

Mill Hill Preservation Society founded 1949

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For the attention of Andrew Dillon, Principal Planning Officer

Major Development Team
London Borough of Barnet
Barnet House
1255 High Road
Whetstone
London N20 0EJ

26th April 2018

Your ref: 18/1998/PNO

Our Ref: JL / jl / mhps planning group

Dear Mr Dillon

TOWN AND COUNTRY PLANNING ACT 1990

SITE: IBSA House, The Ridgeway, London NW7 1RN

PROPOSAL: Change of use from Use Class B1 (office) to Use Class C3 (residential) to provide (221 Units)

PLANNING REFERENCE: 18/1998/PNO

1.0 Introduction

1.1 The Committee of Mill Hill Preservation Society (MHPS) has examined the application on the LBB website and have canvassed neighbouring residents. We have not met representatives of the applicant. However we appreciate the opportunity to comment on the application.

1.2 The Society was involved with the Examination in Public 2009 related to the Barracks Site in Mill Hill East and we know the IBSA building was included in the square foot target for employment space.

"The purpose of the AAP [area action plan] is to ensure that development takes place in a balanced and co-ordinated manner by setting out a comprehensive framework to guide the delivery of housing, employment, leisure and associated community facilities, infrastructure, transport initiatives, and environmental protection and enhancement. The proposals include plans for 2,000 new homes and 500 jobs, a new community hub to provide retail, commercial and community facilities and public transport and highways improvements. The council's overall aim is to create a truly sustainable and well-designed new community."

With the loss of the NIMR and now IBSA house both seen as contributing to employment in the area, this is a real setback for local sustainability. The London Plan, Draft, December 2017, in Policy D1 London's Form and Character, Clause B.3 calls for development proposals to "Aim for high sustainability standards" – which this proposal does not.

1.3 We have addressed the Core Strategy for Barnet and this proposal does not meet the requirements of Section 9 Providing Quality Homes and Housing Choice in Barnet.

Clause 9.1.1. states *“In order to create successful communities we need to maximise housing choice providing a range of sizes and types of accommodation that can meet aspirations and increase access to affordable and decent new homes.”*

Clause 9.1.2 states *“Our Housing Strategy emphasises that to improve choice we need to increase housing supply, including family sized homes.”*

The Society appreciates that in Barnet surveys have shown that 1 in 4 households stated that their current homes were too small and in addition....

Clause 9.2.14 states *“the North London SHMA bed size requirement model, based on housing affordability according to London Plan definitions, in general supports our prioritisation of family accommodation. It shows that in the market sector there is the need for family homes of at least 2 bedrooms, in particular 4+ bedrooms. This supports our stated level of priority. In the intermediate and social sector there is also a marked need for 4+ bedroom as well as 2 and 3 bedrooms.”*

Taking all this into account it is clear that 221 studio flats crammed into one location, with no amenity space envisaged, and no facilities provided within the development (for example laundry facilities) or available nearby in the immediate locality (except one public house), this proposal is not a useful contribution towards the creation of quality homes and housing choice in Mill Hill East.

2.0 Permitted Development Rights

2.1 We understand that under permitted development rights developers are required only to give a ‘prior approval’ notification. Through this procedure boroughs are required only to consider transport and highways impacts, contamination risks and flooding risks. Under this scheme thousands of square metres of office space have already been lost, displacing jobs and threatening the viability of economic centres. It is very difficult to support jobs and growth without suitable commercial property and the loss of this kind of accommodation has a knock-on effect on community amenities.

2.2 We view transport, highways, contamination and flooding risk as a very limited assessment in these circumstances because our main concerns are with the residential mix for the development proposal and how the proposal relates to the Borough housing strategy. We doubt whether there are increased contamination or flooding risks, however we shall comment on transport and the highways aspects.

3.0 Transport

3.1 This is another scheme where, whether we agree with the number of units proposed or not, the level of car parking provided does not match the number of residential units proposed. This has happened already on the gas board site adjacent Waitrose and on Millbrook Park where there is considerable parking congestion and where the under-provision of car parking spaces has been to the detriment of the development. We feel the same is happening at the NIMR site on The Ridgeway, where there is a likelihood of overspill car parking in the adjoining quiet rural lanes.

3.2 There is a considerable provision of cycle spaces and we are not convinced that there is a demand for this form of transport especially in a hilly location such as Mill Hill East and as there is poor provision for cycle ways in the borough. It is unclear how useful cycles will be, for example, it seems unlikely they will be helpful for the weekly shop at Waitrose.

3.3 The nearest underground station, Mill Hill East, is some way away and there is only a normal bus service. We are surprised that the documents claim a PTAL rating of 2 for the site, when lower down Bittacy Hill, on the Millbrook Park development the lowest PTAL is 1a. The underground is already under stress from its current usage before Millbrook Park is finished, and with no chance of increased capacity. We believe the nature of this development will put additional strain on local services.

4.0 Highways

4.1 The 'office' site at IBSA house has been virtually traffic free, as most people working there have walked to work from adjoining premises. There still remains, and not part of this application, the commercial element of the site that in the past has generated the highest degree of highway impact. It is reasonable to assume that this usage will continue in some form with additional congestion.

4.2 The entrance/exit to the site will be busier than it ever has been (see 4.1 above) and with its location just north of the new access road into Millbrook Park, and the new roundabout at the junction of Bittacy Hill with Engel Park it is in an inconvenient point of the road network to have a significantly increased impact. With the units being studio flats it is unlikely that the highway will have school traffic added, however, rush-hour traffic at each end of the day is likely to increase.

4.3 These increases will no doubt add inconvenience to residences adjacent the site and to other users of the highway and affect their amenity. Increased noise, dust, traffic fumes and pollution should all be taken into account.

4.4 There will be an increase in construction traffic as this scheme will be sandwiched between the NIMR site and Millbrook Park development. There is enormous pressure on the Conservation Area and little attempt by the Council to protect this huge environmental asset. We suggest that if this scheme is granted planning permission then a defined construction traffic route is made conditional that avoids the Conservation Area altogether.

5.0 Conclusion

We believe this proposal is a poor contribution to the housing mix of the Borough with a detrimental effect on the character of the area through increased traffic and highway activity. The scheme does nothing to provide amenity space for the new residents, and will increase pressure on social facilities. The proposal does not fit well with the Core Strategy for Barnet providing as it does only one type of accommodation – that being bedsits. We feel the remaining commercial premises will pose noise, traffic and pollution problems for the new residents. Finally it is not possible to comment on the proportion of 'affordable' versus market priced properties, as we could find no information given in the application documents on this subject.

For all the above reasons we suggest the application should be recommended for refusal by the officers to the Council.

Please be in touch if you require any further information

Yours sincerely

John Living

John Living on behalf of the MHPS Planning Group
Chair: MHPS