

Mill Hill Preservation Society founded 1949

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For the attention of **Andrew Dillon**, Principal Planning Officer, Major Project Team
London Borough of Barnet
Development Management & Building Control Service
Barnet House
1255 High Road
London N20 0EJ

7th December 2016

Your Ref: **16/6662/FUL**
Our ref: jl /KH/MHPS Planning

Dear Andrew Dillon,

TOWN AND COUNTRY PLANNING ACT 1990

SITE: Hasmorean High School, 2-4 Page Street, London, NW7 2EU

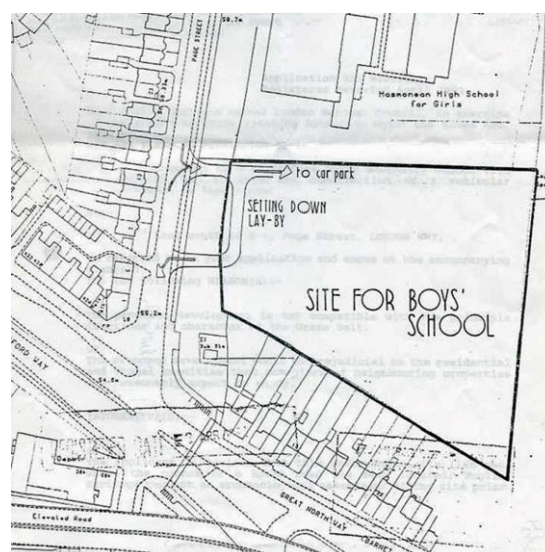
PROPOSAL: Demolition of existing Girls school and construction of a new combined Boys and Girls school with vehicular access from Champions Way including 167 car parking spaces and 220 cycle parking spaces; three pedestrian accesses north, east and south of the site; along with associated landscaping (including swales), sports and recreational areas and ancillary buildings for energy centre and service yard; security gatehouse. School drop-off and pick-up space will be set out adjoining land | Hasmorean High School 2 - 4 Page Street London NW7 2EU

PLANNING REFERENCE: 16/6662/FUL

1.0 Introduction: The Committee of the Mill Hill Preservation Society (MHPS) have examined the application on the LBB planning website; we have met the School's design team in committee and attended a public exhibition showing the proposal. We were against the proposals. The Society objected by letter dated 8th March 2016 on the planning application 16/1295/ESC - Environmental Impact Assessment Scoping Opinion – that was refused by the Council. In view of the large number of documents to be reviewed (over 290) in such a relatively short space of time, we have commented based on our general but significant experience with the project – rather than on detailed clauses in all the documents. This is a site in the Green Belt and requires special consideration.

It is clear that the proposals contravene Green Belt Policies in the National Planning Policy Framework (2012), the London Plan (2016) and Barnet's Local Plan (Core Strategy - 2012). We also believe the proposals fail to demonstrate the 'very special circumstances' (NPPF, para 87) that would be needed to justify such development. We therefore request that the application is refused.

2.1 History of the Site: A new 2-form entry and 6th form school for 350 pupils (Girls' school) with parking and hard play was approved with conditions on 22nd November 1972. Two main conditions were applied to ensure the free flow of traffic and the maintenance of trees and landscaping as a local asset. There have been a couple of attempts to build the boys' school next to the girls' school, the last details we can establish being application W0099AK that was turned down for the following reasons:



The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH
Telephone & fax: 020 8906 0769 Email: contact@mhps.org.uk

Registered Charity 212993
www.mhps.org.uk



1. The proposed development is not compatible with the principal function and character of the Green Belt.
2. The proposed development would be prejudicial to the residential and visual amenities that occupiers of neighbouring properties may reasonably expect to enjoy.

2.2 Over-occupation of Boys' Site: According to the Design & Access Statement (2.1.3) the Hasmonean Boys' School is housed in premises that were suitable for 350 boys, but now they house some 600 pupils overall. It is clear that there has been an element of mismanagement to enable limited facilities to be so oversubscribed, the consequence of which is the current planning application.

