

John Gillett, Chairman - Mill Hill Neighbourhood Forum.

I am addressing you on behalf of the Neighbourhood Forum and I note that our MP Dr. Matthew Offord, Andrew Dismore our GLA member, and all of the ward councillors for Mill Hill & Hale are against this scheme.

We welcome the Officer’s report and recommendation for refusal. We believe it should be refused but not just on the points raised in the officer’s summary.

This application should be refused as it fails to meet the requirements of the current London Plan, the Local Barnet plan and the specific design brief for the site which we understand was paid for by the developers. It is bizarre that they completely ignore its content.

While the draft future London plan may indicate less emphasis on density, the current Plan (SPG May 2016) clearly states that the recommended density for this site in its “suburban” setting (PTAL 1), should be around 65 units per hectare. Even if the site was in an “Urban” area the units per hectare should not be greater than 95. This site, which is “a little over three hectares” should therefore have no more than 300 dwellings, if classified as “Urban” or 195 if “suburban”. The removal of the density matrix from the Draft New London Plan is hotly contested by many professionals. In any event 724 dwellings in 3 hectares (241 per hectare) is grossly over that which is reasonable for this site. The Proposed development at North London Business Park was refused (and by the Mayor of London on Appeal) at a density of 82 dwellings per hectare with 1.4 car spaces per dwelling and a maximum of 9 storeys high. The new flats being built in Grahame Park are being built within the Local Plan guidelines to a maximum of 5 storeys and this development, sitting directly opposite over the railway lines, will dwarf them!

The same SPG 1.3.65 recognises that “car ownership” (if not its regular use) is something many Londoners value and indeed in areas of low PTAL they are likely to be more dependent on the car (London Plan Para 2.36), if not for commuting then for family activities and shopping. The loss of the retail space at Pentavia means that residents of Mill Hill now have to travel to Borehamwood to buy DIY goods for example, thus increasing the need for a car. The aspirations of GLA planners for reducing car usage are wholly unrealistic. Indeed, the Council’s own development in the Fairway, NW7 of 140 properties (also next to the M1 and close to the A1) was approved as providing 145 spaces for 120 properties a ratio of 1.21.

Further the development in Bunns Lane at Churchill Place consists of 46 dwellings with 46 parking spaces. This is blatantly insufficient as cars are now regularly parked on Flower Lane and Bunns Lane when attending this estate which will be entirely dwarfed by the proposed development. We notice that the Planning Consultants for both Pentavia and Churchill Place are Quod.

The Parking space requirement to meet standards would be in the range 84% - 134% for number of proposed dwellings but the proposed provision is only 69%. This is normally unacceptable in an area with a poor PTAL rating. The applicant relies on “Fizzy Living Logic” (which is not made available) to justify the lower provision but the “Fizzy Living” model is appropriate only in high accessibility town centre locations. The Officer notes that the parking ratio is below the London Plan guidelines.

We cannot find a parking survey of surrounding streets to analyse impact of overspill parking in these roads as a consequence. Part of the mitigating measures for the air quality is to get occupiers to not use a car but the site is in a very poor accessibility area. Further the parking spaces will be charged at an additional £75 per month and this will lead to residents seeking spaces outside the site to the severe detriment of existing residents.

The majority of current rented properties in the area are either house conversions or small blocks of flats. The proposed build to rent scheme will probably be occupied by more than 2000 people so it is very likely that more than 1 in 4 will own a car, and where will visitors park? The developers brazenly suggest (Para 12.8) that there is adequate residual capacity in surrounding residential areas and this is blatantly untrue as anyone in Mill Hill will tell you!

Bunns lane and its connection to Graham Park Way and at Page St/Pursley Road is heavily congested now. The Page Street/ Pursley Road junction is under consideration for change in an attempt to mitigate the regular log-jams. Vehicles will leave the Pentavia site along the A1/A41 to Mill Hill Circus and this junction is heavily congested at peak hours and often throughout the day such that TfL are expecting to spend £4.5m in an attempt the streamline throughput. Mill Hill simply cannot take more vehicles.

The big mass of bulk, is apparently required to help mitigate noise & air quality. The air quality assessment is sparse in respect of actual data of on-site conditions and relies on modelling - We think this is deliberate because the on-site conditions are probably worse than the model would predict.

The noise and air quality mitigating measures are simply not enough to ensure quality residential provision. Acoustic mitigation is very questionable with reference to a woodland barrier (woodland has minimal acoustic benefits). One of the noise mitigating measures around amenity space are 2 metres high glazed screens - glazed screens have minimal noise mitigating benefits.

Noise monitored over 5 days in July 2015 - not sure this is the appropriate time of year because of summer holidays.

The noise measurements were not carried out on one corner of the site next to the M1 - Why?

Noise assessment concludes that the building elevations facing the M1 & A1 would be exposed to “medium to high” risks.

- The habitable rooms facing the M1 will have horrendous noise and air quality issues
- Windows cannot be opened without serious noise and air pollution consequences.
- The expressed need for sealed windows, ventilation systems/air conditioning is testament to the poor location and will greatly raise the energy consumption.
- Noise mitigating measures to overcome serious concerns are questionable.
- The amenity space on roofs will have significant noise & air quality issues, so will not be usable.
- The amenity space provision is too low particularly now that the revised plans bring more 3 bedroom flats for family occupation.
- The water supply and waste water infrastructure (Thames Water para 4.11) is insufficient and it has not been possible to establish the waste water needs. The implications for the surrounding area and this development require a very full appraisal.

The mix of residential units, with a large number of small units is not policy compliant, especially in an area with a poor accessibility rating.

Light to habitable rooms - over 25% of habitable rooms within the proposal would not meet BRE target values.

Light to amenity space - 32% of amenity space would not meet BRE guidelines.

Finally, the “Viability appraisal” assumes existing use as high value retail, but this is questionable because the use is vacant in reality (why did retailers leave in the first place?). As the proposed properties will be built to rent, we do not see the inhabitants adding anything to the economy of Mill Hill, or it’s families-based Community, but existing residents will be hugely negatively impacted if



this development is allowed. It will ruin the very fabric of our delightful village in the suburbs of London.

Table 3.2 - Density matrix (habitable rooms and dwellings per hectare)

TABLE 3.2 - DENSITY MATRIX (HABITABLE ROOMS AND DWELLINGS PER HECTARE)

|                                      | SETTING            | PUBLIC TRANSPORT ACCESS LEVEL (PTAL) |                        |                         |
|--------------------------------------|--------------------|--------------------------------------|------------------------|-------------------------|
|                                      |                    | 0 TO 1                               | 2 TO 3                 | 4 TO 6                  |
| INDICATIVE AVERAGE<br>DWELLINGS SIZE | <b>SUBURBAN</b>    | <b>150 - 200 HR/HA</b>               | <b>150 - 250 HR/HA</b> | <b>200 - 350 HR/HA</b>  |
|                                      | 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 - 3.77 hr/unit | 40 - 100 u/ha                        | 80 - 210 u/ha          | 175 - 355 u/ha          |
|                                      | 2.7 - 3.0 hr/unit  | 50 - 110 u/ha                        | 100 - 240 u/ha         | 215 - 405 u/ha          |

Source: Greater London Authority