

Objection to planning application 18/3653/FUL

NorthWestTWO Residents Association opposes this application on many grounds. We have long looked forward to redevelopment of this site and its current tired and bleak buildings, but to overwhelm Cricklewood with a 6-storey frontage and a fifteen-storey tower block would cause lasting damage and set the tone for more. Our members and other residents have already detailed many of our grounds for opposition and emphasised time and again how inappropriate, overbearing, and excessively high, dense and bulky this development would be. We highlight a few points here and draw attention to some misleading aspects of the application. We hope officers will understand that we may not use the best technical or legal terms at times and that you will nevertheless find the sense in our objections and those of our members and fellow-residents.

Surrounding Context

The application's planning statement states (2.12) "The Site is included within the wider Brent Cross Cricklewood (BXC) Framework." It neglects to point out that the Framework does not suggest development on the Site. The framework puts forward development in West Hendon, at and around the Brent Cross shopping centre, immediately south of that and down Brent Terrace and Claremont Road, and east of the A5 down to the railway curve, but not on the Site. Instead, it describes that part of Cricklewood (Chapter 3, p22) thus: "Due to narrow footways and high traffic levels, the pedestrian environment is uncomfortable, a problem exacerbated by the scale of the surrounding buildings." The application proposes a minor widening of a short stretch of pavement and a major exacerbation by scale with a six-storey frontage and a fifteen-storey tower block.

The application's planning statement claims (2.12) that "The land forms part of a wider outline application which was approved in October 2010 (LPA Ref: C/17559/08)". This is incorrect. The highway, lands immediately surrounding the Cricklewood Lane / Cricklewood Broadway (A5/A407) junction and the "Cricklewood Lane Zone" (the green space immediately east of the site) were included in the outline application C/17559/08. The Site was not. This is made clear at several points such as the description of the Cricklewood Lane Zone on page 131 of the Committee Report and Addendum of September 2010 concerning C/17559/08, and the plans referenced in that description. The subsequent Section 73 application F/04687/13 does not include the Site either.

The Design and Access Statement refers to a number of consented schemes as the "immediate context of the Site." (3.1) Hardly any are of similar height: Colindale Gardens, miles away, and Brent Cross South, a mile away and always represented to us (as in the framework and applications above) as a new town centre without any suggestion that it would include intensive and high-rise development in the middle of Cricklewood.

The application includes as context the adjoining green space on Cricklewood Lane, calling it "Pocket Development" and writing of what "will" be built. This is misleading. Since the Section 73 approval, in 2015 a report to the Assets, Regeneration And Growth Committee proposing its sale to Pocket Development was withdrawn after strong opposition from local residents and councillors. Pocket Development announced they had no further interest in the site. In 2017 the green space was registered as an Asset of Community Value. No further plans for development of the green space had emerged before this application.

The application then tries to repair the lack of any appropriate context in Cricklewood by inventing one, a “Cricklewood Quarter”, proposing that their buildings would be in keeping with this hypothetical development and concealed by it. They suggest more intensive development than any in Brent Cross Cricklewood. They say this “exercise” was requested by Brent Planning Department without stating that Barnet officers had any input into this “Masterplan” or have responded positively to it.

- They do not own the land shown and no single owner does.
- No applications have been submitted for such development.
- Barnet Council has not produced any masterplan for Cricklewood.
- Approval of such high-intensity, high-rise development by the LPA and the Mayor of London would be a radical departure from existing policy and practice and there is no indication that it would be forthcoming.

On the contrary, the production of this Masterplan demonstrates that development on 1-13 Cricklewood Lane according to this application

- would only be in keeping with the context of the rest of Cricklewood unless the “Cricklewood Quarter” was built
- would blight the land it overlooked and limit options for anyone who did think of building on the B&Q site.
- would make more high-rise high-density development in the heart of Cricklewood more likely, creating a new “context” and closing off more appropriate development.

The applicable context for this site is the rest of Cricklewood, with three-storey and occasionally four-storey buildings fronting Cricklewood Lane and Cricklewood Broadway, and two-storey buildings behind them. This tower block would overlook them all and be utterly out of keeping with the area.

The planning context that is lacking here is that there is no plan for Cricklewood as a whole and the Cricklewood, Brent Cross and West Hendon framework only includes Barnet’s quadrant. There is no strategic co-operation in the spirit of the Localism Act reaching across the borough boundaries with Brent and Camden, and approval of this application would pre-empt and be contrary to any such strategic co-operation.

Affordable housing

The application does not state how much affordable housing will be provided and refers to an Affordable Housing Viability Assessment without publishing it. This lack of transparency is unacceptable and renders consultation and assessment meaningless. The plans appear to show that only 9 of the 187 residential units will be “affordable”; this is completely out of line with London and Barnet targets and requirements, utterly neglects real housing need and has caused widespread revulsion. It is incomprehensible that even such intensive development as proposed cannot meet targets and requirements.

The implication is that the proposal is barely financially viable at all and Cricklewood could be left with a collapsed project and another empty site.

Transport

The Site has a high PTAL rating and this is used in the application to justify high-density development. Transport for London are clear that PTAL ratings omit many factors. In this case, the proximity of Cricklewood Station is included but the low levels of service and the short trains (due to the impossibility of extending platforms) are not. Worse, Cricklewood Station is the last before the interchanges of West Hampstead and Kentish Town without being a morning destination in itself; trains arrive at Cricklewood at their most crowded, few disembark and Cricklewood passengers often find difficulty in boarding.

Several bus services pass near the site, raising its PTAL. Unfortunately, that stretch of Cricklewood Lane is one of the slowest in England – in 2015, the joint slowest – and often clogs adjoining roads and junctions accordingly.

Conditions at the Site and nearby are significantly worse than PTAL ratings, casual daytime visits outside peak hours, or this application would suggest.

Design

The application notes that light and visual amenity will be restricted for neighbours and that this will fall outside guidelines in various cases. It notes that several apartments will be single-aspect, now marginally mitigated by bay windows and balconies only at the prompting of GLA officers. It indicates that apartments will meet minimum standards for floor area without stating by how much any will exceed minima or if any will in any way. It indicates that the overall density will exceed density matrix figures for the PTAL (itself a poor guide as noted above) by 65%-478%, then quibbles about the currency of the density matrix. The amount of amenity space provided to residents is restricted to a small patch of land in between blocks; we are amazed that this is thought sufficient, even if one accepts the inclusion of balconies.

We note that these claims by the applicants seek to make light of and excuse their deviations from and occasional minimal compliance with standards, guidelines and policies. It is vital that the planning committee receive an independent assessment of these claims and others, presented neutrally. We regret that our own knowledge is not sufficient to identify all the other aspects of the design which may or may not be highlighted in the application but require close scrutiny and we look forward to seeing them brought out and examined in the planning officer's report.

Community Benefit

The small patch of land between blocks would be closed to the public. There would be space for a GP surgery in the basement with the car parking. The pavement might be, depending on any eventual remodelling of the A5/A407 junction per the outline and Section 73 approvals, two metres wider and a couple of trees might be planted on it, together with some cycle stands. The community benefit provided by this scheme would be insufficient even without the harm caused by such excessive development.