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Mill Hill Preservation Society

**Mill Hill East Development
Major Project Group
Planning & Environmental Protection Service
The London Borough of Barnet
Building 4, North London Business Park
Oakleigh Road South, London, N11 1NP**

18th October 2007

Dear Sirs,
**Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Development) (England) Regulations 2004
Mill Hill East Area Action Plan - Preferred Options Report**

Thank you for your letter of the 17th September 2007 addressed to David Welch. I am replying as the current chair of the Society. We had more to say than would fit on your standard forms and we extended our comments into this letter - but we shall try to follow the same format.

Executive Summary: We attended previous consultation events, and have been involved in the consultation process. We welcome the chance to comment on the AAP. Having studied the documents our Major Projects Group has drawn the attention of our Committee to many areas where we cannot agree with the proposal outlined and we note the main ones here. We wish to challenge the density projections used. We wish to see a suburban development rather than one with an urban character. We wish to highlight our anxiety on matters of traffic and the expected congestion. We wish to suggest that the proposed public space proposals are weak and not in accordance with recommended legislation. We would wish to point out that the proposals for the site represent overdevelopment when any 'normal' criteria used by the Local Authority are applied. Finally, the AAP fails to provide a good analysis of the Mill Hill East suburban character and creatively reflect this in the indicative Master Plan.

Overall Strategy: Page 44: Section 5.1: (also page 16: section 2.2)

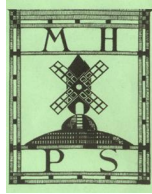
The MHPS are somewhat confused about the statement in this Section that the required Housing Target for 2026 is not 2000 homes as first thought, but seemingly 3,500 homes as proposed by the non-statutory North London Sub-regional Development Framework. We understand that nothing has been finalised - quote - "*These issues are currently subject to consideration at the Examination in Public of the London Plan Alterations.*" We do not support the proposed densities used to reach the 2016 and 2026 targets, preferring the density figures set out in the UDP for Barnet - which we understand to be the current adopted plan for Barnet. We would certainly wish to contest the 2000 homes target figure and it follows that a target figure of 3,500 homes on the site would, in our opinion, be considered out of the question.

Traffic: On page 45 it states that Technical tests have been undertaken to assess the potential impact of 3,500 homes on the transport network - quote - "*It is estimated that this would result in significant and unsustainable increases in traffic, during peak hours.*" We are concerned about the general traffic problems that will be caused by a development of 2000 homes plus a school, shops, medical facility, and employment opportunities and so forth. Our question would be what Technical tests have been carried out on the AAP proposed development, and where are the test results recorded for public view? Why are these results not included in this document? MHPS is not convinced that the increased traffic generation can be dealt with on this site and environs and on any other project we would claim the site was being overdeveloped.

More on Transport: There is obviously some concern over congestion expressed by the authors of the report in the area of Transport and we make reference to the following which represent some of the report statements:

Page 8 - quote - "*The AAP will establish the requirement for highway improvements and the mechanism for securing and safeguarding the necessary infrastructure required to support future development and strategic movements in this part of the borough.*"

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Page 16 - quote - *“The London Plan places particular emphasis on the need to ensure that development proposals achieve the highest possible intensity of use compatible with local context, design principles for a compact city and with public transport capacity”.*

Page 21 - quote - *“The need for infrastructure improvements to enable appropriate strategic links and routes that connect to the rest of the borough’s highway and public transport networks, especially a new ‘east west’ link route to Sanders Lane and Frith Lane and the enhancement of Mill Hill East Underground Station and Northern line Tube services.”*

Page 27 - quote - *“... traffic is forced to make use of either Bittacy Hill / Frith Lane junction or Holders Hill Circus gyratory which have limited capacity, thereby placing considerable pressure on both junctions at peak times.”*

“ ... based on traffic modelling it is considered that the additional traffic arising from the development of around 2,000 new homes can be accommodated with appropriate mitigation.”

