

# **London Borough of Barnet**

National Institute for Medical Research Planning Brief

Consultation Report

March 2016

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### Summary of Consultation Activity

Consultation on the National Institute of Medical Research Planning Brief took place over a period of 6 weeks extending from 7<sup>th</sup> January until February 17<sup>th</sup> 2016. Consultation involved letters that were e-mailed to stakeholders on the Local Plan consultation database as well as posted to residents living next to the NIMR. A Public Notice was published in the Barnet Press to publicise the consultation. Officers attended the Mill Hill Neighbourhood Forum in January to publicise the consultation. Further publicity included a drop-in session at Mill Hill Library on 4<sup>th</sup> February.

Responses were received from local residents and statutory stakeholders including Historic England, Highways for England, Natural England and the Environment Agency. Local groups including the Mill Hill Preservation Society, Herts and Middlesex Wildlife Trust and the Hendon and District Archaeological Society submitted comments on the Brief. A response was also received from Barratt London, the prospective developer of the site.

Below is a summary of the issues raised, with a full set of summarised comments, alongside the Council's response to each, and what action was taken to amend the Planning Brief to address the issue raised in the response included at Appendix A of this report.

## **Main issues raised & what changes we are making.**

### **Impact on/ Development appropriate to the Green Belt Location/ Scale of development**

There was concern locally that any development on the site should have a beneficial effect on the setting and outlook to the Green Belt. This was a mixed response, with notable support for the development's impact. Concern was expressed that the new development could be overbearing. Overall it seemed the Planning Brief had struck the right tone in this regard.

### **Construction Traffic/ Traffic**

There was particular concern with the potential impact of construction traffic on the Ridgeway, amid reports that developments in the area such as Millbrook Park had caused problems. It is noted that a certain amount of construction traffic is inevitable with any development, but that the effects can be managed by appropriate use of a Construction Management Plan, which will be required alongside a planning application.

### **Retention of existing buildings/ Conservation assets nearby**

There is generally support for the "Main Building" within the NIMR campus. There was concern from the potential developer that this building may be beyond repair/conversion may not be possible due to the nature of the building. The Council is clear that if the building is to be removed, it will expect a faithful replica to be rebuilt. A new building that differs from the original, but maintains the same height will not be acceptable.

### **Developer Response**

In addition to expressing concern about the potential to retain the Main Building on the campus, developers consider that the development does not need to expressly identify "very special circumstances" as it can be demonstrated through the Planning Brief, and subsequent application that the redevelopment will have a beneficial effect on the openness of the Green Belt setting.

The Council agrees this position, but feel that there needs to be a rigorous set of criteria that the development needs to be assessed against in order for it to fulfil this.

## Appendix A: Representations and Council Responses

### Impact on/ Development appropriate to the Green Belt

#### Location/ Scale of development

Respondent	Summary of Response	Council Reply	Action
Local Resident	The Area north of the existing security fence should be kept as rough open ground to maintain the rural feel of the area.	This accords with the Planning Brief.	No change necessary.
Local Resident	It is good that you only intend to develop the two front clusters and not the Valley cluster. I take it that this will be demolished and returned to open space.	This accords with the Planning Brief.	No change necessary.
Local Resident	<p>How will this development affect the abundance of trees and hedgerows which are so important to this Greenbelt /Conservation Area? What will be the impact on our privacy and quality of life as residents, living directly opposite the current MRCT facility?</p> <p>We are very worried that this Greenbelt / Conservation site will be compromised, and our quality of life detrimentally affected by the impact of such a large scale development happening right on our doorstep.</p>	<p>It is the aim of the Planning Brief to secure a use on the site which is compatible with the aims of both the Conservation Area, and the Green Belt.</p> <p>Both the London Plan and Barnet's Local Plan are clear that any development either adjacent to or within either of these designations would need to be developed in an appropriate manner.</p> <p>The Planning Brief provides significant guidance with regard to the areas of the site which should be retained as open space. The Brief has sought to keep as much of the site as open/ rural space as possible ensuring that its sensitive setting is not compromised whilst securing a viable outcome for the site.</p>	No change necessary.
Drop in	Seeking no dormer windows larger than	This is a detailed matter which relates to any future	No change

Session Comment 6	existing.	planning application However it is clearly stated in the Planning Brief that any replacement of the “Main Building” on the NIMR site will not be larger than the original.	necessary.
Local Resident	Concerned that high elevation buildings would not be in keeping with the character of surrounding buildings.	Agreed, it is considered that this is already covered in the Planning Brief.	No change necessary.

