Coalition for a <u>Sustainable</u> Brent Cross Cricklewood Plan

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Our objective is to prevent 'Brent Cross Cricklewood' (BXC) in the London Borough of Barnet being built according to current plans.

Why we object:

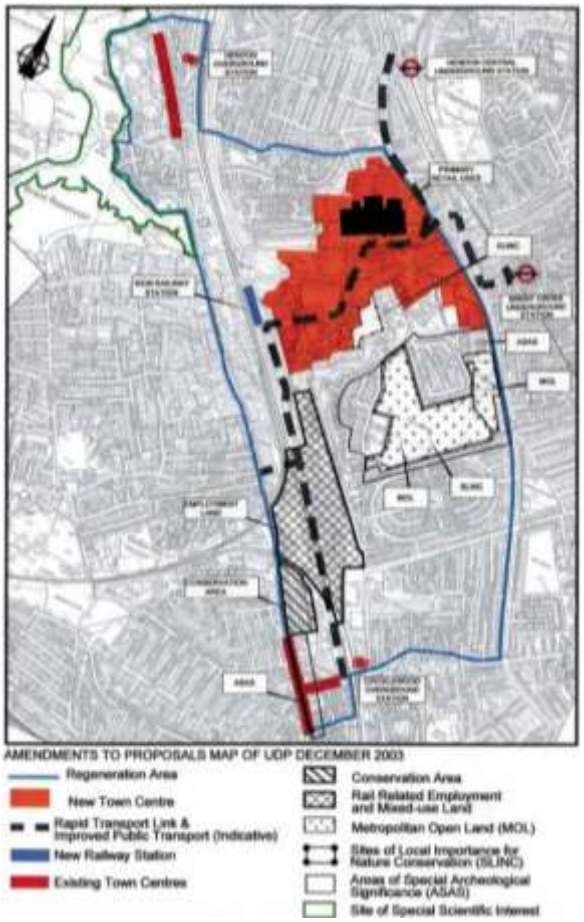
- **transport issues,** notably around Barnet's prediction of over 29,000 extra cars every 12-hour working day *(including at West Hendon)*
- **environmental degradation**, including aspects of a proposed waste processing facility
- **massing issues,** including noise, light pollution, and overlooking of existing housing
- **lack of social sustainability,** including facilities for youth

Background

The Brent Cross area, beyond the shopping centre and car parks, has never been well maintained by Barnet and (what is now) Transport for London. As many people will know, there are rusty metal railings, derelict areas where former offices have been demolished, little obvious maintenance of the green spaces, and uneven pavements. Air pollution along the North Circular Road is, according to Greater London Authority figures, some of the worst in London. Parkland, housing and schools exist further south.

In 2003, planning permission for a 25,000 sq.m. extension to the shopping centre alone was rejected by the Office of the Deputy Prime Minister, mainly for environmental reasons, and because sentiment had moved away from out-of-town shopping centres - which Brent Cross was considered to be.

In 2004, Brent Cross was designated by the Mayor of London in his 'London Plan' as a 'proposed opportunity area'. In another effort to redevelop the area, Barnet approved a **'Brent Cross, Cricklewood and West Hendon Development Framework'** plan. This was to apply to the whole Brent Cross district, on both sides of the North Circular Road, not just the shopping centre. There would be more shops (retaining the old shopping centre) but also extensive new housing and offices, and attempts would also be made to regenerate West Hendon and Cricklewood.



The Barnet document stated that, "It is forecast that the land use proposals within the Framework will generate 132,800 new person trips per 12-hour weekday into the area, including 29,100 additional vehicles. An additional 35,800 passengers per day will arrive by bus and 28,900 passengers will arrive by rail or underground. Walking and cycle journeys will be shorter in distance and many of these will be made entirely within the area."

The local planning authority's estimate of **'29,100 additional vehicles'** (plus presumably more outside the 12-hour period) has been one of several mobilising issues, taken up by local people opposed to the ***current***

proposals for the redevelopment.