“Although Partingdale lane has been recently been reopened to traffic, the suitability of this road for providing this east-west connection is considered to be limited given its essentially rural character. It would therefore be necessary to provide a new east-west connection through the site in addition to Partingdale Lane to serve new growth and development.”

Page 32 - quote - *“There are existing constraints within the local highway network and public transport services which must be addressed to ensure that development does not give rise to increased congestion in the area. The successful delivery of new houses and employment in the area will be dependent upon mitigating the transport impacts associated with future development.”*

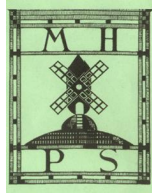
Page 41 - quote - *“Where increased traffic is likely to cause serious congestion problems on nearby roads and junctions, the development must provide improvements to help overcome these problems. Junctions requiring improvement may include Frith Lane / Bittacy Hill, Holders Hill Circus as well as the proposed access points into the site. A new east-west route and link to the borough and therefore strategic road networks shall be provided, with strategic junction connections between Frith Lane to Sanders Lane via Bittacy Hill.”*

Page 79 - quote - *“The site will be accessed by junctions onto Frith Lane and Bittacy Hill and these will be designed to cater for the movement demands into and out of the site. The design of these junctions must sensitively address the adjacent residential properties and seek to limit any loss of trees along the boundary of the site.”*

Page 80 - quote - *“Real time traffic analysis (VISSIM modelling) of the emerging options has indicated the need for improvements to the existing highway network sitting outside the AAP boundary. This is to ensure that any traffic created by the development will not cause increases in traffic congestion. The details of these improvement schemes are to be firmed up through the planning application process, but current options under consideration include: Frith Lane / Bittacy Hill: replacement of the existing mini-roundabout with traffic signals including additional pedestrian crossing facilities; and Holders Hill Circus: reconfiguration of the exiting roundabout including partial signalisation with additional pedestrian crossing facilities. ... creation of a new connection between Sanders Lane and Devonshire Road, linked to a new east-west route through the Mill Hill East site. This will require further testing to confirm this approach.”*

MHPS feel the above comments explain graphically the problems, but are light on solutions. We believe there is congestion now at key times and that the development will cause considerably more congestion. We feel that nothing is really being proposed for the surrounding roads other than traffic lights at existing or new junctions. This will not solve the new congestion brought about, it will simply back it up more along Frith Lane, and may even back up Bittacy Hill into the Conservation area. Imagine workday mornings when a combination of school traffic, commuter traffic and through traffic meets a series of new obstacles when coming down Bittacy Hill.

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We assume the new east-west cross route is proposed to alleviate some of this congestion - but it is more likely to bring Frith Lane congestion onto Bittacy Hill. However, MHPS do agree with the comments regarding the obviously limited use Partingdale Lane will be in this respect. MHPS are not convinced the road network, even with minor improvements will cope with the proposed increases in density of land uses. If Public Transport can be improved this will help but there is not huge spare capacity available. If this were the case for any normal development proposal we would argue that the site is being overdeveloped.

Design Options: Page 15 - Section 1.5 - The text states that there are preferred options presented in this Document. However, we can only find one option being put forward for further comment - that being on page 65 and thereafter. Indeed the text on page 64 states at 7.3 - quote - *“The Preferred Options plan (figure 7.1) shows broadly the distribution of different land uses etc.”* So, the text describes the options in the plural and then refers to the scheme in the singular. MHPS reserve the right to comment on any or all the options shown in the report. Indeed it is hard to understand how the previously preferred option Schemes A and B have ended up looking like the plan figure 7.1. Both Scheme A and B have linked green spaces, which in turn relate to the adjoining green spaces. This concept seems to have been lost. Scheme A had 2 east-west cross routes and Scheme B multiple routes. Scheme A - which was the favourite did not have a ‘high street’ concept, yet the final proposed option does have. Whatever new businesses or shops shown were on A were as a reinforcement to what is currently available from Waitrose down to Holders Hill Circus. What is proposed now seems to be a mini ‘Mill Hill Broadway’ may have a detrimental effect on the existing shopping. Has a retail impact study been done for the wider area? It is hard for shops to get a foothold locally, and so blandly suggesting a new high street will work is to our mind somewhat optimistic. (For instance have all the shop/office units been taken up on the gas board site yet?)