2.4 Verification of Numbers: The Society is concerned that we do not have sufficient time or skill to verify the pupil numbers and Barnet targets in the application documents. However, we did notice in the Jewish News 29th September 2016 that the Chief Rabbi, Ephraim Mirvis, said it would be "irresponsible" for London's Jewish community to try to open more than one new school after the government lifted a ruling limiting faith-based places to 50%. He said that the opening of more than one modern Orthodox school for Jewish students was unrealistic. A spokesman wrote on his Facebook account "A site of suitable size and location, along with the hard work and the problems that an oversupply of places would cause, would be both irresponsible and impracticable to try to open more than one new school." The Society is left concerned that the Jewish community is worried about the oversupply of their own school places. The current application plans to increase the number of school places.

2.5 CPRE: In their document 'A Done Deal' the Campaign for the Protection of Rural England (CPRE - December 2015) state that the need for school places is often questioned by local residents; the need for school places may be defined differently by government supporting 'demand' for free schools catering for a wide area, as compared to local authorities defining local need. In fact, the 'need for school places' is being cited as an 'exceptional circumstance', as required to build on Green belt or Metropolitan Open Land, though it is clearly a generalised pressure and not an 'exceptional circumstance' as per the intentions of the Green Belt and Metropolitan Open Land provisions. The following section explores these issues.

3.1 GREEN BELT MATTERS: As has already been noted the application site falls within the Green Belt. Barnet's Local Plan leads with the Three Strands that provides the spatial vision that underpins the **Core Strategy and the Local Plan. Strand 1 calls for the 'absolute protection of the Green Belt'** (e.g. para 2.2.1 and para 7.1.5). The submission therefore needs to address the requirements of the relevant development plan policies – for example policies CS7 and DM15 of the Barnet Local Plan and policy 7.16 of the London Plan.

3.1.a Policy CS.7: covers the protection of Public Open Space, stating there should be no net loss of open space in Barnet Parks from the 2010/11 baseline. **As the site is fenced off with a security fence there is reduced access by the public and therefore Policy CS.7 would not be met.**

3.1.b Policy DM15: Green Belt, Open Spaces and MOL is important to this application so we quote it in full:
a: Green Belt / Metropolitan Open Land (MOL)

i. Development proposals in Green Belt are required to comply with the NPPF (para 79 to 92). In line with the London Plan the same level of protection given to Green Belt land will be given to Metropolitan Open Land.

ii. Except in very special circumstances, the council will refuse any development in the Green Belt or MOL which is not compatible with their purposes and objectives and does not maintain their openness.

iii. The construction of new buildings within the Green Belt or Metropolitan Open Land, unless there are very special circumstances, will be inappropriate, except for the following purposes:

- a. Agriculture, horticulture and woodland;
- b. Nature conservation and wildlife use; or
- c. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of Green Belt or MOL.

- iv. Extensions to buildings in Green Belt or MOL will only be acceptable where they do not result in a disproportionate addition over and above the size of the original building or an over intensification of the use of the site.
- v. The replacement or re-use of buildings will not be permitted where they would have an adverse impact on the openness of the area or the purposes of including land in Green Belt or MOL.
- vi. Development adjacent to Green Belt/MOL should not have a detrimental impact on visual amenity and respect the character of its surroundings.

b: Open Spaces

i. Open space will be protected from development. In exceptional circumstances loss of open space will be permitted where the following can be satisfied:

a. The development proposal is a small scale ancillary use which supports the use of the open space or

b. Equivalent or better quality open space provision can be made.

Any exception will need to ensure that it does not create further public open space deficiency and has no significant impact on biodiversity.

ii. In areas which are identified as deficient in public open space, where the development site is appropriate or the opportunity arises the council will expect on site provision in line with the standards set out in the supporting text [para 16.3.6].

Any analysis of this policy will establish the following – which also relates to the NPPF:

The openness of the Green Belt is not maintained: the proposed use is non-conforming: the proposed buildings are disproportionate in size: the buildings are of detriment to the visual amenity and the character of the surroundings: no equivalent or better quality open space has been made. For these reasons it is clear that the requirements of DM15 would not be met by the proposals.

3.1.c Policy 7.16: The London Plan, Chapter 7 ‘London Living Spaces and Places’ states that the strongest protection should be given to London’s Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Clause 7.55 states: Paragraphs 79-92 of the NPPF give clear policy guidance on the functions the Green Belt performs, its key characteristics, acceptable uses and how its boundaries should be altered, if necessary. Green Belt has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners. Boroughs with landscape designations (such as AONBs) should follow the advice of NPPF paragraph 113.

