



Sadiq Khan, Mayor of London
New London Plan Draft.
GLA, City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

4th March 2018

Dear Mayor Sadiq Khan
The Draft New London Plan 2019-2041 Consultation

The Mill Hill Neighbourhood Forum committee has reviewed the Draft London Plan (DLP) and has the following comments to make for your consideration:

Housing Shortage:

We understand the current view that there is a significant housing shortage both in London and across the UK, but we question whether relaxing sound planning principles is the correct solution? We see reviews that suggest that there are 900,000+ empty homes across the UK of which 330,000 are long-term empty. More than 400,000 homes have been granted permission but are still waiting to be built, according to analysis published by the Local Government Association (LGA) - a rise of 16 per cent in the past year. Within our area we have the Mill Hill East Area Action plan which called for 2150 new homes in 2012 but the developers say it will be 2026 before the site is fully built out!

An analysis of Brownfield Land Registers, published on 12th February 2018, confirms that there is enough space on brownfield land to build at least one million new homes, with more than two-thirds of these homes deliverable within the next five years. Many of these sites are in areas with a high need for housing. This means that three of the next five years' worth of Government housing targets could be met through building homes on brownfield land that has already been identified, easing pressures on councils to continue releasing greenfield land unnecessarily and preventing the unnecessary loss of countryside.

In view of the above we think that measures should be taken to get empty properties into use. For example, many landlords consider under current legislation, that it is too risky to take on tenants who are on benefits. This is a direct result of housing benefits being paid to tenants rather than landlords directly. This was the consequence of a change in legislation that was not thought through. Developers are deliberately land-banking and will continue to do so as you make it easier for them to get planning approvals; they will not build more houses without much encouragement. It should be possible when allowing planning permission to not only put a date by when building must start but also one by which time the site must be built. The other consequence of it taking a long time to complete developments is that early residents and all those who surround it are living with noise, dust, and construction traffic and the too slow provision of infrastructure agreed to be supplied under S106 conditions.

We do not see anything in your new DLP that addresses these very real issues, which could deliver more homes much more quickly than any other measures you have proposed.



Neighbourhood Planning

When we set out to complete our Neighbourhood Development Plan we were encouraged that it could make a real difference locally and we certainly did not set out to be NIMBY, far from it; we set out to get the right distinctive developments that would enhance Mill Hill as an attractive place to live, work and play, along with the right infrastructure to support our residents. With now around 21950 residents in Mill Hill ward (an increase of 19% since 2011) and an expected population of 25900 in 2028 (an increase of 55% since 2006) of which 30% are likely to be over 60, we are a different suburb from many you may be most familiar with. People live in Mill Hill because it has mainly low-rise family homes (many built in the 1930s and still very attractive and well maintained) with small gardens and the area is ideally suited to the development of families in a multi-cultural, safe environment.

We are disturbed that the DLP does not really acknowledge Neighbourhood Planning as the third tier (or is it the 4th with NPPF) in the Planning system as set out in the Localism act of 2011. Neighbourhood planning is now well established in the capital and warrants much more recognition for its role in helping deliver the London Plan's objectives than a few passing references in the draft. Therefore, the London Plan is unsound in failing to conform with the National Planning Policy Framework on the role and importance of neighbourhood plans. Indeed, the Plan's objectives for "good growth" depend on effective and early community engagement in development choices. The challenging objectives that the DLP suggests to increase housing numbers and develop more small sites will depend on securing community consent through neighbourhood planning and very effective engagement and this will rely on local knowledge applied through neighbourhood plans which are already identifying many appropriate development sites and bringing forward development better and faster than many Local Plans.

We believe that stronger, better and earlier design input is critical to the successful delivery of the London Plan and neighbourhood planning can provide this, including design codes and character assessments at the very local level. The London Plan needs to be clear which are the strategic policies with which neighbourhood plans have to be in general conformity and it should not stifle local grass-roots opinion that will usually be much more effective in shaping places than a hand from on high.