Density: Page 17 - section 2.5 - Densities: We are somewhat bemused by the densities argument - quote - *“Mill Hill East has an accessibility index (PTAL) ranging from a high 2 in the southern part of the site, to a level 1 in the north. The site currently falls within the suburban setting of density ranges, indicating a low level of transport accessibility, with a slightly more urban character near to the recent Gas works development in the south. The housing densities and adopted London Plan target figures reflect his low PTAL rating. Higher densities could only be achieved by very significant public transport investments and improvements.”* From this information we have an argument for *“30-50 units/ha in suburban locations with a PTAL of low 2 to 1.”* This seems acceptable. Then we have an argument for *“30-80 units/ha are proposed for suburban locations with a PTAL of 3 to high 2.”* We just creep into this one as we do not have a PTAL of 3 rating anywhere mentioned but we are a suburban location.

However the unacceptable item is *“50-150 units/ha are proposed in URBAN LOCATIONS (our caps) with a PTAL of 3 to high 2.”* The baseline report (updated September 2007) states that ‘the site has a relatively low accessibility by public transport’ (sec 7.1) and as we do not have a PTAL rating of 3 nor is the site an Urban one, nor is its context Urban, we do not accept the higher density. There is some confusion throughout the document on this urban v. suburban issue and some of these are highlighted below:

Page 4 - Forward by Councillor Melvin Cohen - quote - *“Our aim is to ensure that his key site is developed in a coherent way that ensures we create a high quality, new suburban quarter where people will want to live and work.”*

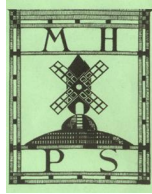
Page 5 - Preface - quote - *“... and help deliver the Three Strands Approach for Successful Suburbs by protection, enhancement and sustainable growth.”*

Page 8 - section 1.1 - quote - *“Deliver a new high quality suburban place.”* and *“The AAP will seek to achieve an appropriate and sustainable level of development whilst ensuring that impacts on the local environment are minimised and the suburban area enhanced.”*

Page 16 - quote - *“The London Plan places particular emphasis on the need to ensure that development proposals achieve the highest possible intensity of use compatible with local context, design principles for a compact city and with public transport capacity”.*

Page 18 - Section 2.2 - quote - *“Promoting high quality architecture and urban design in character with the quality suburban location.”*

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Page 19 - section 2.4 - quote - *“A successful suburb, focusing on protecting and enhancing the best of Barnet while growing through successful regeneration and sustainable development.”*

Page 20 - Section 2.4 - LBB Three Strands - quote - *“Protect and enhance the best of Barnet suburbia ...”*

Page 21 - Section 2.5 - quote - *“In terms of housing density, a balance must also be struck between protection and enhancement of the suburban character of the area ...”*

Page 22 - section 3.1 - quote - *“The need to enhance the suburban nature and character of the area and to ensure that a new development is of an appropriate scale and style.”*

Page 25 - Section 3.3 Physical Characteristics - quote - *“The area has a suburban character and is surrounded by Green belt to the north and east of the site.”*

Page 36 - Section 4.3 Public Exhibition - quote - *“Principle 4: Respecting local character, suggesting people felt strongly that development should reflect the high quality, leafy suburban setting and variations in character ...”* And then it is written in as an addendum, *“from Green belt Edge to more urban character.”* We would like evidence of the number of people who actually wrote - ‘from greenbelt edge to more urban character’, during the consultation process. Especially as this clause has been used later in the AAP as a design criteria.