### Construction Traffic/ Traffic

Respondent	Summary of Response	Council Reply	Action
Mill Hill Preservation Society	Concern over lack of a schedule of delivery, and concern over potential long build out period.	This is a detailed matter which would accompany any future planning application	No change necessary.
Drop in Session Comment 2	Concerns highlighted about the impacts of construction traffic on the amenity of nearby residents.	Construction impacts should be managed and mitigated through a construction statement to accompany any future planning application.	No change necessary.
Drop in Session Comment 3	Concern that the Millbrook Park Construction Management Plan is not being adhered to.	These comments have been passed to officers responsible for the Millbrook Park development.	No change necessary.
Local Resident	Wish for the developer to ensure the Ridgeway is left in pristine condition once development completes.	The Council will seek that the impact of construction is mitigated and the number of construction trips are minimised through a Transport Plan and Construction Management Plan. Maintenance of roads is the responsibility of the Council therefore any damage to surfaces will be addressed by Highways.	No change necessary.
Local Resident	My concern about this is largely the effect on traffic on the Ridgeway which has already increased to levels where the road -which used to be quiet and without incident, is now constantly busy. Often schools traffic parked in the area from Mill Hill School past the Adam and	Changing the use on the site entails that the types of trips to and from it will change. However it is not considered that there will be a significant change in the number of trips generated in the end-use of the development.	No change necessary.

	<p>Eve pub cause chaos from approximately 2.45 until 5 pm on weekdays. The road becomes impassable - especially when larger vehicles are trying to get through, The only way is for cars to mount the pavement! The new developments on the old Army site have already made this even worse despite reassurances from the council that this would NOT happen and these proposals would be a disaster for anyone living in the area, particularly those along the side roads such as Burtonhole Lane. I understand that many residents favour some sort of community arts hub, or business use, which I support PROVIDED that there is ample parking. If there is not sufficient provision for this, it will just clog the road up on a constant basis. Suggesting that people would use public transport instead is unrealistic. The buses using that road already cause more problems trying to pass than anything else does! Parents will always park near schools to pick up young children.</p>	<p>A Transport Assessment will be required to accompany any future planning application.</p> <p>The Council will apply its Local Plan residential parking standards to this development. These are highlighted at para 4.31. Parking standards for non residential uses will be applied in line with the London Plan</p>	
Local Resident	<p>We are very worried about the impact of increased traffic, vehicle access, noise &amp; pollution on our semi rural environment, in particular along Burtonhole Lane.</p>	<p>A Transport Assessment will be required to accompany any future planning application.</p> <p>Mitigation of noise impacts through design, layout and insulation will be expected where appropriate</p>	<p>No change necessary.</p>

## Retention of existing buildings

Respondent	Summary of Response	Council Reply	Action
Local Resident	Will the façade of the present building be preserved?	If the existing building cannot be retained our preferred approach would be to rebuild the Main Building as set out in paras 3.33 and 3.34 of the Planning Brief	See revised text at paras 3.33 and 3.34
Local Resident	I am pleased to see that you intend to retain the Main Building as this is a great local landmark.	Please see response above	See revised text at paras 3.33 and 3.34
Mill Hill Preservation Society	<b>Clause 3.27</b> Support retention of the Main Building	Please see response above	See revised text at paras 3.33 and 3.34
Mill Hill Preservation Society	Clause 3.28 Disagree that the Collaborate Centre at 1-3 Burtonhole Lane has architectural merit, and would prefer demolition to increase flexibility on the site.	Objection noted. It is considered that this issue is subjective, and that debate around the matter is welcomed at the planning application stage. The statement in the Planning Brief is not considered to be overly prescriptive.	No change necessary.



## Developer Response

Respondent	Summary of Response	Council Reply	Action
Barratt London	<p>Paragraphs 3.5 to 3.9 of the draft Brief aim to highlight key Green Belt policy tests and guiding principles that should be addressed through the redevelopment and reuse of the Site.</p> <p>Paragraph 3.8 (c) is misleading and does not accurately reflect paragraph 89 of the NPPF by stating that “if Very Special Circumstances do not exist, the scheme is likely to be refused planning permission.”</p> <p>Paragraph 89 of the NPPF states that a local planning authority should regard the construction of new buildings in the Green Belt as inappropriate, unless it accords with certain exceptions.</p> <p>The 6th exception identified under Paragraph 89, is:  ‘Limited infill or partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continued use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’</p> <p>Development which falls within this category is considered to be ‘appropriate.’ Where development is considered ‘appropriate’, Very Special Circumstances (VSC) are not required.</p> <p>The Brief proposes a framework for the complete redevelopment of the Site, which is a previously developed site. If the redevelopment does not have a greater impact on the openness of the Green Belt and the purpose of including land within it will be considered appropriate against Paragraph 89 and VSC will not be required.</p>	Agreed that the site fulfils the criteria of the 6 <sup>th</sup> exception of the NPPF para 89.	See revised text at para 3.8
Barratt London	<p>Paragraph 89 sets out two potential options for redevelopment of brownfield land in the Green Belt:</p> <p>The development accords with para. 89 by not having a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Therefore the development is considered appropriate and VSC are not required.</p> <p>The scheme does not accord with para. 89 by having a greater impact on</p>	The Council has changed para 3.8 with regard to Very Special Circumstances and revised para 3.10	See revised text at para 3.10

