



Representation re GSS04 Cricklewood Growth Area

from NorthWestTwo Residents Association.

The welcome clear structure of the Inspector's Matters, Issues and Questions shows us that we need to address the proposed GSS04 Cricklewood Growth Area as well as its sites.

There is no outline map of the proposed Growth Area in the Local Plan, so we don't know whether it includes all the properties between Cricklewood Broadway, Cricklewood Lane and the MML/Thameslink railway, or properties south of Cricklewood Lane also, or properties east of the railway too. This very much needs clarification; there is even less justification for intensive development south of Cricklewood Lane, for example, than there is for the area north of it.

It seems this growth area largely or entirely consists of 2 sites: Site 7 Beacon Bingo and Site 8 Broadway Retail Park. The designation of capacity as "1,400 new homes, with the potential to increase further upon delivery of the West London Orbital" seems largely dependent on the indicative capacities of those two sites, 132 and 1,007 respectively. These capacities have not been justified and are – most especially Site 8 – contrary to the Plan's Sustainable Residential Quality Density Matrix, which only provides for such density in a central area, i.e. "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 an Inter-national, Metropolitan or Major town centre", which does not describe Cricklewood at all.

We should make some factual corrections and clarifications.

1. Site 7 is no longer Beacon Bingo, following the acquisition of Beacon by Merkur, the removal of the Beacon brand UK-wide and the new naming of the bingo as Merkur Bingo.
2. Site 8: The SoCG with Historic England EB_SoCG_11 wrongly states that "*Outline planning permission (Ref 20/3564/OUT) has now been granted on this site.*" The application has a resolution to approve from LBB's planning committee (09 Sep 2021) and the Mayor of London has written to LBB that he is content to allow the local planning authority to determine the case" (28 Mar 2022). However on 25 Mar 2022 the Secretary of State for Levelling Up, Housing and Communities directed the council "*not to grant permission ... without specific authorisation ... to enable him to consider whether he should direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to him for determination.*" So far as we know, as of 23 Aug 2022, no decision has been published on whether the application should be referred, the council has not been authorised to grant permission, and permission has not been granted.
3. At various points in LBB's supporting documents it's stated that the Brent Cross Cricklewood development has been divided into parts, Cricklewood Growth Area being one. This is misleading. The BXC applications C/17559/08 and F/04687/13 don't include the crucial sites 7 and 8, for example, and only extend into Cricklewood town centre to include the junctions of Cricklewood Lane with the A5 Cricklewood Broadway and Claremont Road / Lichfield Road, which have now been opened up. The 2005 Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework did include central Cricklewood, but was very clear that intensive development on either side the A406 North Circular would not extend into Cricklewood town centre (e.g. Figure 19 Building Height Profile and Figure 20

Residential Type and Density). The designation of Cricklewood as a Growth Area is novel and not part of the Brent Cross Cricklewood development.

Cricklewood is half in Brent (west of the A5), and perhaps 20% Camden, 30% Barnet, that being the extreme south-west corner of Barnet. Intensive development of the Barnet corner will impact all Cricklewood, a running theme of the 2,200 objections to application 20/3564/OUT for Site 8. No comparable development of the Brent and Camden parts of Cricklewood town centre is foreseeable, given the land ownership and the largely 2-storey residential nature of the properties behind the sometimes 3-storey frontages on Cricklewood Broadway, including two conservation areas. The residential properties in the Barnet corner south of Cricklewood Lane are likewise 2-storey, behind 2-storey and 3-storey frontages on Cricklewood Lane. GSS04 thus threatens a thoroughly lopsided and incoherent development of Cricklewood.

We welcome the suggestion that Barnet may collaborate with Brent and Camden (indeed, we welcome the provision of housing on Site 8, another running theme of the 2,200 objections). The draft Local Plan's actual policy GSS04 makes no such commitment, ending only "potentially through working with LB Brent and LB Camden", thus emphasising the inherent democratic deficit of unilateral development of a piece of the town centre. It writes an open cheque for "1,400 homes with the potential to increase further" without providing any justification for that figure. We cannot see how that figure can be justified, particularly given the many issues informing the strong objections to the intensive development of Site 8 alone, including Barnet's own Heritage and Conservation officers' objections to 20/3564/OUT and as also covered in other comments on this draft Local Plan, and the proximity of conservation areas to the proposed Growth Area.