

Mill Hill Preservation Society founded 1949

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...making change worthwhile

Sarah Considine

Senior Manager – Development & Projects

NIMR Public Hearing

The Planning Team (PP-18)

Greater London Authority

City Hall

The Queen's Walk

London SE1 2AA

GLA ref: D&D/3967

LPA ref: 16/4545/FUL

MHPS ref: JL/kt/16/4545/FUL/planninggroup

7th September 2017

Dear Sarah Considine,

Town & Country Planning Act 1990 (as amended): Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) ("EIA Regulations"); Town and Country planning (Mayor of London) Order 2008.

Consultation on revised documents for planning application at National Institute for Medical Research (NIMR), The Ridgeway, NW7 1AA, in the London Borough of Barnet.

Firstly we would draw your attention to our letter of consultation on the original application 16/4545/FUL dated 22nd August 2016, which was a considered view taken by the Society on the scheme. Although changes have been made our original letter stands as none of the suggested changes really addresses the points we made. In fact we feel that the proposed changes have made the scheme less attractive, and we give details supporting this statement below.

1.0 Reduction in proposed car parking from 613 spaces to 535 spaces:

1a. This subject is covered in our original letter under section 5.e – where we reference Chapter 6 of Residential Car Parking Standards, and under the section labelled Maximum Residential Parking Standards it states *"In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures"*. Overspill parking in the surrounding area is a serious concern of local residents.

1b. The site has a low PTAL rating – stated as 1b, but we have unable to ascertain the source for this. The site is served by only one bus route and the local underground and railways stations are considerable distances away. As the site is on a ridgeway, there are considerable climbs involved in all directions and in reaching other means of transport. Under these circumstances we feel the London Plan should be applied more flexibly, and not as a document set in stone.

1c. Considering the detail of the parking we think having 3 spaces allocated to the detached houses is disproportionate to the other provisions. The Society believes this should be reduced to 2 per house with the other twelve car spaces allocated to other dwellings across the site. We are concerned that the undesignated parking spaces will be reduced by spaces for electric charging vehicles and those allocated as 'disabled bays'. The on-street parking for commercial use seems low as users of the gym and the café will mostly arrive by car. It is also disappointing that the number of parking spaces to be hidden away underground is reduced, as there is a chance on this sloping site to reduce the impact of the cars on the environment.

1d. We are still surprised by the suggested allocation of cycle parking places. The charts provided by the Traffic Consultants for both the residential and commercial journeys generated show a level of bicycle journeys totally disproportionate to the provision of cycle storage proposed.

1e. As a final point we would like to comment on the underground train services at Mill Hill East. The Society has been trying to have these improved without much success. The report of the London Assembly Regeneration Committee (a copy of which we received in February 2016) stated that "At Mill Hill East in particular, the Committee found that the existing transport infrastructure will struggle to meet the needs of the growing community.... Housing development in Mill Hill as part of the Intensification Area will put further pressure on an **already inadequate service.**" Also the Northern Line connection to Finchley Central is a shuttle service, with waiting times of up to 20 minutes for connecting trains. All this reflects poorly on the PTAL rating of the site and reinforces the location of the site as 'remote'.

1f. We shall mention parking again under the repositioning of blocks.

2.0 Repositioning of proposed blocks J1, J2, J3, Ki and K2, and Reconfiguration of the internal access road.

2a. We have taken these two aspects together as they are interconnected.

2b. In our original letter 22nd August 2016 we actually liked the distribution of the these blocks (see our Clause 6.b 'Woodland Cluster'). We do not think the new arrangement is an improvement as the landscaped pedestrian/play area between the blocks has been lost now with an access road through the middle.

2b. The changes show a large parking area behind block J3 which was not on the original scheme. This parking area is going to be a considerable intrusion to the residents of Burtonhole Lane as it will generate uncontrolled noise at any time of the day or night. There was parking on the original site near this point, but it was only used during office hours so was not so intrusive. This parking area could be relocated into a less sensitive area and screened.

2c. The access point between the above car park and Burtonhole Lane is labelled for emergency use only but is not clearly explained in the documents. Local residents are very concerned that this entrance point will become an access to the car park and to the site in general at any time. This would be undesirable. We also note on the drawings that the access is to be controlled by three bollards, presumably lockable in some way. The problem we see is that the bollards will allow people to park in Burtonhole Lane, and other local lanes, and walk through to the site either to a residence or to explore the walks and greenery.

This entrance should be positively closed off to any people access. Furthermore, parking needs to be provided for people to use when visiting the site to walk and the enjoy the proposed green spaces.

2d. With the reorientation and 4-storey height of the block K2 there will be considerable overlooking in the dwellings on the other side of Burtonhole Lane. This block should be reduced to 3 storeys to match the original building in this position.

2e. There is also the issue of how the playing field is to be accessed? Will there be more car parking proposed in the Green Belt? What pavilion or changes facilities will be provided and where? Will there be floodlighting? We have asked these questions and received inappropriate answers.

3.0 Reduction in proposed tree removals and Additional Landscaping.

3a. We have taken these two aspects together as they are interconnected.

3b. MHPS would not wish to discourage either of these two aspects and welcome the additional greening of the site. Keeping of existing mature trees is especially important. It is not clear whether this planting will remove our objection expressed in our original report (22nd August 2017) Clause 9 'Construction Impact on Surrounding Area'. The issue is the view of the development from the Totteridge Valley, and it seems to us that the heights of the buildings are equally as important in this respect as the planting. Nothing has been done to reduce the impact of the buildings or make them more suitable for a scheme in the Conservation Area.

Conclusion

We believe the suggested reduction in parking provision is inappropriate and will result in unwanted overspill parking into adjoining roads and lanes. The lack of parking will also potentially inhibit the development of the commercial aspects of the development. The parking rules for an inner London site are being applied inappropriately to an out of town semi-rural site. The loss of the high quality pedestrian area between blocks J1, J2, J3, K1 and K2 is unnecessary. The new car parking arrangements adjacent to Burtonhole Lane will be 'antisocial' and the parking would be better located underground. The use of the emergency access is vague and should be people proof. The provision for people wishing to drive to, and explore, the new landscaped area is non-existent. Most importantly we are not convinced these changes will make the scheme more appropriate to the Conservation Area and fully respect the views from the Totteridge Valley. We suggest the scheme, as revised, is recommended for refusal.

Yours Sincerely

John Living

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