Respondent	Summary of Response	Council Reply	Action
	<p>the openness of the Green Belt and the purpose of including land within it than the existing development. Therefore the development is considered to be inappropriate and VSC are required.</p> <p>We are very concerned that the Brief as drafted does not explicitly allow for the first option, and only refers to option B. To address this, we suggest that the following amendments (insertions highlighted green and deletions red) to paragraph 3.8c of the Brief to bring it in line with the NPPF:</p> <p>“The NPPF defines inappropriate development. This is development which is, by definition, harmful to the Green Belt [<del>and should not be approved except in very special circumstances. The NPPF states that the construction of new buildings in the Green Belt is inappropriate, unless it accords with certain exceptions, in which case the development is considered to be appropriate.]</del> <i>Very Special Circumstances, therefore, must exist to enable development within the Green Belt. Harm to the Green Belt is, therefore, the priority key material consideration in determining any planning application for this site. If Very Special Circumstances do not exist, the scheme is likely to be refused planning permission. The NPPF addresses the issue of appropriate development in the Green Belt in Paragraph 89 which inter alia, defines as an exception to inappropriate development.</i> Paragraph 89 sets out a number of exceptions to inappropriate development as, which includes:</p> <p><i>‘Limited infill or partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continued use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’</i></p> <p><i>[If the scheme therefore demonstrates that the redevelopment of the site will not have a greater impact on the openness and the purpose of the Green Belt than the existing development, in accordance with Paragraph 89</i></p>		

Respondent	Summary of Response	Council Reply	Action
	<p>of the NPPF, very special circumstances will not be required.]</p> <p>[The development principles described in the Brief take account of the need to protect openness, and to respect the objectives of the Green Belt.] <del>This Brief addresses this point. The proposals the Council is setting out make use of a brownfield site and in such a way that it does not have a greater impact on the Green Belt.</del> It does this in two ways:</p> <p>By restricting all new development to the [Ridgeway cluster and Burtonhole Lane cluster] <del>southern part of the site</del> (see Figure [7]), it clears the northern section of all existing buildings (although the retention and conversion of one building for a visitors centre may be allowable). This enhances the openness of the Green Belt.</p> <p>It enables the site to be designed, re-sculptured and enhanced by fresh landscaping and in a setting which promotes openness, permeability and a mix of uses complementary to its setting and the Green Belt.”</p>		
Barratt London	<p>To ensure consistency, we also consider that para 3.9 of the draft brief should be amended as follows:</p> <p>“Any future proposal will need to demonstrate that the location and scale of new buildings will not have a greater impact on the openness of the Green Belt. <del>[If it does, very special circumstances will need to be demonstrated.]”</del></p> <p>A further paragraph should be inserted after para 3.9 to set out the potential factors, that either in isolation or in combination, could amount to demonstration of VSC if required. We suggest that the following paragraph is included:</p> <p><i>“If it is identified that Very Special Circumstances are required, the following factors, either in isolation of combination could be considered:</i></p> <p><i>Improvements in access to high quality open space;</i>  <i>Increased opportunities for sport and recreation;</i></p>	<p>The measures set out at para 3.12 are considered appropriate to test the suitability of the scheme in terms of ensuring the positive management of the Green Belt.</p> <p>The Council sees no merits in proposing a new test for very special circumstances along the lines proposed.</p>	No change.

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	<p><i>Landscape and biodiversity benefits;</i>  <i>Socio-economic Benefits;</i>  <i>Securing the future economic redevelopment of the site, which will be vacant and contains buildings that are not suitable for conversion or re-use;</i>  <i>Removal of unsightly features and buildings that detract from the Mill Hill Conservation Area and the Green Belt”</i></p>		
Barratt London	<p>Given the housing shortage in London and the acknowledgement that a lack of housing is the number one threat to the London economy, the delivery of a significant number of high quality homes on the Site should also be given significant weight.</p> <p>The direction of travel in planning policy is to make the best possible use of Brownfield land that is suitable for housing, including land within the Green Belt. The current consultation on the proposed changes to the NPPF (December 2015) includes an amendment to alter Paragraph 89. The consultation draft sets out that development on Brownfield land in the Green Belt, which contributes towards the delivery of Starter Homes may be considered appropriate development where any harm to openness is “not substantial.” This amendment would provide greater flexibility for the redevelopment of Brownfield land in the Green Belt in comparison to existing policy.</p> <p>We request that the consultation draft of the NPPF and subsequent potential changes are acknowledged within the Brief.</p>	<p>The council considers that making changes based on a draft update to the NPPF is not appropriate.</p> <p>This proposal to amend para 89 of the NPPF and diminish the impact on openness as a key material consideration causes the Council serious concern.</p> <p>To create a blanket change relating to Green Belt policy in favour of a specific class and type of housing ie Starter Homes will not support sustainable development objectives.</p>	No change.
Barratt London	<p>Paragraph 1.9 of the draft Brief sets out that one of the opportunities for the Site is the retention and re-use of the Main Building, in whole or part. Barratt has undertaken a design competition for redevelopment of the building, which the Council, the GLA and local interest groups participated</p>	<p>If the existing building cannot be retained our preferred approach is to rebuild the Main Building</p>	See revised text at paras 1.9


