

Residents Associations' Statement of Case

NorthWestTwo Residents Association
Cricklewood Railway Terraces Residents Association
Mapesbury Residents Association
The Groves Residents Association
Golders Green Estate Residents Association

Planning Inspectorate Inquiry ref APP/N5090/V/22/3307073

London Borough of Barnet Application ref 20/3564/OUT

Broadway Retail Park, Cricklewood Lane, London NW2 1ES, commonly known as "the B&Q site"

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1. PREAMBLE

- 1.1. The Broadway Retail Park in Barnet, not to be confused with the nearby Cricklewood Broadway Retail Park in Brent, is commonly known as the B&Q site. The B&Q store is popular but most of its car park is unused at any time on any day, wasting space that could be used for homes. This was a running theme of the 2,200-plus objections as well as the 48 letters of support. We want to see the site brought into use and developed for sorely needed housing.
- 1.2. Sadly, this application is for grossly excessive height, massing and density. It would be disproportionate for the area, have significant impact on Cricklewood in general and on the neighbouring Railway Terraces conservation area in particular, provide poor conditions for its own residents and fail to provide the promised public benefit. This too has been a running theme of the objections, and while some have looked for two- to four-storey development similar to schemes elsewhere, many have said that development in the order of half the proposed 1,049 units would be reasonable. It is sad to think that such a development could have been approved and progressed long ago.
- 1.3. Instead, Cricklewood's residents have been threatened by this proposal for over three years, causing anxiety and consuming precious time, attention and other limited resources. Cricklewood, being divided between three boroughs and with two conservation areas within it, does not have a single residents association but each one has opposed this application in its own way and collaboratively. The following have grouped together as participants with similar views for the purposes of this inquiry:
 - 1.3.1. NorthWestTwo Residents Association is open to everyone living in Cricklewood. It was established in 2007 from a neighbourhood watch group to cover the Brent side of Cricklewood north of the Mapesbury Conservation Area, but now has members all over Cricklewood and thus a particular interest in the centre of Cricklewood as well as strong links with other local residents' associations and community groups. It applied for and was granted Rule 6 status for this inquiry.
 - 1.3.2. Cricklewood Railway Terraces Residents' Association (CRTRA) represents around 250 households in Gratton, Midland, Johnston, Needham and Campion Terraces, plus Burlington Parade and Dorchester Court. It was founded in 1975. Residents are a mix of owner occupiers and private renters. All households are invited to join and almost all do so. The estate was built by the London Midland Railway in the latter half of the nineteenth century to house its employees and is now a conservation area.
 - 1.3.3. The Groves' Residents' Association covers a collection of four residential streets of homes built in the 1880s: Oak Grove, Ash Grove, Elm Grove and Yew Grove. It is nestled immediately west of Cricklewood Broadway and south of Cricklewood Lane, and thus lies immediately south of the site and, the site being on raised ground, below it.
 - 1.3.4. The Golders Green Estate Residents Association covers nine roads of the Golders Green Estate in north-east Cricklewood. The estate is a 1930s John Laing estate of 1,000 semi-detached homes built on Handley Page's erstwhile factory and aerodrome.
 - 1.3.5. Mapesbury Residents' Association (MapRA) covers the Brent side of Cricklewood south of Chichele Road. Its membership area is largely coterminous with the Mapesbury Conservation Area. That area is one of Brent's largest conservation areas, consisting of detached and semidetached houses largely built between 1895 and 1905 (with some

from the late 1870s and some up to 1920) set on tree-lined streets, with a character “defined by the large eclectically detailed town houses with numerous influences such as the Arts and Crafts movement Gothic and classical architectural forms.” (Mapesbury Conservation Area Character Appraisal, Brent Council, 2006)