The plans were jointly promoted by the Greater London Authority, the major land owners, developers, and Barnet Council, and became ‘Supplementary Planning Guidance’. This guidance was then incorporated into Barnet’s ‘Unitary Development Plan’. (Since then, redevelopment of the West Hendon area has been dealt with separately.) The main Brent Cross developers are Hammerson, Brookfield Multiplex, and Standard Life Investments.

In March 2008, a part-outline, part-full, planning application was partly registered with Barnet Council.However, the ‘Transport Assessment’ part of it was only published eight months later. Barnet had given 5 January 2009 as the deadline for public comments on the planning application, but later backed down.

Public opposition to the plans grew quickly, and this umbrella ‘Coalition for a Sustainable Brent Cross Cricklewood’ has been formed by residential, environmental and transport groups, opposing various overlapping aspects.

In February 2009, the neighbouring borough of Brent decided to oppose the application.

Also in that month, the Greater London Authority issued a report, stating these six main comments and criticisms:

> ***Car Parking:*** the parking provision proposed in the application is beyond the level which would normally be acceptable for a town centre development.
>
> ***Public transport provision:*** for this application to be considered acceptable, there must be closer integration of transport and spatial development.
>
> ***Section 106 [planning levy]:*** it is essential that Transport for London is, along with Barnet Council and the applicant, made a party to the section 106 agreement. The development represents one of the largest in London, with a lengthy implementation period, and one which has far-reaching implications for strategic road, rail, Underground, walking and cycling networks.
>
> ***Bus station:*** ... the Mayor broadly accepts the proposed location, subject to agreeing the most efficient circulation routes for both pedestrians and buses to and from the new location. ***[We disagree – the new location will expose staff and passengers to ten-lanes of pollution from the North Circular Road.]***
>
> ***Affordable housing:*** the Mayor considers it unacceptable that there will potentially be no net increase in affordable housing in the primary development package. The applicant is strongly advised to reconsider this position.
>
> ***Flat layouts:*** the Mayor raised the issue of the quality of residential accommodation. ... The current design guidelines do not sufficiently secure or inform the later detailed design stages, to ensure high quality space standards.

Extra documents were added to the planning application in March 2009.

In April 2009, the borough of Camden decided to oppose the application.

Network Rail has permission from the Office of Rail Regulation for the sale of a huge area of 'Cricklewood Railway Lands', after 'consultations' that totally excluded the public. It includes the site of the current 'Hendon Waste Transfer Station'. The developers want to buy a replacement waste site on the A5 Edgware Road to the west, on the border of Brent – by compulsory purchase*. (This is a classic way for developers to operate – build multi-storey housing blocks, by trying to move current users to much cheaper land.)* Barnet is one of seven boroughs in the 'North London Waste Authority', but this body is unwilling, or unable, to specify what technology the new waste depot (some call it an 'incinerator' – it is would seem to be at least a 'combustor') would use.

The estimated emissions for the whole Brent Cross Cricklewood development is in excess of 54,300 tonnes of carbon dioxide every year *(BXC09 document, page 111)* and the mitigation offered is to create 'energy from waste', defined as:

> "an advanced thermal treatment unit, fuelled by municipal solid waste (MSW) or refuse-derived fuel (RDF) containing a high proportion of organic matter."

