

**London Borough of Barnet**

Pentavia Planning Brief

Consultation Report

December 2016

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## **Summary of Consultation Activity**

Consultation of the draft Pentavia Planning Brief took place over a period of 6 weeks from 8<sup>th</sup> September until 20<sup>th</sup> October 2016. The consultation procedure included emails being sent to stakeholders on the Local Plan consultation database as well as letters posted to residents living in proximity of the Pentavia Retail Park. A Public Notice was published in the Barnet Press to publicise the public consultation and the draft Planning Brief was published on the Council's website. The public consultation event was a drop-in session at Hartley Hall on 5<sup>th</sup> October 2016. This was attended by representatives from the Planning Service who engaged with residents and answered questions. A comments board was set up to allow residents to express their views of the Brief. The consultation responses received during this event are detailed in Appendix A of this report.

There were 30 responses received through the postal/email consultation. They were received from statutory stakeholders including TfL, Historic England and Environment Agency together with the Mill Hill Neighbourhood Forum, Mill Hill Preservation Society, the landowner and local residents. Of these responses, 9 supported the comments made by the Mill Hill Neighbourhood Forum. These consultation responses are detailed in Appendix B of this report.

Below is a summary of the main issues raised, with a full set of comments, alongside the Council's response to each representation. Any actions to revise the Planning Brief in order to address responses are highlighted.

### **Main issues raised**

Impact on traffic

Pollution and noise

Affordable Housing

Impact on local services

Mass of the building and impact on character

Other appropriate uses

## **APPENDIX A: RESPONSES FROM PUBLIC CONSULTATION EVENT**

<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
Access for emergency vehicles, A1 gridlock, impact on Bunns Lane	The Council will need to ensure that any proposal will have satisfactory and efficient means of access. This will be appraised at the application stage.	No change necessary.
Rivington Close – high impact	Rivington Close is to the west of the Pentavia site, in para 2.9 of the Brief which states that <i>'the residential areas to the west of the site consist of two storey houses'</i> . Further consideration is given to the impacts on these residential units in the Constraints, Urban Form and Building Heights and Bulk sections of the Brief.	No change necessary.
How many cars will be on site – will this have a detrimental impact?	The Brief does not aim to not restrict development and therefore does not specify a maximum or minimum number of vehicles that will be on site as a result of the future redevelopment of the site. Para 7.18 specifies that residential parking provision must be in line with Local Plan policy DM17.	No change necessary.
Ground stability	The Environment Agency have identified that the site is located on a historic landfill site and appears to be subject to a past activity which poses a high risk of pollution to controlled waters. Issues relating to ground stability and contamination will be considered at the application stage and further investigation is therefore merited.	Add to end of para 4.11. <i>'The Environment Agency have identified that the site is located on a historic landfill site and appears to be subject to past activity which poses a high risk of pollution to controlled waters. Issues relating to ground stability and contamination will be considered at the application stage. Further investigation is therefore merited'</i> .
Former retail park not successful	The Planning Brief acknowledges that the existing retail park is <i>'outmoded'</i> and its out of centre location is not supported by national policy .	No change necessary.
Tall buildings – visual impact	The role of the Planning Brief is to act as a guide for future developers. This includes setting out the site's constraints and opportunities for development. As stated in para 6.14 of the Brief	In order to clarify the approach to building heights the following text will be added to para 6.14 <i>'Any application will need to</i>

	<p><i>'Any development proposals for Pentavia should demonstrate successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors'. Para 7.7 goes on to state that application designs must not appear overbearing on Barnet's skyline nor to adjoining residential areas. It is considered that this is sufficient analysis of the building height issue in this Brief. Of course any application will need to provide visualisations of the proposed scheme to allow planning officers to assess the impact of the proposal on the skyline and local character, as well as overshadowing drawings to show the extent of overshadowing caused by a future development.</i></p>	<p><i>include view visualisations to show the impact of the proposal on the skyline and local character. These views should be agreed with the Council in advance of submitting the application. In addition, overshadowing drawings will also need to be provided to show the extent of overshadowing'.</i></p>
What does cycle link mean?	<p>Cycle links refer to new dedicated cycle lanes between the site and adjoining areas to allow cyclists to travel separated from vehicular traffic.</p>	<p>No change necessary.</p>
Impact on views from Grahame Park Way	<p>Applications will need to provide visualisations of the proposed scheme to allow planning officers to assess the impact of the proposal on the skyline and local character. Para 7.7 states that any designs must not appear overbearing either on Barnet's skyline or to adjoining residential areas.</p>	<p>The following text will be added to para 6.14 <i>'Any application will need to include view visualisations to show the impact of the proposal on the skyline and local character. These views should be agreed with the Council in advance of submitting the application. In addition, overshadowing drawings will also need to be provided to show the extent of overshadowing'.</i></p>
Pollution levels should be tested on site	<p>This is addressed in the Brief, para 4.11 states <i>'Detailed mapping of particulates across the site will be required due to its constrained nature between transport corridors. Furthermore, an on-site assessment will be required to identify if more permanent measuring systems and controls to limit health risks are required in order to ensure proposed uses support improvement of health and wellbeing as envisioned within the Council's Health and Wellbeing Strategy'.</i></p>	<p>No change necessary.</p>
Young people	<p>This Planning Brief is directly related to the Pentavia Retail Park site</p>	<p>No change necessary.</p>

accommodation in a better environment may be ok – students	and is assessing the types of uses that would be appropriate in this location.	
Less than 8 storeys	The role of the Planning Brief is to act as a guide for future developers as to the kind of development which is considered acceptable to the Council. This includes laying out the site constraints and outline opportunities for development. As stated in para 6.14 of the Brief <i>‘Any development proposals for Pentavia should demonstrate successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors’</i> . It is considered that this text provides sufficient analysis of the building height issue in this Brief. Of course any application will need to provide visualisations of the proposed scheme to allow planning officers to assess the impact of the proposal on the skyline and local character.	In order to clarify the approach to building heights the following text will be added to 6.14 <i>‘Any application will need to include view visualisations to show the impact of the proposal on the skyline and local character. These views should be agreed with the Council in advance of submitting the application. In addition, overshadowing drawings will also need to be provided to show the extent of overshadowing’</i> .
Relationship with Churchill Place	This is addressed in para 6.16 of the Brief which states that the proximity of the site to low rise residential areas of Bunns Lane entails that the height of any new build should not have a detrimental impact on these neighbouring properties in terms of overbearing and overshadowing.	No change necessary.
Cars	There will be changes in the patterns of vehicular movement resulting from the redevelopment of the site. This is addressed in para 7.15 of the Brief which highlights that a full Transport Assessment will be required to examine the impact of the proposed development and how such impacts will be mitigated. This will enable the Council to properly assess the impact of new vehicular movements.	No change necessary.
Levels	Paras 4.3-4.4 of the Brief address issues relating to level changes around the site. The Brief states that <i>‘These level changes may have an impact on any new development achievable within the site, which will need to be addressed with any redevelopment proposal especially in terms of privacy and overlooking.’</i>	No change necessary.

Community uses needed	The objectives for the Pentavia site as listed in para 1.2 include new and ancillary community space that serves the needs of Colindale and Mill Hill.	No change necessary.
Steep levels	This is acknowledged in para 5.8 of the Brief which states <i>'There appears to be significant level changes between the site and Grahame Park Way. This requires further investigation. It is, however, anticipated that this area of low rise residential housing may be affected by any future development on the Pentavia site. Again careful consideration will need to be given to building height and mass as well as set back distances at this boundary'</i> .	No change necessary.
Loss of existing retail use	The retail park use of this site has been identified in the Brief as <i>'outmoded'</i> and such out of town retail parks are no longer supported by national and local planning policy due to the detrimental impact they can have on local town centres (see para 3.20 – 3.25). However, the Brief objectives do identify the need for non-destination retail on this site.	No change necessary.
Will access work with levels?	It is understood that this could be an issue for any application for this site. In response to this comment, additional text has been added to the Planning Brief.	Add to para 7.14 <i>'Any proposed access will have to work with the level changes between Bunns Lane and the site and will need to be off an appropriate gradient.'</i>
3 or 4 storeys is high enough	The role of the Planning Brief is not to restrict development, but to act as a guide for future development. This includes laying out the site constraints and outline opportunities for development. As stated in para 6.14 of the Brief <i>'Any development proposals for Pentavia should demonstrate successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors'</i> . Para 7.7 goes on to state that application designs must not appear overbearing on Barnet's skyline not to adjoining residential areas.	No change necessary.
Flats do not make for good communities	The Planning Brief does not specify that flatted development should happen on this site. Any proposal will need to demonstrate that it	No change necessary.

	provides the necessary facilities to allow for new communities to be created e.g. mix of uses, good accessibility and legibility, new public space.	
Ambulance and fire access	Any application will be expected to provide ambulance and fire engine access to the site. These accesses will be reviewed as part of the application appraisal process.	No change necessary.
No block type development	The role of the Brief is not to restrict development and para 7.6 states that as the site is separated from other adjoining residential areas by major transport infrastructure, there is the opportunity to construct a distinctive built form that utilises modern building techniques to mitigate constraints and deliver an efficient and flexible form of development of the site. Any future developments will be assessed in terms of its impact on the skyline and adjoining residential areas and conservation areas.	No change necessary.
Tall buildings	Building height will be a key consideration in appraising any applications as per para 7.7 which states that future designs must not appear overbearing on Barnet's skyline nor to adjoining residential areas.	No change necessary.
Site safety and security	Site safety is a key issue. In response to this comment text relating to this issue will be added to the Brief.	Addition to para 6.19 <i>'Site safety is a key consideration and any future proposal should be designed in line with secured by design principles'</i> .
Over development	How development manifest itself and whether this constitutes overdevelopment will be considered at the application stage. However, key contributors to over development namely building heights, mass and density have been addressed in the Brief.	No change necessary.
Design and density are key issues	Para 6.15 of the Brief states <i>'Density should have regard to Table 3.2 of the London Plan, which guides density in terms of the surrounding character of the area, and access to public transport'</i> . This is considered to represent sufficient consideration of this issue.	No change necessary.
Will an appropriate level of	Para 6.2 states that future applications will be supported on the basis	No change necessary.

affordable housing be provided	that they ' <i>contribute to the maximum reasonable amount of affordable housing in line with Local Plan and London Plan policies</i> '. This is considered to clearly outline the Council's approach to affordable housing.	
Facilities for teenagers needed in Mill Hill	The objectives for the Brief include community uses and new amenity space.	No change necessary.
New residential uses will have a positive impact on Mill Hill Broadway economy.	The Council agrees with this consultation response.	No change necessary.
Overcrowding in new flats	The planning system has little control over occupancy of new residential units. An appropriate dwelling mix will be required in accordance with local plan policy.	No change necessary.
Buses full 211/113, northern line capacity	Para 9.3 outlines 'that contributions may be sought for ' <i>improvements to public transport infrastructure, systems and services</i> '. The extent of these will be considered at the application stage.	No change necessary.
Need leisure facilities in Mill Hill i.e. cinema – mainly an evening and weekend impact	The Council's preferred approach is to support such uses in town centres where they contribute to vitality and viability.	No change necessary.