Housing Density, PTAL ratings & Tall Buildings

We are pleased to see you strengthening your guidance on the minimum size of dwellings in new and conversion developments! We do still believe that the density matrices relative to Inner, Outer, Suburban areas and the PTAL ratings should be retained as a way of containing over avaricious developers who are motivated purely by profit, caring little for the neighbourhood they can destroy. It is wholly inappropriate to allow buildings of anything above say 6 storeys to be built when all surrounding buildings are but 2-4 storeys high. We also are all aware of the disastrous high-rise housing estates built in the 1960s & 1970s where children certainly have rarely thrived and most of these buildings are being demolished or have become no-go areas. We firmly believe the density matrices are more valid today than perhaps they were when created. Our draft (Emerging) Neighbourhood Development plan, following extensive local consultation, calls for buildings in NW7 to be no more than 4-6 storeys high (as indeed does the Mill Hill East Area Action Plan). Current residents bought their properties based on the understanding that Mill Hill would remain an attractive suburban village and have no desire to see this changed. New people have been attracted to the area in recent years entirely for the same reasons. We see that you have included Mill Hill as an area for further development, but



we trust that you will acknowledge the growth that we are already committed to and the issues such growth has already caused.

Supporting Infrastructure

The other measure of density must relate to whether the local infrastructure can be developed to support such development. Following recent growth, it is now almost impossible to get an appointment with a GP in under 3 weeks in our area. As Barnet has grown into almost the most populous Borough in London over the last 15 years the transport infrastructure, schooling, etc have not been developed to cope. Orbital links across NW London are appalling. Journeys into London by the Northern Line are OK if you can survive the crush! The branch line with its shuttle service outside peak times to Mill Hill East is woefully inadequate for purpose. While the Thameslink line to Mill Hill Broadway has improved tremendously with new trains and more per hour will soon stop, the station itself is not fit for purpose with 39 steps to the platform and no lift.

For Mill Hill (or any other part of North West London) to cope with any further expansion better public transport must be provided. We suggest that the old railway line between Mill Hill East, Mill Hill Broadway, Edgware, Bushey and potentially Watford should be strategically reserved for future transport services. In the immediate future between Mill Hill East & Edgware a safe cycle route could be achieved at relatively low cost; indeed, an additional bus service could provide relief to existing routes and access into the Cophall green spaces and Saracens Rugby Club. Ultimately this could be a Lite-Rail service from Finchley Central through to Bushey. We would whole heartedly support the development of a rail service from Mill Hill Broadway along the Thameslink line then through Dudden Hill freight line to Old Oak Common. These strategic improvements are well within the timeline of the new London Plan but will be made impossible if the existing routes are not now reserved. This forward thinking requires proper review and feasibility/costing studies if any further development is to be enabled.

Car Journeys & Parking Provision

Without adequate and effective provision of viable public transport alternatives (including as suggested above) the motor car (in whatever form technology advances may deliver) will remain the vehicle of choice for the majority. People need mobility and while we agree most could walk more and thus be healthier, most people will not take to cycling, (less than 2% of journeys in Barnet are today done by bicycle, a 100% increase will be possible but it will remain a minority past-time) even with the development of electric bikes. The motor car is most appropriate for conveying children, carrying golf clubs, the weekly shop, or a teacher's pile of homework for marking or pots of paint and other DIY items. With the demise of some local amenities where retail parks, and offices are being converted into residential, we now have to travel much further to buy such items which is in fact increasing the need for car travel in the suburbs. Additionally, many people rely on a car or van for their work and this is unlikely to change indeed much more is being delivered to homes increasing demands on our roads. One very simple thing you could set as a policy would be to require all premises to clearly display their number in the street. Many residents & commercial/office premises display a name, but it is difficult for people to find the name if unfamiliar, while a number will be sequential. This simple policy would stop the growing army of delivery drivers, driving around for long periods usually very slowly, thus impacting other road users, and causing further pollution, while they look for the home for their goods.