Clause 113 states: Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

In the opinion of The Society, Policy 7.16 and the sub clauses stated above cannot have been met; this scheme does not secure the objectives of improving the Green Belt; paragraphs 79-92 of the NPPF are not met for reasons stated under 3.1.b (see also section 4); there is no consideration given to biodiversity of the site which is considered to be a Site of Importance for Nature Conservation.

4.1 The National Planning Policy Framework (NPPF) and related issues:

Some requirements of the NPPF have already been touched upon but there are other aspects to this matter.

Clause 80 of the NPPF describes how the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Copthall Open Space is important in ensuring the sprawl of Mill Hill does not reach the sprawl of Hendon and this proposal eats away at this space by encroaching further into the Green Belt. **The site is important to the local setting - providing breathing space, a recreational area not given over to formal sports and a place to be in touch with nature – one of the last such areas in the Copthall complex. This is harm to the Green Belt.**

4.2 Clause 88 of the NPPF seems especially important: “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. **‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.**”

The Society considers that there is considerable harm to the Green Belt due to this proposal; the disruption to the recently finished Copthall Development Plan, **the building itself on the Green Belt, the loss of public access to this recreational area, the destruction of a Site of Importance for Nature Conservation, the loss of trees, hedgerows and mature landscape, the level of on-site car parking and the adjoining drop-off point.**

This is not the only harm. **There is the harm caused to the area by virtue of the change of use and the increased buildings on what was otherwise a green area, so there is harm to the wider residential area. Similarly, with the increased number of schools and the increased number of pupils there is going to be an intensification of activity in the locality. Taken all together this is a considerable degree of harm.**

It is a matter of judgement, but the Society believes that the harm caused to the Green Belt and the environs by this application is not clearly outweighed by other considerations. In our opinion there is serious doubt as to whether this level of inappropriateness, and other harm, can be set aside. **Whether this Green Belt site needs to be used depends in large measure to what other sites the applicant has explored, and we have examined this.**

4.3 Development Alternatives: In the LBB Delegated Report ref: 16/1295/ESC concerning the ‘Environmental Impact Assessment Scoping Opinion’ states “For the avoidance of any doubt the ‘alternative site options’ considered should include consideration of different sites (a sequential site search), different ways of developing the site to the rear of Page Street (including the potential for options which involve less land take...”

It is therefore important that proper ‘alternative site consideration’ has been given in order to answer the question why the essential need exists for this scheme on this particular site. We have already touched on the questionable relationship between the girls’ and boys’ schools. Without the expressed ‘need’ to be adjacent to each other, this site would not be under consideration at all. The fact that Hasmonean, for many years they claim, have looked for alternative sites solely for the boys’ school questions the claimed ‘need’ to be adjacent.

4.4 There is a brief mention of these matters under Section 2.8 ‘Site Considerations’ in the Design & Access Statement. **Clause 2.8.2 claims that the Hasmonean School has been looking for alternative sites since 1976. In particular, the search for a site for the replacement of the Boys’ School has been extensive.** Clause 2.8.3 suggests that sites have been looked for in Barnet, and the adjacent boroughs of Brent and Hertfordshire.

4.5 MHPS looked for evidence to validate these statements in the Environmental Statement. Section 5.5 Alternative Site Search covers this subject. **In fact, there was little evidence found.**

- There is mention of a proposal to relocate the boys’ school refused at ‘Ochre’ dating from 1992.
- The NIMR site was considered in 2014 but it claims the site could not accommodate both schools for 1400 pupils. This is surprising given that the Copthall site is about 21 acres and that the NIMR site is 47 acres. Admittedly both are in the Green Belt but at least the NIMR site is a brownfield site.
- In 2015 a site was researched in the Brent Cross regeneration area, but alternative school provision was already being made.

In the case of the Hasmonian School only 3 sites have been cited following searches over 40 years. There is no evidence given of a sequential site search over this period. Given the pupil catchment area for the school is greater than the borough of Barnet there is little evidence of more widespread searches. This analysis casts doubt on the rigorous nature of the site searches made over 40 years as set out in clause 5.2 above.