2. DESCRIPTION OF CRICKLEWOOD

- 2.1. Cricklewood is divided between three boroughs, Barnet, Brent and Camden. The A5 Cricklewood Broadway runs through the middle of it and is the boundary between Brent on one side and Barnet and Camden on the other, Barnet having arguably a larger portion than Camden (Cricklewood has no clear outer boundary). Cricklewood is at about the midpoint of Brent’s eastern side, and forms the south-west corner of Barnet and the north-west corner of Camden.
- 2.2. The Brent Local Plan describes its half thus: “Cricklewood and Mapesbury are characterised by suburban houses with large gardens and turn of the century town houses.”(5.6.2) The Plan’s Policy BP6 provides further detail and priorities: “The character of the A5 corridor will be enhanced and the Victorian terraces which characterise Cricklewood Town Centre protected. Redevelopment of infill sites currently not in keeping with the character of the terraces will be supported where development is consistent with the building line and proportions of adjoining predominantly 3 storey buildings and of a height and high quality which complements local character.” However “The A5 corridor is an important gateway into both Brent and central London. It is heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses.” (5.6.25) Cricklewood is identified in the Town Centre hierarchy as a District Centre. (6.4.28)
- 2.3. The Barnet draft Local Plan describes the built environment of its portion of Cricklewood (about Cricklewood thus: “Whilst Cricklewood Broadway retains high quality historic frontages and vibrant town centre functions, there is unused and underused land between the Broadway and Cricklewood station to the east. This includes the Broadway Retail Park a site of extensive car parking and low-rise buildings - but which has excellent public transport links from Cricklewood Station and bus routes along the A5 - has considerable potential for intensification.” (4.17.4) “Traffic congestion is an issue in Cricklewood.”(4.17.5) Cricklewood is identified in the Town Centre hierarchy as one of Barnet’s fourteen District Town Centres.(Table 13)
- 2.4. Barnet’s current Local Plan includes the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework. It describes the centre of Cricklewood thus:

The main local shopping area in Cricklewood is situated around the junction of Cricklewood Lane and the Edgware Road. It is characterised by small convenience stores, budget shops, restaurants and an assortment of necessity stores. The High Street has little aesthetic quality as the majority of shops are currently in poor physical condition. The buildings along the High Street are mainly three to four storeys high, with small shop fronts at ground level and offices and flats above. Due to narrow footways and high traffic levels, the pedestrian environment is uncomfortable, a problem exacerbated by the scale of the surrounding buildings. There are large bulky retail outlets and a timber yard between the High Street and the railway line.
- 2.5. The A5 in Cricklewood is fronted largely by two- to four-storey buildings, much Victorian. The A407 (Cricklewood Lane, Chichele Road) crossing it has two- to three-storey buildings, largely Victorian or Edwardian. Behind them, the B&Q site excepted, are two-storey homes

that a 1912 Ordnance Survey map shows as largely completely developed and recognisable to this day, with some 1930s development, largely two-storey, behind those.

- 2.6. In Barnet, two nineteenth-century residential developments are closest to the site. The streets to the south, the Groves, are largely streets of two-storey terraces. The older Railway Terraces to the north-west were laid out as terraced blocks, largely cottages, separated by short streets but off the main road with no through roads. The enclave's exceptional character has led to it being designated a conservation area and it has a longstanding strong community spirit. Heritage law and policy requires that the conservation area and its setting must be respected.
- 2.7. Cricklewood Station lies on the busy Midlands Main Line but its platforms are too short for most trains and due to track curvature and layout cannot be extended. The platforms are accessed by a small tunnel from the station building on the north-east side (OS map 1912) which replaced a footbridge (OS map 1894); there is no indication that the tunnel ever reached the south-west side. The station is normally served by eight eight-carriage trains an hour, four in each direction; this is a comparatively low level of service for a London train or underground station, but that does not affect the PTAL.