We do actively encourage local people to take public transport and to walk more but in reality, it is not going to significantly change the requirement for parking spaces in developments and in public places such as Town Centre. We agree that allowing outer London Boroughs to use 1.5 car park spaces per dwelling as a norm in new developments would be well received and indeed be more likely to meet current and indeed long-term future reality.

Industrial Areas & Employment

We are pleased to see that you are supporting the retention of designated Industrial Areas. We like to refer to them not just as Industrial Areas but as “job creation areas” and the one in the centre of Mill Hill we wish to retain and expand to offer opportunities to notably start-up businesses and those who fulfil a vital, if less glamorous function/service, within our community.

We thought that the current London Plan was too Central Zone centric when it came to employment and many past-times. We welcome a more Polycentric London. We need employment locally, and not simply in low level service roles but professional & managerial roles. The Medical Research Centre moved to Kings Cross recently with the loss of more than 1000 jobs from our local economy. It is of concern that Barnet does not have a single Footsie 100 Company headquartered within its area. The only major business headquarters is McDonalds. Many businesses do not need to be in Central London paying rents of £80+ per square foot. They could operate as effectively in Mill Hill where rents are £25-30 per square foot, where their staff would be able to be housed without the need for a long commute and on an occasion when a trip to see a client in Central London is required it could be accomplished in 25 minutes. We would like to see more pro-active measures in the new London Plan to encourage larger businesses to locate to our fine suburb.

We are also concerned that the DLP suggests a single solution to the development of any space near a transport hub; it should be residential. We do not support this in the specific of Mill Hill's Town Centre which is close to Mill Hill Broadway Mainline Station. As a consequence of recent growth, parking in and around the high street is a nightmare which detracts many from bothering to shop locally. In our Neighbourhood plan we designate a site (currently a surface car park for 180 cars, owned by the Council) for development of a 150 Bedroom hotel & conference centre with 400 car park spaces & 250 cycle spaces in a multi-story facility and a developer is very interested in building such. Further we want to have a two-screen cinema in the Town Centre. These amenities will bring real value to our local economy, reduce travelling and bring greater cohesion amongst the community. Such developments will revitalise our Town Centre and make it a magnet for better shops and restaurants, as a popular destination for local people and those from surrounding areas. We notice that you are proposing to create new Town Centres to support new developments. We are doing everything in our power to encourage investment to revitalise our Town Centre for the benefit of all. We hope we will have your support?

Affordable Housing

We are pleased to see your better definitions of what could really be affordable housing! We think it should be possible for key workers and those in service-industries to live in the areas where they work such that they feel a key part of the community they work with. We have seen



too many planning applications where developers have tried to fudge the “affordable” issue. The viability statements for developments need far closer scrutiny.

Technology developments

London should plan to be early adopters of technology developments and the DLP should have a section outlooking the key developments that will make a significant impact over say the next 5 years. This should be regularly updated as an addendum to the London Plan thus keeping fresh the aspirations for London to be at the forefront in taking advantage of emerging technologies and here I include building technologies that can make developments of high quality dwellings more “affordable”

We see that some simple and relatively low-cost technologies could be very cost effective and help to make London “Smart”. For example, deploying sensors in public parking spaces could assess when a car arrives and when it leaves and bill accordingly for the time used (in much the same way as we are now billed for crossing the Dartford road bridge/tunnel). People would not have to put money in a meter or pay-by-phone; they would pay for the time they use and a message could be sent to them to tell them they are entering a further charging period. Parking Penalty notices and traffic wardens would almost be consigned to history or deployed to better Police our streets. This is but one idea for consideration but we believe the GLA should take a lead in such strategic thinking.

We welcome the advent of the Autonomous Vehicles which could be called to your location via a smartphone (or whatever technology has replaced it by then) and would drive you to mass-transit; it would not need to park but could travel on to meet the next customer. Such a public utility should be run by TfL across London. If you want a place to trial them come to Mill Hill.

We hope you find these discussion areas and comments of great interest as you move the London Plan forward.

Should you have any questions on the points raised please contact the undersigned.

John H Gillett

Chairman- Mill Hill - Neighbourhood Forum

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

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