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	<p>in, including the Mill Hill Neighbourhood forum. De Metz Forbes Knight architects were successful and are now working in collaboration with Hawkins Brown architects to design the redevelopment of the Site. The preferred scheme which emerged from the competition consisted of the retention of the central element of the building, and the demolition and rebuilding of the four wings. This scheme was selected as it would reduce the bulk of the building and allow for enhanced openness and views into the countryside from the Ridgeway.</p>	<p>as set out in para 3.34 of the Planning Brief</p>	<p>and 3.34</p>
<p>Barratt London</p>	<p>Based on the outcome of the design competition, Barratt has undertaken detailed analysis of the structural condition of the building and a detailed assessment of the works required to convert the building. This analysis has indicated that the layout and structure of the building does not lend itself to be easily adapted for residential and commercial uses.</p> <p>With specific regard to the preferred scheme from the design competition, demolition of the four wings and conversion of the central element would require significant structural alterations. The structure and layout of the existing building would impact severely on the quality of the residential and commercial space that can be created, with some apartments being unable to meet certain minimum design standards.</p> <p>The required works would ultimately result in a large proportion of the central element of the building needing to be re-built, and would consequently have a significant impact on the fabric and appearance of the building.</p> <p>The key issues are summarised below (please see the enclosed document by dMFK for further information):</p> <ul style="list-style-type: none"> <li>•To facilitate the removal of the wings and other alterations to brickwork, over 50% of the facade of the central part of the building would be new brickwork. Architecturally, it is problematic to match the new brickwork with the old, and this would therefore result in an incoherent composition or an unacceptable brick match.</li> <li>•The existing brickwork of the building is of poor quality with many spalled</li> </ul>	<p>The Council considers that the issues raised here are too detailed for inclusion in the Planning Brief, and instead should be used in the preparation/ decision of a planning application.</p> <p>Our preferred approach is set out at para 3.34</p>	<p>See revised text at paras 1.9 and 3.34</p>

Respondent	Summary of Response	Council Reply	Action
	<p>bricks, detached brick slips, and poor quality pointing.</p> <ul style="list-style-type: none"> <li>•The oxidised green copper roof is a key design feature of the building. However, the material is at the end of its design life, and any refurbishment scheme would require the complete replacement of the existing roof.</li> <li>•The west chimney needs to be re built to include cavity trays.</li> <li>•Whilst Floor to Ceiling Heights are generous to the lower floors, the 4th and mezzanine (5th) floors do not meet minimum standards and are of insufficient height to accommodate residential space, with the 5th floors at less than 2m under the existing, unlined beams. The existing mezzanine floor cannot be altered as it braces the main facade.</li> <li>•The current arrangement of the floor levels does not allow for dropped ceilings which will be required for residential and commercial accommodation. Dropped ceilings to service apartments and create insulation and soundproofing will result in unsightly bulkheads above all new windows in the facade.</li> <li>•Existing floor slabs are cast deep into the brickwork facades, creating a thermal cold bridge problem. This can be solved by completely overcladding the building, however this would significantly alter the appearance of the existing building.</li> <li>•Existing floors are not structured to deal with B1 office live loads. The existing floor construction is beam and pot construction, which performs badly for acoustic separation.</li> <li>•The building is not framed and the brick façade is load bearing. The facades are constructed using solid loadbearing masonry and are up to 900mm thick. They require substantial internally fixed additional structure to strengthen them to withstand disproportionate collapse. This would impact on the layout and structure of the building.</li> <li>•The existing cores are poorly located and, if reused, result in unworkably shallow units at the ends on each level.</li> <li>•The re-positioning of the cores requires complex temporary support, and</li> </ul>		