Page 38 - Section 4.4 - Principle 4 - quote *“Development must reflect the high quality leafy suburban setting. Development must also reflect the local variations in character from Green belt edge to the more urban character near to the station.”* We would dispute the area round the station is Urban. The station is an end of line single storey structure, and the adjoining buildings are all single storey and some 2 storey. There are houses right up to the station site boundary. Once under the railway bridge there is a larger scale as the Waitrose mass is considerable and the housing opposite is higher than 2 stories. Even then the scale could not really be described as urban.

Page 43 - Section 4.5 - Summary - quote - *“... local people and communities have identified that development at Mill Hill East should be an environmental exemplar whilst reflecting the area’s suburban nature.”*

Page 44 - 5.1 Scale of development - see previous.

Page 63 - Section 7 - Preferred Options - quote - *“Good urban design is essential ... Good urban design also has the potential The London Borough of Barnet is committed to securing good urban design, to enhance and maintain the high quality, leafy suburban character and create a variety of attractive residential environments.”*

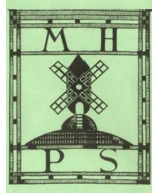
MHPS believe the document is flawed in its discussion of what is suburban and what is urban, and that references to ‘urban’ on this site are inappropriate. The confused argument has been a smoke screen for the allowing of higher densities that are alien to this suburban area. We therefore dispute the densities that area proposed and consider the scheme to be overdeveloped and detrimental to the nature and grain of the surrounding suburban settlement. MHPS would support the London Borough Barnet approach to density as set out in their 3-Strand Approach - especially Strand 2 (see Baseline Report Sept ‘07 page 14).

Open Space: There seems to be a level of confusion in the report surrounding open space provision. Below are listed some quotes from the AAP which will highlight our concerns:

Page 4 - Forward by Councillor Melvin Cohen - quote - *“In Barnet there are three strong attractors stimulating growth: great open spaces, a strong local economy and excellent schools.”*

Page 20 - Section 2.4 - quote - *“Development needs to be very sensitive to the surrounding green belt and ensure that there is no net loss of open space.”*

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Page 26 - Section 3.3- quote - *“... These are bordered by thick leaved woodlands. Approximately eight hectares of recreational open space are currently located with the Mill Hill East AAP ...”* and *“Recognising the ecological value (albeit limited) of these habitats, a core framework of habitats should ideally be retained and enhanced with any future development to create wildlife habitat corridors.”*

Page 40 - Principle 11 - quote - *“Open space should be provided within the site for outdoor recreation, children and young people’s play, relaxation, and wildlife. Open spaces should include viewing points so that panoramic views over Barnet can be enjoyed by the public and future residents.”*

Page 46 - section 5.2 - quote - *“Open space: Linking green spaces within the site and to adjacent green spaces to the north and south.”* NB. There is Bittacy Park to the west that is not mentioned here and elsewhere (see page 38 Fig. 4.2). This is an important Park as the other open spaces are effectively ‘footpaths’ through green space, whereas Bittacy Park is a complete open area. The majority of groups (nos. 3, 4 and 5) at the 22nd February spatial options workshop (Summary of consultation to date report, September 2007) highlighted a link to Bittacy Park but this has not been fully acknowledged.

Page 75 - Section 7.5 - Public Open Space - quote - *“Guidance by the National Playing Fields Association recommends around 2.43 ha of public space per 1,000 of population. This is also reflected by Policy H20 of the existing UDP. This would result in provision of an additional 10+ hectares of open space, which would limit deliverability of the density targets and employment targets set out here. At Mill Hill East a lower level of provision is considered acceptable, reflecting the excellent provision of space in the area and access to the existing footpath network through greenbelt land, and the existing Bittacy Park adjacent the site. ”*

The AAP states that the brief could not be met if the open space requirements were applied. This suggests to MHPS that the scheme is overdeveloped. In fact far from meeting the required targets the development will end up with less open space than exists on the site at present. To argue that because nearby areas have been planned properly to meet the required open space standards, in some way allows the AAP site not to meet the required standards is, in our view, illogical. It will also mean that the adjoining facilities that are acceptable now will become overrun if sufficient provision is not made through the AAP.