3. CATEGORISATION OF CRICKLEWOOD AND THE SITE

- 3.1. Cricklewood can thus reasonably be described as urban and suburban according to the categories in Barnet's draft Local Plan, viz

central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 m walking distance of a Metropolitan or Major town centre.

urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 m walking distance of a district centre or, along main arterial routes

suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

- 3.2. Cricklewood is clearly not central: it is not very dense, the uses are almost completely residential and retail with a scattering of offices above shops, footprints are small to medium, and so on. There is no metropolitan or major centre within 800m and barely anything above four storeys, let alone typically. Within 400 metres of the development, much of Cricklewood becomes suburban, with detached and semi-detached homes two or three storeys high. Barnet's somewhat deprecatory Regeneration Area Development Framework quoted above does not suggest it is in any way central.
- 3.3. Sites immediately adjacent were categorised as urban by Barnet council officers in 2017 and 2019, but in the draft Local Plan the site is categorised as central. NorthWestTwo Residents Association and the Railway Terraces Residents Association challenged this at the examination of the Local Plan in September and November 2022 and the council did not defend that categorisation. The inspectors have decided that following the council's submission of further supporting documents and amendments, there will be an inspector-led consultation prior to the inspectors' report and we welcome that. We hope that the categorisation will be changed.

- 3.4. The draft Local Plan's indicative capacity for the site of 1,007 units depends on that categorisation as central. We contend that this is inappropriate and the application's 1,049 units even more so. Whether or not the draft Local Plan is approved, the system of categorisation expressed in it highlights the stark difference between Cricklewood's urban and suburban nature and the proposed development.
- 3.5. As to the current Local Plan, the Regeneration Area Development Framework includes all the Barnet part of Cricklewood but does not allocate or specifically support the development of the site. Its maps of Cricklewood, Brent Cross and West Hendon showing development locations, types and building heights do not show development to any height or density of note in Cricklewood. An application of this magnitude was not envisaged and is not supported by the current development plan.



- Key**
- Regeneration Area
 - Existing Shopping Centre
 - Existing Car Parks
 - Proposed Car Parks
 - Open Space
 - Comparison Retail
 - Neighbourhood Retail/ Bars/ Restaurants
 - Residential
 - Community
 - Leisure/ Hotel
 - Business
 - Education/ Leisure
 - Rail Freight Facility
 - Waste Handling Facility
 - New Railway Station
 - New Bus Station

Figure 17: Proposed land uses

4. PUBLIC BENEFIT

- 4.1. Montreaux have heralded much about the local benefit of its application, but as far as local residents are concerned there simply is none.
- 4.2. The application includes an Urban Design Study which describes the proposal in terms appropriate to a final detailed design rather than an outline scheme, and repeatedly praises the development with little evidence or explanation for its effusiveness. It makes aesthetic judgments without explaining or supporting them. It asserts, repeatedly, that the development has elegance (*more elegant outline* (twice), *elegant proportions*, *elegant form*, *the elegance of each*, *elegant form and materiality*, *the elegance and crowning feature of the highest building*, *contribute to its elegance*, *the elegance and crowning detail*, *the building's elegance and meaning*, *increased in its elegance*) without ever explaining the basis of that highly subjective judgment which local people do not share.
- 4.3. Likewise, the study uses "*generous*" or "*generously*" seven times without any explanation, let alone an indication of what is being generously given. The summary paragraph states that the development "*has the right to be visible*", though the idea that a building has moral rights is nowhere argued and utterly novel, and ends "*Its joyful and generously designed top adds meaning and richness to the vistas and glimpses above existing buildings in a celebratory and thoughtful way.*" Nowhere does the study explain what is joyful about the top or how the designers were generous, or what meaning it adds to vistas or how obtruding into views adds richness. It minimises the extreme visibility of the development by talking of glimpses, and then introduces the idea that it celebrates something, without saying what or how, and that it does so in a thoughtful way, without ever explaining what it is thinking.
- 4.4. Twenty times the study speaks of a "landmark". It never establishes any need for a landmark or explains how a landmark development would benefit Cricklewood. Neither the centre of Cricklewood nor the railway station are hard to find; the area is provided with Legible London signage, the centre is a simple crossroads on the A5, the station is signposted from there and elsewhere, and its highly visible railway bridge is painted bright red with "CRICKLEWOOD" in large white letters on both sides. There is no evidence that large numbers of people are struggling to find their way to either one from miles around, or that either one, once found, would be so easily forgotten that we need a marker visible all day, every day from miles around. In an early discussion, the architect remarked on how good the view would be for tower residents and was discomfited to be reminded this meant that it would be visible from far around. The attempt to justify this visibility as providing a landmark is entirely inadequate and self-serving, and the repeated assertions do not make it any more valid.
- 4.5. The developers claim that Cricklewood needs a town square and that their plan will provide one. The current green space and widened pavement on the lane are currently used as a site for community events and markets, and host a flock of wooden sheep funded and built by local residents. The purported town square will be a small windblown space at the top, utterly dominated and darkened along with the green and widened pavement by the very tall buildings of this private development. It would sit apart from the roads and the centre of Cricklewood. Images in the application show it with a brightly lit cinema or advertising screen shining into the windows of the residents across Cricklewood Lane, but no assessment of this impact is offered.