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	<p>results in an unsatisfactory arrangement of internal columns, to the detriment of the quality of the residential units.</p> <ul style="list-style-type: none"> <li>•Existing centrally located columns impact negatively on the quality of the residential units.</li> <li>•Significant cost in connecting new basements to new cores</li> <li>•The lower ground floor slab would need to be re cast as the existing slab is only 100mm thick.</li> <li>•The formation of a lightwell around lower ground floor to obtain beneficial use of accommodation requires significant retaining structure and framing for relatively low quality space.</li> </ul>		
Barratt London	<p>Tavernor Consultancy has undertaken an assessment of the building's heritage significance. The assessment states that the building holds some historic and architectural interest, but most of its significance is derived from the building's use as a research institute, which will be much reduced when the Medical Research Institute vacate the site. The building is not nationally or locally listed.</p> <p>The Brief should support the rebuilding of the central part of the building in a similar form and scale to the existing building. This would deliver a number of benefits:</p> <ul style="list-style-type: none"> <li>• The replacement building would be of better design quality, and could incorporate key elements of the design of the existing building including: <ul style="list-style-type: none"> <li>o The profile and appearance of the roof;</li> <li>o The form of the building; and</li> <li>o Architectural detailing.</li> </ul> </li> <li>• It would have the capacity to gently address poor architectural features which contribute to the negative effect of the building on the Conservation area, and replace with elements that will enhance the character of the area.</li> <li>• It would maintain its contribution towards the Conservation Area as a focal point and landmark building forming part of an important view across</li> </ul>	<p>If the existing building cannot be retained our preferred approach is to rebuild the Main Building as set out in para 3.34 of the Planning Brief .</p> <p>Para. 3.34 has been revised to highlight the Brief's expectations with regard to any replacement building in the event of the removal of the Main Building</p>	See revised text at paras 1.9 and 3.34

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	<p>the valleys into the Conservation Area from Totteridge Common and Totteridge Lane;</p> <ul style="list-style-type: none"> <li>• It would deliver better quality homes, meeting all space standards, and better quality employment space;</li> <li>• It would deliver a more energy efficient building; and</li> <li>• It would improve the viability of the scheme, which could enable wider benefits to be delivered.</li> </ul>		
Barratt London	<p>We request that the Brief is amended to allow for the Main Building to be rebuilt. To allow for this scenario, we request that the following amendments are made to the Brief:</p> <p>Para. 1.9 Bullet 10 –  <i>“To improve, retain <del>and</del> re-use [or re-build] the distinctive Main Building, in whole or part. <del>This would have a positive impact on its appearance through the removal of unsightly additions;</del>”</i></p> <p>Para. 3.27 –  <i>“Any development should preserve or enhance the character <del>and</del>[or] appearance of the Mill Hill Conservation Area as a designated heritage asset. Although the Mill Hill Conservation Character Appraisal states that the Main Building ‘due to its appropriate height, scale and prominent siting fails to enhance the character of the area’ it is the Council’s desire to retain [or re-build] the Main Building in part or in whole.”</i></p> <p>Para. 3.28 –  <i>“In the event of the removal of the Main Building, <del>it is unlikely that a replacement building of the same scale would be considered acceptable its rebuilding in a manner which retains the scale, massing and positive features of the building would be acceptable.]”</del></i></p>	<p>These revisions are largely agreed.</p> <p>Para. 3.34 has been revised to highlight the Brief’s expectations with regard to any replacement building in the event of the removal of the Main Building</p>	<p>See revised text at paras 1.9, 3.33 and 3.34</p>
Barratt London	<p>Paragraph 3.5 of the Brief states that new built development will be restricted to the Ridgeway Cluster and the Burtonhole Lane Cluster only – the extent of both clusters is shown on Figure 7.</p> <p>We request that both the Ridgeway cluster and the Burtonhole Lane cluster are amended in accordance with the enclosed plan (please see enclosed).</p>	<p>The Council considers that the Clusters shown in the Brief are indicative. This is made clear in para 5.5. The text has been revised</p>	<p>See revised text at Fig 7 and para 5.4</p>



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	<p>This will bring the northern boundary of the Ridgeway cluster broadly in line with the rear of the building line of residential properties along St. Vincent's Lane. The amended clusters ensure that new development will be focused to the south of the site, with the northern section being cleared of existing buildings to deliver significant benefits to the openness of the Green Belt.</p> 	<p>at para 5.4 and at Figure 7 to clarify their indicative nature.</p>	
<p>Barratt London</p>	<p>We also request that a degree of flexibility is provided at Paragraph 5.4 to allow for potential of new development to be located outside of the Ridgeway and Burtonhole Lane clusters, if for any reason this is required and subject to it being robustly justified in accordance with NPPF policy, which is summarised earlier in these representations. The proposed amended wording is set out below:  <i>“New built development <del>will</del> [should] be restricted to the [indicative] Ridgeway Cluster, including the associated car parks, and the [indicative] Burtonhole Lane Cluster only as shown on Figure 7. It is unlikely that <del>no</del> development, [other than] save for ancillary facilities for the playing pitches</i></p>	<p>There is flexibility within the Brief. As highlighted above the indicative nature of the clusters is made clear at paras 5.4 and 5.5 as well as Figure 7. However the message on zoning of development is an essential component of the Brief.</p>	<p>No change.</p>

