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Mill Hill Preservation Society The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH

Registered Charity No. 1185939

Patron: Lady Hobson OBE JP President: Dr Michael Worms BSc PhD Hon. Architect: John Living AAdip CMdip RIBA

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For the attention of Inspectors Wildgoose and Philpott

C/O Mr I Kemp
Programme Officer
PO Box 241
Droitwich
WR9 1DW

5th September 2022

Sent only by email to [REDACTED]

Matter 10 Comments from the Mill Hill Preservation Society

Barnet Council's Draft Local Plan (Reg 19) June 2021 Plan Period 2021 to 2036

Mill Hill Preservation Society is a civic society with more than 800 members and a large following of supporters on Facebook. Our remit is to consider the postcode area of NW7 and our reading of the proposed Local Plan is in part limited to this area.

We have made comments on both the Regulation 18 and 19 consultations and would ask that those be referred to for the full comments of the Society.

This response is in respect of the MIQs raised by yourselves in respect of Matter 10.

The Society is concerned regarding sites 29, 33, 46, 47, 48, 49 and 50 of Annex 1 of the Emerging Local Plan.

Our representations to the Regulation 19 consultation deal with the specifics associated with the specific sites, but generally we are concerned that significant development is again targeted within and adjacent to the Mill Hill Conservation Area without considering the cumulative impact on the area.

Mill Hill has been subjective to extensive levels of growth in recent years that has impacted significantly on the value of the Conservation Area. One of the primary concerns has always been associated with the increased levels of traffic and displacement of car parking onto the road network as a result of under provision of parking on sites.

Whilst this is now being addressed by the Highway Authority through the introduction of excessive areas of double yellow lines, this "solution" has an impact on the aesthetic value of the area itself.



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It is considered that this cumulative impact has been largely ignored with sites being assessed individually. It is our opinion that without this assessment being undertaken, the allocation of these sites is unjustified and that reasonable alternatives have not been considered.

This is further emphasised when considering the infrastructure available to the sites. Mill Hill underground station is already under pressure and extant residential and commercial permissions not yet complete. The line is severely limited by structural inadequacies of the viaduct between Mill Hill East and Finchley Central stations. The loss of the railway car parks also dissuades people from 'park and ride' options leading to more commuting in individual cars.

The additional documentation requested by yourselves from the Local Planning Authority regarding the capacity and delivery of sites is yet to be published, accordingly we reserve our position and may wish to comment on that information once it is published.

We would draw the following to the attention of yourselves:

Site 46: IBSA House. Whilst planning permission is under consideration for the residential development of this site, it has been recently converted into the North London Studios, with significant investment being made to enable movies and television programmes to be filmed in this location. The site has always been one providing local employment.

We have not seen any information that demonstrates this site will now be delivered for housing within the Plan period. Moreover, it highlights that the employment and commercial use of the site remains a viable prospect and should have been considered as a reasonable alternative.

It is not considered that this allocation is justified or effective.

Site 49: Watch Tower House. A planning application has been submitted for 175 specialist elderly persons dwellings and 9 affordable units. The applicant asserts that the specialist units are C3, but this has been questioned.

The scale of development proposed is 40 units less than that included within the proposed allocation policy. This is of significance as strong objections have been raised to the scale of development based on impact to the character and appearance of the Conservation Area, the impact on residential amenity, the impact on protected trees and a lack of biodiversity net gain.

The applicant has also claimed that the scheme is not viable if more than 5% affordable housing is provided.



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On face value the scale of development proposed within the allocation policy has not been justified and the constraints of the site not been fully considered. It is not considered that this site allocation policy is effective.

The concerns regarding the allocation of this site are further compounded by the proposed inclusion of land that is to be retained as having a Green Belt 'feel'. It seems counter intuitive to include land that is proposed to be retained in its current form thus no longer having the benefit of Green Belt protection.

We do welcome the proposed main modification (MM372) that now proposes that development be limited to areas of the existing built form and not extending into green space. This does however bring with it further challenges, as the area of existing built form is constrained by protected trees.

It is considered that the site is not deliverable in the manner suggested by the Local Planning Authority.

We welcome the opportunity to comment further on the additional evidence produced by the Local Planning Authority.

Yours sincerely

John Living

John Living Honorary Architect
On behalf of Mill Hill Preservation Society