This will involve a new building on the other side of the Thameslink railway line, with a chimney rising above the high-level North Circular Road flyover. Strangely, the chimney did not appear on the physical model of the whole development that was shown to the public in Barnet's modern Hendon Sports Centre *(which, incidentally, will **also** be demolished, for higher-value use of the land).*

Quotes

- "**At this point** we do not have the privilege of knowing whether we are fighting a proposal that is actually acceptable or not, because we are being consulted on 'an idea' rather than a detailed plan."
  – Viv Stein, Brent Friends of the Earth (and quoted by Cllr Mark Cummins to sum up Brent Planning Committee's own views in Planning Committee meeting February 2009)

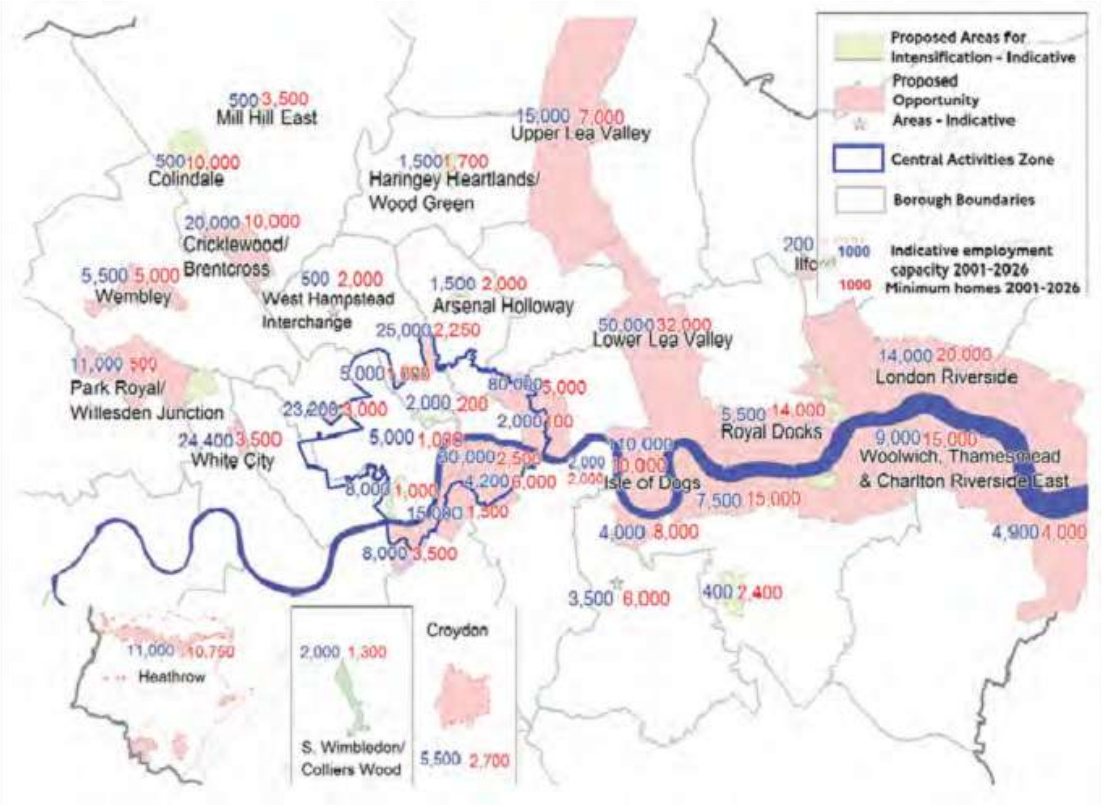
- "**This is an attempt** to build Manhattan in a suburban setting, destroying much green space in the process. Frankly, the whole scheme is overbearing, and smacks of over-ambition, especially in the current climate."
  – Alison Hopkins, Brent Resident

- "**An independent consultants' report** makes it clear that The Dump *[waste depot]* will be the cause of traffic chaos. Plans are ill-thought-out, and unworkable."
  – Alec Castle, Brent Councillor

- "**This proposal** does not take into account Government guidelines as regards affordable housing and carbon-neutral development. [The developers have] failed to consult meaningfully with residents."
  – Dawn Butler, MP for Brent South

- **Regeneration** should be about making an area better, not worse. This dismal scheme needs radical improvement."
  – Sarah Teather, MP for Brent East

- "**Why build** a huge waste-combustor for seven London boroughs across the road from a Brent residential area – not even one of the seven?
  Why not use the 'Pinkham Way' North Circular Road site, in a wholly-industrial area, and which Barnet has just sold to the North London Waste Authority, instead?
  There's also a failure to combine planning-gain money from ***all*** Boris's north London redevelopment sites, to build affordable new light-rail links."
  – John Cox, Brent Resident



London's "opportunity areas", showing Brent Cross

Who we are, and why we are opposed

The coalition is a wide-ranging loose alliance, spanning the boroughs of Brent, Barnet and Camden. It includes residents' associations and representatives, three Friends of the Earth groups, two cyclists' groups, the London Campaign for Better Transport, four political parties, two Members of Parliament and one London Assembly Member.

Some of these groups have been working together for over two years to fight the current ill-considered plans for the development around Brent Cross. We are not opposed to regeneration, but the term here is misleading: it may well be 'destruction'. The only ***firm*** commitment is to double the size of the Brent Cross retail space, build the waste combustor plant and construct a mere twenty-five houses, whilst over two hundred dwellings will be destroyed. The Government rejected plans to double the size of Brent Cross in 2003, so we believe that the developers are cloaking their motives in a fog of vagueness and "green-wash".

Barnet, Brent and Camden residents who would be seriously disadvantaged by the proposal have been minimally and misleadingly consulted. For instance, the dump/incinerator/combustor happens to be positioned on the Barnet and Brent boundary, as far as possible from the valuable building zone, but with the greatest damage to Brent. There are several schools and hundreds of homes nearby *(which is not true about the alternative Pinkham Way site).*

Major changes to the Staples Corner road junction on the North Circular Road *(where the developers want to spend fifty-million-pounds!)* mean that, in order to cope with some of the extra 29,000 Brent Cross cars, through-routes that have existed since the 1920s will be removed.

Motorists driving south on the A5 Edgware Road will hate being forced into the M1 motorway roundabout (particularly during a Brent Cross rush-hour!) and will use the southbound A5 flyover and then the westbound residential streets, instead. In addition, hundreds of waste lorries a day at the new depot will add to the congestion on the Edgware Road and surrounding residential roads.

Nothing must get in the way of increased road capacity for the 29,000 extra Brent Cross cars, and the resultant congestion away from the site is "not the developers' problem" *(or receiving any planning-gain benefit from them, in migitation, because all the available money is apparently being used up on-site).*

Cycle and pedestrian routes will be removed, because the developers believe the future lies with new high-level metal walkways – which have been discredited as a brutal feature of townscapes since the 1970s.

New employment is mainly only offered in the final phases, many years ahead. There is, understandably, no actual commitment to build the large office blocks, and questions are being asked about whether London's economy will ever need them, if there is a permanently-smaller financial services industry.

Regarding new housing, the proposed dwellings are mostly high-density flats, each with a maximum of twelve square metres of outside space in private gardens. Guaranteed social housing is thought to be only fifteen per cent.

Barnet Council has worked closely and exclusively with one set of developers over a long period. Actual implementation of the planning application, particularly selling public land, would seem to contravene the European Court of Justice ruling of 18 January 2007 (the Roanne ruling) that local authorities must always tender for development partners within the Official Journal of the European Union (OJEU), or else are in breach of EU procurement regulations.

Further detailed objections now follow...

Transport issues

notably around Barnet's 29,000 extra cars per 12-hour working day
(less a thousand or so accounted for by West Hendon)

and the possible closure of Cricklewood and even Hendon stations, if a huge new 'Brent Cross Thameslink' station is built

"29,000 cars"

The "car-based plan" to redevelop Brent Cross, Cricklewood and West Hendon will bring over 29,000 extra cars every day on our local roads, according to Barnet Council's own figures. No wonder both Brent and Camden Councils oppose the Brent Cross scheme.

The A5 Edgware Road, the A406 North Circular Road, the A41 Hendon Way, the Claremont Road and Cricklewood Lane area, they will all suffer from the extra congestion.