## **APPENDIX B: WRITTEN CONSULTATION RESPONSES**

### **Impact on traffic**

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Transport for London</b>	<b>Para 1.1</b> TfL supports the overall purpose of the Brief	The Council welcomes this support.	No change necessary.
<b>Transport for London</b>	<b>Para 1.2</b> TfL supports the proposal to improve pedestrian and cycle links.	The Council welcomes this support.	No change necessary.

<p><b>Transport for London</b></p>	<p><b>Para 1.3</b> TfL supports the idea of screening the site from the A1/A41, with the following caveats:</p> <ul style="list-style-type: none"> <li>- TfL would need to agree to any works adjacent or in close proximity to TfL highway structures</li> <li>- TfL provide bus services on the A1 (Route 113). The development should improve access to nearest bus stops and welcome any positive suggestion to improve the ambience of these stops.</li> </ul> <p>Also, any future applicant should also consider how they can improve legibility, safety and security along existing and new pedestrian and cycle links.</p>	<p>The Council welcomes this support and notes the caveats.</p>	<p>No change necessary.</p>
<p><b>Transport for London</b></p>	<p><b>Para 5.1</b> Whilst it is true that M1 and TLRN act as barriers to movement, they also connect the site to the rest of the road network and provide important public transport links.</p>	<p>The Brief has been revised to acknowledge that the restricted movement caused by surrounding major transport infrastructure relates mainly to pedestrian and cycle movement as opposed to vehicular movement.</p>	<p>Add to para 5.1 <i>'These strategic transport infrastructure barriers predominantly impact on pedestrian and cycle connections between the site and its surroundings'</i>.</p>
<p><b>Transport for London</b></p>	<p><b>Para 5.4</b> TfL agrees creating a pedestrian and cycle link to Bunns Lane is essential.</p>	<p>No response required.</p>	<p>No change necessary.</p>
<p><b>Transport for London</b></p>	<p><b>Para 5.9</b> The 113 runs from Edgware to Marble Arch only. The N113 runs from Edgware to Trafalgar Square.</p> <p>Intentions of this paragraph are agreed with by TfL.</p>	<p>Further clarification on bus services has been added to the Brief.</p>	<p>Change wording of para 5.9 to <i>'There is a bus stop directly outside the site on the A1 / A41 Watford Way which serves routes 113 and N113. Both these buses serve Mill</i></p>

			<i>Hill and Hendon on a route that runs from Edgware to Marble Arch on the 113 route and to Trafalgar Square on the N113 route at a frequency of every 6-11 minutes during peak times’.</i>
<b>Transport for London</b>	<p><b>Para 5.12</b></p> <p>TfL would note that if a new pedestrian link to Mill Hill Broadway station is provided that a PTAL of 3 could be achieved for the site or part of the site. The London Plan indicates that areas with PTAL between 0-1 are regarded as low accessibility when considering car dependency. The London Plan states the <i>“The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.”</i> TfL priority would be to promote cycling, walking and public transport access to this site and would provide the evidence. We note that 20% of households do not have access to a car in Mill Hill (only 29% of households use a car to get to work), and 40% of household in Colindale ward do not have a car, and only 19% use a car to get to work. The provision of a car club on site would help decouple car use from car ownership. Reference should be made to the following document  <a href="https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/TfL%202012%20residential-parking-provision-new-development.pdf">https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/TfL%202012%20residential-parking-provision-new-development.pdf</a>.</p>	PTAL calculations; promotion of cycling, walking and public transport; use of census data and provision for a car club on site are all standard topics for the required Transport Assessment.	No change necessary.
<b>Transport for London</b>	<p><b>Para 5.13</b></p> <p>TfL supports this requirement. We note that basement parking, though desirable way to hide car parking, can represent poor</p>	This is noted by the Council. Parking will be assessed in accordance with Barnet’s parking policy (DM17).	No change necessary.

	quality environments, which impinge on the surface due to the design of access ramps and can limit the developers ability to develop public realm above them. To achieve good quality public realm on the surface requires good design and we suggest we overall car parking constraint.		
<b>Transport for London</b>	<b>Para 6.6</b> TfL agrees with this concern. It is important the site promotes public transport use, walking and cycling, also that all vehicles movements into and out of the site are managed appropriately, including management of servicing, deliveries and construction.	No Council response required.	No change necessary.
<b>Transport for London</b>	<b>Para 6.7</b> TfL would also note that active travel is important to good health. <a href="http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf">http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf</a> The site should promote active travel as this has a direct health benefit to residents and that leads to reduce car travel it can reduce pollution caused by cars.	No Council response required.	No change necessary.
<b>Transport for London</b>	<b>Para 6.7</b> Other transport measures that promote a good environment, are securing provision for Electric Vehicle Charging in accordance with London Plan standards, cycle parking in excess of the London Plan and managing delivery and servicing vehicles activity.	EVCP and cycle parking in accordance with the London Plan will be sought on the site as standard. A Delivery and Servicing Plan will be conditioned as part of any development.	No change necessary.
<b>Transport for London</b>	<b>Para 7.9</b> See comment under Para 5.1	Greater clarity is needed in the Brief to demonstrate that the restricted movement caused by surrounding major transport infrastructure relates mainly to pedestrian and cycle movement as opposed to vehicular movement.	Add to para 5.1 ' <i>The major transport infrastructure barriers particularly detrimentally affect pedestrian and cycle connections between the site and its surroundings</i> '.

<b>Transport for London</b>	<b>Para 7.14</b> TfL recommends that design of this access is provided in accord with highway authority's advice.	Agreed by the Council.	No change necessary.
<b>Transport for London</b>	<b>Para 7.15</b> The scope of junction assessments should be with the Council and TfL.	A Transport Assessment Scoping report will be required to be submitted as part of the EIA to both the Council Council and TfL. This will be required to include junctions for assessment which will have to be agreed by the Council.	No change necessary.
<b>Transport for London</b>	<b>Para 7.16</b> Transport Assessment should be prepared in accord with TfL Guidance.	This is agreed by the Council.	No change necessary.
<b>Transport for London</b>	<b>Para 7.18</b> Note earlier comments on parking constraint.	This is noted. The parking will be assessed in accordance with Barnet's parking policy (DM17).	No change necessary.
<b>Transport for London</b>	<b>Para 7.19</b> TfL agrees that the Travel Plan should be secured to be successful that needs to supported appropriate measures including offsite pedestrian and cycle measures, support for local bus services as well car parking restraint/ management.	Improvements to sustainable travel will be sought. Parking provision will be in accordance with Barnet's parking policy (DM17).	No change necessary.
<b>Transport for London</b>	<b>Para 8.9</b> Note the Mayor's <a href="https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/supporting_documents/Consultation%20and%20information%20document.pdf">https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/supporting_documents/Consultation%20and%20information%20document.pdf</a> focus on air quality and reference to London Plan Policy 7.14 and need to reduce emissions from transport as part of zero carbon development.	This is noted.	No change necessary.
<b>Transport for London</b>	TfL is the landowner of the site to the east of the A1, as shown in the attached plan. TfL Property is currently reviewing its entire portfolio of land across London and we have identified this site as	The Council looks forward to working with TfL Property in identifying development opportunities for their	No change necessary.

	<p>having the potential to come forward for operational and/or development opportunities within the next four years. TfL Property would therefore want to ensure the Planning Brief has regard to this neighbouring site and, ideally, explore with the Council the possibility of including the site within the boundary of the Planning Brief to allow for a more comprehensive redevelopment of the area, which may also aid in addressing some of the wider issues for the site.</p>	<p>portfolio in Barnet. This will be done through sites property in the Local Plan supported by Planning Briefs for individual sites.</p>	
<p><b>Transport for London</b></p>	<p>TfL support comments within the Draft Planning Brief relating to changes in site levels which acknowledge the potential for any development of the main Pentavia site to impact surrounding sites in terms of overshadowing, overbearing and privacy, as set out under paragraphs 4.4 and 6.16. No development of the main Pentavia site should limit or restrict the potential for the development of neighbouring sites.</p>  <p>The image is a site plan titled 'Mill Hill Slip Road Site Plan'. It shows a street layout with a green highlighted area and a blue highlighted area. The green area is a large, irregularly shaped plot, and the blue area is a narrower strip along the road. The plan includes a north arrow, a date of 22/09/2016, a user name 'rebecca.laden@tfl.gov.uk', and a scale of 1:1250 at A4. The logo of the Mayor of London is visible in the bottom left corner.</p>	<p>It is not the intention of this Planning Brief to restrict opportunities for development at neighbouring sites.</p>	<p>No change necessary.</p>

<b>Highways England</b>	Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M1. Further to our telephone conversation and having examined the above document, we do not offer any comments. However Highways England would want to comment on any planning application that is received in the future.	Highways England will be consulted on planning applications with regard to this site.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 5.12</b> It is fundamental that any development fully accommodates all requirements for car parking within the site without allowing any overspill into already overcrowded roads that surround the site.	This is noted. Parking will be assessed in accordance with Barnet's parking policy (DM17), taking into account the proximity and any associated parking restrictions on adjacent streets.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.6</b> The Brief should also state that any development proposal for the site demonstrates how it will have no detrimental effect on the wider road and transport network.	Any development of the site will require a Transport Assessment to be submitted as part of the planning process. This requires the impact of the development on the wider road and transport network to be assessed.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.6</b> The is important given that, currently, there are almost daily "knock on effects" across the Mill Hill area, including, but not limited to, Mill Hill Broadway, Flower Lane, Graham Park Road and, further afield, the routes to both the A1 (Aerodrome road) and Colindale station/A5 (Colindale Road), Pursley Road and Devonshire road down to Holders Hill Circus, Hale Lane and Selvage lane up to Apex Corner.	Any development of the site will require a Transport Assessment to be submitted as part of the planning process. This requires the impact of the development of the wider road and transport network to be assessed.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.6</b> As background to the potential traffic problems the Brief should also note that Bunn's Lane is only passable currently because for	The existing operation of the adjacent highway network will form the basis of any submitted Transport	No change necessary.

