



NORTHWESTTWO RESIDENTS' ASSOCIATION

29/06/2019

Re planning application 18/6353/FUL

I write on behalf of NorthWestTwo Residents Association to raise further objections beyond those we raised in December 2018.

The reduction of the tower to 9 storeys does not render the application acceptable. It will still be far higher than the 3-storey buildings nearby, the 5-storey building at 194-196 Cricklewood Broadway for which planning permission has been granted, and the 2-storey buildings of the surrounding neighbourhood. It will not be obscured, as shown in the application, by the building at the corner of Cricklewood Lane and Cricklewood Broadway; that is going to be demolished to straighten out the junction as part of the Brent Cross Cricklewood development. Likewise, its design will not be a visually satisfying echo of that building – that building will be gone. At 9 storeys and as wide as it is tall, it will constitute excessive massing.

The revision of the application does not represent a compromise. It was the developers' choice to open consultations with a 13-storey building. In the teeth of criticism, they increased that in the application to 15 storeys, a strategy which prepared the ground for apparently splitting the difference at a height which would, if it had been the original bid, been plainly unacceptable. Indeed, with 145 residential units and a maximum height of about 29.6 metres, it would appear designed to fall just below the limits for referral to the Mayor of London, were it not that the total floor area of 17,266 square metres exceeds the 15,000 m² criterion for referral.

The application does not refer to or propose any coherent plans for Cricklewood town centre, or any specific plans for the Brent half or the Camden quarter of Cricklewood. Instead, it refers to the London Borough of Barnet's *Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework*. That framework provided a basis for the Brent Cross Cricklewood regeneration. It was explicit that it did not propose tall buildings everywhere: *"Buildings will generally respect the minimum storey heights within each zone unless the specific location justifies a taller building. Whilst tall buildings will be encouraged in certain locations it is not desirable that they become the predominant urban form."*(p32) It went on to include a *Building height profile* (Fig.19, p33) showing new building heights in the area ranging from 2-4 storeys to 20-25 storeys. 1-13 Cricklewood Lane fell within that area; the profile did not show increased building heights on it or anywhere else in the Barnet quarter of Cricklewood town centre.

In contrast, this application claims the Brent Cross Cricklewood masterplan *"fails to do the same around Cricklewood Station"* (8.2.1) as if this was some casual oversight on the part of Barnet's planners. It proposes to *"provide similar massing and densities as seen in the Brent Cross Master Plan"*. (8.2.2) It shows the development as *"creating cityscape presence (increased mass)"* (8.2.2) with helicopter's-eye views of a swooping arc peaking at Brent Cross at one end and Cricklewood at the other. The development framework offered respect and showed high-massing regeneration constrained within bounds; this application declares that a failure and calls for intensive development to sprawl south.

The developers' agents have argued that it's appropriate to develop intensively near a railway station. Their Transport Assessment indicates that's irrelevant; hardly anyone will use the station.



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The increase from 15 residential units to 145 will generate just *"7 additional trips on London Underground and rail services [which] would be distributed across services from Cricklewood railway station"*.(7.19) Presumably, if anyone used Willesden Green station instead, which the transport assessment also lists, then even less than residents will use Cricklewood station.

In fact the Transport Assessment is deeply flawed in many ways and cannot be relied upon. It uses the 2011 census figures for transport use in the neighbourhood without comprehending that the figures are only for people going to work and only tally the main mode of transport; for example, someone walking 5 minutes to a bus-stop, then taking a 10-minute bus trip to an Underground station and a 20-minute Underground journey, is only counted as taking an Underground journey. It thus omits, for example, all bus journeys to schools, colleges, shops and leisure facilities and all bus journeys that are a part of a longer commute to work. Even so, to claim that *"the proposed development could generate a maximum of 18 additional two-way trips by public transport modes in the AM peak, including 11 two-way trips by bus and an additional 9 two-way trips by public transport modes in the PM peak, including 7 by bus"* is palpably absurd for an additional 130 units and a reduction in the number of affordable units (perhaps to 9 from the current 15). It would seem that the selection of comparable locations for processing in TRICS, the basic failure to grasp the nature of the census results, and perhaps other errors which Barnet's transport officers may detect, have combined with an eagerness to show a light impact to produce absurdities such as *"the proposed development could generate an additional 2 two-way walking trips in the AM peak and no increase in trips during the PM peak"*(7.12), begging the question of how anyone will access public transport, and *"the development is also expected to generate circa 1 additional two-way cycle trip in the AM peak period and 1 in the PM peak period"* despite providing *"191 cycle parking spaces for residents and 16 spaces for retail staff"*.

The brief cycling sections alone exemplify the flaws of the qualitative aspects of the Transport Assessment. It quotes a cycling infrastructure guideline that there is *'substantial potential for substituting cycling for driving for distances up to 5 miles'* without noting that that depends on the provision of cycling infrastructure,(3.5) and then glances at a Transport for London map which shows (3.6)

1. some ordinary roads which lack any cycling infrastructure but were identified as *"have been recommended"* (in an exercise managed by the London Cycling Campaign when they prepared the maps for TfL in 2001-2002, in an attempt to suggest comparatively low-traffic routes, to which perhaps two members living within two or three miles of these streets responded)
2. Cricklewood Broadway, signed for cycling but completely lacking in infrastructure, without even Advanced Stop Lines (ASLs) at any of the signalised junctions.

This glance at a map is mutated into *"a good level of infrastructure for cyclists in the area"* (7.15), and the mention in 3.6 of the Transport Assessment of *"nearby Ashford Road, Melrose Avenue and Fordwych Road marked as 'other roads that have been recommended for cyclists, may connect other route sections'"* is mutated by motivated misunderstanding into the Design and Access Statement 7.3's *"nearby Ashford Road, Melrose Avenue and Fordwych Road are frequently used by cyclists"*.

It would be tedious to pick over the entire transport assessment and the related statements elsewhere; we hope we've done enough to demonstrate it is qualitatively and quantitatively absurd and cannot be relied upon.



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The objections to this application that we already raised remain. Wherever we examine it more closely, more objections arise. We hope we have expressed them clearly – please do contact us if not – and in highlighting some aspects, encouraged scrutiny of others. Please reject this application.

Best regards,

Ben Tansley