

Mill Hill Preservation Society founded 1949

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...making change worthwhile

Sadiq Khan (Mayor of London)

New London Plan, GLA City Hall
London Plan Team
Post Point 18
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London SE1 2AA

28th February 2018

Our Ref: JL / jl / mhps planning

Dear Mayor Sadiq Khan

The Draft New London Plan 2019-2041 Consultation

Mill Hill Preservation Society is a local Civic Group that was set up in 1949 to protect the Green Belt and local amenities in NW7 against development. We are a non-political organisation with some nine hundred members. We welcome the opportunity to comment on the draft London Plan although due its size we have not had time to study and comment on it in as greater depth as we would have liked. However we do have concerns, some echoed by local residents, and these are incorporated below.

The plan is focused on promoting high density housing in the outer London boroughs and as we represent part of Barnet we feel this is unreasonable. The proposals in the plan will change the character of the Mill Hill that we have sought to nurture and protect for many years. In fact the expected provision of new dwellings in the borough for the coming 10 years seems extreme as the figures do not take into account the existing high level of intensification that has already taken place.

Amongst the items that seemed particularly detrimental to Mill Hill residents have highlighted:

- Increasing the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary (small site development).
- Redeveloping retail and leisure parks to deliver housing intensification.
- A positive approach to the Build-to-Rent sector.
- Scrapping PTAL density ratings.
- The ability to 'swap' designated Metropolitan Open Land. (Policy G3C should be deleted.)

Residents are concerned at how these proposals will impact on the future development of Mill Hill – particularly in relation to The Broadway, Mill Hill East, the redevelopment of Pentavia Retail Park and the Neighbourhood Development Plan that is currently being written.

From the MHPS point of view we are additionally concerned by the following:

- There is a section on design of developments from Policy D1 including criteria for tall buildings in D8. This may allow tall buildings in an area of predominantly low rise. Cities (e.g. Glasgow) which went down the 'high rise' route in the past are now having these buildings taken down.
- The target for new homes is increased in the borough by 33% to 31,340 units in the period 2019/20 - 2028/29 this being 3,134 per annum. This will put more pressure on Green Belt, Metropolitan Open Land and other open spaces.

- The requirement for affordable homes has been set at a high percentage of new build. We are concerned about the definition of 'affordable' as this seems to be variable and most affordable rents are not actually affordable for the groups that need the housing.
- Densification of land use is proposed in outer London boroughs and town centres. The best use of land does not always mean higher densities. There is no longer a density matrix and several policies indicate how density should be managed. This will be problematic as developers tend to push the boundaries of desirable densities without strong guidelines.
- Excessive housing density in new development should be resisted to protect the character of London's neighbourhoods. Whilst there is some emphasis on existing local character, serious concern exists that in outer London boroughs character may be sacrificed to meet growth.
- Boroughs' Local Plans will have to be revised to implement the objectives of the Mayor's new plan for London and whilst groups such as ours will need to be engaged in that process, we have no certainty that this will be the case.

The Society wishes to comment on general development and the fact that housing targets have not been met. The proposed targets seem very challenging due to the low rate of new housing delivery in the past three years and the problems around viability assessments. It seems that enough planning permissions are being granted and that developers are not building out their approvals in a reasonable time span, probably to artificially hold the price of residences to ensure future profits. We do not see this issue being tackled in the Mayor's Plan and we think it needs to be.

On the positive side we are encouraged by the promises of Green Belt protection and the plan to increase open space and wooded areas. However, the test for this policy locally will be the schools proposal by Hasmorean at Copthall, where Green Belt is under threat from two schools. Elsewhere additional undesirable sports facilities are planned on woodland. The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Our experience is that green spaces are being whittled away by roundabouts, car parking and development. We are pleased that the draft plan recognises the importance of green spaces but adequate protection needs to be ensured, and extended to public and private gardens.

The Society are also pleased to see standards being set for dwelling sizes and storage as in our experience there have been some local applications proposing undesirably small dwellings.

Finally some crystal ball-gazing: car use in the low density outer suburbs of London will remain a reality, irrespective of improved public transport. We see in local planning approvals an increase in the number of cycle spaces at the expense of cars, and reasonable visitor parking is overlooked. We are not totally convinced of this policy. Traditionally, people have found that mobility suites their needs, and whilst the combustion engine may be a historical relic in the making, we feel that bicycles do not suffice. Conveying children, a weekly shop, golf clubs, homework marking for a teacher and so forth, are all difficult on a bike. MHPS believe that some form of mechanised conveyance – perhaps the electric car - will always be with us and, as such developments should facilitate this. Shared pedestrian/cycle paths are also a health and safety hazard, and often unsightly in open spaces.

We would hope that these points be taken into consideration and the draft plan adapted accordingly. Please be in touch if you require clarification on the points raised.

Yours sincerely

John Living

John Living AAdip CMdip RIBA
Chair - on behalf of the Mill Hill Preservation Society