- 4.6. The application makes much of providing a public pedestrian and cycling route between Depot Approach and Cricklewood Lane.
 - 4.6.1. It would not serve cyclists travelling between Cricklewood Lane and the A5 junction with Depot Approach. The concept fails to meet Transport for London's London Cycling Design Standards. Diverting off straight roads to cycle up and down sharp inclines and in amongst pedestrians fails to satisfy the core outcomes of directness, comfort, coherence and adaptability to increasing volumes, and breaches the principle that bicycles must be treated as vehicles, not pedestrians.
 - 4.6.2. It would bring pedestrians and cyclists into conflict with each other; the images provided all show paths adequate only for pedestrians.
 - 4.6.3. The traffic and transport sections of the application make no attempt to evaluate likely use or benefits of this feature.

5. CRICKLEWOOD RAILWAY TERRACES

- 5.1. The Cricklewood Railway Terraces Residents Association (CRTRA) represents c.250 households in Gratton, Midland, Johnston, Needham and Campion Terraces, plus Burlington Parade and Dorchester Court. It was founded in 1975 as 'The Residents' Community Association' (and is still commonly referred to as 'the RCA'). Residents are a mix of owner occupiers and private renters. All households are invited to join and almost 100% do so.
- 5.2. The CRTRA:
 - keeps a watching brief on planning applications within the Terraces and planning and licensing applications in wider Cricklewood (Barnet, Brent and Camden)
 - organises community events
 - produces a newsletter 'Cottage Jottings' 2 or 3 times annually
 - regularly emails information on Terraces and Cricklewood matters to all members
 - holds AGMs and regular committee meetings (open to all members)
- 5.3. In the mid-1970s, the initial achievement of the residents' association was to work with Barnet to re-establish allotments, which had fallen into disuse following World War II. Over the years, we have worked with Barnet on many projects to improve the Terraces, including a re-design of the Kara Way playground and a replanting of the shrubbery between the Edgware Road and Gratton Terrace. Recently, we collaborated with the LPA, DB Cargo and other local residents' associations to mitigate the effect on the Terraces and wider Cricklewood of a rail freight aggregate transfer station/concrete batching plant and a waste transfer station, built close to the Terraces' northern boundary.
- 5.4. The residents' association sees the Montreaux application for the B&Q site on the south-eastern boundary of the Terraces as a serious threat to its historical significance and appearance. We disagree with the developer's assessment that the harm to conservation area and its setting is 'less than substantial'. In any event, "considerable weight and attention" should be given to any harm found to arise in respect of the character or appearance of the area (*Barnwell Manor Wind Energy v SSCLG* [2014] 1 P&CR 22). Even if the harm is judged to be "less than substantial" (which we disagree with) this should be

given “considerable importance and weight” (*Forge Field v Sevenoaks DC* [2014] EWHC 1895at [43]).