Respondent	Summary of Response	Council Reply	Action
	<i>and a possible visitors centre for the Totteridge Valley (as part of a new regional park, as promoted in the London Plan) will be acceptable outside of these two areas.”</i>		
Barratt London	Paragraph 3.19 states that the Council expects the development to seek to provide at least 2,000 sq. m of employment space for B1 (a) and B1 (b) uses, subject to the findings of a supporting Employment Study. Barratt consider 2,000 sq. m represents an appropriate viable amount of employment space that could be supported on the Site, given its location and the demands for businesses seeking to expand or relocate within Barnet. The employment space will help support innovation and growth through provision of workspace for small to medium enterprises, the entirety of which we consider can be accommodated in the Main Building.	We note these positive comments and highlight that the Brief expects at least 2,000m2	No change.
Barratt London	Paragraph 1.9 - The development <del>that takes</del> [should seek to take] advantage of the topography and the landscaping so that, with the exception of the Main Building, development nestles within the existing and enhanced landscaping	Agreed.	See revised text at para 1.9
Barratt London	Paragraphs 1.3 and 2.8 - The MRC will commence the decant of the Site in 2016 but the Site will not be vacant until Summer 2017. Please amend paragraph 1.3 and 2.8 for accuracy.	Agreed.	See revised text at paras 1.3 and 2.8
Barratt London	Paragraphs 3.9 - The NPPF does not define openness or the criteria against which it will be tested. Case law has established that it can be assessed taking into account a balance of factors. Barratt support the measures set out in paragraph 3.9 but request that the following is also included as this is an important factor in assessing the openness of a site: <i>“Existing and proposed managed publically accessible open space.”</i>	The existing list of considerations at para 3.12 includes an assessment of public accessibility	No change.
Barratt London	Paragraphs 1.8, 3.22 and 3.27 – please amend the relevant sections of these paragraphs to state - preserve [or] enhance the character [or] appearance of the Mill Hill Conservation Area in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.	Our view is that development should preserve or enhance character and appearance	No change.

Respondent	Summary of Response	Council Reply	Action
Barratt London	<p>Paragraph 4.4 – It will be necessary to build up certain parts of the site to achieve the appropriate levels. We request the wording of para 4.4 is amended as follows to provide flexibility for this:</p> <p><i>“New development may require parts of the site to be relevelled. This should [primarily] be done by cutting into the slopes, [but it may also be necessary to build up certain parts of the site]”.</i></p>	<p>of the Conservation Area.</p> <p>Agreed in part. There is some ambiguity in what is meant by “to build up”. Primarily can be added.</p>	<p>See revised text at para 4.4</p>

## Other Issues

Respondent	Summary of Response	Council Reply	Action
Drop in Session Comment 4	Concern over the issue of drainage on the sports field. Concern over potential contamination of local water supply from drainage methods.	A planning application of this size will be required to be accompanied by a Flood Risk Assessment, and a contamination report.	No change.
Drop in Session Comment 5	Opposition to use of local school as landfill for construction waste.	This is outside the scope of the Planning Brief.	No change.
Drop in Session Comment 7	Existing biodiversity, there are slow worms and snails.	A biodiversity study will need to be carried out as part of any future planning application.	No change.
Mill Hill Preservation Society	Clause 3.20 We would have liked an accommodation schedule to be provided	This is a detailed matter which should accompany any future planning application.	No change.
Drop in Session Comment 1	This is a country area, and the Ridgeway is becoming congested.	It is acknowledged that by changing the use on the site, that the types of trips entering and egressing the will change. It is not considered that there will be a significant change in the number of trips generated in the end-use of the development however.	No change
Mill Hill Preservation Society	Clause 3.19 We are surprised that no A1 uses have been included	This site is outside of a Town Centre. The Council will therefore not seek to promote retail at this location, to preserve the vitality of existing centres.	No change
Mill Hill Preservation Society	We believe that Clauses 4.15 & 4.16 should come after Clause 4.13 as they relate to the southern site boundary fronting The Ridgeway. The current Clause 4.14 concerning the eastern boundary should come before Clause 4.17	Agreed.	See revised order of paras 4.13 to 4.16