	much of its length; from the M1 bridge to the Page street junction, vehicles park entirely on the pavement.	Assessment.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 7.14</b> The wording is welcomed in stating that any development should have “nil detriment” on connections in both directions. However we think the area and roads impacted should be extended as proposed earlier in this response.	Any development of the site will require a Transport Assessment to be submitted as part of the planning process. This requires the impact of the development of the wider road and transport network to be assessed.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 1.2</b> Transport links to Colindale cannot be improved and the pedestrian and cycle route seems to be the existing route reused. There may be some visual impact, but that is about all.	See proposed amendment.	Following amendment made to para 1.2: <i>‘and improvements to pedestrian and cycle links to.....’</i>
<b>Mill Hill Preservation Society</b>	<b>Para 5.4</b> MHPS are of the opinion that even with any improvement in the access to Bunns Lane, an already busy road, the development of the site would be limited by similar constraints to that of Churchill Place. However, Churchill Place is better located in relation to the open space of Mill Hill Park. This clause is misleading and needs to be revised.	Para 5.4 is considered to represent an accurate analysis of the site’s relationship with Bunns Lane and the potential to develop this linkage.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 5.7</b> The Society feels that this clause is unnecessary. It discusses items on the other side of the north/south transport corridor that are unrelated to the development of the Pentavia site and therefore is misleading. The clause needs to be omitted.	The close proximity of Grahame Park from the site warrants its mention in the Brief acceptable. Graham Park Way lies less than 100 metres from the boundary of Pentavia despite its physical separation by the M1 and railway line.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 5.12</b> We are pleased that the Brief confirms the low PTAL rating for the site. However MHPS believes it is fundamental that any development	Para 5.12 is clear on the application of parking standards within the site and 5.13 is clear on minimising	Para 5.12 to be amended to state <i>‘Due to the low PTAL</i>

	fully accommodates all requirements for car parking within the site without allowing any overspill into already overcrowded roads that surround the site. The Brief should confirm this.	parking within the site. Reference has been made to relevant policy DM17. The enhancement of pedestrian and cycle links and the provision of a range of uses on site discourage the use of vehicles. The potential for the implementation of a CPZ on neighbouring roads will be considered at the application stage.	<i>rating combined with difficult pedestrian and cycling linkages, plus the potential for parking overspill, any future development.....'</i>
<b>Mill Hill Preservation Society</b>	<b>Para 6.3</b> The Brief could make clearer the desire to provide substantially greater business use, given the proximity of the site to Central London and both the M1 and the A1, especially as we consider the site not really appropriate for residential use.	The Brief's objectives require the provision of employment floorspace as part of a mixed use scheme. It is considered that a range of uses would be appropriate for this site and would comply with planning policy.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 6.6</b> The Brief should state that the development proposal for the site will demonstrate how there will be no detrimental effect on the wider road and transport network. As background to the potential traffic problems the Brief should also note that Bunn's Lane is only passable currently because for much of its length, from the M1 bridge to the Page street junction, vehicles park entirely on the pavement. NB: We state this because there are almost daily "knock on effects" across the Mill Hill area, including, but not limited to, Mill Hill Broadway, Flower Lane, Graham Park Road and, further afield, the routes to both the A1 (Aerodrome Road) and Colindale station/A5 (Colindale Road), Pursley Road and Devonshire Road down to Holders Hill Circus, Hale Lane and Selvage Lane up to Apex Corner.	Para 7.15 outlines the role of the Transport Assessment in assessing the impact of developments on the local road network. Para 7.14 states that new vehicle connections should have nil detriment on connections in both directions.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 6.8</b> The Brief should require any development proposal to include this in a traffic management plan.	Queue times, impacts of local transport movements are key considerations in the Transport	No change necessary

		Assessment. Relevant conditions relating to this issue may also be required at the application stage.	
<b>Mill Hill Preservation Society</b>	<b>Para 7.10</b> The last sentence of this clause should be changed to read as follows: "Therefore the additional traffic movements from proposed new uses for the site need to be carefully considered and is (delete 'might become') a constraint on the scale of the development. Using the word 'might' in this sentence will make it meaningless.	The extent of the constraint caused by new uses is unknown. Therefore the use of 'might' is considered appropriate. This will be assessed at the application stage.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 7.16</b> MHPS do not agree that any vehicular access onto Bunns Lane from the site creating a connection between the A1/A41 Watford Way Northbound and Bunns Lane and Graham Park Way would be 'appealing'. Is this route a requirement of the design solution? We feel it is not and so the clause should be carefully rewritten to be more explicit.	The Council agrees that wording should be neutral on this connection.	Change para 7.16 by removing 'appealing'

### Pollution and noise

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 4.10</b> The Brief should take greater account of the impact of air pollution and acoustic impact that cannot simply be resolved by regular and permanent monitoring.	This is addressed in the Brief which highlights that any new development should incorporate modern building techniques to mitigate constraints (i.e. noise and air pollution) (see para 7.6). Para 6.20 and 6.21 requests that appropriate mitigation measures are installed as a matter of necessity, including consideration	No change necessary.

		of external mitigation measures and the design of the scheme to determine whether the built structures proposed can in fact provide sufficient screening to noise and air pollution.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.21</b> Within this context we think that “green buffers” would have negligible effect on air quality or on acoustic impact. The Brief should request that clear technical evidence is provided with any planning application on how measures will overcome the considerable environmental constraints of the site.	The Council’s Environmental Health Service considers that green buffers would have a positive impact on air quality. However, buffers would need to be of a suitable density, length and height to reduce noise inside the site.	Add to end of para 6.21 <i>‘Buffers would need to be of a suitable density, length and height to reduce noise inside the site to have an acoustic benefit’.</i>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 7.8</b> The guidelines on light pollution are welcomed. We think the Brief should also mention the impact of light pollution on existing residents as well as the University of London Observatory.	The Planning Brief has been amended at para 6.22 to address the issue of light pollution.	Add to end of para 6.22 <i>‘Any proposed street lighting will require 0% light uplift. This will ensure that any future development will not result in sky glare’.</i>
<b>Sue Willetts</b>	One major issue is the pollution aspect from A41/M1/train – the noise/pollution levels would surely rule out any development here apart from retail	As part of preparing the Planning Brief, the Environmental Health Team was consulted regarding the suitability of residential uses on this site. After this team carried out on-site measurements, they considered that residential uses were appropriate on the condition that the appropriate mitigation measures be implemented as per para 6.20-6.22 of the Brief.	No change necessary.
<b>Deloitte on behalf of</b>	UCL are concerned that buildings up to 7 storeys along the northern edge of the site appear to be promoted	After consulting the Council’s Street Lighting department, the	Add to end of para 6.22 <i>‘Any proposed street lighting will require</i>

<b>University College London</b>	and seek assurance that the height and massing in this part of the site will be restricted to prevent any light pollution to the Observatory.	Planning Brief has been amended to address the issue of light pollution.	<i>0% light uplift. This will ensure that any future development will not result in sky glare'.</i>
<b>Resident</b>	The increase in the pollution to the area caused by increased traffic is a major concern. The ill health caused by increased exposure to pollution will put more strain on NHS.	This is a key consideration at the application stage. The Council will ensure that Public Health colleagues are consulted on applications at this location. Consideration will be given to the overall site sustainable travel plan compared to previous uses of the site to ensure that the application is air quality neutral.	No change necessary.
<b>Resident</b>	The location of the site makes it wholly unsuitable for housing in terms of noise and air pollution.	The Brief expects that any new development should incorporate modern building techniques to mitigate constraints (i.e. noise and air pollution) (see para 7.6). Para 6.20 and 6.21 requests that appropriate mitigation measures are installed as a matter of necessity, including consideration of external mitigation measures and the design of the scheme to determine whether the built structures proposed can in fact provide sufficient screening to noise and air pollution.	No change necessary.
<b>Resident</b>	Mill Hill Polluted already	This is a key consideration. The Council will ensure that Public Health colleagues are consulted on	No change necessary.

		applications at this location.	
<b>Resident</b>	A few trees are not going to be sufficient noise and air pollution (mitigation) measure(s) when the site is surrounded by the A1, A41 and a 4-track mainline railway.	As stated in the Planning Brief, mitigation measures will not just involve trees but instead a range of measures as per para 6.20-6.22 of the Brief.  Any mitigation measures implemented as part of an application will need to satisfy Environmental Health requirements to ensure that there are no detrimental impacts for future or existing residents.	No change necessary.
<b>Resident</b>	Poor decision for such a development there. Pollution.	This is a key consideration. The Council will ensure that Public Health colleagues are consulted on applications at this location.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 6.20 and 6.21</b> The sentence setting out mitigation measures needs to be changed to read... “residential units are not exposed to noise levels exceeding 55db nor poor air quality.” On the matter of ‘mitigation measures’ within this context we think that “green buffers” would have negligible effect on air quality or on acoustic impact. The Brief should request that clear technical evidence is provided with any planning application on how measures will overcome the considerable environmental constraints of the site.	The role of the Council’s Environmental Health Service in assessing mitigation measures is made clear in para 6.20. Environmental Health considers that green buffers would have a positive impact on air quality. However, buffers would need to be of a suitable density, length and height to reduce noise inside the site.	Add to end of para 6.21 <i>‘Buffers would need to be of a suitable density, length and height to reduce noise inside the site to have an acoustic benefit’.</i>
<b>Mill Hill Preservation Society</b>	<b>Para 7.8</b> The guidelines on light pollution are welcomed.	Noted.	No change necessary.

<b>Mill Hill Preservation Society</b>	<b>Section 4</b> The fact that the Brief states (Clause 4.10) that the national Air Quality Objectives for Nitrogen Dioxide and Particulate Matter (PM10) are exceeded reinforces our view that the site wedged between transport corridors is not appropriate for residential use and this fact should be emphasised in the Brief. Figure 12 -'Site constraints' (see Clause 4.12) does not indicate the full extent of the low-rise residential areas well enough. Nearly all the housing areas shown on this map are low-rise residential but they are not indicated as such. The figure needs redrafting.	Para 6.20 to 6.22 detail how noise and air pollution will need to be mitigated in order to provide a satisfactory living environment. Residential is therefore a use that can be considered at this location.  Figure 12 shows adjoining residential areas. This should be made more explicit in the Brief.	Change key description for Figure 12 to 'adjoining' residential areas.
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### Affordable Housing

Respondent	Response	Council Reply	Action
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 3.14</b> We believe that the Brief needs to be strengthened to make clear that Barnet Council expects that, if a residential development is submitted by any developer, it must comply with 40% provision of affordable housing target, split 60% social rent and 40% intermediate.	Para 3.14 states ' <i>Affordable Housing should be provided in line with the Council's strategic borough-wide target of 40% provision, subject to viability, for all new homes with a tenure mix of 60% social rented and 40% intermediate</i> '. As per standard appraisal procedures, applications will need to be	No change necessary.