The map on page 40 of the Design & Access Statement does list 17 locations that have been considered, but as a Society we have been involved with many of these sites and we know of no involvement by Hasmonian. The list simply looks like a list of recent development sites in the area with no evidence of serious intent to use them. The report by Cushman & Wakefield 'Alternative Site Search Report – Hasmonian High School September 2016' – Appendix to Chapter 5 of Environmental Statement, **does list a lot of sites that are obviously too small for the school, and some analysis of larger sites. However, these sites are very 'current' and this suggests that the work has been done recently as opposed to over a period of 40 years. We therefore feel that the work has been done to support the application rather than as evidence of a sustained search over many years as has been stated.**

4.6 In the opinion of The Society, the alternative site search and development alternatives seem insufficient to show that the proposed harm to the Green Belt can be set aside on the basis that it is clearly outweighed by other considerations. In this case the applicant needs to reply on 'very special circumstances'. We set out our views on these in the next section.

5.1 VERY SPECIAL CIRCUMSTANCES: The following sections look at the claimed 'Very Special Circumstances' related to NPPF:

a. The application seems to incorporate a property exchange between Hasmonian (the boys' school premises on Holders Hill) and the LBB (a large acreage of the Cophall Green Belt) with a monetary sum to make up for the difference in values. Whilst this may prove to be advantageous to the school in terms of administrative convenience, and to the local authority in terms of obtaining an old school premises, in our opinion this does not constitute 'very special circumstances' under the terms of the NPPF.

b. It is not a 'very special circumstance' for the boys' school to be located next to the girls' school. It is questionable whether the boys' school needs to be immediately adjacent the girls' school – certainly it has not been there before and whilst it may be more convenient for staff this would not constitute a 'very special circumstance'. **Additionally, as the boys and girls are not allowed to mix or share play, there seems to be very little 'pay-off' in** this arrangement as facilities cannot overlap. The only function that seems to serve both schools is the kitchens! The Society believes that a clear case for the schools to be adjacent has not been made.

c. Through poor management the existing boys' school has been allowed to become overcrowded and without sufficient facilities but this does not create a 'very special circumstance' in planning terms. **In fact, Hasmonian, in looking for a site to accommodate both schools, has made the task more difficult as the site area required is much larger. These are both self-induced positions.**

d. It is clear that provision of places to meet the local authority need does not represent 'very special circumstances' under the terms of the NPPF. This application comes at a time when a number of Jewish schools are being proposed. We have already touched on this under clause 2.4 above, and in addition there is an application for a new inclusive Jewish secondary school currently with the Department for Education (DfE) for Barkai College a new Modern Orthodox secondary school offering places to students across Borehamwood, Mill Hill, Edgware, Finchley, Hendon and Barnet. **The Chief Rabbi has expressed concerns about over supply of spaces as we have mentioned previously.**

e. The fact that the architects concerned have managed to produce a building of some architectural merit to fit on the proposed 'site' in the Green Belt does not in itself represent 'very special circumstances'. The fact that the buildings meet the Building Regulations and would represent a high level of sustainability would not constitute 'very special circumstances'. It is just the architects doing their job properly. **Similarly, the fact that the schools are both considered high performers by Ofsted does not make for a 'very special circumstance'.** However welcome, it is just the school team doing their job properly.

f. It is not a 'very special circumstance' for the scheme to incorporate proposed new footpaths linking Page Street through to the Copthall Open Space to the south and the Great North Way. In fact, this is rather tame fare when the walks are provided as compensation for the loss of free public access to some 15 acres. Similarly, the retention of a limited area of the mature woodland, and trees at the perimeter of the site, is not a 'very special circumstance'. Furthermore, the area between the proposed school site and **the planning application boundary shows landscaping, tree planting and public footpaths**. However, **these features do not form part of the application** and are merely a suggestion of what the Council might like to do at a later stage. **The school makes no commitment to its future implementation and we consider this to be misleading.**

g. It is not a 'very special circumstance' that there is to be a community changing facility. **The community changing facility only seems to be part of the boys' sports facilities that are given over to 'Community Use' at specific times, not a community facility as such.** We see no other reference to Boys and Girls sports changing on the plans.

h. It is not a 'very special circumstance' for a scheme to provide sports facilities adjacent to a large acreage that is already given over to a whole range of sports. The school claims that some of their facilities may be shared by the community but with the following proviso **"A draft Community Use Agreement has been prepared and modelled on other faith educational facilities, where access has to be controlled according to the diversity of the faith."** (D&AS Clause 10.8) This wording is of concern, as we would like to think that the facilities would be open to all the community irrespective of their religion. **Such a limitation is likely to mean that the suggested sports asset does not represent a true community benefit.**

5.2 So when considering the NPPF statement that 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations" The Society is of the opinion that there are no considerations that clearly outweigh the need to overlook the harm to the Green Belt and nor are there 'very special circumstances' that ameliorate this harm.

6.1 Alternative Site Arrangements: There is also a need to look at how the applicant has considered possible alternative arrangements on the site (see 4.3 above). The Design & Access Statement covers this at the back of the document and gives 5 options. It is regrettable that all this analysis has done is position the existing design 5 different ways on the proposed new site. Given that the text implies that the building is designed to meet the contours of the site, of course it does not work so well when it is repositioned. Furthermore, there has been no serious attempt to look at alternatives as to how to reduce the land take. **Consequently, in our opinion, the alternative proposals section is poor and insufficient to truly show the potential to reduce the land-take of Green Belt.**

7.1 The Copthall Development Brief by Barnet: We wish to comment on the recently agreed Sports Development Brief for Copthall. The proposed site lies within the south-west corner of the designated area that is given over to sports and recreational development. The Hasmonian Girls' school is not part of the designated area. The objective of the Planning Brief is to support the Council's strategic objective of being seen as a national leader in developing attractive suburban parks that promote health and wellbeing whilst conserving the natural character of the area. **Copthall South Fields within the south west of the site covers an area of 6 hectares and is designated as a Site of Local Importance for Nature Conservation.** The Brief states, "the three fields and hedgerows provide a pocket of countryside locally and are managed to encourage wild flowers. These areas of nature conservation importance will enhance the parkland element and the overall attractiveness of Copthall as a visitor destination."

To be precise, Clause 7.4 of the Brief states **"The area of grassland in the south west corner of the site provides access to natural greenspace and it should retain that function with no development.** Improved pedestrian access should be created at the southwest corner of the site – giving access to the pedestrian subway." It is absolutely clear that the Brief does not support the use of this site as a school building. This reason alone is sufficient for the application to be refused.

The Design & Access Statement repeatedly claims to meet the requirements of clause 12.2 of the Development Brief. This clause asks that “12.2 Each planning application should show how it fulfils the objectives of this Draft Planning Brief and the planning objectives for Copthall. This will ensure that the overall vision is observed and discordant development is not allowed. Any development over and above that highlighted in this plan will need to show how it still meets the objectives of the plan and the Green Belt.”

We are of the opinion that the proposal to build a school on the site does not conform to the Development Brief nor does it meet the suggested standards – one example; improved pedestrian access should be provided... etc., whereas the site is being fenced off.

8.1 Traffic and Parking: **The existing Hasmorean Girls’ School, off Page Street, has 506 pupils** and 73 parking spaces. The residents of Page Street complain bitterly of the noise and congestion caused by the school, especially when children are being delivered to and being collected from the school. **The new application seeks planning permission for a school with 1,400 pupils** (including 300 sixth form students), with 167 on-site car parking spaces that will be accessed from a main vehicular T-junction on Champions Way. The site will also house 190 secure, covered and lit cycle spaces for students plus 32 for staff. There will also be a drop off point on adjoining land at the Mill Hill Rugby Club forecourt. The Society are concerned that the increase in traffic generated by the schools will cause chaos with further noise and air pollution, in addition to local congestion.

8.2 Whilst the parking strategy for the project claims to be in accordance with the requirements of the London Plan we do not have sufficient information to verify this. **However, the proposed school is inappropriate on the Green Belt and therefore the associated extensive parking is also inappropriate in the Green Belt.**

8.3 The level of parking provision will give too much emphasis on car travel to the schools. Similarly, the ‘off site’ drop-off point proposed for the Girls’ and Boys’ schools will encourage children being brought to school by car. There will be some 300 pupils in the 6th form that will also attract pupil parking, which will probably not be supported by the school, but will find its way onto adjoining roads.

8.4 Pick-up / Drop-off Points: The girls’ school drop-off point is proposed to be at the entrance to Mill Hill Rugby Club and includes for additional staff parking. The times for drop-off will be between 07.00 – 09.00 and pick-up between 15.30 – 18.00 Monday to Friday, and between 09.00 and 13.00 on Sundays. The exit onto Champions Way will cause congestion and disrupt traffic on Champions Way moving toward the Page Street junction. A similar boys’ drop off point is not established and is proposed as being on Champions Way. This is going to cause considerable congestion with cars arriving, stopping, turning and trying to move to the Page Street roundabout past the exit to the girls’ drop-off point. The Society believes there will be clashes at weekends when there is a Saracens Rugby match with resulting congestion. There may well be similar disruption when Mill Hill Rugby Club wishes to use their own car park for matches. There is mention of a potential boys’ drop-off point at Metro Golf Course but we believe this to be impractical and too far away from the school to be attractive. **In inclement weather pupils will be dropped off directly outside the school.**

8.5 Car Journeys: Whilst the undesignated diagram on page 40 of the Design & Access Statement is meant to show the catchment area of pupils attending the school, it also indicates the distances that they have to travel to attend and we believe that car journeys will be the prevalent means of conveyance to the schools, especially in inclement weather. Additionally, the schools cannot be taken in isolation as there is a new leisure centre proposed for the Copthall site which will, no doubt, attract more people using cars to reach the venue. Also, Saracens new West Stand is about to be submitted for planning and this will entail additional car parking causing increased pressure on Champions Way. The difference between those applications and that of the schools is that they are in accordance with the Development Brief for Copthall and the schools are not.

The Design & Access Statement clauses 6.10.1 to 6.10.4 give some staggeringly low figures for increased traffic generation for a school with 1400 pupils, with additional staff, service vehicles and visiting parents.

It is predicted that at the Page Street/Champions Way/Longfield Avenue junction, between 08:00 – 09:00, the busiest school arrival period, there will be a net increase of 209 vehicles. The traffic engineers assess that this junction will be within capacity between 07:00 – 09:00 and 16:00 and 18:00.

Similarly, the Page Street/Bunns Lane/Pursley Road double mini roundabout between 08:00 -09:00 will have an extra 21 vehicles, and between 16:00-17:00 an extra 10 vehicles.

At the Page Street/A41 Watford Way/A1 Great North Way 'Fiveways' Junction between 08:00-09:00 there will be some extra 51 vehicles and between 16:00-17:00 some extra 81 vehicles.

Were it not for the fact that every other school in the area causes traffic chaos between the stated times these numbers might appear quite acceptable. We do not have the models and expertise that the traffic engineers have – but from our own experience we do not believe them. The current girls' school with some 500 pupils causes local chaos according to the residents living nearby. **If this is the case for a school with 500 pupils, we believe that two schools with 1,400 pupils will have more than double the impact.**

The suggestion that the vehicle entrance has moved into Champions Way, some short distance from Page Street, will somehow make a significant difference to the traffic congestion caused by the school is suspect. Moreover, given that Cophall is going to get busier with an improved golf range at Metro, a new leisure centre and an enlarged Saracens, there is going to be congestion caused by the increased activity at the Page Street/Champions Way/Longfield Avenue junction stopping the free flow of traffic into and out of the wider site at key times. **We believe the increased traffic will lead to greater noise and pollution for the residents of the area. For these reasons we feel the transport proposals are unacceptable.**

In conclusion, we are convinced that this Green Belt site application is inappropriate and does not meet the requirements of the NPPF, the London Plan, Barnet's Local Plan and even Barnet's own Development Brief for Cophall, nor are the traffic proposals acceptable. We feel there is no special case to answer or 'very special circumstances' that would allow the obvious harm to the Green Belt to be set aside. For these reasons we believe the application should be refused.

Yours sincerely

John Living

Mill Hill Preservation Society
On behalf of the Committee and the Planning Group