Mill Hill Preservation Society	Support inclusion of public art recognising the historical achievements at the site.	We welcome this support	No change.
Natural England	Natural England does not consider that this Consultation on draft Planning Briefs North London Business Park poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Noted	No change.
Highways Agency	No comments.	Noted	No change.
Herts and Middx Wildlife Trust	<p>The plans must take appropriate account of the existing ecological value of the site. The development proposals must demonstrate how they will conserve and enhance biodiversity, in accordance with NPPF. This will entail ecological survey of the site and the specification of any avoidance, mitigation, compensation or enhancement measures required to achieve net biodiversity gain. The survey should be consistent with BS 42020 'Biodiversity code of practice for planning and development'. It should show; what is there, how it will be affected by the development proposals and how any adverse impacts can be avoided, mitigated or compensated in order to achieve net ecological gains. Ongoing management proposals to achieve net gain should be described, including the funding arrangements required to maintain ecological gains in perpetuity.</p> <p>NPPF also states that 'opportunities to</p>	<p>Noted, the purpose of a Planning Framework is to establish the principals a development must be in accordance with in order to gain planning consent.</p> <p>It is considered that the Planning Brief sets this out in sections 3.33-3.35.</p>	No change.

	<p>incorporate biodiversity in and around developments should be encouraged'. Bird and bat boxes are a useful way of achieving this. It is important that such features are positioned in the correct areas, i.e. next to productive feeding and commuting routes, orientated correctly for the species concerned i.e. bat tubes south facing birds north, as high as possible on the building, and most importantly integrated into the fabric of the building e.g. Habibat bat boxes. Free standing boxes are less effective and prone to vandalism or theft.</p> <p>Given the semi rural location of the site, planting schemes should mimic natural vegetation communities in order to maximise ecological gains. Therefore tree planting, meadow creation or waterside planting should be consistent with the most appropriate National Vegetation Classification community for the area and soil type.</p> <p>Lighting within and around development should respect the ecological functionality of nocturnal movement corridors. Certain species of invertebrate and mammal are highly sensitive to inappropriate lighting. Surveys should determine where these movement corridors are and put forward measures that demonstrate how these will be protected and enhanced.</p>		
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Local Resident	Overall I think the planning brief is good.	Support is noted.	No change.
Local Resident	Affordable housing is very important in the area and it would be good to include this on site and not allow the developer to build it elsewhere.	Affordable housing will be required on all new residential development.	No change.
Local Resident	The workspace units should be restricted in size for start-ups and maybe something along the lines of Barnet's own Tech Park	The Council will support a wide range of uses within the commercial element of the development.	No change.
Local Resident	With regard to the access from Burton Hole Lane I would have thought that traffic could move within the site if there was an internal road between the 2 clusters.	It is not the intention of the development to direct traffic through the site.	No change.
Local Resident	Don't think shops are a good idea as there are plenty at Kelly's Corner but a cafe and or restaurant is	Noted, there will only be limited ancillary retail use.	No change.
Glartique Ltd	As a local micro business (currently working from home in Bunns Lane) there are no adequate affordable artist studio space in NW7. NIMR is an ideal space to develop a creative hub in north london. There many places in central and east london but none in the outer areas of North London that are accessible and affordable. This space would be a great addition to the local area, as a tech and creative hub for micro and small businesses.	Support is noted.	No change.
Local Resident	An affordable NW7 creative hub with artist studios and micro and small creatives businesses would be the best use for this site. There are loads of these in East London, but nothing like that in NW7. This would help to retain the "villagey" feel of Mill Hill. The more	It is considered that flexible B1(a)/B1(b) commercial space will fulfil this purpose adequately.	No change.

	that little matchbox flats are crammed into this area, the less of its original character is retained. Also, it is all very well housing more people, but they need somewhere to work. If people can work locally, that is much greener for the environment because they do not need to use fuel travelling into central London.		
Local Resident	I understand that many residents favour some sort of community arts hub, or business use, which I support PROVIDED that there is ample parking.	It is considered that flexible B1(a)/B1(b) commercial space will fulfil this purpose adequately. Parking standards will be applied in accordance with the adopted Local Plan policy.	No change.
Hendon and District Archaeological Society (HADAS)	The draft brief deals satisfactorily with matters relating to the built heritage (especially the NMRC building itself, whose importance is well recognised) and conservation aspects of the site, but fails to mention archaeology. Although not in an Area of Special Archaeological Significance the site borders Area 16 delineated in the map at Appendix 1 to the Development Management Policies document of Barnet's Local Plan, published in September 2012 and is close to Area 1b. Tara Fidler's 2007 report to the Council on Areas of Archaeological Significance states, referring to Area 16 that An Acheulian hand-axe (Neolithic), a barbed and tanged arrowhead (Bronze-age) and baked clay and wattle building material of possible Iron Age date have been found in the area. The recent discovery of prehistoric remains on the site of the old Inglis Barracks indicates the potential.	Noted. Information will be included, with Historic England to advise on the specific undertakings upon submission of a planning application.	Add contextual information at para 3.29.



