenities.

12) This proposal suggests a density of housing of 205 units per hectare. The current London Plan states that as such this level of density may be appropriate in a Central London setting with PTAL 2-3 access to public transport. This site is in a suburban setting with PTAL 1b accessibility to transport. Accordingly, the recommended density of housing should be around 55 units per hectare, indicating that a maximum of 193 Dwellings should be included in any development of this site. See also point 5 where the density of properties in the Northern Character Area was approved at 50-100 units per hectare.

We also reference the planning application 17/07932/OUT here (North London Business Park - NLBP) and note the reasons for its refusal as follows:

The proposed development, by virtue of its excessive height, scale and massing would represent an over development of the site resulting in a discordant and visually obtrusive form of development that would fail to respect its local context and the pattern of development in its context, to such an extent that it would be detrimental to the character and appearance of the area. The proposal would therefore not constitute a sustainable form of development and would be contrary to policies CS NPPF, CS5, DM01 and DM05 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policies 3.4, 7.4, 7.6 and 7.7 of the London Plan (July 2011, October 2013 and January 2014).

The proposal was for 1350 dwellings and a school within this 16.37 Hectare site indicating a density of 82 units per hectare which was within the guidance for a site in a PTAL 1-2 area.

The tallest structure was 9 storeys while the levels across the site change by as much as 20metres (equates to 7 residential levels) and Car park spaces were proposed at 1.4 per dwelling.

Compared to the application for development at Pentavia at 205 units per hectare and 16-17 storeys high it would confirm that the precedent to refuse such applications that grossly exceed guidelines is set. The NLBP application went to appeal and was still refused by the Mayor of London. Both Pentavia and NLBP fall outside areas designated in Barnet as suitable for buildings above 4-5 storeys.



13) The loss of A1/A3 (Retail/Restaurant) units will lead to a reduction in local amenities. There are a large number of significant nearby developments (e.g. Millbrook Park, the National Institute for Medical Research centre, IBSA House, together with developments in Grahame Park, and Colindale) plus the number of smaller scale but still substantial developments in the area nearing completion or recently completed, and likely future sites in the pipeline with little or no retail offering. The area already suffers from a lack of amenity and retailers and such demand will grow with the many more potential customers. To buy DIY goods residents now have to travel to Borehamwood or Finchley and carrying pots of paint or planks of wood on public transport or on a cycle is not possible. This will lead to more traffic and greater congestion in and around the area and elsewhere, or leave the new developments as dormitories, fit only as assets for overseas owners.

In summary the application represents an overbearing and enclosed design. It is a gross overdevelopment of the area, which is out of conformity with the draft design brief, which advocated a mixed-use medium density development. The design brief proposed a maximum of 3-5 storeyed development. The designed density of the scheme is more in keeping with a city centre, rather than an attractive garden suburb.

Yours sincerely

John H Gillett

Chairman- Mill Hill - Neighbourhood Forum

Call +44(0)7766078395 Website: www.millhillforum.org.uk

Facebook: <https://www.facebook.com/MillHillForum>

