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Mr Carl Griffiths
Principal Planning Officer Major Projects Team
Development Management & Building Control Service
London Borough of Barnet
Barnet House
1255 High Road
LONDON
N20 0EJ

31st January 2018

Planning ref: **17/8102/FUL**

Re: Town and Country Planning Act 1990

Pentavia Retail Park, Watford Way, London NW7 2ET

Redevelopment of site including the demolition of all existing buildings and construction of 717 new Build to Rent residential units (Use Class C3) along with 745 sqm of ancillary residential facilities, 985 sqm of retail floorspace (Use Class A1), 558 sqm of food and drink uses (Use Class A3 and A4), 152 sqm of community floorspace (Use Class D1) within buildings ranging from 5 to 15 storeys, a new pedestrian access off Bunns Lane, open space, landscaping, car parking, acoustic mitigation and highway / pedestrian improvements.

Dear Mr Griffiths,

We wish to object to the above application for the following reasons:

1. The scale and mass is excessive and breaches the Barnet Plan, the London Plan and the Planning Brief for the site

The application is for 18 blocks ranging in size from 6-storeys (Block R with ground + 5 levels) to 17-storeys (Block A with lower ground, ground + 15 levels). The Pentavia site is bounded by predominantly 2-storey terraced and semi-detached family houses for which this development will be extremely overbearing. This includes some newly built properties on Bunns Lane which are not shown on some of the outdated maps and plans submitted in this application. On the Colindale side of the M1 the new builds are 3-4 storeys high as part of a plan to 'step-up' to the main Colindale development. The application describes the site as "urban" but it is suburban and should be described as such.

Barnet's Local Plan, specifically Policy CS1, seeks to consolidate growth in clearly defined areas whilst protecting and enhancing the historic suburban environment. Colindale is identified as an area for regeneration and development, the boundary for which is to the west of the M1 and main railway line and is clearly shown in map 4, p39. *Pentavia is outside this boundary*. Policy CS5, defines the requirement to respect the local context and distinctive local character. It provides clear guidance on the locations in which tall buildings (8+ storeys or 26 metres) may be appropriate. *The Pentavia site is not included in the strategic list of locations* and indeed falls a long way outside the 'Colindale Avenue Corridor of Change' (Colindale AAP, fig. 4.2, p32). The policy specifically states: "outside of these specific locations, proposals

for tall buildings will not be supported". Furthermore, the Tall Buildings Study of London Borough of Barnet (2010) states that there should be a general presumption against tall buildings or other very dense forms of development where the public transport provision is low; the Pentavia site has a low Public Transport Accessibility Level (PTAL) rating of 1b.

The London Plan specifies that tall and large buildings should generally be "limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport; should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building; related well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm; ...and enhance the skyline and image of London." (Policy DM05 para 7.7). The Pentavia site is not in an area designated for intensification and does not have good public transport links (PTAL rating is 1b). The suburban character of Mill Hill will be adversely affected by such a large-scale development which is out of proportion to other buildings in the area and which will loom large over the predominantly 2-storey terraced and semi-detached family houses in the immediate vicinity.

The Pentavia Retail Park Mill Hill, Planning Brief (December 2016), states that this site should deliver a "sustainable mixed use development... reuniting the site with the surrounding residential area of Mill Hill" (*Purpose of the Planning Brief*). It also states that there should be a maximum of 3-5 storeys.

2. Detrimental impact on local views which breaches the Barnet Plan, the London Plan and the Planning Brief for the site

Barnet's Local Plan, Core Strategy CS5, states that developments should "protect important local views from places within Barnet". The view from The Mill Field towards Harrow-on-the-Hill is one of four key view corridors in the borough and the proposed Pentavia development will fall within the foreground of this view. Paragraph 10.6.4 states that any development must be compatible with key view corridors "in terms of setting, scale and massing and we object to proposals that we consider would cause harm to them. Development will not be acceptable if it obstructs important local views or skylines."

London Plan 7.7 D states that "Tall Buildings... should not impact on local or strategic views adversely".

The Pentavia Retail Park, Mill Hill Planning Brief (September 2016) states "This site is elevated above the surrounding area, it is visible from a number of locations including Mill Hill and Watling Estate Conservation Areas, as well as a number of parks and recreation areas. For this reason, any proposed redevelopment incorporating blocks of 4 to 7 storeys is likely to be quite visible. The design must not appear overbearing on the Barnet skyline nor to adjoining residential areas". It also states: "The appearance of the development in terms of height, mass and bulk of any new buildings will require careful consideration so as not to appear excessively dominant within this low-rise landscape."

The proposed development clearly breaches the instruction to protect views laid down in the Barnet Plan, the London Plan and in the Planning Brief. The excessive bulk and height will have a severely detrimental impact on the view from The Mill Field and the Mill Hill Conservation Area, which is described in the Local Plan as an "important" view that should be protected. It will also adversely affect the views from Mill Hill Park and Sunny Hill Park. Furthermore, the proposed development will loom large over nearby residential roads such as Bunns Lane and the Watling Estate Conservation Area.

3. **Overshadowing impacts**

The height and bulk of the development will cause significant overshadowing of both the surrounding areas and within the development itself, for example the central gardens.

The *Daylight/Sunlight/Overshadowing Assessment* submitted as part of the application only shows shadows cast on 21st March (the spring equinox). In the 6 months of the year from September to March, the overshadowing will be worse and this information is conveniently omitted. Furthermore, as elsewhere in the application, this document does not show the newly built houses along Bunns Lane.

4. **The scheme offers poor quality housing provision**

This is an 'over-dense' development where the flats are very small with little storage space. The development is sandwiched between the M1 and the A1/A41 and the main railway line and hence is subject to high levels of **noise pollution** and **air pollution**. Whilst much is made in the application about "acoustic protection", the reality is that in warm weather these small flats will get stuffy and people will want to open their windows. The air pollution maps for London show the A1/A41 from Mill Hill to Apex Corner as one of the most polluted parts of London.

5. **Adverse effects on the local community in Mill Hill**

The 717 units will add in excess of an additional 2,000 residents to Mill Hill, which as a community has already significantly expanded with the Millbrook Park development, planning permission granted for NIMR site and numerous other smaller-scale developments. There has been no parallel increase in the local infrastructure, such as schools, GP surgeries and public transport provision, all of which are already struggling to cope. Mill Hill has traditionally been a settled family neighbourhood and a large 'all for rent' development with a transient population is out of keeping with the area. Indeed the Planning Brief for the site is clear that should be mixed use with retail and employment opportunities, which are needed in the local area.

6. **Transport Problems**

Local public transport is very poor as demonstrated by the site's 1b PTAL rating designated by TfL. As such, 540 parking spaces for 717 units, comprising 86 x 3-bed, 314 x 2-bed and 317 x 1-bed units, is clearly insufficient and will cause overspill parking in local roads, which will be exacerbated by the proposed new pedestrian access route to Bunns Lane. The scale of this development coupled with poor public transport will have a significant impact on traffic levels on both local roads and on the A1/A41 on which all traffic from the development will have to travel. The roundabout at Mill Hill Circus is already subject to serious congestion.

7. **Light Pollution**

The size of this development and the consequent light pollution generated will have an adverse impact on the University of London Observatory situated less than 500 metres away.

For these reasons, we ask that this application is refused and plans for a less intensive, mixed-use development are brought forward in its place.

Yours sincerely,

Kevin Green

MHPS Planning Group