	<p>Possible Roman road 167 is said to follow The Ridgeway through Mill Hill. There may have been a Saxon settlement near Mill Hill Village, an arrowhead, knife (9th or 10thC) and axe being found here. Settlement developed in the 17th and 18thC with the construction of large houses along the Ridgeway. The planning brief should draw attention to all this, and indicate that any proposals which involve significant excavation, whether or not for building, should take into account the possibility that archaeology, whether artefacts or evidence of earlier landscape use, will be encountered and should be studied appropriately. It will be for Historic England to advise on whether any specific archaeological condition should be imposed on any planning application made in pursuance of any planning brief.</p>		
Local Resident	<p>Since this is a conservation area on green belt land, the land should not be appropriate for a dramatic change of use. It is currently offices with a small amount of private residential use. The land also has some sports and recreational for the private use of the offices and residential owners only. There is currently no A1 small retail or A3 restaurants &amp; the sports and recreation within the property are for not available for public use. Changing this land to public leisure &amp; entertainment use, will increase traffic, noise &amp; the potential for further planning. Once small retail, restaurants, sports</p>	<p>It is considered, that once the site is vacated, that a new use needs to be found. Evidence suggests that the continuation of the use by a different occupier is not likely, meaning a change of use of the site is required. In the context of significant housing need in London, leaving the floorspace vacant is not considered practical.</p> <p>The Council is satisfied that the replacement of some of the jobs on the site, alongside new residential, with a</p>	No change.

	<p>and leisure activities become a destination for the public, there is no reason why further expansion of the retail &amp; leisure activities may not be considered for a larger retail park in the future. How are the planners proposing that this represents conserving the land for private office &amp; residential use only? What do the planners consider are the principles of conservation of the use of the land?</p>	<p>returning of some of the site to the green belt represents an appropriate use of the land.</p>	
Environment Agency	<p>A small part of the south of the site sits on Secondary A Aquifer and within Source Protection Zone II and we would therefore like to provide the following comments and recommendations.</p> <p>The proposed development site appears to have been the subject of past industrial activity which poses a high risk of pollution to controlled waters. We are however unable to provide detailed site-specific advice relating to land contamination issues at this site and recommend that you consult with your Environmental Health / Environmental Protection Department for further advice. Where necessary we would advise that you seek appropriate planning conditions to manage both the risks to human health and controlled waters from contamination at the site. This approach is supported by Paragraph 109 of the National Planning Policy Framework.</p>	<p>Noted. These will be undertaken when an application comes in.</p>	<p>Identify the potential actions in the Planning Brief at para 4.20</p>
Environment Agency	<p>We recommend that developers should:</p> <ol style="list-style-type: none"> <li>1. Follow the risk management framework</li> </ol>	<p>Noted. These will be undertaken when an application comes in, but can be flagged</p>	<p>Identify the potential actions</p>

	<p>provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.</p> <p>2. 2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.</p> <p>3. 3. Refer to the contaminated land pages on GOV.UK for more information.</p>	up in the Planning Brief	in the Planning Brief at para 4.21
Historic England	<p>While the NIMR site does not lie within an Archaeological Priority Area as currently defined, its Northern area does contain extensive undeveloped land with significant potential for new discoveries. GLAAS therefore recommends that any major application is supported by an archaeological desk-based assessment and, if extensive earthmoving is proposed on previous undeveloped land, field evaluation. The Southern built-up area has historical interest related to its wartime and medical research uses. GLAAS recommends historic building assessment and recording of significant structures prior to conversion or demolition. Research should be supported by documentary and oral history which together could inform locally distinctive place-making for the new development.</p>	Noted.	Identify the potential actions in the Planning Brief at para 3.29.
Historic England	<p>We note that you have highlighted the Mill Hill Conservation Area in relation to the site at the</p>	Noted.	Identify the potential actions

	<p>National Institute Medical Research, and the Grade II listed lodge building that is in close proximity to the Copthall site. In addition to these two heritage assets we would encourage you to make reference to the potential for impacts on the setting of other listed buildings in close proximity to the National Institute Medical Research site. These include the Banqueting House in the grounds of St Vincent's Convent, St Vincent's Convent (part called 'Littleberries'), Chapel adjacent to St Vincent's Convent and Burtonhole Farmhouse (all Grade II listed). This is because when planning applications are submitted on these sites you will need to consider the impact on the setting of listed buildings, as set out in the 1990 Planning (Listed Building and Conservation Areas) Act</p>		<p>in the Planning Brief at para 3.29</p>
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