- 5.5. We are hugely disappointed that the LPA initially worked with Montreaux on this application without involving the residents’ association until the scale of what was planned was decided.
- 5.6. The CRTRA welcomes building housing on the B&Q site, but believes the Montreaux scheme is far too big. Multiple very tall buildings would be intrusive in the Conservation Area’s homes, streets and allotments to the detriment of its internal appearance, historic significance and setting within Cricklewood.
- 5.7. Under the ‘umbrella’ of the CRTRA, the Cricklewood Railway Terraces Allotment Society has its own committee, constitution and rules. The site is part of the Conservation Area. In 2012/13 we worked with Barnet towards self-management status and the site continues to be fully-let and well-cultivated. In addition to plot holders’ cultivation of vegetables and fruit, there are beehives and small ponds, providing a charming green oasis in urban surroundings. The site is used by the whole community during events and provides a polling station for local and national elections and a venue for meetings with our MP and Councillors.
- 5.8. The Montreaux scheme would be hugely intrusive on the allotments, harming its value as a peaceful, green space. See Montreaux Statement of Case, Appendix 1 - November 2022, Addendum, View 14, pages 50 and 52.
- 5.9. More generally, the scheme’s height, scale and massing are excessive and would harm the character, appearance and historic significance of the Terraces.
- 5.10. It would be obtrusive in the streets, homes and gardens of the Terraces.
- 5.11. It would harm the setting of the Railway Terraces Conservation Area and key views from it.
- 5.12. It would radically change the small-scale, intimate 19th-century character of the Terraces.
- 5.13. The design is visually discordant in scale and style with Cricklewood town centre.
- 5.14. It would be contrary to the provisions of the NPPF relating to conservation areas (para. 194-196), to Policies D3, D4, D9 and HC1 of the London Plan 2020 and Policies CS5, DM01, DM05 and DM06 of the Barnet Local Plan Core Strategy and Development Management Policies 2012.
- 5.15. It is for the Applicant to establish that public benefits arise which outweigh the harm. It cannot do so. Whilst we accept that the provision additional housing is a general benefit, the majority of the “benefits” of the scheme are private in nature and do not overcome the considerable harm to the conservation area which is not respected by the scheme.
- 5.16. Montreaux’s justification for the extreme height of buildings in the B&Q scheme is that the site is in Barnet’s Opportunity/Growth Area and on the A5 corridor, designated as appropriate for tall/very tall buildings. However, it is also hard up against a Conservation Area and the CRTRA believes it is inappropriate and damaging. Rather than being ‘in the A5 corridor’, the B&Q site is more accurately described as located in Cricklewood town centre. Barnet’s recommendation for building height in town centres (LBB Tall Buildings

Update 2019, especially pages 23-31) is 1-7 storeys, which we believe would be more acceptable for this development.

Conservation Area

- 5.17. The Cricklewood Railway Terraces Conservation Area was designated in 1998 and is described in the Railway Terraces Cricklewood, Conservation Area Character Appraisal Statement (second edition 2004) and Railway Terraces Cricklewood, Conservation Area Character Appraisal and Management Proposals (2016). It includes 181 locally listed buildings (not seven as claimed in Montreaux's Statement of Case – page 7, para 3.9). The appraisal describes the importance of the regular building rhythms of the Terraces, which is little altered from its 19th century origins:

“The Railway Terraces form an individual and unusual area with clearly defined boundaries and a uniform character. There is a great sense of place within the conservation area and there appears to be a vibrant and cohesive community. The formal, regular streetscape and building layout, together with the unusual relationship between buildings, private and public open space, all help to give the area a distinctive, intimate but ordered feel. The area is characterised by small scale, dense development with regular building rhythms and designs.” (page 20)

“The houses have unusually large chimney stacks with ten pots per pair of houses, adding greatly to the formal, regimented appearance of the terraces. Many of the original tall terracotta chimney pots remain.” (page 21)

