

Application ref: 2020/3825/P
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London Borough of Barnet
Development Management & Building
Control Service (20/3564/OUT)
Barnet House
1255 High Road
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N20 0EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - Objection

Address:

**Broadway Retail Park
Cricklewood Lane
Barnet
London
NW2 1ES**

Proposal:

Outline planning application (including means of access with all other matters reserved) for the demolition of existing buildings and the comprehensive phased redevelopment of the site for a mix of uses including up to 1100 residential units (Class C3), and up to 1200 sqm of flexible commercial and community floorspace (Classes A3/B1/D1 and D2) in buildings ranging from 3 to 25 storeys along with car and cycle parking landscaping and associated works.

Drawing Nos: letter from London Borough of Barnet reference 20/3564/OUT

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises objection for the following reason(s):

Reason(s) for Objection

- 1 The site is currently occupied by a range of retail outlets, including a large B&Q DIY Store, Pound Stretcher and Tile Depot. These large warehouse retail buildings are situated in the south-western aspect of the site. The northern and eastern aspects of the site mainly consist of car parking

associated with the above retail outlets, as well as soft landscaping adjacent to the railway lines, and the southern entrance to the site.

Additional retail properties are situated beyond the south western boundary of the site, including a large Co-Op supermarket, as well as numerous local business such as pharmacies, food take-aways, international supermarkets, barbers and other general stores. Other retail properties are located close to the site beyond its north east boundary. The application site sits approx. 250m from Camden's borough boundary.

Landuse-

Concern is raised regarding the small proportion of commercial floorspace being proposed, especially the lack of a mix of uses which is proposed across the blocks with block C and D having no commercial offering which is considered to be contrary to chapters 2 and 6 of the National Planning Policy Framework 2019. 1,100 residential units are proposed with a small proportion of community infrastructure being proposed to support the development. The planning statement draws on the creation of a 'civic heart' yet there is no community space offering which could support this. The commercial offer is 1,500sqm of all use classes (A1-A3, D1 and D2). Whilst the document states that it is unlikely that one use could occupy all of the commercial space, this is a possibility and therefore the lack of commercial floorspace is of a concern, especially due to the range of retail services which the existing site offers to the local community. This is further challenged through the lack of community infrastructure that the development is proposing.

Camden is concerned at the loss of the retail provision and lack of community space being proposed. This inturn would put further pressure on the community facilities in Camden and would fail to deliver a mixed and balanced sustainable development.

Of particular concern is the current pressure on GP services within the area. Within the submitted document ES Volume one Chapter 14, it states: '14.4.31- At the eight practices there are 22.3 FTE GPs in total. The average number of patients per FTE GP across the practices (2,177) far exceeds the target ratio of 1,800 patients per FTE GP and therefore has no capacity for additional residents.' It is stated that one of the key objectives of the development is to "Provide a new civic space and community facilities, reflecting and building on Cricklewood local residents' civic aspirations and pride." (Page 30 of Design and Access Statement). This is not achieved nor considered to be included within the current application and this is of considerable concern to Camden due to the pressure the development could put on Camden's health services.

Design and bulk-

Concern is raised regarding the bulk of block A. It is considered that it sits proud of block C and harms the visual links through the scheme which the development is trying to achieve. Due to the height of the proposed buildings, relief needs to be provided at the ground floor level across the site, and currently this is not achieved. By reducing the bulk of Block A and lining it up with Block C, further connection through the site could be

achieved and a further enhanced area of public open space delivered as demonstrated within an early sketch on page 34 of the DAS. This would break up the bulk and provide some meaningful open space which would reduce the pressure on open space in Camden.

- 2 Concern is raised regarding the proposed maximum building heights to allow for varying maximum amounts of plant, lift overruns, stair access to roof and building management units. This should all be contained within the building envelope and total maximum height. Through incorporating such additions within the design of the building, this would reduce a cluttered skyline and associated paraphernalia which would otherwise harm longer views of the proposal when viewed from Camden.

Affordable housing-

Camden would want to see the policy-compliant amount of Affordable Housing on site, which should be split between Social Rent and some Intermediate Housing affordable to working families (eg: key workers).

On mixed tenure schemes, Camden would expect to see a larger number of homes for social rent, along with a smaller proportion of intermediate housing units.

In order to create mixed, balanced communities, a mix of sizes should be provided, including 1, 2, 3 and 4 bed homes, with a policy-compliant proportion to be family sized units. There are 105 three bedroom units with no 4 bed units.

Consideration should also be given to child density. A policy-compliant percentage of wheelchair housing across the whole site should be provided. Proportions to be split between Fully Accessible (M4(3)(2)(b) and Adaptable (M4(3)(2)(a) wheelchair homes.

Currently it is not considered that the proposed housing mix would deliver a mixed and balanced community.

Transport-

The Transport Assessment states that the development will be secured as a car-free development via a S106 agreement. This would mean future residents would be unable to obtain residents parking permits to park on the public highway in the vicinity of the site. This is welcomed by Camden as it will encourage future residents to use active and sustainable means of transport.

The development proposes to provide residents disabled parking for 3% of the proposed 1100 flats, with the ability to provide additional parking for a further 7% of flats. This is in line with the (intend to publish) London Plan. Eight operational and four disabled parking bays are proposed for the non-residential uses, which is welcomed.

The Transport Assessment estimates that a total of 70 vehicles movements (40 Heavy Goods Vehicles and 30 Light Goods Vehicles) per day will occur from Jan 2023 to Dec 2024. This represents the peak vehicle movements of

the construction programme. Further details should be secured within a Construction Logistics Plan (CLP) if planning permission is granted. The CLP should be reviewed and approved prior to implementation. The TLRN should be used for construction vehicle movements, and local roads used only to access the site from the TLRN.

Amenity-

Whilst the proposal is for an overly large development which would have an impact on the townscape, it is not considered that the development would harm the amenity of Camden residents in terms of daylight, sunlight, outlook or privacy.

- 2 On the basis of the submitted information, the development is considered unacceptable due to the bulk of block A, the affordable housing provision, and the loss of retail floorspace and lack of community provision, therefore failing to provide a sustainable and appropriately designed development. This would harm the local economy, vitality and viability of the local community, existing health services, and character and appearance of the surrounding townscape, which would be contrary to policies C1, C2, C3, D1, E1, E2, G1, H4, H6, H7, H8, TC1, TC4 and TC5 of the Camden Local Plan 2017. It is requested that the application is refused unless the above concerns can be adequately addressed.

Yours faithfully



Daniel Pope
Director of Economy, Regeneration and Investment