The developers are using "green-wash" on what is really a 1980s-style mega-proposal, which fails to bring any significant benefits to north-west London. Most of the 'planning gain' money is being wasted, like the fifty-million-pounds on Staples Corner.

The developers concentrate on the ***proportion*** of Brent Cross people who will use cars every day (which, we agree, is an improvement on past development schemes). **The Coalition concentrates, quite rightly, on the *absolute* number of extra cars, because that is what will cause the road congestion – over 29,000 extra cars every day.**

Instead of spending so much on new roads (some are necessary, particularly the minor ones) the transport "planning-gain" money ***could*** be used to benefit hundreds of thousands of people across north-west London, not just the developers.

Members of the Coalition are not mandated to support a ***specific*** transport alternative, but many groups have supported, if it is affordable, a 'North and West London Light Railway' across the Brent Cross site, because it would serve the transport needs of Brent Cross, and also transform ***orbital*** public transport across North London. It could also eventually rejoin the two branches of the Northern Line, for the first time since 1939! ***Both Harrow and Ealing Council have voted in support the light railway in principle***. *(Details: enter 'nwllr' in Wikipedia.)*

Crucially, this is the only chance in our lifetimes to combine the planning money from all the major Northern 'London Plan' development sites of Wembley, Park Royal, Colindale, Brent Cross, and so on. It may be feasible – and affordable – to connect them together, because of an accident of history – the existence of old Victorian freight lines that ***still*** connect the sites, combined with the reuse, after many years, of abandoned railway track beds.

The political and planning leaderships of London (under Ken and Boris) seems to have failed to combine the transport planning-gain of Brent Cross with other areas, and there is no co-ordination between the development sites whatsoever.

The Mayor of London set up an 'Outer London Commission' in early 2009, to study this subject, amongst others. Better orbital transport, and possibly affordable light-rail, was on its agenda, until late in its consultation period. The Commission was then briefed that there was now an 'age of austerity' (due to near financial melt-down at 'Transport for London') and such matters could not be recommended. That is no way for a ***strategic*** body to behave – it should devise strategies, to be implemented as and when resources allow. *(During the Second World War, no-one would have produced the 'Beverage Report', or the 'Abercrombie Plan' [which recommended the 'motorway boxes' like Westway, and the M1 motorway down to the North Circular Road], with such an attitude.)*

Whether or not there are immediate resources for new infrastructure – possibly meaning light-rail – the developers promise to carry out short-term damage to what might be longer-term light-rail plans. We must try to stop this – we need to fight the imminent demolition of the 'Tempelhof Avenue road bridge' across the North Circular, in front of the Brent Cross car parks. We also need to stop the developers destroying the possible route towards Brent Cross tube station that currently exists underneath the Brent Cross Flyover, at the junction of the North Circular with the A41 Hendon Way. **Neither safeguarding will cost much money – but it allows the building of light-rail across the Brent Cross site, *when possible!***

Finally, to repeat, it is amazing to want to spend fifty-million-pounds at Staples Corner. There are huge dis-benefits to drivers and bus passengers who do not need to visit Brent Cross, but will find that the roads take them there, anyway!

Thameslink stations

The proposed ‘Brent Cross Thameslink’ station will threaten the closure of Hendon and Cricklewood stations, where the platforms are no longer going to be extended, to take new, longer Thameslink trains. And amazingly, Network Rail says the line is so congested that the local trains will have to miss out ‘Brent Cross Thameslink station’ entirely - so much for it being a "major new transport hub for north-west London".