- 5.18. The Montreaux scheme would intrude on the Conservation Area in every street, at front and back of the houses and from top to bottom of the Terraces. The striking roof and chimney lines outlined against the sky would be compromised by the very tall buildings of the scheme projecting above them. The Terraces is a stylistically coherent 19th century railway village and the Montreaux development would hugely diminish its attractiveness and sense of place.
- 5.19. Despite late 2022 reductions in height of some of the scheme's blocks, the overall height is still unacceptable to residents of the Terraces. The reduction in the height of Block A from 25 to 13 storeys, while necessary to mitigate the effect of that end of the development, does nothing to solve the problems for the Conservation Area.
- 5.20. Montreaux repeatedly claims that 'to respect the conservation area' the block nearest to the Terraces, immediately behind Champion Terrace, has been dropped to three storeys. Immediately behind the 3-storeys, however, there would be blocks of 6, 15, 16, 17 and 18 storeys intruding on multiple views within the Conservation Area and looking out from it.
- 5.21. Montreaux also claims that the design of their scheme responds to the Railway Terraces.
- “The Scheme shall respond to its immediate and wider context, and shall encourage an architectural narrative that is derived from the character of Cricklewood's High Street and heritage assets, namely The Crown and the Cricklewood Railway Terraces Conservation Area.”* (Design Code – November 2022 Addendum, para 1.1.2 in Montreaux's Statement of Case, page 5)
- 5.22. We do not believe this scheme respects the Conservation Area or encourages an 'architectural narrative' between the Terraces and the scheme. It is completely alien to everything the Conservation Area represents.

Historical significance

5.23. The Terraces were built by the Midland Railway between the late 1860s and early 1900s to house railway workers. At that time Cricklewood was largely agricultural. The arrival of the Midland rail line – and the building of the Railway Terraces - marked the beginning of Cricklewood as a residential area. (Cricklewood Railway Terraces: A Village History, 2001)

5.24. The Cricklewood Railway Terraces are described in major reference works on the general and architectural history of London:

“The growth of modern Cricklewood began after the opening of Childs Hill (later Cricklewood) station in 1868, when the ‘railway village’, terraced cottages for Midland railway employees, was built between the railway and Edgware Road. (fn. 21) After a pause, small houses spread north from Kilburn and Brondesbury, until by 1897 they had been built in Elm Grove, Yew Grove, and Ash Grove, south of Cricklewood Lane....” (A P Baggs, Diane K Bolton, Eileen P Scarff and G C Tyack, 'Hendon: Growth after 1850', in A History of the County of Middlesex: Volume 5, ed. T F T Baker and R B Pugh (London, 1976), pages 11-16)

“Immediately to the N, tucked away between main road and railway, railway workers’ housing in parallel rows of simple two-storeyed brick terraces, with back yards to service roads, and front doors opening onto paths with gardens beyond. GRATTON and NEEDHAM TERRACES are the earliest, of the 1860s. Some of the gardens are arranged as communal spaces, others are individual tiny enclosures of delightful variety. Allotments beyond.” (Bridget Cherry , Nikolaus Pevsner: The Buildings of England. London 4 North, Blackwells, 1998, pages 112-113)

5.25. The Railway Terraces are listed by the London Gardens Trust in their inventory of Historic Green Spaces. In spring and summer a number of local and garden history groups bring walking tours to the Railway Terraces.

Built form

5.26. The Terraces were built as a railway village and they remain an unusually strong community, where everyone knows everyone else. In part, a legacy of its origins in the close railway community, which endured for more than a century, this also stems from the layout, which is unusual in London. The small cottages of the back terraces are back-to-back and front-to-front, with gardens between the fronts and single-track access roads at the back.