The proposals also include a number of ‘new public squares’ often a busy road intersections. These will have limited value and practically no resonance with existing suburban character - where else in Mill Hill are there ‘public squares?’

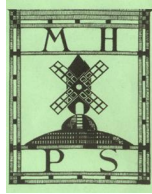
The Summary of the Consultation to date Report (September 2007) highlighted a number of shared principles including *“Linking green spaces within and to adjacent green spaces.”* The preferred option fails to do this and provides a fragmented arrangement of open spaces, most of which will have traffic on all sides. The big failure is not connecting central ‘Panoramic Park’, with the Officers Mess and with Bittacy Park. This connection, in turn, could give an extended route down to Cophall playing fields and Sports Centre.

Also Page 75 - quote - and *“In addition to onsite provision, developer contributions will be sought where appropriate to provide improvements to adjacent areas. Improvements may include: Work to local footpaths, and Improvements to Bittacy Park including a new entrance onto Bittacy Hill and a pedestrian link to the new development.”*

What exactly is meant by this clause is not clear and further explanation would be welcome. There has been some discussion locally of an underpass to link Bittacy Park to the new development thus avoiding the need for mothers, young children and senior citizens to cross what will be a very busy Bittacy Hill. We doubt that such an underpass would be ‘wildlife friendly’, although the suggestion has some appeal.

Education: page 29 - Section 3.6 - quote - *“Preliminary estimates (Mill Hill: Education Impacts - a report prepared for LBB by Hunt Dobson Stringer, March 2007) indicate that the proposed new development would generate a need for the provision of an additional primary school and some additional secondary school places in new or existing facilities.”* MHPS note the comments made. We look forward to hearing what final decisions are made and how they will impact the transport issues.

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Healthcare: page 29 - Section 3.6 b- quote - *“Further demand for increased healthcare provision is also anticipated.”* MHPS note the comments made. We look forward to hearing what final decisions are made and how they will impact the transport issues.

Design Criteria: page 36 - Public Exhibition (April 2007) - The MHPS accept and support the design criteria established at the public exhibition as stated in the AAP numbered Principle 3: an Environmental Exemplar; Principle 4: Respecting Local Character (except we do not agree the last 8 words - see previous note under Density); Principle 11: Functional green space; Principle 14: Improving Public Transport; Principle 15: Providing appropriate car parking.

Views out of Site: page 40 - Section 4.4 - quote - *“Open spaces should include viewing points so that panoramic views over Barnet can be enjoyed by the public and future residents.”* See also Fig 7.1 showing high density housing to the North of Panoramic Park - in this location views from higher up the site are blocked off. This housing block is in a different position to that shown in Scenario Plan A on page 65 - where it wraps round the green space on the West and North West sides. In principle having tall housing on the highest part of the site is not attractive as it will stick out - especially against the lower ‘greenbelt edge’ housing. MHPS would prefer all the higher density housing to be located on the lower part of the site. All the views out of the site will have to be carefully planned for them to be seen by the general public from ground level.

Tree Lined Verges: page 41 - Section 4.4 - The picture on this page showing the lady walking the dog down a tree lined avenue is liked by MHPS and has some resonance with the local character. We think that on Figure 8.11 - page 91 - the north south roads linking ‘retained woodland’ to ‘village green’ to ‘panoramic park’ to ‘local park’ and then onto Partingdale Lane, should be of this design. This would then provide a wildlife corridor from north to south through the site. The same would apply to the roads linking ‘Bittacy Park’ to ‘Officers Mess’ to ‘Panoramic Park’ thus provide an east west route for people and wildlife.