> **Network Rail study: New Lines Programme: Capacity Analysis**
> **20 August 2009**
>
> *On the Midland Main Line [MML, through Brent Cross] there is no passenger demand capability gap in 2020, because of the significant increase in capacity delivered through the Thameslink programme, but the route cannot carry any additional services on most route sections. Completion of the Thameslink programme will lead to the route being effectively full south of Bedford, both peak and off-peak.*
>
> *This will impose substantial planning and performance risk and will severely limit freight capacity. MML Thameslink paths must match those planned on the East Coast Main Line and through the Thameslink core, or there is a risk that the planned quantum of trains on both routes cannot be achieved. Similarly, longer distance services must be planned around the Thameslink pattern, in order for the route to perform effectively.*
>
> *The peak hour pattern south of Bedford is therefore assumed to be:*
>
> - *5 trains per hour on the fast line for East Midland services from north of Bedford to St Pancras (High level);*
> - *8tph fast line Thameslink service from Bedford to St Pancras (Low level);*
> - *4tph slow line Thameslink service from Luton to St Pancras (Low level); and*
> - *4tph slow line Thameslink service from St Albans City to St Pancras (Low level).*

The current plan is for four ***short*** trains to call at Cricklewood and Hendon stations, but to always miss out ‘Brent Cross Thameslink’, because otherwise, eight trains per hour on the ‘slow line’ is not possible. Railway industry experts tell us that this whole plan is unlikely to be sustainable in the long term. The method used to close stations in the Beeching Era was to run down the services, and then claim no-one was using them. Will that happen here?

Ominously, the Office of Rail Regulation has told Network Rail, in its document about the sale of the ‘Cricklewood Railway Lands’, which legal method to use in order to ***close*** Cricklewood station – ***because Network Rail asked.***

Parking and congestion

There are specific issues related to traffic and parking, that the commercial buildings will bring with them. No parking is planned for office staff, on the assumption that workers will travel to the new Thameslink station or via the Northern Line. However, employees of these companies are unlikely to come simply from the directions of these lines, or from the limited destinations served by buses. If people cannot park at the offices, they will seek to park on residential roads in the surrounding area. If new parking zones are set up, people will park beyond the zones.

However un-green it is, we have to recognise that office employers will be more attracted to 'campus office estates' that offer car-parking. The only solution is to create such a good, inter-connected public transport network, over a sufficiently large area, that car-use is not considered necessary – and solutions regarding outer-London orbital transport (like a light railway) seek to address this.

The developers fail to properly document the increase in volumes of waste to be handled by the enlarged waste facility, all of which will be delivered by road along the A5 Edgware Road, and much of which will leave the site by the same route, rather than by train as it does today. Sorted, recycled scrap of various types must also be removed from site, which will also probably involve road transport, given the lack of railway line space *(because so much railway land is being sold off!).*

There is no technical need to move the waste depot from its ***current*** position (if it doesn't move to Pinkham Way). A new railway line west of Bedford is currently being constructed, so the eastern side of the 'Midland Main Line' at Brent Cross is just as good as the western side, in order to reach land-fill sites like Calvert in Buckinghamshire (since land-fill will not stop completely in the future). The developers' claim that the current site cannot be used for the new depot is more likely to be that, actually, eight-storey flats are more profitable.

More road congestion will be felt by many people, due to Brent Cross – from Brent residential roads in the west, along the A5, the North Circular, Claremont Road, Cricklewood Lane, the A41 Hendon Way, and so on.

Environmental degradation

including aspects of a proposed waste processing facility

A planning application of the scale of Brent Cross must be accompanied by an 'Environment Statement', providing information for an independent assessment of the environmental damage or impact. Remarkably, the applicant has not supplied this information regarding waste processing at Brent Cross – which makes it impossible to fully assess the potential environmental impact. The applicant should provide details of the technology proposed and, should it be desired to change this, a variation of condition can be applied for later. **Giving outline approval now, with no detail, gives 'carte blanche' to build whatever is chosen, largely out of democratic control, in the future.**

The developers have consistently evaded answering questions about the nature and impact of the technology to be used. If it is too soon to choose a waste process, it is too soon to approve planning permission, and the developers will have to wait!

