

Ref.		Section	Comments	Council's Response
1	English Heritage	General comment	<p>The Regulations require English Heritage, as a statutory agency, be consulted on Neighbourhood Plan where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As English Heritage's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.</p> <p>The area covered by the proposed Neighbourhood Plan includes a number of important designated heritage assets including the Mill Hill Conservation Area, for which we note the Council produced a detailed <i>Character Appraisal Statement</i> in 2008, and over 50 listed buildings/structures.</p> <p>While the area incorporates numerous heritage assets, the proposed boundary does not raise significant issues for English Heritage. We do not therefore wish to comment in great detail at this stage. We can however offer the following advice and observations:</p> <p>English Heritage is keen to encourage the opportunity to review the local evidence base and promote policies for the positive management of heritage assets as part of the Neighbourhood Planning Process. In developing a robust evidence base, upon which to develop policies which sustain and enhance the positive elements of local character, and their settings, we would encourage the Neighbourhood Forum to identify those areas of which require updating or further analysis.</p>	<p>We welcome these comments from English Heritage.</p> <p>The advice on developing the local evidence base with regard to heritage assets and producing policy for positively managing such assets will be forwarded to the MHNP Forum.</p>

			<p>We would also suggest consulting the Greater London Archaeological Advisory Service, Heritage Environment Record as a primary resource for the identification of heritage assets glher@english-heritage.org.uk. The HER should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. It may also be useful to involve local voluntary groups such as local Civic Societies or local historic groups in the production of the Neighbourhood Plan.</p> <p>Further guidance on techniques for identifying and managing character and heritage assets are available on English Heritage's website which includes links to the following publications: Good Practice Guide for Local Listing; Understanding Place: An Introduction; and Streets for All. These documents can be viewed at: http://www.englishheritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/</p> <p>In the event of agreement to the designate the proposed boundary and Neighbourhood Forum, we would be happy to comment further on the developing plan.</p>	
2	Environment Agency	General comment	<p>We are a statutory consultee in the SEA process and aim to reduce flood risk and protect and enhance the water environment. We have no objection to the formation of a Neighbourhood Forum. However, based on our review of the draft plan, we think there are environmental constraints that should be acknowledged and addressed within the</p>	<p>We welcome these comments from the Environment Agency.</p> <p>The advice on managing flood risk and water quality and involvement in the development of any Strategic Environment Assessment / Sustainability</p>

		<p>plan. We have identified that the neighbourhood plan is affected by the following environmental constraints:</p> <p>Flood risk The area covered by the Neighbourhood Plan includes land that falls within flood zones 2 and 3. Development should be directed away from these areas. All development should comply with the requirements of the National Planning Policy Framework (NPPF), the Planning Practice Guide and the London Plan: Policy 5.13.</p> <p>Main rivers The following watercourses (designated as ‘main rivers’) run adjacent to or through the Mill Hill Neighbourhood Plan area.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dollis Brook <input type="checkbox"/> Folly Brook <input type="checkbox"/> Hendon Cemetery Drain <input type="checkbox"/> Oakhampton Road Drain <p>These watercourses are currently failing to reach good ecological status/potential under the Water Framework Directive (WFD) for reasons including, but not limited to; heavy modification and poor ecological and biological status.</p> <p>Developments within or adjacent to a watercourse should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. An assessment of the potential impacts of the neighbourhood plan local watercourses under WFD should be included within any SEA/SA appraisal.</p>	<p>Appraisal of the Neighbourhood Plan will be forwarded to the MHNP Forum.</p>
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3	Highways Agency	General comment	<p>Further to your email regarding the Mill Hill Neighbourhood Plan Applications, the Highways Agency confirms that we have no comment.</p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p>	<p>We welcome these comments from the Highways Agency.</p> <p>Clarification on the responsibilities of the Highways Agency will be forwarded to the MHNP Forum.</p>
4	Transport for London	General comment	<p>TfL has no objection to the establishment of the Neighbourhood Area and Forum in this area promoted by the Mill Hill Forum. TfL does however, have a number of assets and operations within the area including Mill Hill East Underground station, operating bus services, bus stops and stands and roads including the A41 and A1 that</p>	<p>We welcome these comments from Transport for London and look forward to the publication of their neighbourhood planning protocol</p> <p>Clarification on the responsibilities of Transport for London and the development of the</p>

		<p>form part of the Transport for London Road Network (TLRN).</p> <p>The Neighbourhood Planning (General) Regulations 2012 state that consultation will occur through all stages of the neighbourhood planning process with 'people who live, work or carry on business in the area'. Given its very nature, as a transport operator, employer and owner of land, assets and infrastructure across London, TfL would request consultation throughout the neighbourhood planning process.</p> <p>TfL has an interest in facilitating the neighbourhood planning process and to ensure that any local transport aspirations are achievable and compliant with the London Plan and the Mayor's Transport Strategy. In addition this provides an opportunity for TfL to ensure investment is targeted appropriately in relation to neighbourhood plans and that infrastructure which is fundamental to transport operations can be protected to ensure service reliability. TfL is also a landowner and developer.</p> <p>With that in mind, TfL is in the process of developing a protocol to govern its involvement in the neighbourhood planning process and liaison with London Boroughs and neighbourhood forums.</p> <p>TfL therefore encourages the organisation to contact us should their plans or proposals impact on TfL's assets or operations through the development of their plan in order to assist in the development of policies. Information on TfL's assets operations and proposals can be shared</p>	<p>neighbourhood planning protocol will be forwarded to the MHNP Forum.</p>
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5	Natural England	General comment	<p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. http://www.naturalengland.org.uk/publications/nca/default.aspx</p> <p>Protected species You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.</p> <p>Natural England Standing Advice Local Wildlife Sites You should consider whether your plan or proposal has any impacts on local wildlife sites, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) or whether opportunities exist for enhancing such sites. If it appears there could be negative impacts then you should ensure you have sufficient information to fully understand the nature of the impacts of the proposal on the</p>	<p>We welcome these comments from Natural England. Clarification on the responsibilities of Natural England and advice on developing a local evidence base will be forwarded to the MHNP Forum.</p>