		<p>accompanied by a viability assessment which will be appraised by a Council appointed assessor to ensure the maximum reasonable amount of affordable housing is provided.</p>	
<p><b>Mill Hill Neighbourhood Forum</b></p>	<p><b>Para 3.14</b>  Further we consider it important that this Brief, and future Briefs for other developments, should state that developers publically demonstrate they have made these assumptions when agreeing the purchase price for the land to be developed. Given the significant shortfall across Barnet and London more generally in the provision of affordable housing we think all parties need to demonstrate publically the desire to achieve these housing targets. Any sale of land for residential development should specifically acknowledge the need for “Affordable” housing and be priced to account for such.</p>	<p>This is a strategic issue that is beyond the remit of a Planning Brief. This is an issue which is likely to be addressed in the Mayor’s Draft Housing SPG by the end of 2016.</p>	<p>No change necessary.</p>
<p><b>Mill Hill Neighbourhood Forum</b></p>	<p><b>Para 3.14</b>  We would expect to see specific evidence of real local need for the type of residential properties to be proposed by Meadow Partners in any application and not simply evidence to suggest that such need exists generally in London, but that it exists for people living in Mill Hill.</p>	<p>The London Plan encourages boroughs to have a more positive approach to the private rented sector supporting growth where this results in well managed, good quality accommodation, mixed and balanced communities and sustainable neighbourhoods. The Council cannot ignore the role that the Private Rented Sector has in meeting the diverse requirements of Barnet residents. Such</p>	<p>No change necessary.</p>

		requirements were highlighted in the Housing Needs Assessment that supports the 2015 Housing Strategy.	
<b>Resident</b>	The wording with regard to affordable housing is not strict enough. There is a shortage of housing in the area, and without stricter wording this development risks being private rental properties. There should be a minimum level, below which the development will not go ahead.	Planning Briefs reflect existing policy frameworks i.e. the Local Plan and the London Plan in which the approach to securing affordable housing is set out. The London Plan encourages a more positive approach to the Private Rented Sector where this results in well managed, good quality accommodation, mixed and balanced communities and sustainable neighbourhoods.	No change necessary.
<b>Resident</b>	The lack of control over the amount of social housing and the risk that we will end up with yet more overpriced privately rented flats.	Para 3.14 states <i>'Affordable Housing should be provided in line with the Council's strategic borough-wide target of 40% provision, subject to viability, for all new homes with a tenure mix of 60% social rented and 40% intermediate'</i> .  In terms of private renting the London Plan encourages a more positive approach where this results in well managed, good quality accommodation, mixed and balanced communities and	No change necessary.

		sustainable neighbourhoods. The Council cannot ignore the role that the Private Rented Sector has in meeting the diverse requirements of Barnet residents	
<b>Mill Hill Preservation Society</b>	<p><b>Para 3.14 &amp; 3.15</b> The Mill Hill Preservation Society believes that the Brief needs to be strengthened to make clear that Barnet Council expects that, if a residential development is submitted by any developer, it must comply with 40% provision of affordable housing target, split 60% social rent and 40% intermediate.</p> <p>Further, we consider it important that this Brief, and future Briefs for other developments, should state that developers publicly demonstrate they have made these assumptions when agreeing the purchase price for the land to be developed. Given the significant shortfall across Barnet, and London more generally, in the provision of affordable housing we think all parties need to demonstrate publicly the desire to achieve these housing targets. Any sale of land for residential development should specifically acknowledge the need for “Affordable” housing and be priced to account for such.</p>	<p>These paragraphs outline the policy in regard to affordable housing requirements.</p> <p>Para 3.14 states ‘<i>Affordable Housing should be provided in line with the Council’s strategic borough-wide target of 40% provision, subject to viability, for all new homes with a tenure mix of 60% social rented and 40% intermediate</i>’. As per standard appraisal procedures, applications will need to be accompanied by a viability assessment which will be appraised by a Council appointed assessor to ensure the maximum reasonable amount of affordable housing is provided. In terms of managing the sale of land this is a strategic issue that is beyond the remit of a Planning Brief. This is an issue which is likely to be addressed in the Mayor’s Draft Housing SPG due out by the end of 2016.</p>	<p>Add the following text to end of 9.6 ‘<i>As per standard viability appraisal procedures, applications will need to be accompanied by a viability assessment which will be appraised by a Council appointed assessor to ensure the maximum reasonable amount of affordable housing is provided</i>’.</p>

**Impact on local services**

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Resident</b>	Current public facilities (such as doctor surgeries) are already full to breaking point.	<p>In compliance with the Planning Obligations SPD (2013) appropriate contributions will be sought through CIL to fund various infrastructure projects including roads, schools, health and social care, parks and leisure centres.</p> <p>Appropriate S106 contributions will also be sought to mitigate the impact of the development.</p> <p>The role of CIL and S106 in providing development contributions at this site is outlined on pages 32 and 33 of the Planning Brief.</p>	No change necessary.
<b>Resident</b>	I am concerned about the impact another residential development will have on the Mill Hill area. Where is the provision for new GP surgery places, primary school places, secondary school places.	<p>In compliance with the Planning Obligations SPD (2013) appropriate contributions will be sought through CIL to fund various infrastructure projects including roads, schools, health and social care, parks and leisure centres.</p> <p>Appropriate S106 contributions will also be sought to mitigate the impact of the development.</p> <p>The role of CIL and S106 in providing</p>	No change necessary.

		development contributions at this site is outlined on pages 32 and 33 of the Planning Brief.	
<b>Resident</b>	I urge the council to ensure that adequate measures are in place to deal with the increased passenger numbers on the Thameslink rail services at Mill Hill Broadway Railway Station. It is common knowledge that the Thameslink line is very unreliable and the trains are already crowded at peak times. The poor design of the station also lends itself to severe passenger congestion at the entrances and exists.	The requirement for contributions in regard to rail station upgrades is dependent on TfL appraisals of the impact of development. In the event that their response requests contributions for station improvements, this will be requested through S106.	No change necessary.
<b>Resident</b>	People cannot board a train now in the rush hour(s) sometimes and trains are cancelled causing more problems for the next train to arrive. How would a few hundred more people fit on a train?	The requirement for contributions in regard to rail station upgrades is dependent on TfL appraisals of the impact of development. In the event that their response requests contributions for station improvements, this will be requested through S106.	No change necessary.
<b>Resident</b>	It would be a concern for the station (which has incompetent systems at best) and the local services like doctors and schools.	In compliance with the Planning Obligations SPD (2013) appropriate contributions will be sought through CIL to fund various infrastructure projects including roads, schools, health and social care, parks and leisure centres.  Appropriate S106 contributions will also be sought to mitigate the impact of the development.	No change necessary.

		The role of CIL and S106 in providing development contributions at this site is outlined on pages 32 and 33 of the Planning Brief.	
<b>Resident</b>	I am concerned about the impact another residential development will have on the Mill Hill area. Where is the provision for new GP surgery places, primary school places, secondary school places. Bunns Lane is barely coping with rush hour traffic as it is, it is often at a standstill causing long delays. Mill Hill Thames Link is not going to be able to accommodate another 50 -100 commuters.	<p>In compliance with the Planning Obligations SPD (2013) appropriate contributions will be sought through CIL to fund various infrastructure projects including roads, schools, health and social care, parks and leisure centres.</p> <p>Appropriate S106 contributions will also be sought to mitigate the impact of the development.</p> <p>The role of CIL and S106 in providing development contributions at this site is outlined on pages 32 and 33 of the Planning Brief.</p>	No change necessary.

### Mass/height and design of the new buildings

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 3.16</b> We believe the Brief should state that any proposed residential development must meet, as a minimum the space and design standards laid out in the London Plan. Design standards should include, for any proposed residential unit, the means of escape with domestic sprinklers or include suitable fire engineering	As part of the appraisal process, any application will be assessed by the London Fire Brigade and will have to ensure it meets their safety standards. Any application will be assessed against standards set out in the recently adopted SPDs on	Add to para 6.19 <i>'The safety of future residents is of key importance. Therefore, future development proposals should contribute to the minimisation of potential physical risks, specifically fire. Appropriate mitigation</i>

	if any proposed residential unit is of “continental style” with bedrooms off open plan living rooms/kitchens.	Residential Sustainable Design and Construction.	<i>measures will need to be implemented including means of escape, domestic sprinklers or suitable fire engineering in line with London Plan policy 7.13. In the event that an application is submitted the London Fire Brigade will be consulted as part of the appraisal process.’</i>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 3.19</b> We think the Brief should be more explicit that this site falls outside the strategic locations for tall buildings identified in the local plan. It should also reference the Colindale AAP in the section on the planning context that notes the M1 forms the eastern boundary. This adjacent area indicates buildings of around 1-2 stories as appropriate rather than anything higher.	Pentavia is not a strategic location for tall buildings. No new tall buildings have been approved outside of the strategic locations highlighted in the Local Plan policy CS5 since adoption in September 2012. The Colindale AAP is only applicable to the regeneration area and therefore cannot be reference in the context of Pentavia.  We have added a reference to the specific Local Plan policy on Tall Buildings.	Para 3.19 includes the following text: <i>‘Policy DM05: Tall buildings States that all buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:</i> <i>i. an active street frontage where appropriate</i> <i>ii. successful integration into the existing urban fabric</i> <i>iii. a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline</i> <i>iv. not cause harm to heritage assets and their setting</i> <i>v. that the potential microclimatic effect does not adversely affect’</i>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.2</b> The Brief should make clear this is a suburban area and therefore, if a residential development is built, densities should be used consistent with the SQR matrix of a suburban area with a PTAL rating across	Par 6.15 states <i>‘Density should have regard to Table 3.2 – the Sustainable Residential Quality density matrix of the London Plan, which guides density in terms of</i>	Revise para 6.15 and add full title of London Plan Table 3.2.

	the majority of the site of 1b. Ideally the Brief should include the matrix in the body of the report.	<i>the surrounding character of the area, and access to public transport.</i> This extracts refers to the matrix stated in this consultation response.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.13</b> We believe this paragraph should omit the statement that 'tall buildings of 8 storeys or more in height will not be supported' as this suggests that buildings of 7 storey's may be acceptable. The last sentence therefore should be omitted from the Planning Brief.	The role of the Planning Brief is not to restrict development, but to act as a guide for future development. This includes laying out the site constraints and outline opportunities for development. As stated in para 6.14 of the Brief 'Any development proposals for Pentavia should demonstrate successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors'. Applications will need to provide visualisations of the proposed scheme to allow planning officers to assess the impact of the proposal on the skyline and local character.	In order to give further detail in regards to the assessment of the building heights the following text will be added to 6.14 ' <i>Any application will need to include view visualisations to show the impact of the proposal on the skyline and local character. These views should be agreed with the Council in advance of submitting the application</i> '.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.13</b> The Brief should be strengthened by making clear the impact of building heights on the site should be measured from the lowest level in the immediate vicinity of the development, not the height from the surface of the current car park in the retail park. Given the recent building of Churchill Place, which will be majorly impacted by any proposed development,	Para 4.3-4.4 outline that level changes are a key constraint to development. These paragraphs particularly note the significant level change between the site and Churchill Place and Grahame Park Way. The Brief goes on to state ' <i>These level changes may have an</i>	No change necessary.

	we think the Brief should make clear that any proposals should be consistent with the planning decisions and restrictions that were placed on this site.	<i>impact on any new development achievable within the site, which will need to be addressed with any redevelopment proposal especially in terms of privacy and overlooking’.</i>	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.13</b> We note that an earlier application for the Churchill Place site (H/01249/10) was refused. We think decisions about Pentavia Park should also be consistent with this decision	It should be noted that the Churchill Place site, although close to the Pentavia site, has a different building and character context as it fronts onto a residential road and is not separated from its built surroundings by major transport infrastructure. It is considered that the relevance of this application refusal is not a consideration.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.13</b> The Mill Hill Neighbourhood Forum note the height and density ranges applied in the Grahame Park Supplementary Planning Guidance, as recently as May 2016. In particular the height and density ranges for the “northern character area” quoted on page 38, limit height to, typically, 2-4 stories and density to 50-100 units per hectare. As the northern character area is the closest part of Grahame Park to Pentavia Park we believe any development on the latter site should be consistent with, and certainly limited to, the ranges used for the former site. Indeed Pentavia Park sits higher topographically and hence has the potential to be more overbearing.	The siting of Grahame Park and its relationship to surrounding residential areas is very different to that of Pentavia Retail park. Specifically, although Pentavia Retail Park is topographically higher than Grahame Park, it is surrounded by major transport infrastructure and therefore is spatially separated from nearby residential areas. Although these adjoining residential areas will be a key consideration in terms of impact (including loss of light and privacy), its physical separation	No change necessary.

		allows a different approach in terms of design and height.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 7.7</b> The words should be rewritten so as not to imply that blocks of 4 to 7 stories could be acceptable.	The role of the Planning Brief is not to restrict development, but to act as a guide for future development. For this reason the Planning Brief has not given an exact storey height to which proposals will need to comply. However, any future application will be assessed against the constraints outlined in the Brief including level changes and impact on local built character.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 7.7</b> It should also state that blocks of any height would be very visible, rather than quite visible.	The visibility of any future development is dependent on the height and design of the proposed buildings. At the Planning Brief stage it is not possible to fully clarify the extent of visibility.	Wording to be amended to <i>'prominent'</i> on para 7.7
<b>Resident</b>	Any buildings constructed on the Pentavia Retail Park site need to be in keeping with the character of the rest of Mill Hill in terms of height and density. New buildings should, therefore, in our view, be no taller than 4 storeys high. No mention is made of areas adjacent to Hillside Grove, the southern edge of Parkside and the southern corners of Mill Hill Park.	Para 7.6 of the Planning Brief notes that as the site is separated from other adjoining residential areas by major transport infrastructure and therefore has the opportunity to construct a distinctive built form that utilises modern building techniques.  However, para 6.14 of the Planning Brief also states that any development proposals for	No change necessary.

		<p>Pentavia should demonstrate successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors identified in Map 8 of the Local Plan Core Strategy, local views and the skyline.</p> <p>Although the Planning Brief doesn't explicitly make reference to the areas mentioned by this respondent, the para 7.7 of the Brief does states that the design must not have an overbearing impact on adjoining residential areas. This paragraph also state as the Pentavia site is elevated above the surrounding area, it is visible from a number of locations including a number of parks and recreation areas. This will include Mill Hill Park.</p>	
<b>Resident</b>	<p>The wording around the height of the buildings will encourage designs of 4-7 storeys. This is too high for the area and is out of character of Mill Hill.</p>	<p>The role of the Planning Brief is not to restrict development, but to act as a guide for future development. This includes laying out the site constraints and outline opportunities for development. As stated in para 6.14 of the Brief <i>'Any development proposals for Pentavia should demonstrate</i></p>	<p><i>Add to 6.14 'Any application will need to include view visualisations to show the impact of the proposal on the skyline and local character. These views should be agreed with the Local Authority in advance of submitting the application'.</i></p>

		<i>successful integration into the existing urban fabric and have regard to topography and no adverse impact on Local Viewing Corridors’.</i>	
<b>Mill Hill Preservation Society</b>	<p><b>Para 3.19</b> MHPS believe the Brief should state more explicitly that this site falls outside the strategic locations for tall buildings identified in the local plan. It should also reference the Colindale AAP in the section on the planning context that notes the M1 forms the eastern boundary to that development. This adjacent area indicates buildings of around 1-2 stories as appropriate rather than anything higher especially as the site is already elevated in relation to any nearby residential development.</p>	<p>Pentavia is not a strategic location for tall buildings. No new tall buildings have been approved outside of the strategic locations highlighted in the Local Plan policy CS5 since adoption in September 2012. The Colindale AAP is only applicable to the regeneration area and therefore cannot be reference in the context of Pentavia.</p> <p>We have added a reference to the specific Local Plan policy on Tall Buildings.</p>	<p>Para 3.19 includes the following text: <i>Policy DM05: Tall buildings States that all buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:</i></p> <ul style="list-style-type: none"> <li><i>i. an active street frontage where appropriate</i></li> <li><i>ii. successful integration into the existing urban fabric</i></li> <li><i>iii. a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline</i></li> <li><i>iv. not cause harm to heritage assets and their setting</i></li> <li><i>v. that the potential microclimatic effect does not adversely affect existing levels of comfort in the public realm.</i></li> </ul>
<b>Mill Hill Preservation Society</b>	<p><b>Section 4</b> Constraints: Generally, the constraints section could be better worded. This section needs to include building density and provide a clear description of the surrounding suburban housing of 1-2 -3 story properties.</p>	<p>The Council agrees with this response. This adds to paras 6.12-6.19 highlight views from a range of locations including the Watling Estate.</p>	<p>Add to para 4.3 <i>‘These drawings should include cross sections showing the relationship between proposed developments and adjoining built environments’.</i></p>

	<p>It should also highlight the need to consider any potential visual impact on Bunns Lane and Mill Hill Park, along with other residential areas and viewpoints from higher ground within the Mill Hill Conservation area (noted in Clause 4.5). The Brief should request that various cross sections be provided that are drawn to include adjacent areas of housing, with transport corridors, and not simply through the site (Clause 4.3).</p>		
<p><b>Mill Hill Preservation Society</b></p>	<p><b>Para 6.2</b>  The Brief should make clear this is a suburban area and therefore, if a residential development is proposed, densities should be used consistent with the London Plan, Policy 3.4 - Table 3.2 'Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)' for a suburban location with a PTAL rating across the majority of the site of 1b. Ideally, for the sake of clarity, the Brief should include the relevant part of the matrix in the body of the report. We doubt that residential uses are "appropriate for the site" as stated in this clause. Further, MHPS feel that the sentence... "The Council recognises that as housing need increases new innovative and non-conventional housing products will come forward" be omitted from the Brief as this presumes the outcome will be a residential development.</p>	<p>Notes to Table 3.2 of the London Plan define urban and suburban settings. It is considered that the Pentavia Retail Park lies in an urban setting as surrounding built character consists of predominantly terraced housing with some blocks of flats to the east, mansion style blocks to the North and East within Churchill Place and off Bunns Lane and a large block building accommodating a car showroom which is effectively 4 storeys in height. There is also a mix of uses in the immediate area including nursery, car showroom, petrol station, school and a college. The nearby major transport infrastructure is not characteristic of a suburban site. The site as currently presented with large building footprints and areas of hard surfacing and lack of</p>	<p>No change necessary.</p>

		<p>residential uses is not suburban in character.</p> <p>The objectives for the Brief are very clear that residential can be provided as part of a mixed use development.</p>	
<b>Mill Hill Preservation Society</b>	<p><b>Urban Form and Character: sub –heading</b></p> <p>The subtitle in the draft Brief after Para 6.11 should use the word “<i>suburban</i>” rather than the word “urban”. This reflects better both the nature of the broader area in which any development needs to sit, along with the more specific guidelines about density and mass of any proposed buildings.</p>	<p>It is considered that the Pentavia Retail Park lies in an urban setting as surrounding built character consists of predominantly terraced housing with some blocks of flats to the east, mansion style blocks to the North and East within Churchill Place and off Bunns Lane and a large block building accommodating a car showroom which is effectively 4 storeys in height. There is also a mix of uses in the immediate area including nursery, car showroom, petrol station, school and a college. The nearby major transport infrastructure is not characteristic of a suburban site. The site as currently presented with large building footprints and areas of hard surfacing and lack of residential uses is not suburban in character.</p>	No change necessary.
<b>Mill Hill</b>	<b>Clause 6.13</b>	The role of the Planning Brief is not	Add the following text to para 7.1

<p><b>Preservation Society</b></p>	<p>We believe this paragraph should omit the statement that ‘tall buildings of 8 storeys or more in height will not be supported’ as this suggests that buildings of 7 storeys may be acceptable. The last sentence therefore should be omitted from the Planning Brief. The Mill Hill Neighbourhood Forum make other points about this clause which we agree with and restate below:</p> <ul style="list-style-type: none"> <li>• The Brief should be strengthened by making clear the impact of building heights on the site should be measured from the lowest level in the immediate vicinity of the development, not the height from the surface of the current car park in the retail park.</li> <li>• Given the recent building of Churchill Place, which will be majorly impacted by any proposed development, we think the Brief should make clear that any proposals should be consistent with the planning decisions and restrictions that were placed on this site.</li> <li>• We note that an earlier application for the Churchill Place site (H/01249/10) was refused. We think decisions about Pentavia Park should also be consistent with this decision.</li> <li>• We also note the height and density ranges applied in the Grahame Park Supplementary Planning Guidance, as recently as May 2016. In particular the height and density ranges for the “northern character area” quoted on page 38, limit height to, typically, 2-4 stories and density to 50-100 units per hectare. As the northern character area is the closest part of Grahame Park to Pentavia Park we believe any development on the latter site should be consistent with, and certainly limited to, the ranges used for the former site. Indeed Pentavia Park sits higher topographically and hence has the potential to be more</li> </ul>	<p>to restrict development, but to act as a guide for future development. For this reason the Planning Brief has not given an exact storey height to which proposals will need to comply. However, any future application will be assessed against the constraints outlined in the Brief including level changes and impact on local built character.</p> <p>Notes to Table 3.2 of the London Plan define urban and suburban settings. It is considered that the Pentavia Retail Park lies in an urban setting as surrounding built character consists of predominantly terraced housing with some blocks of flats to the east, mansion style blocks to the North and East within Churchill Place and off Bunns Lane and a large block building accommodating a car showroom which is effectively 4 storeys in height. There is also a mix of uses in the immediate area including nursery, car showroom, petrol station, school and a college. The nearby major transport infrastructure is not characteristic of a suburban site. The site as</p>	<p><i>‘Cross section drawings should be submitted as part of any future application showing the relationship with the new development and adjoining roads and housing’.</i> This will allow accurate assessments of the impact of the development on adjoining residential areas including Churchill Place.</p>
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	overbearing.	<p>currently presented with large building footprints and areas of hard surfacing and lack of residential uses is not suburban in character.</p> <p>Churchill Place and Grahame Park, although close to the site, have a different built environment context and surrounding urban grain. Therefore, references to storey height, densities and recent planning refusals are not considered relevant to the Pentavia site.</p>	
<b>Mill Hill Preservation Society</b>	<p><b>Para 6.14</b> The Society does not consider that reference to Local Viewing Corridors identified in Map 8 of the Local Plan Core Strategy is appropriate. This map is far too general to deal with the potential impact of buildings of any bulk on the skyline in the immediate neighbourhood of Mill Hill. This clause needs to be redrafted to include the impact on local views as well as the macro situation.</p>	<p>Para 4.5 refers to a range of views in addition to Local Viewing Corridors including Mill Field and St Joseph’s Missionary College.</p>	<p>Replace ‘dominant’ with ‘predominant’.</p>
<b>Mill Hill Preservation Society</b>	<p><b>Para 6.18</b> We do not understand why this clause has been included. All elevations are visible therefore the clause is meaningless. We suggest it is omitted. It also smacks of a get ‘out of jail free card’ if the developer does propose high buildings that are not appropriate to the site.</p>	<p>The extent of the visibility of elevations is expected to vary. Some internal elevations may not be visible from outside the site. The quality of appearance of elevations will not overcome any detrimental impacts of overshadowing, over-bearing</p>	<p>Addition to para 6.18: <i>‘It should however be noted that the quality of appearance of elevations will not overcome any detrimental impacts of overshadowing, over-bearing appearance of negative impact on skyline’.</i></p>

		appearance of negative impact on skyline.	
<b>Mill Hill Preservation Society</b>	<b>Para 6.19</b> The Brief should be more explicit about what it means by <i>'some roofline interest might frame the sky exposure of views from adjacent areas and make any structures less overbearing.'</i> If buildings proposed are of a height to suit the surrounding residential uses they should not be overbearing. MHPS would prefer the Brief to be more specific on what constraints any development should follow.	The role of the Planning Brief to act as a guide for future developers. The Brief has therefore not been more explicit on this issue. This will be a key consideration in the event of an application.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 7.7</b> The words should be rewritten so as not to imply that blocks of 4 to 7 stories could be acceptable. It should also state that blocks of any height would be very visible, rather than quite visible.	The visibility of any future development is dependent on the height and design of the proposed buildings. At the Planning Brief stage it is not possible to fully clarify the extent of visibility.	Wording to be amended to 'prominent' on para 7.7

#### Other uses would be more appropriate

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 3.22</b> More fundamentally, we do not believe that the case for changing the use of the site from A1/A3 to mixed use has been definitively made.  We think the Brief should presume a continuation of the existing type of use. Pentavia Park, as a retail site, was successful for almost 25 years. Meadow Partners first proposed a new and improved retail/leisure offering and Barnet Council approved this application.	Ensuring the efficient use of brownfield land is an overwhelming national policy priority. The existing out of town centre retail park is not considered efficient or sustainable reflecting changing trends in retail and the need for new homes as well as new business space in Barnet and London.	No change necessary.

<p><b>Mill Hill Preservation Society</b></p>	<p><b>Para 3.22</b> Meadows Partners has not justified, except by implication in narrow short term financial terms, the reason to build substantial residential units on the site.</p>	<p>The Brief is clear that new residential uses will be part of a mixed use development in order to achieve such balance advocated by the Mill Hill Preservation Society.</p> <p>Given the demands for delivering new homes in London, changing retail trends in terms of the higher use of internet shopping and national policy supporting town centre first, we would not normally expect landowners to justify loss of retail in an out of town location. The need for residential is supported by the Council and this Brief has been produced to set the parameters for a development that will reunite the site with the Mill Hill area.</p> <p>We recognise the importance of consumer choice in our Local Plan while emphasising the need to attract inward investment to out of town centres. However, shopping habits are changing with the rise of internet retail and the growth of click and collect premises in town centre locations.</p>	<p>No change necessary.</p>
<p><b>Mill Hill Neighbourhood Forum</b></p>	<p><b>Para 3.22</b> Whilst the need for additional housing across London is unarguable, so is the need for areas to have a</p>	<p>Core principles of the NPPF encourage the effective use of land by reusing land that has been</p>	<p>No change necessary.</p>

	<p>balanced set of developments with appropriate amount of residential builds along with community infrastructure (schools, medical facilities etc), transport infrastructure that can support the number of residents and retail/commercial infrastructure that fosters a vibrant local economy. We think the Brief should put greater emphasis on the potential of this site to provide all types of non-residential infrastructure.</p>	<p>previously developed (brownfield land), provided that it is not of high environmental value. The NPPF promotes mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas. A mixed use scheme at Pentavia can deliver more benefits than a single use scheme be it retail or residential'</p> <p>Retention of the existing use is a decision for the landowners and this is acknowledged in para 2.1</p>	
<p><b>Mill Hill Neighbourhood Forum</b></p>	<p>Para 3.22 The “town centre first” policy does not mean that Mill Hill Broadway could accommodate larger retail units of the type historically on the Pentavia site. Indeed the Pentavia site was seen by many residents as complementary to the small scale shops of the Broadway. With the closure of the current retail facility on Pentavia park Mill Hill residents must drive further (Borehamwood for instance – thus damaging Barnet’s economy) in order to use facilities that could be accommodated on Pentavia.</p>	<p>We recognise the importance of consumer choice in our Local Plan while emphasising the need to attract inward investment to out of town centres. However, shopping habits are changing with the rise of internal retail and the growth of click and collect premises in town centre locations.</p>	<p>No change necessary.</p>
<p><b>Mill Hill Neighbourhood Forum</b></p>	<p><b>Para 6.8</b> It is noted that the provision of residential development is phrased as a question. We think the</p>	<p>The objectives for the Planning Brief request a range of uses. It is likely that any future scheme will</p>	<p>No change necessary.</p>

	rest of the Brief should follow the same approach and not assume or imply that the site will be a substantially residential development.	include a significant proportion of residential uses. However, in order to comply with the objectives of the Brief any future development will also need to provide other uses including retail, employment and community. This is to strengthen the future communities on this site, revitalise this location and create a strong sense of place.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.8</b> The availability of any onsite community and retail uses will be used by Mill Hill residents' generally and not just residents of any proposed residential development. The Brief should require any development proposal to include this in a traffic management plan.	All new vehicle movements will be required to be accounted for in the Transport Assessment.	No change necessary.
<b>Resident</b>	The Pentavia Retail Park site to be ideally placed to meet the growing demand for retail, leisure and office facilities that has resulted from the continued expansion of Colindale, Mill Hill and the surrounding areas. Would suggest wording of Brief changed to support the development of the Pentavia Retail Park as an out of centre location for retail, leisure and office use. The lack of any alternative, apart from Mill Hill Broadway, which has only limited scope for expansion, makes this an attractive option.	As described in para 11.2.3 of the Core Strategy ' <i>National guidance defines the main town centre uses. This definition includes retail development leisure, entertainment facilities such as cinemas, restaurants, pubs, offices and theatres, museums and hotels</i> '. As leisure is included in this list of town centre uses, this site's out of town centre location means this use is not appropriate for this site.	No change necessary.

<b>Resident</b>	The area would benefit far more from having additional retail and entertainment facilities on that site than it would from having hundreds of new homes.	The Core Strategy defines retail, leisure and entertainment facilities as town centre uses. The Brief already explains why residential uses as part of a mixed use development are appropriate for this site.	No change necessary.
<b>Resident</b>	We need somewhere for the youth in the area to go. A cinema would be good.	Cinemas are a town centre use, it is against planning policy to locate this town centre use in an ' <i>out of town</i> ' location.	No change necessary.
<b>Resident</b>	The large majority of Mill Hill residents want and are in dire need of more leisure facilities outside of the small individual shops of Mill Hill Broadway. The proposal does not address this at all.	National guidance defines the main town centre uses. This definition includes retail development, leisure, entertainment facilities such as cinemas, restaurants, pubs, offices and theatres, museums and hotels. As leisure is included in this list of town centre uses, this site's out of town centre location means this use is not appropriate for this site.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 1.2</b> MHPS do not agree with all the objectives laid down for the site (see above). While we accept that one of the objectives for the site should be that "new and ancillary small-scale 'non-destination' retail and leisure uses that serve the needs of the new development" should be permissible; we do not accept that "new and ancillary community space, such as a	The application will need to be accompanied by a Transport Assessment which will consider the traffic implications resulting from all uses. Colindale, as an adjoining area is raised in the Brief. To improve interconnectivity	No change necessary.

	nursery, that serves the needs of Colindale and Mill Hill” should be allowed. In the latter instance this would simply add to the traffic in and out of this site as certainly in the case of a nursery parents would deliver and collect their offspring by car thus exacerbating the considerable traffic issues. In fact we are dubious as to why Colindale comes into this Brief at all. The last item in this clause reads “improvements to existing transport infrastructure and creation of a new pedestrian and cycle links to .... Colindale.”	between different areas within Barnet, the Brief seeks to improve connectivity with Colindale.	
<b>Mill Hill Preservation Society</b>	<b>Para 1.3:</b> Again this clause references Colindale – “New uses to serve the needs of Small & Medium Enterprise businesses and community uses primarily to serve the needs of Colindale and Mill Hill”. MHPS see the site predominantly as a Mill Hill site due to the nature of the railway and motorway constraints.	Colindale is close to the site and as Entrepreneurial Barnet identifies that a significant proportion of Barnet’s population work locally, it is conceivable that Colindale residents may work in new employment spaces at Pentavia. This would improve social integration of the Pentavia site with its surrounding residential areas.	No change necessary.
<b>Mill Hill Preservation Society</b>	<b>Para 3.22:</b> Meadows Partners has not justified, except by implication in narrow short-term financial gains, the reason to build substantial residential units on the site. Whilst the need for additional housing across London is unarguable, so is the need for areas to have balanced development of residential building alongside a proper level of community and transport infrastructure with retail/commercial facilities that foster a vibrant local economy. The Brief should put greater emphasis on the potential of this site to provide	The Brief is clear that new residential uses will be part of a mixed use development in order to achieve such balance advocated by the Mill Hill Preservation Society.  We recognise the importance of consumer choice in our Local Plan while emphasising the need to attract inward investment to out	No change necessary.

	all types of non-residential infrastructure. The “town centre first” policy does not mean that Mill Hill Broadway could accommodate larger retail units of the type historically on the Pentavia site. Indeed the Pentavia site was seen by many residents as complementary to the small-scale shops of the Broadway, and with its closure Mill Hill residents must drive further afield (to Borehamwood for instance) in order to use facilities that could be accommodated on Pentavia. This damages the local economy.	of town centres. However, shopping habits are changing with the rise of internal retail and the growth of click and collect premises in town centre locations. The Pentavia Retail Park is considered to have failed as a modern and sustainable development. We have no desire to make out of town centre retail developments more successful.	
<b>Resident</b>	It is my view that this site has been enjoyed by the local population for a long time and should remain a retail park. The developers are simply taking advantage of the need for new housing, however this is not an ideal site for that purpose.	The Planning Brief has identified why residential uses would be appropriate for this site.	No change necessary.

#### Other comments

<b>Respondent</b>	<b>Response</b>	<b>Council Reply</b>	<b>Action</b>
<b>Resident</b>	Difficulty of a second access point to the development – the height/gradient of any access road for cars/fire engines/ambulances would see not be viable.	Future applications should have due regard to <b>Manual for Streets (2010)</b> . See the relevant text from this document below: Para 5.2.5 <i>‘The gradient of pedestrian routes should ideally be no more than 5%, although topography or other</i>	Add to paragraph 7.14 the following text: <i>‘Due consideration must be given to the acceptability of the topography of pedestrian footways and new roads to ensure they comply with gradient recommendations outlined in the Manual for Streets (2010),</i>

		<p><i>circumstances may make this difficult to achieve. However, as a general rule, 8% should generally be considered as a maximum, which is the limit for most wheelchair users, as advised in Inclusive Mobility'.</i></p> <p><i>8.4.1: 'A maximum longitudinal carriageway gradient of 6% is desirable (TD 9/93 para 4.1), although a gradient of 5% is desirable where there are significant numbers of pedestrians walking along the route'.</i></p> <p><i>8.4.2 'In hilly areas steeper gradients will be frequently required, but a gradient of 8% should be regarded as a practical maximum unless there are particular local difficulties. This is also the maximum gradient that a manual wheelchair can negotiate'.</i></p> <p>Regard must also be given to <b>Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG October 2014</b> Appendix 7 page 121 '<i>Ensure that length to gradient ratios of footpaths and other routes do not</i></p>	<p><i>specifically paragraphs 5.2.5, 8.4.1 and 8.4.2; and Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG October 2014, specifically appendix 7 page 121'.</i></p>
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		<i>exceed 2000mm at 1 in 12 and 5000mm at 1 in 15...routes to entrances should not be steeper than 1 in 15'.</i>	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 2.1</b> The Brief states there are 9600m2 of available floor-space. However in paragraph 6.12 it says 8200m2. Is this an error or are they different measurements?	The figure of 8200m2 relates to the size of the warehouse building footprint and not to the actual amount of floorspace within these buildings. The 8200m2 also doesn't take into account the footprint to the TGI Friday's building.	Text amended in para 2.1 to include ' <i>(this figure does not include internal floorspace of the warehouse buildings or the footprint of the TGI Friday building)</i> '.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 4.3</b> The Brief should request that cross sections should be drawn to include adjacent areas of housing and not simply through the site.	Cross section drawings should include adjoining roads and housing.	Add the following text to para 7.1 ' <i>Cross section drawings should be submitted as part of any future application showing the relationship with the new development and adjoining roads and housing</i> '.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 4.12</b> Figure 12 on constraints should indicate more explicitly all adjacent low rise residential areas.	It is noted that there is low rise housing to the east of the site that has not been demarcated on Figure 12, although para 6.2 of the Brief does make reference to this area of housing. Para 6.16 states that proximity of the site to low rise residential areas of	Low rise residential demarcation on Figure 12 has been extended to include low rise housing to the east of the site.

		Mill Hill to the east, entails that the height of any new build should not have a detrimental impact on these neighbouring properties in terms of overbearing and overshadowing.	
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.3</b> The Brief could make clearer the desire to provide substantially greater business use, given the proximity of the site to Central London and both the M1 and the A1.	The Brief's objectives require the provision of employment floorspace as part of a mixed use scheme. It is considered that a range of uses would be appropriate for this site and would comply with planning policy.	No change necessary.
<b>Mill Hill Neighbourhood Forum</b>	<b>Para 6.5</b> The use of an LEA is welcomed.	Noted.	No change necessary
<b>Mill Hill Neighbourhood Forum</b>	The subtitle in the draft Brief after Para 6.11 should include the word "suburban" rather than word "urban". This reflects better both the nature of the broader area in which any development needs to sit, along with the more specific guidelines about density and mass of any proposed buildings.	Notes to Table 3.2 of the London Plan define urban and suburban settings. It is considered that the Pentavia Retail Park lies in an urban setting as surrounding built character consists of predominantly terraced housing with some blocks of flats to the east, mansion style blocks to the North and East within Churchill Place and off Bunns Lane and a large block building accommodating a car showroom which is effectively 4 storeys in	No change necessary.

		<p>height. There is also a mix of uses in the immediate area including nursery, car showroom, petrol station, school and a college. The nearby major transport infrastructure is not characteristic of a suburban site. The site as currently presented with large building footprints and areas of hard surfacing and lack of residential uses is not suburban in character.</p>	
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>Planning Brief does not comply with NPPF as not:  <b>Positively prepared:</b> The Brief proposes that Pentavia Retail Park is an appropriate site to meet a variety of business needs. The site is not identified as an existing employment site and is not located in Barnet’s priority town centres (Edgware, North Finchley, Finchley Church End and Chipping Barnet) where new mixed use commercial floorspace is encouraged. We therefore do not agree with the Planning Brief on this aspect as there is no sound policy basis for this approach.</p>	<p>The Brief has been positively prepared through engagement with Meadow Residential, Mill Hill Neighbourhood Forum and the wider community. Creating a sustainable, mixed use development on a physically constrained site of low environmental quality in an outmoded, out of town centre location whilst reuniting the site with the surrounding area is a positive outcome. We encourage the provision of employment floorspace to meet the changing needs of modern businesses across Barnet. This need is recognised in Entrepreneurial Barnet 2015-2020 which states that ‘many of our businesses are</p>	<p>Following text to be added to Section 3: <b><i>‘Entrepreneurial Barnet 2015-2020 states that many of the borough’s businesses are owned by residents and a significant proportion of our residents (around 40%) work locally. Entrepreneurial Barnet also identifies Mill Hill as an area for growth. This document goes on to state that this growth will create new opportunities for businesses looking to start-up, invest and grow, and for local people to find new jobs and develop new skills’.</i></b></p>

		<p>owned by residents and a significant proportion of our residents (around 40%) work locally'. The new residential use proposed by the Planning Brief at this site will create a new workforce population. In order to deliver our corporate objectives as set out in Entrepreneurial Barnet we highlight that new workspace should be provided within the site to provide opportunities for new residents as well as local communities.</p> <p>Entrepreneurial Barnet also identifies Mill Hill as an area for growth. This document goes on to state that <i>'this growth will create new opportunities for businesses looking to start-up, invest and grow, and for local people to find new jobs and develop new skills'</i>. The objective for new modern business space to meet the needs of SMEs is in line with the aims of Entrepreneurial Barnet which further demonstrates that the Brief has been positively prepared.</p>	
<b>Quod on behalf</b>	Planning Brief does not comply with NPPF as not:	The Planning Brief sets the	Amendment to para 2.4 the

<p><b>of Meadow Residential</b></p>	<p><b>Justified:</b> The Council state that the Brief considers a number of land uses for the site and has been justified against the relevant policies. However, the Brief fails to acknowledge the existing use of the site as an unrestricted Open A1 Retail Park. It must recognise that the clear alternative for this site is to retain the existing unfettered retail use.</p>	<p>parameters for the future development of this outmoded out of town centre retail park. Core principles of the NPPF encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The NPPF promotes mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas. A mixed use scheme at Pentavia can deliver more benefits than a single use scheme be it retail or residential Retention of the existing use is a decision for the landowners and this is acknowledged in para 2.1.</p>	<p>following text ‘Recent relevant planning applications have been listed in Appendix 3. These include the most recently approved full planning applications for this site (14/08075/FUL, 15/01820/FUL and 15/01825/FUL) and a certificate of Lawful Development (W00408BQ/06) allowed at appeal in 2008 (appeal reference APP/N5090/X/07/2034877) which confirms the lawful use of units to be any use within the A1 Class’.</p>
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>Planning Brief does not comply with NPPF as not: <b>Effective:</b> We would argue that in order for the Brief to be deliverable, the Brief should recognise the sites high existing use value. It is therefore necessary for the value of this development to exceed the Existing Use Value if the applicant is to be incentivised to bring forward an alternative use.</p>	<p>The existing use of the Retail Park is reflected through the Brief. It is agreed that more details can be provided in the Brief relating to the site’s planning history.</p>	<p>Reference has been made to the unlimited A1 use class in para 2.4. Appendix 2 details recent planning permissions.</p>
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>Planning Brief does not comply with NPPF as not: <b>Consistent with national policy:</b> The Planning Brief must be consistent with paragraphs 153 and 182 of the NPPF.</p>	<p>The Planning Brief is consistent with the NPPF.  In regard to para 153 we consider that this Planning Brief will help</p>	<p>No change necessary.</p>

		<p>developers to come forward with proposals that bring this site into more beneficial use. We do not consider that supporting a mixed use development and setting out the Council's objectives at Pentavia will add unnecessary financial burdens. The addendum to the report presented to Policy and Resources Committee on 1<sup>st</sup> September provides further explanation.</p> <p>Para 182 refers to the preparation of the Local Plan. Barnet's Local Development Scheme 2016 lists all Local Plan documents. This is a Planning Brief which provides an opportunity to bridge the gap between the provisions of the Local Plan and the requirements of any planning application for the site.</p>	
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>The Brief fails to acknowledge the existing use of the site as an unrestricted Open A1 Retail Park. This particular use is the most valuable of all non-residential uses. The value is crystallised by the following recent retail planning permissions approved by Barnet Council:-</p> <ul style="list-style-type: none"> <li>➤ Planning Permission ref: 14/08075/FUL, date approved 05/08/16;</li> <li>➤ Planning Permission ref: 15/01820/FUL, date approved 05/08/16; and</li> </ul>	<p>The Brief has been revised in regard to the open A1 use and recent planning history. As stated in the Addendum of the report presented to Policy and Resources Committee on 1<sup>st</sup> September '<i>Planning Briefs do not assess viability issues. This will be considered at a later stage prior</i></p>	<p>Following text to be added to para 2.4: '<i>Recent relevant planning applications have been listed in Appendix 3. These include the most recently approved full planning applications for this site (14/08075/FUL, 15/01820/FUL and 15/01825/FUL) and a</i></p>

	<p>➤ Planning Permission ref: 15/01825/FUL, date approved 05/08/16.</p> <p>It is therefore necessary for the value of this development to exceed the Existing Use Value if the applicant is to be incentivised to bring forward an alternative use. Clearly a development of a lesser scale which does not meet this NPPF viability test, would not be delivered.</p>	<p><i>to the submission of a planning application. The Planning Brief therefore does not 'devalue' the site'.</i></p>	<p><i>certificate of Lawful Development (W00408BQ/06) allowed at appeal in 2008 (appeal reference APP/N5090/X/07/2034877) which confirms the lawful use of units to be any use within the A1 Class'.</i></p> <p>Addition of planning history appendices detailing the recent permissions outlined Quod's consultation response.</p>
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>The site is a "windfall" site, assisting the Borough in meeting its objectively assessed housing needs. The site is not allocated for any particular use and lies close to residential areas to the north, east and west of the site.</p> <p>As LB Barnet is not meeting its housing needs, and is only achieving 55% of the London Plan Housing Target for the Borough (London Plan Annual Monitoring Report 2014/2015), then residential is the priority use for this site, beyond other uses.</p> <p>This fundamental objective for the site is not clearly emphasised within the Brief. Paragraph 1.2 mentions residential uses but in a convoluted way. The first bullet point of paragraph 1.2 be amended to state that redevelopment should be 'residential led' rather than 'mixed use'.</p>	<p>The Brief is clear that it supports a sustainable, mixed use development of which a significant proportion will be residential. The Brief is also clear in describing the site's relationship with nearby residential areas to the north, east and west of the site.</p>	<p>No change necessary.</p>
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>This is a new inclusion within the Brief, and it is unclear why it is proposed, certainly when one considers:-</p> <ul style="list-style-type: none"> <li>▪ The existing use</li> <li>▪ The borough's failure to meet its housing needs, and housing being a priority use</li> <li>▪ The objective to meet affordable housing needs</li> </ul>	<p>As per the objectives listed in para 1.2, this Brief does seek a mixed use scheme which provides residential, employment, non-destination retail and community uses.</p>	<p>No change necessary.</p>

	<ul style="list-style-type: none"> <li>▪ The viability impact of delivering SME floorspace on site</li> <li>▪ Barnet’s development plan policy on SME floorspace The site is not identified as an existing employment site and is not located in Barnet’s priority town centres. The site is not considered an appropriate site to solely meet business needs, rather a mixed use, multi-use approach which provides wider development and economic benefits. The delivery of lower value floorspace would not confirm with the NPPF paragraph 153.</li> </ul> <p>The delivery of such lower value floorspace would not conform with the NPPF paragraph 153 and it appears as an onerous and unsound inclusion.</p>	<p>The provision of employment floorspace on this site is in line with Entrepreneurial Barnet, which states that <i>‘many of our businesses are owned by residents and a significant proportion of our residents (around 40%) work locally’</i>. The new residential use proposed by the Planning Brief at this site will create a new workforce population. In order to comply with the terms of Entrepreneurial Barnet, new workspace should be provided within the site to allow the new residential population to work locally within the site.</p> <p>Entrepreneurial Barnet also identifies Mill Hill as an area for growth. This document goes on to state that <i>‘this growth will create new opportunities for businesses looking to start-up, invest and grow, and for local people to find new jobs and develop new skills’</i>. The objective which</p>	
<b>Quod on behalf of Meadow Residential</b>	The Brief confirms that as this site is not within a strategic location, tall buildings of 8 storeys or more in height will not be supported. We consider that there are material	Local planning policy is clear regarding the siting of tall buildings within the borough.	Para 3.19 includes the following text: <i>‘Policy DM05: Tall buildings States that all buildings outside the</i>

	<p>considerations which weigh in favour of not complying with this:-</p> <p>i. We believe that housing need in Barnet is a fundamental issue which requires an optimised approach to site capacity. An increased minimum housing target has been set for Barnet between 2015/16 and 2024/25 in the London plan (2016) which suggests that Barnet’s policies for growth areas, and tall building locations, are fundamentally out of date.</p> <p>ii. Other factors include the protection of green belt, substantial need for affordable housing, and encouraging the effective use of underutilised brownfield sites.</p> <p>iii. The need to create an appropriate residential environment.</p> <p>iv. The site is characterised by tall buildings to the west of the M1 (Motorway).</p> <p>v. The need to deliver a viable development and incentivise alternative land use options.</p> <p>Reference should be made to paragraph 7.25 of the London Plan which states that ‘Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning application to the Mayor’. In this location the referral height is 30m (10 storeys equivalent).</p>	<p>Pentavia is not a strategic location for tall buildings. No new tall buildings have been approved outside of the strategic locations highlighted in the Local Plan policy CS5 since adoption in September 2012. The Colindale AAP is only applicable to the regeneration area and therefore cannot be reference in the context of Pentavia.</p> <p>Reference has been added to the specific Local Plan policy on Tall Buildings.</p> <p>The Brief is also clear in describing the site’s built environment context.</p> <p>As per the addendum to the Planning Brief, viability is not a consideration at this stage.</p>	<p><i>strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:</i></p> <p><i>i. an active street frontage where appropriate</i></p> <p><i>ii. successful integration into the existing urban fabric</i></p> <p><i>iii. a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline</i></p> <p><i>iv. not cause harm to heritage assets and their setting</i></p> <p><i>v. that the potential microclimatic effect does not adversely affect’</i></p>
<p><b>Quod on behalf of Meadow Residential</b></p>	<p>Paragraph 6.19 of the Planning Brief confirms that any development proposal at this site should account for roofline interest by varying the height of proposed buildings. It goes onto state that a monotonous roofline motif at this location will have a detrimental impact on the surrounding areas and that some roofline interest might frame the sky exposure of views from adjacent areas.</p>	<p>It is considered that both environmental protection through building design and the implementation of interesting design techniques including varied rooflines are both achievable.</p>	<p>No change necessary.</p>

	<p>The reference to monotonous roofline having a detrimental impact should be removed particularly given that the design, layout and height of any proposed buildings at this site will be dependent on responding to the environmental context and ensuring appropriate measures against noise and air pollution. The treatment of visible elevations are an important consideration in any application and can ensure overall legality of the views from adjacent areas.</p> <p>We</p>		
<b>Woodland Trust</b>	<p>Woodland Trust recommends adding a new paragraph, in between paragraphs 7.3 and 7.4: <i>“The Council will seek an increase of tree canopy cover through new development, due to the wealth of evidence on the many benefits this provides, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity.”</i>;</p>	<p>The Council welcomes the text from the Woodland Trust.</p>	<p>Text provided by consultee is added to the Planning Brief.</p>
<b>Woodland Trust</b>	<p>That the Mayor’s <i>London Tree and Woodland Framework</i> is added to the list of London policy documents in Appendix 1, and TDAG’s <i>Trees in the Townscape</i> and the Woodland Trust’s <i>Residential Development and Trees</i> are added as new references.</p>	<p>The focus of Appendix 1 is on the main policy framework upon which any application at this site will be considered.</p>	<p>No change necessary</p>
<b>Woodland Trust</b>	<p>Your strategy mentions the need to control flooding, so it would be useful to emphasise the importance of retaining large-crowned trees, and referring to the research by the University of Manchester which has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. The Woodland Trust has also</p>	<p>The Council welcomes the text from the Woodland Trust.</p>	<p>Include the following text to para 7.4 <i>‘Recent research shows that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. The implementation of trees across</i></p>

	<p>produced a policy paper illustrating the benefits of trees for urban flooding – <i>Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity</i> (<a href="http://www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf">www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf</a>).</p> <p>Therefore, the Woodland Trust would like to see trees acknowledged with more detail of their role on flood amelioration in the Planning Brief.</p>		<p><i>the site is very important to reduce the risk of on-site flooding.'</i></p>
<p><b>Woodland Trust</b></p>	<p>Trees play an important role in urban climate change strategies, as increasing tree cover in urban areas can help mitigate the urban heat island through direct shading and by reducing ambient air temperature through the cooling effect of water evaporation from the soil via plant leaves. The shading provided by trees can also reduce energy use for heating and cooling buildings. I suggest this could be explicitly stated in your Strategy.</p> <p>Therefore, trees specifically should be acknowledged within the Brief as being able to help combat climate change, with a suggested new paragraph: "Increasing tree cover in urban areas can help mitigate the urban heat island through direct shading and by reducing ambient air temperature through the cooling effect of water evaporation from the soil via plant leaves. The shading provided by trees can also reduce energy use for heating and cooling buildings."</p>	<p>The Council recognises the contribution of trees to combatting climate change and welcomes this text from the Woodland Trust.</p>	<p>The following text is to be added to para 7.4 <i>"Increasing tree cover in urban areas can help mitigate the urban heat island through direct shading and by reducing ambient air temperature through the cooling effect of water evaporation from the soil via plant leaves. The shading provided by trees can also reduce energy use for heating and cooling buildings."</i></p>
<p><b>Mill Hill Preservation Society</b></p>	<p><b>Para 1.1</b> This clause presumes the site will be mixed development. MHPS think that the Brief should not presume the nature of the development and needs rewording. More fundamentally we do not believe that the case for changing the use of the site from A1/A3 to mixed use has been definitively made. We think the Brief should presume a continuation of the existing type of</p>	<p>The Core Planning Principles of the NPPF states that planning should 'promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas'. The objective for a mix of uses on</p>	<p>Inclusion of this core planning principle in the Planning Policy Framework section of the Brief.</p>

	<p>use. Pentavia Park, as a retail site, was successful for almost 25 years. Retail/leisure uses have been previously approved on this site. The site confined by the A1 and M1 is not suitable for residential properties.</p>	<p>this site complies with this objective.</p> <p>The Brief gives clear guidance on the environmental mitigations which will be required.</p>	
<p><b>Mill Hill Preservation Society</b></p>	<p><b>Para 3.16</b> We believe the Brief should state that any proposed residential development must meet, as a minimum, the space and design standards laid out in the London Plan. Furthermore, we think the Barnet Housing strategy 2015 – 2025 (page 12) is misquoted in the Brief and should be corrected. It says ... <i>“The Local Plan 2012 recognised the need for a range of accommodation tenures and sizes to reflect the needs of a changing and growing population, and, taking account of the market’s predisposition to provide one and two bedroom homes, prioritised larger family homes of 3 bedrooms or more across affordable, intermediate and private developments.”</i> This implies there should be an emphasis on larger type accommodation rather than the market pre-disposition toward one and two bedroom units.</p>	<p>In response to the new space standards in the March 2016 version of the London Plan the Council has revised SPDs on Sustainable Design and Construction and Residential Design Guidance. These SPDs were adopted in October 2016 and are now referenced in Appendix 1.</p> <p>Policy DM08 is our Local Plan dwelling mix policy. The Housing Strategy reflects on the market’s predisposition for smaller units.</p>	<p>Add to section 3’Policy 3.5 Quality and design of housing developments.</p> <p>The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.</p> <p>Table 3.3 outlines the minimum space standards for new dwellings.</p>
<p><b>Mill Hill Preservation Society</b></p>	<p><b>Figure 15 Para 6.6</b> We object to this diagram because it shows various uses for the site in an irrational way. There is no need for the employment zone to be limited to where shown; no need for the amenity space to be limited to where shown; no need for the community space to be limited to where shown; the key for housing is</p>	<p>Figure 15 is an indicative primarily demonstrating the locations for the uses in regard to their relationship with surrounding infrastructure (i.e. green space located in centre of development to create a sheltered amenity;</p>	<p>Figure 15 amended.</p>

	shown all over the site and this seems totally unreasonable given the comments we have made previously. MHPS feel the figure would best be left out of the Brief.	residential uses surround the amenity space to allow residential units will open out onto this green area; office space located where site is narrowest and therefore inappropriate for residential. Figure 15 has been amended to make this more clear.	
<b>Mill Hill Preservation Society</b>	<b>Para 6.8:</b> It is noted that the provision of residential development is phrased as a question. We think the rest of the Brief should follow the same approach and not assume or imply that the site will be a substantially residential development. The availability of any on-site community and retail uses will be used by Mill Hill residents generally and not just residents of any proposed residential development.	The objectives for the Planning Brief request a range of uses. It is likely that any future scheme will include a significant proportion of residential uses. However, in order to comply with the objectives of the Brief any future development will also need to provide other uses including retail, employment and community. This is to strengthen the future communities on this site, revitalise this location and create a strong sense of place.	No change necessary.
<b>Mill Hill Preservation Society</b>	The MHPS has not checked the accuracy of Appendix 1.	No response required.	Appendix 1 has been updated to add reference to the revised SPDs on Sustainable Design and Construction and Residential Design Guidance.
<b>Environment Agency</b>	We agree the site is in flood zone 1 (low probability of flooding from rivers or sea). We agree that a Flood Risk Assessment will need to be carried out to assess any risk of	Issues relating to ground stability and contamination will be considered at the application	See amendment listed on page 4 in regards to land contamination.

	<p>surface water flooding for the attention of the Lead Local Flood Authority.</p> <p>There are no watercourses or areas of sensitivity for groundwater e.g. Source Protection Zones, major/minor aquifers.</p> <p>However, there is an historic landfill indicated on our maps within the site boundary and therefore potential for land contamination. The Planning Brief may need to mention this and the need to ensure any potential for land contamination is investigated as part of any planning application and remediation to take place where necessary. Given the lack of controlled waters sensitivity at the site, this is probably more relevant to human health risk.</p>	stage and further investigation is therefore merited.	
<b>Natural England</b>	Natural England does not consider that Draft Pentavia Retail Park Planning Brief 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 necessary.
<b>Canal River Trust</b>	As the Canal & River Trust does not own or manage any land or water within this area, I can confirm that we have no comments to make. Our closest area of ownership is the West Hendon Reservoir.	Noted.	No change necessary.
<b>Historic England</b>	<p>Having reviewed the document we have no comments to make at this stage.</p> <p>Please note that this advice is based on the information that has been provided to us and does not affect our obligation</p>	Noted.	No change necessary.

	to advise on, and potentially object to any specific development proposal which may subsequently arise from this Planning Brief and which may have adverse effects on the environment.		
<b>Finchley Society and the Hendon and District Archaeological Society</b>	No comments to make at this time	Noted.	No change necessary.