Whatever promises are made about waste-handling facilities, the day-to-day reality depends on high-quality, rigorous on-site management. Can that be guaranteed? Another facility in Neasden Lane has been prosecuted by the Environment Agency, and has caused huge problems for local people. People do not wish to live under a similar cloud – maybe quite literally!

Noise and pollution

The proposed 'incinerator' could cause significant pollution, both airborne particulates and gases, and regarding noise. The noise pollution will be generated by the turbines, the trains and locomotives, the lorries, and the railway gantry cranes at the waste depot. Barnet Council states that there could be an extra 900 lorry journeys every day on the Edgware Road. A gantry crane is planned, which would move containers between the waste depot and the trains. This can create considerable noise – that of the crane motors, and the noise of containers being positioned.

The proposed new plant is likely to treat or process waste in such a way that it is converted into a fuel. Under the terms of the Government's 'Renewables Obligation', only the proportion of the 'waste stream' classed as 'biomass' is deemed to be 'renewable', at the point at which it is burnt. (so, for instance,

plastics, although they are burnt, are not.) The proposed facility does not encourage recycling, but will reward waste.

We contend that a new facility could be developed on, or very close to, the existing one. Also, to be economically viable, the new facility might have to handle two or three times the volume of waste it is dealing with currently. Such domestic waste would have to arrive from a far greater area, using more road vehicles, than now.

In the new depot, waste will be tipped into bunkers, or on to floors, or into hoppers, before moving through a range of processes to separate out materials and produce the fuel for burning. These operations are potentially much dirtier that the current operations at the Hendon depot, hence the need for a sealed building under negative pressure. The greatest volume of material produced within the new facility will leave, not by rail, but by conveyor belt, to the proposed combined-heat-and-power plant, or by road if various kinds of recyclable materials cannot be produced in sufficient quantities for rail transport.

The developers state, “There is to be no burning of rubbish at all.” It is understood that the North London Waste Authority’s requirement for the new facility is that it should treat the residual waste, after recyclables have been removed, to produce either a solid ‘refuse-derived fuel’ (RDF) or a ‘syngas’, either of which can then be burnt in a heat-and-power plant.

For reference (and why at least one of the plants could be called an ‘incinerator’) this is the Environment Agency’s approach to RDF (from its web site):

> ***Environment Agency Approach***
>
> *We consider RDF is waste, and remains waste until it is burned as fuel and the energy is recovered.*
>
> *Any plant burning RDF must meet the requirements of the Waste Incineration Directive, or have appropriate justification for derogation. Waste used to make RDF can only be counted towards landfill diversion targets once the RDF has been burnt for energy recovery, as at any stage before this the RDF could still be sent for disposal, i.e. to landfill.*

It is recognized as good practice for an applicant to have applied to the Environment Agency for an ‘Environment Permit’ at the time of submitting a planning application. Having made enquiries with the Environment Agency, that does not seem to have happened.

Transport issues for waste transfer

The developers have stated that the ‘Waste Transfer Facility’ has to be on the “freight side” (western side) of the ‘Midland Main Line’. All current freight and railway depot facilities are on the eastern side of the line, where the current waste depot is located, and where all the Network Rail land is being sold off.

There are three pairs of rail tracks – from west to east, the hardly-used ‘Hendon Freights’, then the ‘Fast’, then the ‘Slow’. The slow tracks are equally capable of running freight traffic, and, in fact, the Hendon Freights cross over the fast tracks on a flyover, to join the slow tracks, just over a mile north of the North Circular Road. A waste train leaving for the Calvert land-fill site (or any neighbouring one, formed when clay was extracted for brick-making) can soon travel via Bedford, rather than a circuitous route through Gladstone Park in Brent, then Ealing Broadway (on the equally congested ‘Great Western Main Line’) then West Ruislip, then Aylesbury, as happens every day at present. (Another waste train, from Dagenham to Calvert, via Kentish Town, also does the same journey.)