5.27. The Montreaux development would detract from the secluded ‘village’ feel of the Terraces. In particular, it would hugely alter the views from the front of Needham Terrace. Despite repeated requests, Montreaux’s CGIs ignore views from the front of Needham Terrace, perhaps on the assumption that the front of the Terrace is the road side and the garden is the back. The residents’ association will present photographic evidence to rectify this omission. In addition, all views prepared by Montreaux are from a ground level, street perspective. We will provide photographs to show the effect on views from Terraces houses from first floor level.

6. CRICKLEWOOD

6.1. The impact on Cricklewood as a whole would also be severe.

- 6.2. As even the applicant's wireframes show and the CGI images show more dramatically, the buildings would dominate sightlines all around Cricklewood, from the eastern views over the station to the western views from Brent. It would directly overlook the shops, homes and gardens of Cricklewood Lane and the Groves to the south and dominate their skylines.
- 6.3. This single development would change the area into one of very tall buildings, which it is not now and even if mooted and approved developments are eventually actually built, would still not be.
- 6.4. Far from joyously enhancing Cricklewood with elegance, the tall, massive and dense blocks would, as shown in the applicant's images, create a prominently gloomy and overbearing environment in the heart of Cricklewood, with even south-facing lower-storey windows of seeming single-aspect flats cast into shadow by the blocks south of them.
- 6.5. The Crown, a Grade II listed building on Cricklewood Broadway, has been an iconic part of Cricklewood since 1900. The tall buildings in the proposed development would project above the roofscape of The Crown at its northern end, diminishing the Crown's beneficial impact on Cricklewood Broadway. (Montreaux SoC, Appendix 1 - November 2022 Addendum, pages 30 and 32).
- 6.6. There are no substantial proposals for the buildings to offer wider public benefits to Cricklewood in the form of community centres or facilities, nor are workshops and workspaces offered, and only the vaguest idea that perhaps shops, perhaps restaurants, perhaps something else, might move in. There is no strategy for encouraging appropriate uses. There is no policy to ensure they are let and do not remain empty as at nearby developments. The "town square" is shown in the application to be too windswept for comfortably sitting or standing.

7. TRANSPORT

- 7.1. The revised Transport Assessment is flawed and reveals flaws in the application. It does not evaluate the impact of the development and its residents on the movements of either the current working and residential population of Cricklewood or the new residents themselves. The evaluations it does make show serious problems.
- 7.2. The assessment estimates an additional 88 passengers will travel south by train in the morning peak hour. On the one hand, it undermines the case for placing a very large development beside a station if only 88 commuters from 1100 residential units use trains to go into town. On the other hand, it is very weakly founded, guessing that two-thirds of an extrapolated 133 commuters will be southbound with no evidence for that proportion, and it does not evaluate the impact of those commuters on train crowding. The covering letter suggested that the estimate "will inform any further discussions regarding CIL payments or S106 contributions" without indicating how CIL or S106 funds could be used to alleviate overcrowding on trains.
- 7.3. The assessment sets out that the development would provide a minimum of 1,846 long-stay and 28 short-stay cycle parking spaces for the residential use. It does not evaluate the impact of significant numbers of cycle users on local traffic and pedestrians. It asserts that cycle users will have difficulty joining traffic on Cricklewood Lane and then be so intimidated by the nearby junction with the A5 Cricklewood Broadway that they will wheel their bikes across. The assessment thus avoids evaluating the impact of cycle users on road traffic there. If this was credible, then it would be necessary to evaluate the impact of many

cycle users wheeling bicycles on busy pavements round corners, across pedestrian crossings and through torturous fenced pedestrian islands, continually obstructing and in conflict with pedestrians. It is however not credible; this is not the observed behaviour of cycle users in London nor how new generations are taught to use the roads in their school Bikeability courses.

