

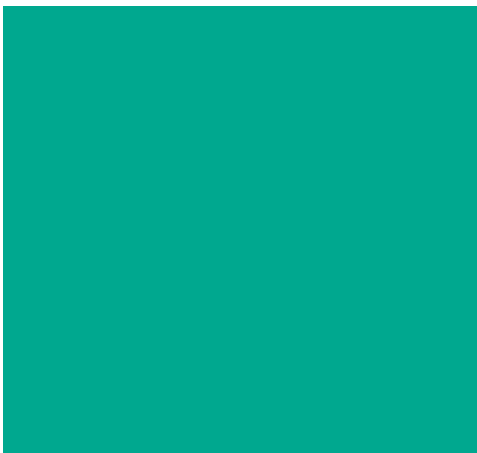
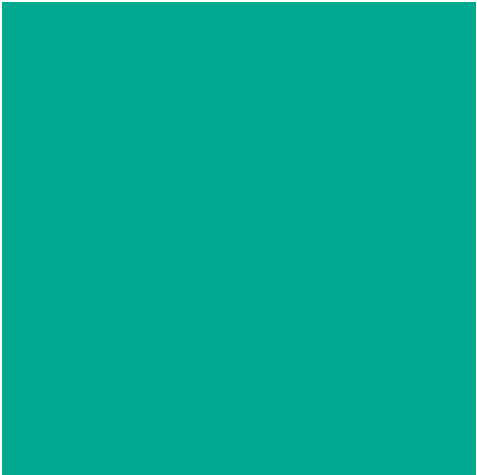
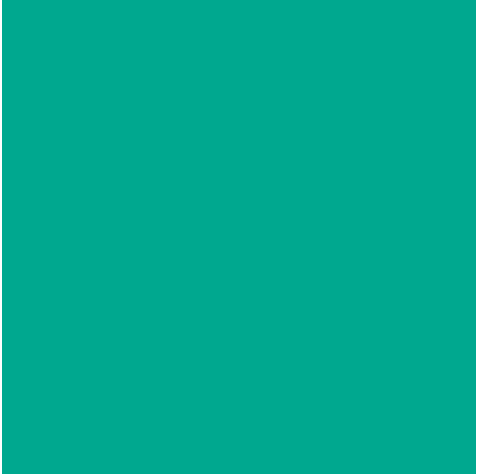


BARNET LOCAL PLAN MATTER 10 STATEMENT

For: Mr and Mrs Donald
Oakfield House,
Burtonhole Lane
Mill Hill

Project Ref: LF/hbg/21052_MS

Date: September 2022



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Matter 10 – Site Allocations

Issue:

Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

Questions:

The following questions link to the request in the Inspectors letter of 18 May 2022 for further work to be completed by no later than 23 August 2022, including the production of a technical paper relating specifically to the sites in strategic policies (Policies BSS01 and GSS01 to GSS13) and the proposed allocation of sites listed in Annex 1 of the Plan. The Council is requested to draw upon and cross refer to that evidence as appropriate when addressing the following questions. For sites where specific representations have been made, the Council is also requested to respond to the particular issues raised. In doing this any updated information regarding site capacities, planning permissions, sites under construction and existing uses should be included.

- 1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?*
- 2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?*
- 3) Are the site allocation boundaries justified?*
- 4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?*
- 5) What is the expected timescale for development in terms of lead in times and annual delivery rates, and are these assumptions realistic and supported by evidence?*
- 6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?*
- 7) Are the proposed allocations and the associated development requirements and principles identified in Annex 1 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?*
- 8) Are any further modifications required to ensure that the relevant policies for each site and/or their development requirements identified in Annex 1 are accurate and sound?*

Introduction

This statement has been prepared on behalf of the owners of Oakfield House, Burtonhole Lane, Mill Hill in relation to the forthcoming Hearing Sessions for the London Borough of Barnet Local Plan Examination.

This Statement has been produced in advance of the Council's additional evidence being published. We understand that this has been sent to the Examining Inspectors, but has not as yet been released for publication.



Mill Hill History

Mill Hill started its life in the 15th Century as a rural part of Hendon, but by the 18th Century, estates comprising large houses were being formed, attracting staff for the houses and estate workers to the area. Many of these houses exist today, however, many were lost to housing and commercial development, a trend that continues today.

By the late 60's Mill Hill had developed into an outer London Suburb typical of others in the London fringes. However, through the introduction of Green Belt policy and the work of the Mill Hill Preservation Society, Mill Hill still benefits from the retention of large properties in green space, which is still in agricultural or institutional use. The feeling of green is what makes Mill Hill desirable and forms an integral part of its character.

With the closure of many of the institutions within the area, this character and history is being eroded as the sites are lost to dense residential development.

To date, Mill Hill has seen the following extent of development:

- Inglis Barracks. Closed in 2007.

Outline planning permission was approved in September 2011 for:

"the comprehensive redevelopment of the site for residential led mixed use development involving the demolition of all existing buildings (excluding the former officers mess) and ground re-profiling works, to provide 2,174 dwellings, a primary school, GP Surgery, 1,100sqm of 'High Street' (A1/2/3/4/5) uses, 3,470sqm of employment (B1) uses, a district energy centre (Sui Generis) and associated open space, means of access, car parking and infrastructure (with all matters reserved other than access). Full application for the change of use of former officers' mess to residential (C3) and health (D1) uses."

Reserved Matters have been submitted on a phased basis and is still under-construction.

As a result of increased densities across the site, a further full planning permission was granted for an additional 82 residential units and 615sqm of employment space.

Total 2,256 dwellings

- National Institute for Medical Research.

Full planning permission approved in December 2017 for:

"Redevelopment of the site to provide 460 new residential units following demolition of all existing buildings. New residential accommodation to consist of 448 self-contained flats within 19 blocks ranging from three to nine storeys with basement car parking levels and 12 two storey houses with lower ground floor levels. Associated car and cycle parking spaces to be provided. Provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Reconfiguration of the site access and internal road arrangements and provision of new publicly accessible outdoor amenity space. New associated refuse and recycling arrangements"

A further full planning permission was granted in November 2020 for:

"the construction of 5 buildings of between 5 - 8 storeys in height, with associated basement, comprising up to 189 residential units and provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Associated car and cycle parking, refuse storage and amenity space"

An additional application was then granted in June 2021 for:

"Alterations to the basement, lower ground, upper ground and first floor of the existing Block A Building to provide 16 new residential units, a gym, and a cafe, including associated alterations to landscaping and car parking"

Total 665 dwellings

- IBSA House.

Application for full planning permission pending consideration for:

" Demolition of existing printworks/factory buildings and redevelopment of the site (to provide a total of 197 residential units) including conversion of the existing IBSA House office building into 61 flats with associated external alterations. Erection of 5 no. new blocks ranging from 3 to 6 storeys in height to provide 136 flats. Provision of private amenity space, communal rooftop terraces, refuse storage, 344 cycle parking spaces and basement and surface level parking for 197 cars. Single storey extension to the existing gate house to provide management/security office. Associated alterations to landscaping and ancillary work"

Total 197 dwellings

In addition to the above, smaller schemes amounting to some 57 dwellings have been approved. This draft Local Plan seeks to add a further circa 470 dwellings to this total.

In addition to the residential development, the commercial development also generates an impact. Planning permission has been granted for a B8 storage and distribution depot for Amazon. The scale of this development alone, (with the potential for in excess of 300 additional traffic movements in the AM peak period) on the edge of Mill Hill (Pentavia Retail Park) will have a huge impact on the road network in and around Mill Hill, which their own Transport Assessment shows is operating at capacity.

IBSA House has been granted permission for its demolition and erection of 197 dwellings and the conversion of a retained building into 61 flats.

At present this permission is unlikely to be implemented as the site has been converted into the London North Studios which is a movie recording studio, generating its own level of traffic.

Matter 1: Response

- 1. Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**

As set out in our response to the Regulation 19 consultation, the Strategic Transport Assessment (EB_T_03) is based on out of date information and hasn't been updated to reflect revisions to the emerging Local Plan, particularly in respect of the change in numbers proposed within site allocations.

The document, whilst referencing the TfL model suite MoTiON, continues to use out of date modelling. Between this and the continual reference to Covid it provides the excuse for justifying lower traffic forecasts than modelling tends to demonstrate.

Mill Hill is a Conservation Area that has experienced significant growth in recent years that has directly impacted on the value of this Heritage Asset. The 2008 Conservation Area appraisal identifies an increase in on-street parking as having a negative impact on the area. Since this assessment was undertaken extensive development has occurred and ...

Most of the sites proposed for allocation within this Emerging Plan are located in or adjacent to the Conservation Area, with vehicles accessing the sites through the Conservation Area. The sites are located in PTAL 1a areas.

The level of assessment that has been undertaken to date to justify the level of growth sought within and adjacent to this Conservation Area has not been sufficiently detailed to demonstrate that the Conservation Area's value will not be further eroded by additional development within and adjacent to it.

Watch Tower House and Kingdom Hall (Site No. 49), whilst categorized as previously developed land, are currently within the Green Belt. The site is constrained by a Tree Preservation Order. The allocation proposes a development of 224 dwellings on a small proportion of the overall site. A current application for a 175 units of specialist older person housing and 9 affordable dwellings is currently proposed (application reference: 22/0649/FUL) on the parts of the site identified within the site allocation (not the Main Mods at Exam 4).

This is a scale of development that is less than envisaged within the criteria for Site No. 49 and has received a significant amount of objections, not just from local residents but also statutory consultees. Issues pertaining to impact on the Conservation Area and Protected Trees are among them.

What this scheme highlights is that the quantum of development for Site No. 49 is ill informed when having regard to the sites constraints when a development for 40 units less than proposed in the allocation is struggling.

The proposed modification set out in Exam4 MM372 exacerbates this position. Whereas the existing wording rationalises the percentage of land that can be used for development, the proposed modification limits this further to areas of existing buildings only. This results in even less of the overall site being developable, therefore placing even greater pressure on the areas of existing buildings which are those affected by the Tree Preservation Order.

The scale of development on Site No. 49 has not been properly considered when having regard to the site's constraints, such that it is unlikely the quantum of development envisaged is deliverable.

2. Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?

The pending application for Site No. 49 (application reference 22/0679/FUL) is only proposing the inclusion of 9 affordable dwellings. Whilst the 175 specialist older persons (according to the applicant) are C3 dwellings, the applicant has submitted a viability assessment stating that the site is unviable unless the affordable housing provision is reduced to no more than the proposed 9 units which equates to 5%.

Clearly with rising build costs and difficulties in sourcing materials that is leading to extended lead in times to start on site, this viability position is only going to be exacerbated.

3. Are the site allocation boundaries justified?

Development on the now redundant buildings within Site No. 49 is entirely understandable and, with appropriate assessments to justify and quantify the level of development that is achievable, is entirely reasonable.

The proposed allocation as it is currently written anticipates 80% of the site to be retained as undeveloped Green Belt. This runs contrary to the proposed allocation boundary that sees the entire site being removed from the Green Belt.

If there is an intent for more than three quarters of the site to remain as Green Belt, then surely the proposed allocation boundary could reflect this position as opposed to placing it as a policy criterion.

The proposed modification in MM372 seeks to preserve all undeveloped areas of land within the site. There appears to be no logic to the undeveloped areas being excluded from the Green Belt.

The proposed allocation boundary is considered to be unjustified when considering the allocation intent.

4. Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?

There appears to be no analysis regarding site capacity, having regard to site constraints. In respect of Site 49, the net developable area is clearly linked to the existing footprint of development that currently exists on site. It is the density of development and the resultant quantum that causes the most concern and lacks any foundation.

As mentioned earlier in this statement, the pending application for Site 49 is testament to this assertion. There is a lesser degree of development proposed and there are significant and, in my opinion, founded concerns regarding impact on trees, neighbour amenity and the Conservation Area.

5. What is the expected timescale for development in terms of lead in times and annual delivery rates, and are these assumptions realistic and supported by evidence?

We have no comments on this question.

6. Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

We have no comments on this question.

7. Are the proposed allocations and the associated development requirements and principles identified in Annex 1 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?

Site 49 is not in a sustainable location when considering the PTAL rating, however, it is, in part, a previously developed site upon which re-development should be encouraged.

However, the inclusion of all land, including that to be retained with a Green Belt feel, is not justified or necessary and undermines the principles of retaining Green Belt land.

The extent of development proposed on Site 49 is also deemed questionable. There is no justification for the quantum proposed to be accommodated and, in light of the viability concerns regarding the pending application for the site, a more

realistic and deliverable quantum of development is required. If the scale of development is rationalised to have regard to the sites constraints, there are concerns that the site is not deliverable.

It is not therefore considered that the proposed allocation of Site 49 and its associated requirements within Annex 1 are either justified or deliverable.

8. Are any further modifications required to ensure that the relevant policies for each site and/or their development requirements identified in Annex 1 are accurate and sound?

The policy/site requirements for Site 49 need to be amended to reflect a more appropriate quantum of development that reflects the sites constraints.

If a lesser quantum of development cannot be shown to be a viable prospect then the site should be removed from the emerging Local Plan or consideration given to an alternative use for the site other than residential.

The proposed boundary of the allocation needs to be amended to remove the green space proposed to be retained as open space. This will avoid future speculative development proposals as the land would no longer be protected by Green Belt policy constraints.

Conclusions

There is a distinct lack of evidence to justify the effective allocation of Site 49 in the manner proposed. The quantum of development is too great when having regard to the site's constraints, with viability questions then being raised if the quantum is reduced.

The site should be either removed or alternative uses proposed.

The proposed site boundary is excessive and lacks any justification, especially with the intent to retain the undeveloped land as open. There is no requirement for this additional land to be included within the proposed allocation.

At the time of writing, the Local Planning Authority's additional information has not been made publicly available. We reserve the right to comment on that additional evidence when it is made available.