		<p>local wildlife site.</p> <p>Best Most Versatile Agricultural Land</p> <p>Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Para 112 of the NPPF states that:</p> <p><i>‘Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality’.</i></p> <p>General mapped information on soil types is available as ‘Soilscapes’ on the www.magic.gov.uk and also from the Landis website; http://www.landis.org.uk/index.cfm which contains more information about obtaining soil data.</p> <p>Opportunities for enhancing the natural environment</p> <p>Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.</p> <p>Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the</p>	
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6	IBSA (International Bible Students Association)	General comment	<p>We wish to commend the applications on a number of points:</p> <ul style="list-style-type: none"> - The proposed Neighbourhood Area has been justified soundly in relation to its ward coverage, where the principal users of Mill Hill Broadway reside, and its local recognition. - The Neighbourhood Forum Committee composition appears sound in terms of its diversity, membership location and relevant expertise. - The application for Neighbourhood Area status demonstrates a strategic awareness of both existing and future development opportunities in the designated area. <p>Whilst reviewing the supporting documentation we have noted that permissible developments within Major Developed Sites in the Green Belt are to be addressed in the Neighbourhood Plan. Watch Tower House is one of the sites mentioned, so it follows that we will take particular interest in this document as it progresses through the consultation stages.</p> <p>As you may be aware, the future use of Watch Tower House, IBSA House and other IBSA owned property is as</p>	<p>We welcome these comments from IBSA.</p> <p>The Council welcomes IBSAs positive comments with regard to working with the Neighbourhood Forum in terms of realising its aspirations for its sites in Mill Hill.</p> <p>The Council will produce a Site Allocations document as part of the Local Plan. This is an opportunity for addressing strategic sites such as Watch Tower House in the Green Belt within the policy framework of the Local Plan Core Strategy. We look forward to IBSA submitting their sites as part of our initial 'call for sites' exercise.</p>

			<p>yet undetermined, as relocation opportunities are being actively pursued. You may have inferred such, bearing in mind past consultations with IBSA regarding the former Inglis Barracks development area. Discussions were eventually curtailed as the full extent of IBSA requirements could not be realised within the already approved outline application for development of the site.</p> <p>With this relocation requirement in mind, major change is highly likely in the current use patterns of IBSA property, and in particular Watch Tower House and IBSA House. When this is aligned with the potential vacation of the National Institute for Medical Research site by 2016, it is clear that future planning policy documents will likely need to accord alternative uses to these sites.</p>	
7	The Inglis Consortium	Area application	<p>The Inglis Consortium (the IC) is the principal landowner and, alongside the phase developers, is responsible for the delivery of the masterplanning of the Millbrook Park site.</p> <p>The Inglis Consortium recognises that consideration has been had to the Millbrook Park site and the Mill Hill East Area Action Plan (AAP) that guided the original outline consent, and continues to guide the delivery of the site as the phases come forward. We note the specific reference made to this within the application and that it is not the Neighbourhood Forum's intention to amend the AAP. However, the IC would request that the Neighbourhood Forum reconsider the current boundary as defined by Appendix 1 to exclude the Millbrook Park site for the reasons set out below.</p>	<p>Officers consider that the relationship between the Local Plan with AAPs as well as Neighbourhood Plans is made very clear in Barnet's Core Strategy. The Mill Hill East AAP forms an important strategic component of the delivery of Barnet's Local Plan as well as the London Plan. This clear strategic context will help avoid complications between the Neighbourhood Plan and the Mill Hill East AAP. In addition there are good planning reasons in terms of promoting strong and cohesive communities for integrating the new populations arising within Millbrook Park with the wider area of Mill Hill. Officers therefore do not consider there is a detrimental impact from inclusion of the AAP area</p>

		<p>The purpose of defining a neighbourhood area is to establish a foundation for the preparation of a Neighbourhood Plan for that area. Once formally adopted, the Neighbourhood Plan will become a statutory plan for that designated area. The preparation of a Neighbourhood Plan must be in accordance with national policies and the Borough's Local Plan.</p> <p>The Millbrook Park site has already been through a similar process following the adoption of the Mill Hill East Area Action Plan. The Mill Hill East AAP forms part of an up to date Local Plan and is site specific to Millbrook Park. The addition of a Neighbourhood Plan to cover the area would result in complications as there would be two area specific plans covering the same area. It would not be possible for Neighbourhood Plan policies to differ from the AAP. If proposed Neighbourhood Plan policies were to conflict with the Local Plan, the Neighbourhood Plan would be rendered unsound. Therefore, a Neighbourhood Plan covering Millbrook Park could only repeat policy already identified within the AAP for this area. Accordingly, there is no need for a Neighbourhood Plan to cover the Millbrook Park site. Although the IC requests that it is not included within the Mill Hill Neighbourhood Area designation, as a key stakeholder and landowner, it would like to express its support as a 'neighbour' to the area designation and emerging Neighbourhood Plan.</p> <p>We trust that this representation is helpful and will be taken into consideration in the progression of the Neighbourhood Area designation and Plan. The IC is happy to meet with the Mill Hill Neighbourhood Forum to discuss this</p>	<p>within the proposed Neighbourhood Area.</p>
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