A waste site (and a proposed separate freight depot) at Brent Cross needs to be directly connected to the North Circular Road, as now, in order to have minimum impact on Brent and Barnet residents. This would leave the Edgware Road to be further developed for retail or housing use.

Zero emission developments

The Mayor of London’s preferred standard, set out in ‘Sustainable Design and Construction’ (2006) states that major developments should be zero carbon-emission developments (ZEDs).

However, in the document BXC08 (section 2.3.2) the developers assert that, “It will not be technically or commercially viable for the entire development at BXC to be a ZED.” They have indicated that technology is not yet advanced enough to achieve that aim – but why the rush? The problem is that London is a mainly Victorian-to-1930s city, with limited ability to be re-engineered to high environmental standards. That makes it even more important that completely new sites in London are ‘pristine’ environmentally. Brent Cross is not, as planned. That is why the planning application should be rejected, and a better plan drawn up – this time with real community involvement.

Massing issues

including noise, light pollution, and overlooking of existing housing

Some points to make:

What seems to have been forgotten by both the developers and Brent Council is that they are dealing with an outer London suburb, not a Dubai like inner city. The proposals are for tower blocks, offices and city streets, rather than a development which builds on existing community structures. If built, it will add incongruous high rise buildings alongside good 1930s housing to the severe detriment of existing neighbourhoods.

The area south of the A 406 North Circular Road is currently a mix of social and private housing, which includes considerable green land. Whilst there is undoubtedly scope to refurbish some of the social housing, the area offers an environment that gives residents access to a great deal of open space, which will be lost if the proposals are adopted. The developers appear not to have learned the lessons of the 1960s and 70s, and are keen to shoe horn families into flats with cramped rooms and no gardens. There is little or no provision for children and young people with a corresponding potential for the area to become yet another sink estate.

Nearly all the proposed housing is made up of flats and apartments, with two bedrooms or less, and room sizes that don't even allow for essential furnishings. This is of little use to the families in Barnet and Brent who need to buy or rent affordable housing. Indeed, most of London is vastly over-provided with flats, partly due to targets imposed by the former Department of the Deputy Prime Minister, now the Department for Communities and Local Government.

The best place to build housing is not necessarily close to a ten-lane section of the North Circular Road!

14 out of 15 residents in Whitefield Avenue say they do not to want their houses to be compulsorily purchased. The local people are worried about losing mature trees, wildlife, and the current Clarefield Park. They do not want tower blocks, but family-friendly houses. The flats in the three tower blocks to be demolished are only two-bedroom, so some of the famililes want three bedrooms, but they are still worried they will lose green space around them.

The people in the nearby sheltered housing also don't want their housing demolished, and the same applies to the residential home and day-centre; these

people have a nice view of the Clarefield Park, which makes day-to-day life more pleasant. The developers are not replacing these properies, even though these are local people involved The list goes on and on – all of these people have been ‘consulted’ and written in, but no-one has taken any notice.

It is disingenuous of the developers to claim there are four new parks, when they are mainly only being restructured. There is a net ***loss*** of open space overall.

Lack of social sustainability

A great many people are worried that new residential buildings will largely be lived in by people to ***have to*** live there, not because they ***want to*** live there.

Only by careful, sensitive consultation can redevelopment be made a success. It does happen in other parts of London. For instance, many people would say that the 'Kings Cross Lands' site has been "consulted to death"! However, it is a fact that residents around Brent Cross feel the consulation has been cursory and even carried out in an arrogant manner.

There may be a technical basis for this – the Development Framework was only meant to be a guidance document, but the developers have interpreted it as effectively approved outline planning permission. **Whatever has happened, the planning application bears a very striking similarity to the Framework, showing that consultation effectively stopped five years ago.**

What will someone who grows up in the new Brent Cross development feel about their surroundings (beyond the ten-lane background buzz of the North Circular that will pervade the site)?

This document, in later editions, will cover the human scale, as opposed to the developers' commercial considerations, in more detail.