- 7.4. The assessment's claim that the A5 is too intimidating is then ignored in calculating the area in easy reach, which does not factor in time spent wheeling across the road through pedestrians and negotiating the various phases of traffic lights, nor consider what would be in easy reach of cycle users if they fear to ride along the A5.
- 7.5. Cycle use of the narrow unsegregated shared-use paths through the development is supposed to constitute a public benefit, suggesting a significant level of usage. The assessment does not consider what the numbers might be, how the cycle users interact with pedestrians in the development and how conflict will be managed. It notes that cyclists will have difficulty accessing Cricklewood Lane, but does not consider how the speeds of cycle users on a steep descent from the development to Cricklewood Lane will be managed without obstructing free movement of pedestrians and of significant numbers of cycle users.
- 7.6. Evaluation of pedestrian movements is similarly flawed and lacks consideration of interdependencies. The pedestrian isochrones assume all pedestrians can walk in every direction at the same uniform speed, with no delay at busy roads, and in straight lines across railways and through buildings. Routes are often evaluated as at current levels of usage rather than the increased levels following development. We see, for example, no estimate of the increased numbers passing under the Cricklewood Lane bridge to access trains, buses, schools and other destinations, but we do see an acknowledgment of that route's hazards and restricted capacity with a suggestion that barriers might be required under the bridge, not accompanied by any estimate of how those barriers would affect pedestrians or road users with regards to congestion, journey times, or wellbeing.
- 7.7. The estimated changes in road traffic are highly sensitive to inputs and methodology.
 - 7.7.1. The reduction in trips to the B&Q store is calculated as the difference between the predominant through traffic using the carpark as a cut-through and the total traffic in and out of the carpark. Any slight failure to recognise trips as through traffic results in an overstatement of the trips to the store.
 - 7.7.2. It is not considered that local residents who currently use the B&Q store will now use another more distant store and often drive to it, putting more traffic on local roads.
 - 7.7.3. As observed by LBB, the predictions do not use TRICS data for similar sites. The applicants then try to use the number of carparking spaces, rather than residents, as an input, assuming the residents are unable to find any alternative parking in the area.

8. PUBLIC RESPONSE

- 8.1. Before submitting the planning application, Montreaux and their representatives met with members of our local residents' associations and held a drop-in exhibition. They showed artists impressions of the development viewed from ground level showing the lower storeys only, saying it was an oversight that none showed the full height of the building viewed from ground level.

- 8.2. Before these meetings took place, LBB officers and councillors requested a meeting with the CRTRA. They were clearly aware that the development would impact negatively on the conservation area. Housing, which the CRTRA had long-expected, was discussed at this meeting, as was the playground and access, but no mention was made of the proposed height or density of the housing.
- 8.3. The applicants' Statement of Community Engagement lists various concerns raised. The "response to feedback" does not indicate that the public response will change the proposal in any way
- 8.4. The London Borough of Barnet received over 2,200 objections to the application, an unprecedented response, with the vast majority from local residents, and 48 responses in support, many of them from outside the area.
- 8.5. Local residents' associations that objected formally as associations or encouraged their members to respond personally included NorthWestTwo Residents Association, Cricklewood Railway Terraces Residents Association, Mapesbury Residents Association, Cricklewood Groves Residents Association, Golders Green Estate Residents Association, Fordwych Residents Association, Brent Terrace Residents Association and Dollis Hill Residents Association. The Cricklewood Town Team also objected.
- 8.6. While many objectors agreed the site was suitable for some form of housing development, they found the proposed development excessive and were deeply concerned at the impact it would have. Some objectors read other objections and borrowed material and phrases from them themselves, some strove to find new ways to express their objections and new ways to persuade the council to reject the application. The officers' report and recommendation to the planning committee summarised these objections in less than a page "in the interests of brevity".
- 8.7. We will not attempt to summarise those objections here. LBB wrote to all objectors in October 2022 informing them of the coming inquiry and stating that all representations had been forwarded to the Planning Inspectorate, as we had expected. We therefore did not encourage further representations from our members, knowing how weary they were after three years, but did not discourage them either and simply reassured them that their previous objections would be considered by the Inspector. We hope that the totality of the objections, in their breadth, depth and vigour, will be yet more persuasive than this simple and inexpert statement.