Continuity and Enclosure: There are various places where it is mentioned that existing mature trees should be retained. Of course MHPS would like to support this. In addition we would like to add areas of hedgerow and shrub planting that make up the overall site boundaries. The current Annington homes development has not retained hedges and trees on their site and the new environment will now look very bland for many years. This contravenes the current UDP that has a presumption against the loss of trees and important hedgerows (Policies D12, 13 & 15). Also, this devastation will have an effect on wildlife in the area. We would refer to the following:

Page 79 - Section 8.2 - Access Points - quote - *“The design of these junctions must sensitively address the adjacent residential properties and seek to limit any loss of trees along the boundary of the site.”*

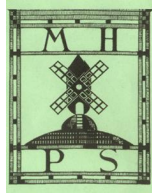
Page 84 - Section 8.4 - Edge Condition - quote - *“The rear fences of properties should not front onto Partingdale Lane, instead either a soft rear boundary or set back property frontage with access from the rear should be designed. The mature trees should be retained wherever possible.”*

Page 85 - Section 8.4 Green Belt Edge - *“Frith Lane also has considerable tree cover along its edges and this should be predominantly retained with sufficient depth from the street edge.”* Whilst these points are valid we would say again the retention of hedgerows is important both aesthetically and as wildlife corridors.

Under this section MHPS would like to add that the preferred options fail to reference the planting alongside Bittacy Hill on the East Side although this is shown on Fig 8.11, page 91. We would reiterate that this planting starting at the top of the site adjacent IBSA house, runs all the way down at least as far as Sanders Lane. We would expect this planting to be retained, protected and reinforced, providing a visual green foil to the new development.

Suds and Courtyard Planting: Page 88 - Section 8.6 - There are two points we wish to raise in connection with Figure 8.10; We would like the ‘hard landscaping’ for cars to be as permeable as possible to avoid large areas of solid finishes and added problems with surface water drainage. Also special attention should be paid to planting in courtyards, to ensure the rather tall buildings do not shade the new trees

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and inhibit their growth. The most southerly 'suds' area shown on Figure 8.11 page 92 near the scout camp needs resolving in terms of existing levels. Presumably the drawing is only diagrammatic.

Summary: We are not much in favour of the current proposals. Starting with the insecurity of which density figures we are all working with based on the PTAL (yet to be agreed) and the Overall Strategy for 2026 (yet to be agreed), through Traffic, Transport, Density, Open Space, Views out of Site, Tree lined verges, finishing with Suds and Courtyard Planting, MHPS is generally unsatisfied on all these issues.

On the matter of the Education, Healthcare, the new High Street and the proposed new road alterations we await further developments.

We do however agree the Design Criteria set out from the Public Exhibition (on AAP page 36) including Principle 4 with the exception of the words ..."from greenbelt edge to more urban character" ... on the basis that we think the setting is wholly suburban as "most" of the AAP report seems to acknowledge.

The overall impression of the document is that it fails to reflect or illustrate adequately the existing character and context of Mill Hill and the suburban nature of Barnet. Much of Mill Hill's quality is driven by the green character of our streets including green verges and trees. The report acknowledges this and highlights the council's objective to protect and enhance the suburban character of Barnet and its quality open spaces and Green Belt. However, the AAP fails to provide a good analysis of this suburban character and creatively reflect this in the indicative Master Plan. Whilst it is encouraging to read that 'The preferred options plan creates a series of park spaces which will be linked by tree lined streets to form an attractive leafy setting ...' we believe that significant further work on the indicative Master Plan is required to fully reflect this aim. Our concern is only increased when taking into account the poor character and quality of recent developments near to the site and adjacent to Waitrose. These bear no resemblance to the leafy schemes illustrated within the AAP.

We seek to secure a commitment from Barnet for this and our other objectives.

Yours faithfully,

John Living AAdip CMdip RIBA
Major Projects Group
Mill Hill Preservation Society
The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH