

**APPENDIX 5 CONSULTATION RESPONSES**

**FIRST CONSULTATION RESPONSES CONSULTATION PERIOD ENDING 10/03/2015**

<b><u>Loss of green space and play facilities</u></b>	Officer Comments
1. The triangles are repeatedly referred to as 'Brownfield sites' this is incorrect and disingenuous.	This inaccuracy is noted.
2. Green space should not be built on when there is so much derelict and brownfield land available in the area including plots identified for development within the Outline Planning Permission.	The triangles are not designated as open space on the Local Plan Proposals Map, however it is recognised that they are utilised by local people. The development of these areas is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions.
3. Green space is vital for the community and would be lost early in the first phase of the Brent Cross Cricklewood Development and will not be replaced until the final phase several decades later.	Both the new Claremont Park and the improved Clitterhouse Playing Fields are to be provided early in the first phase (Phase 1A North) of the development. A condition is proposed to prevent construction commencing on the Brent Terrace Triangles until arrangements have been made to the written satisfaction of the Local Planning Authority for the provision of the Claremont Park Improvements and the Clitterhouse Playing Fields Improvements (Part 1) including a clear commitment to a timetable of delivery. No residential units on the Brent Terrace triangles shall be occupied prior to the practical completion and provision of the Claremont Park Improvements and the Clitterhouse Playing Fields Improvements (Part 1) in accordance with the relevant Necessary Consents.
4. Barnet's policy encourages retention of open spaces for the benefit of wildlife and the health of residents. The loss of these spaces with the development of the Triangles is therefore contrary to Barnet Policy.	The development of these areas is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions. Improvements are proposed to Claremont Park and Clitterhouse Playing Fields as part of the Reserved Matter Applications for Phase 1 N.

<p>5. BX Partners have provided play facilities and doorstep play for the new development plots which are in accordance with the provisions of the RDAS. However, in the development of the plots the children of Brent Terrace will be losing their doorstep play but not having it replaced. (It has been stated by residents of Brent Terrace that 11 Brent Terrace properties will lose their existing 'doorstep play' facilities as a result of this development.)</p>	<p>The triangles are not designated as doorstep play spaces, so while there may be informal use at present, this is not formal play space . There will be significant improvements to the Claremont Way Open Space, which will become Claremont Park, with the provision of play areas for all age groups, where such facilities do not exist at present. A doorstep play space will be provided at the southern end of Plot 54, again where currently there is no formal provision.</p>
<p>6. Play England states that good practice consists of providing mixed age play areas. The proposed play areas being provided on Plot 54 are too small and fail to provide such mixed age play facilities. Given the loss of the plots how is this justified?</p>	<p>In relation to doorstep play space, all units on Plot 53 are within 125m to the play facilities of Claremont Park in accordance with the approved Play Strategy and Hierarchy set out in the DAS and therefore no dedicated play space will be provided on site. All units on Plot 54 are more than 125m but less than 400m from Claremont Park and as such doorstep play area for children under the age of 5 (measuring 180m<sup>2</sup>) is provided on Plot 54 accordance with the provisions. This is in accordance with the principles established in the 2014 Permission.</p>
<p>7. One of the triangles is a designated park space for children's play and the other has been used as public amenity space for decades, removing this would go against Article 31 of the UN convention of the rights. Every child has the right to relax, play and take part in a wide range of cultural and artistic activities.</p>	<p>The triangles are not designated as open space on the Local Plan Proposals Map. The triangles are at present a poorly maintained open space which offers no formal play facilities. The proposals for the new Claremont Park will see the creation of a new open space, with seating, seasonal planting and numerous access points, as well as two play areas for different age groups. There will be passive surveillance of the new park from the new road which will run along its northern edge. It is considered that the new park will provide a significantly improved open space than that provided by the existing triangles.</p>
<p>8. Promises were made by the Developers that the southern triangle would be retained to be used as a playground.</p>	<p>The development of these areas for housing is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions.</p>

<p>9. As a result of the loss of this doorstep open space the Children of Brent Terrace will resort to playing on the road which will be even more dangerous given the increase in traffic associated with the new housing.</p>	<p>Both the new Claremont Park and the improved Clitterhouse Playing Fields are to be provided early in the first phase (Phase 1A North) of the development. Please see above (Comment 3 ) for the condition to be placed on this reserved matter application.</p>
<p>10. The provision of open space on Brent Terrace is of particular concern given the fact that Brent Terrace Properties do not have large Private garden areas. This increases the importance of the spaces that would be lost as a result of the proposed development. The Types of games that would be able to be played would also be curtailed by the loss of these spaces with games of cricket or 5 football no longer being an option within close proximity to the children's homes.</p>	<p>There is no formal play provision within the Brent Terrace Triangles at present, and the 2010 and 2014 Planning Permissions provide for housing development on these areas. There will be substantial improvements to Clitterhouse Playing Fields (Phase 1A North Open Space RMA) to enable football and cricket to be played in an appropriate environment, and Clitterhouse Playing Fields are only a short distance away. There is a formalised 'kickabout' space proposed in Claremont Park to address the loss of the green space within the triangles.</p>
<p>11. Is building a block of flats appropriate on this particular residential street rather than a playground?</p>	<p>The development of these areas is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions. The development proposes both flats and terraced houses. There will be significant improvements to the Claremont Way Open Space, which will become Claremont Park, with the provision of play areas for all age groups, where such facilities do not exist at present.</p>
<p>12. The southern triangle is marked as a play park for children and has been neglected for a number of years with rubbish and detritus mounting up. What is the guarantee that this new development will not be left in a similar condition in a few years?</p>	<p>Appropriate management agreements will be put in place through the Estate Management Strategy to ensure that the play space, and the Claremont Park and Clitterhouse Playing Fields are appropriately managed and maintained.</p>

<p>13. There are no other similar spaces within easy reach where parents would be comfortable in allowing their children to safely play. The potential for such play to encourage responsible social development and community spirit in young people is well established and cannot be overemphasised.</p>	<p>Both Claremont Park and the improved Clitterhouse Playing Fields will provide neighbourhood play areas for all age groups, as well as providing opportunities for sport.</p>
<p>14. The loss of this amenity will have a significant detrimental effect on the health and wellbeing of the residents on this road through the removal of existing green landscaping and open space that currently characterises the area.</p>	<p>As well as providing substantially improved play and sport provision, Claremont Park and Clitterhouse Playing Fields will be upgraded (as part of Phase 1A North) to provide new routes and pathways with attractive planting, seating and picnic areas for quiet recreation. Clitterhouse Playing Fields is to provide an outdoor gym, as well as MUGA for a variety of sports, and significantly improved sport provision to supplement the play and recreation provision to be made in Claremont Park. The proposed new hedge and lengths of hedge to be retained will continue to provide a green 'backdrop' to Brent Terrace as at present.</p>
<p>15. The development will have a particularly detrimental impact upon elderly residents as many have limited mobility and so are reliant on these green spaces to walk their pets.</p>	<p>Claremont Park is accessible to residents for dog walking, and this has been designed to ensure optimum accessibility for all.</p>
<p>16. The loss of the Brent Terrace triangles will see the demise of yet another Cricklewood green space. We recently lost the Hendon Football Club (part of Clitterhouse Playing Fields). A further one fifth of the existing Playing Fields will be lost in the next phase of the Brent Cross development, along with Clarefield Park and possibly the Cricklewood Town Centre Green.</p>	<p>Hendon Football Club was not a publically accessible green space. Clitterhouse Playing Fields will benefit from a slight increase in size as a result of the Reserved Matter Application currently under consideration. The new Claremont Park will provide a significantly enhanced recreation and play facility. There will overall be a quantitative increase in green space through the redevelopment of the Brent Cross scheme, with substantial qualitative improvements, which will make the retained green spaces more user friendly, safe and attractive than at present.</p>

<p>17. How is building on our green spaces, whilst leaving us the brownfield and derelict land '<i>regeneration</i>'?</p>	<p>There will overall be a quantitative increase in green space through the redevelopment of the Brent Cross scheme, with substantial qualitative improvements, which will make the retained green spaces more user friendly, safe and attractive than at present.</p>
<p>18. Brent Terrace properties will be subject to the removal of their existing garden space to the west during later phases when this land will be acquired to form an extremely narrow 'road park'. This is not acceptable as a replacement green space for the Brent Terrace Triangles. These gardens have been used for nearly 100 years by past and present residents.</p>	<p>There will be an opportunity to consider design related to later phases of development when the relevant reserved matters application has been submitted to the Council. In respect of replacement green space please refer to the above response.</p>
<p>15. As pretty the roof garden maybe are they are not an acceptable substitute for open space?</p>	<p>The development for housing of these areas is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions. There will overall be a quantitative increase in green space through the redevelopment of the Brent Cross scheme, with substantial qualitative improvements, which will make the retained green spaces more user friendly, safe and attractive than at present.</p>
<p><b><u>Amenities of existing and future Residents</u></b></p>	
<p>1. The planned development does not take account the Mayor of London's Housing Design (Housing Supplementary Planning Guidance), which encourages greater cohesion between communities.</p>	<p>The plots have been designed in response to the surrounding existing development and following consultation with the local community. All relevant guidance has been considered throughout this process.</p>
<p>2. Cricklewood seems to be the dumping ground for development within the borough. It should be subject to development which gives something back to the community rather than taking from long term residents of the area who form the existing cohesive community. Consideration should be given to the needs of this existing community.</p>	<p>In line with the adopted Development Framework the overall aim of both the 2010 and 2014 Permissions is to create a sustainable new town centre for Barnet. In addition to new homes and jobs the town centre is to consist of extensive new community facilities, transport infrastructure with a particular emphasis upon public transport, and open space.</p>

<p>3. The illustrations and description of the proposed buildings on the green triangles separate the proposed properties from the existing, this would not promote community cohesion and good relations in line with Barnet's Public Sector Equality Duty.</p>	<p>The new buildings create a terrace along Brent Terrace facing the existing terrace opposite. This is the contemporary treatment of the traditional arrangement with the street acting as a shared public space and a place for community interactions. The new development provides back to back gardens with Clitterhouse Crescent - again this is a traditional suburban form that separates the public space of the street from the private space of gardens. All new footpaths provided within the plots are public, and there will be no 'gated community'. Improvements to Claremont Park and the provision of a new doorstep play area to the south of Plot 54 provide places for interaction with the wider community.</p>
<p>4. The proposal for 47 flats on a small piece of land with small size rooms would not provide a desirable environment for any family. The design is therefore not sympathetic to future residents.</p>	<p>The proposals included 11 family sized houses plus 36 flats rather than 47 flats as indicated. All new houses and flats meet or exceed the size of the existing flats and maisonettes on Whitefield Estate and meet current space standards for all rooms, storage provision and private amenity space in the London Plan.</p>
<p>5. It is inappropriate to rehouse people who live in houses into flats; any reduction in the number of units would be a great improvement and would reduce detrimental impacts upon the future residents.</p>	<p>The proposed new unit mix for the Secure Tenants is based on a housing needs survey (undertaken by Barnet in Autumn 2014). The proposed mix for new homes for the Leaseholders is based on a like-for-like reprovion with regards to bedroom numbers. The new homes are designed to current and more generous space standards, so that all new homes are larger in area compared to the existing homes.</p>

<p>6. Regeneration should be about improving the well-being of all residents; the proposals remove the community space from the existing residents and are not sympathetic to the existing environment.</p>	<p>The development of these areas is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions. Both the new Claremont Park and the improved Clitterhouse Playing Fields are to be provided early in the first phase (Phase 1A North) of the development. A key consideration in designing the proposed dwellings was to respect the existing scale and grain of the existing houses along Brent Terrace and those to the rear of the plots along Clitterhouse Crescent</p>
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<p>7. The introduction of a dense development in these locations fragmented from the existing community of residents is a threat to the future wellbeing of both existing and proposed residents. This would cause irreversible harm to the street and change the nature of the neighbourhood.</p>	<p>The proposals fall well within the maximum height permitted for the plots as shown on Parameter Plan 007 of the 2014 Planning Permission and furthermore, the proposals are below the maximum floorspace permitted for the plots as set out on Parameter Plan 014 of the 2014 Planning Permission. This maximum height and maximum floorspace quantum was tested in the environmental and other documentation that led to the 2014 Planning Permission and was considered entirely appropriate.</p> <p>In addition, the proposed density of 236 habroom/ha is below the indicative 298 habrooms/ha established for Brent Terrace Zone as set out in table 3B in the revised DSF.</p> <p>Notwithstanding the maximum parameters permitted in the 2014 Planning Permission, the scheme has evolved through a series of workshops with the local planning authority and as a result the proposed massing and density has been reduced by over 20% from that originally proposed and the minimum distances from the boundary line have been doubled. In light of this process of scheme refinement, proposals are of a comparable height to the surrounding residential properties. The buildings are therefore considered appropriate for the existing environment, whilst also having regard to the fact that the site falls within a defined Opportunity Area in the London Plan and Local Plan which is to undergo significant and comprehensive regeneration.</p>
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<p>8. Barnet Housing Strategy 2010- 2025 (March 2010) promotes mixed communities and highlights that ‘it is important that new and existing communities feel safe’. It is not considered that the proposed development would make new and existing communities feel safe. Brent Terrace residents have raised concerns and are seeking security for existing and future residents</p>	<p>The gardens of the new development will back onto the existing gardens of Clitterhouse Crescent and will make the previously very insecure boundary condition a lot safer.. The new homes will improve passive surveillance along Brent Terrace and therefore improve security. New development is designed to meet Secure by Design standards where possible.</p>
<p>9. Brent terrace suffers from significant levels of fly tipping and littering. It is an area that has been allowed to deteriorate. This development will face similar issues leading to anti-social littering and vandalism. How will this be addressed?</p>	<p>Appropriate management agreements will be put in place through the Estate Management Strategy to ensure that communal areas are appropriately managed and maintained.</p>
<p><b><u>Overlooking and privacy</u></b></p>	
<p>1. The proposed distance is far too close and would cause a loss of privacy for the existing residents.</p>	<p>The proposed buildings have been designed to comply with Barnet’s SPD - Sustainable Design and Construction and achieve the 21m distance required by Barnet Policy.</p>
<p>2. Clitterhouse Crescent properties that back directly onto the ‘triangles’ would be overlooked, in particular by the proposed balconies. The development should maintain the privacy of all existing residents.</p>	<p>Most balconies have been located along Brent Terrace frontage elevation or the side elevations. Where balconies had to face the Clitterhouse Crescent gardens, 1800mm high planted screens ensure privacy and avoid overlooking are proposed . There are no habroom windows on the top floor within the elevations closest to the neighbouring properties. Due to the topography the new development is set lower than the houses along Clitterhouse Crescent which also reduces the impact of the new development.</p>

<p>3. The proposal states that that no windows will be installed that overlook neighbouring properties. Document 1065-10-023 the side elevation and other plans clearly highlights that the third story will overlook 50% of the front gardens and bedrooms on Brent Terrace, the development should be reduced to two storeys in height to maintain the privacy of all existing residents.</p>	<p>All windows of the new development are at least 21m away from the 2 storey Brent Terrace cottages. This distance is deemed sufficient to avoid overlooking and complies with planning policy and the 2014 Planning Permission.</p>
<p>4. The proposed flat roof gardens for the apartment block will give a panoramic vista over existing homes and gardens. Existing residents will suffer a loss of privacy which is against the Human Rights Act 1996 Article 8.</p>	<p>The development does not provide flat roof gardens but rather green/brown roofs for environmental purposes.</p>
<p>5. I am not convinced the minimum distance of 21m will be met can you confirm this distance will be met?</p>	<p>The single storey extensions are on average 18m from new development, but these are generally blank gables. The distance of 21m is achieved for the main houses where the all the relevant habitable rooms are located.</p>
<p>6. The submission states that distances to neighbouring properties exceed 21m throughout. The majority of the Brent Terrace houses are only 16m from the proposed 3 storey façade.</p>	<p>Please see answer above.</p>

<b><u>Daylight/sunlight</u></b>	
1. The Appendix C Daylight and sunlight study only shows up to 16:00 in June; this is insufficient information for the purpose of this application. Residents enjoy late summer sunshine in our gardens and this has to be addressed.	The Appendix C drawings identify that the rear gardens of the properties on Clitterhouse Crescent and Clitterhouse Road will meet the BRE guidance with at least half of each garden receiving at least 2 hours of direct sunlight on March 21st. The proposed scheme will cause very little overshadowing and this will be restricted to the evening in the summer where the shadows cast are inevitably long.
2. The three storey buildings will cause a significant loss of light to Residents of Brent Terrace during the morning periods as the sun rises Behind plot 54.	The proposed windows will comply with the BRE guidance. As the proposed buildings are to the north-east of the Brent Terrace properties, in accordance with the BRE guidance, the proposals will not adversely affect the sunlight received to the rear of the Brent Terrace properties. The transient overshadowing drawings illustrate that the shadows from the proposed scheme will not reach the rear of the Brent Terrace properties in March or in June.
<b><u>Traffic / Parking</u></b>	
1. Parking is already extremely tight and causes social friction on the street, it is not clear that there will be enough car parking spaces after the new build. No visitors parking and provisions for households with more than one car have been provided. The Reserved Matters Transport Report has simply addressed parking issues for the new residents and assured us that there will be a parking space off street for each new unit.	Off street parking provision for 47 vehicles (1 space per dwelling) is proposed for development Plots 53 and 54 in accordance the 2014 Permission. It is not expected that the development will have any material impact on the existing on-street parking availability.
2. Under no circumstances should the north end of Brent Terrace be opened so that it is no longer a cul de sac, Brent terrace would lose many on-street parking spaces.	There are no plans for the length of Brent Terrace serving Plots 53 and 54 to be connected at the northern end. It will therefore remain a cul-de-sac.

<p>3. How many parking spaces in Brent Terrace will be lost as a result of the development?</p>	<p>Currently there are no plans to restrict any of the existing on-street parking and therefore it is not proposed that any 'spaces' will be lost.</p>
<p>4. Existing car parking spaces will be lost as a result of the introduction of the turning circle.</p>	<p>The turning circle has been removed from the proposals and refuse vehicles are now to turn in the entrance to Plot 53,.</p>
<p>6. Brent Terrace is a family orientated road and we previously requested traffic calming and for the street to be a designated home zone. The proposed development will cause more traffic and pollution into the street. With the loss of on street parking the development encourages people to rip up their small gardens to provide off road parking. Surely, this is contrary to all good practice and residents will be left with only their tiny back gardens after the front is turned into car parking. The resulting increase in hardstanding would also increase flood risk in the area.</p>	<p>The Phase 1A Reserved Matters Transport Report forecasts an additional 10 vehicle movements in the weekday AM Peak, 7 vehicle movements in the weekday PM Peak and 4 vehicle movements in the Saturday Peak hour on Brent Terrace for plot 53/54 development. On this basis it can be seen that the development will not result in a material increase in traffic movements. Flood risk has been assessed as part of the ES and no significant increases have been identified.</p>
<p>7. It is difficult if not impossible for wider vehicles to pass or for cars coming from the opposite directions to give way. In emergency situations it would be difficult for an ambulance or fire engine to enter the street and their access could easily be prevented by poor parking. There have been occasions where the fire brigade has been prevented from accessing properties because cars have been parked both sides of the street. The additional traffic proposed would have a huge impact and would be a significant safety issue. This must be addressed in the design proposals.</p>	<p>). Plots 53 and 54 have off-street parking provision, so should not exacerbate the existing situation. If parking abuse exists on the existing highway which impedes emergency vehicles then the Highway Authority could consider implementation of parking restrictions through Traffic Regulation Orders.</p>

<p>8. Could emergency vehicles access the site at all times even when parking is more congested? Are Current Guidelines on traffic and emergency access complied with?</p>	<p>).</p> <p>Based on OS mapping) the street width is 6.2m. The Manual for Streets suggests a carriageway width of 4.8m is adequate for a large vehicle and a car to pass each other. Allowing a minimum 1.8m parking zone along one side of the street leaves 4.4m width; adequate for two cars (or large vehicle and cycle) to pass each other but less than the desirable 4.8m for a large vehicle and car to pass. Accesses to existing properties and the new bell mouth entrances into Plots 53 and 54 do provide some areas where cars can pull in to allow larger vehicles to pass. It should be noted that this situation naturally reduces vehicle speeds that a wider street would otherwise encourage.</p>
<p>9. Brent Terrace is already subject to more incidents, near misses and antisocial behaviour than take place on the main roads. The proposed development fails to provide any mitigation for these issues which will be worsened with the proposed development.</p>	<p>Observed Personal Injury Accident (PIA) data identifies no recorded PIAs on Brent Terrace (South) in 5 year period to end December 2013. The proposed development will increase the active street frontage onto Brent Terrace, creating additional background lighting and informal surveillance.</p>
<p>10. On bin collection days the pathway is so narrow that push chairs and buggies cannot manoeuvre around the bins and parents are forced to take their children onto the road, other pedestrians including children and the elderly are also forced to walk on the road. The proposals do not address this existing problem.</p>	<p>The new development complies with LBB policy on refuse collection. The new development also improves the existing situation by providing a facility which will allow the refuse vehicle to turn around, preventing the need for it to reverse out of Brent Terrace.</p>

<p>11. The street is currently only lit at night from one side and as a driver this is difficult to see people additional traffic would exacerbate this problem.</p>	<p>). The new development will have external lighting which should help enhance lighting levels generally in the area.</p>
<p>12. Safety of existing and proposed pedestrians upon Brent terrace should have formed an integral part of the proposals including provision of alternatives to car ownership and the encouragement of cycling and walking. There is currently a real problem on Brent Terrace and someone could get hurt in a serious accident. Proposals on Brent Terrace should make the street safer for all residents and add to the community feel of the area.</p>	<p>PIA data identifies no recorded PIAs on Brent Terrace (South) in 5 year period to end December 2013. The existing footway on the western kerb is not proposed to be impacted by the development, and any changes to the eastern footway will be in line with current best practise guidance. The development will provide for pedestrian / cycle connections to the existing / proposed network as part of Integrated Transport Strategy (ITS) for BXC.</p>
<p>13. Drivers using the new driveways onto the triangles will have their view obscured by the hedgerow making it dangerous when pulling out onto the street and pulling onto the site across the hidden footpath or cycleway. More information needs to be provided.</p>	<p>The exact requirements for the plot visibility will be determined during detailed design and this will be secured by planning condition. It should be noted that for low speed, low volume roads Manual For Streets allows for reductions in 'x distances' to 2.0m and also states that unless there is local evidence to the contrary a reduction in visibility splays will not necessarily lead to a problem. Notwithstanding this, the applicant will attempt to develop a compromise situation during detailed design where as much of the existing hedgerow is retained as possible without adversely affecting the safety of road users.</p>
<p>14. When the Building/occupier-specific Travel Plan will be developed?</p>	<p>The wider BXC Development is subject to a Framework Travel Plan (FTP) which sets out the basis for Individual Travel Plans for defined development plots. The FTP states that all developments of over 60 residential units are expected to include an ITP. With the proposed provision of 47 units plots 53 &amp; 54 fall outside of this requirement.</p>

<p>15. The turning circle It will increase traffic and noise levels and will encourage vehicles to enter the road increasing the existing flow of traffic even further.</p>	<p>The turning circle has been removed from the proposals and refuse vehicles are now to turn in the entrance to Plot 53.</p>
<p>16. The size of the cycle storage shown on drawing HT-1413-P-03 is a lot smaller than earlier designs and now appears unrealistic at about 1.5 in depth.</p>	<p>Vertical cycle racks are proposed in this location to minimise impact of the cycle storage on adjacent tree roots. The cycle storage is 3m deep.</p>
<p>17. Cycle parking is incorrectly located on the footpath and obscured by the hedge. This will be a temptation for thieves. These cycle storages should be placed in the main car parks so they are visible.</p>	<p>The location of cycle stores has been considered appropriate by the Metropolitan Police Secured by Design officer and will be protected by strong locks.</p>
<p><b><u>Character</u></b></p> <p>1. The current Barnet housing strategy highlights the need to retain the character of the diverse areas (LB Barnet housing Strategy 2010-2015). The proposed buildings are inappropriate and out of keeping with their surroundings. Their presence will have an unacceptable impact on the existing residents and detrimental to the local character. The designs should have been developed to must blend with the local Victorian properties which are dated back to 1880.</p>	<p>The design draws from the existing Brent Terrace houses with regards to material (brick), window proportions and window sill details. e. The length of the individual blocks is shorter than the Brent Terrace rows of houses and will allow for permeability and views through the sites. The back-to-back gardens with the properties on Clitterhouse Crescent is a traditional sub-urban form.</p>
<p>2. The discrete character and charm of Brent Terrace has a strong sense of community and is strongly supported by the Residents Association. The earlier proposals highlighted that “The character of Brent Terrace will be retained and enhanced... vacant land will be occupied by a number of new family terrace houses... set back from the existing street”. The proposed designs should preserve and enhance the architecture rather than obscure it</p>	<p>As noted above, the new development has been designed to reflect the scale and character of Brent Terrace. The new family houses and flats and improvements to the local open space should reinforce the existing character rather than diminish it. The new development is still set back from street and sits behind a hedge which is an existing feature of Brent Terrace that is being replanted .</p>

<p>3. Some drawings are incorrectly scaled and could mislead, the 'triangles' are on a higher elevation. The height of the proposed buildings is unacceptable it will be intrusive, dominating and radically differs from the Character of the existing streetscene.</p>	<p>The drawings are accurately scaled. The triangles will be excavated to reduce floor levels and reduce the height of the new development. The height of the buildings will be as shown on the drawings and are up to 2m lower than the maximum permitted under the outline permission. the fall across the site from Clitterhouse Crescent will reduce the impact of the new development from this aspect.</p>
<p>4. If the developers continue to go ahead with the proposed development, Brent terrace properties will be dwarfed from all sides.</p>	<p>The proposals fall within the maximum height permitted for the plots as shown on Parameter Plan 007 of the 2014 Planning Permission.</p>
<p>5. The proposed housing will not be integrated and is being rushed through in order to fulfil needs for the shopping centre extension without proper consideration to the social and physical context of this Street.</p>	<p>So as to construct the Living Bridge which spans the A406 North Circular, some units of the existing Whitefield Estate are to be demolished and their residents re-located to new homes. This is defined within the 2014 Permission and the Section 106 (S106) Agreement as being part of the Whitefield Estate Replacement Units (Part 1). The 2014 Permission and S106 require the relevant replacement units to be completed prior to any demolition works to the Whitefield Estate units take place. Consultation on Plots 53 and 54 originally took place in 2006 and 2007, with an outline Planning Permission secured in 2010. In October 2013, the Development Partners widely consulted on proposed amendments to the conditions attached to the 2010 Permission. This included revisions to the first phase, included Plots 53 and 54. In July 2014 a new Planning Permission was secured. The 2014 Planning Permission has enabled the Development Partners to start detailed design work on Plots 53 and 54 and there has been etailed consultation on this element of the masterplan since October 2014. Further information about this consultation is provided below.</p>
<p>6. The proposed buildings do not respond to the existing character of the area and would damage to the conservation area.</p>	<p>The area is not designated as a conservation area within the Local Plan.</p>



<p>7. Why can't the new buildings be designed the same way as the existing?</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSF, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting.</p>
<p>8. The height of the proposed buildings is over-powering to the context of surrounding buildings. Side elevation drawing 1065-10-023 show how domineering the new properties will be, these are 2m higher than the current houses on Brent Terrace.</p>	<p>The proposals fall well within the maximum height permitted for the plots as shown on Parameter Plan 007 of the 2014 Planning Permission. Daylight/sunlight and overshadowing assessments have been undertaken which confirms that the proposed new development will comply with guidelines for impacts on the existing surrounding properties.</p>

<p>9. Although relatively small in scale in comparison to the overall regeneration development, the proposed numbers of units are too dense; building 47 homes onto two tiny strips of land is unacceptable. They would be very close to neighbouring houses on both sides and will inevitably lead to undesirable conditions on the whole of Brent Terrace, and create a 'cramped environment' which will be out of context and scale with the neighbourhood.</p>	<p>The development has been designed to provide new houses and flats that are larger than the existing houses and flats that are being replaced on the Whitefield Estate and meet or exceed current minimum space standards for all rooms, storage provision and private amenity space. The amenity of the neighbours has been considered in the design to avoid overlooking and loss of privacy with distances of 21m window to window and 11m and 9.7m from the rear wall of the properties located along Clitterhouse Crescent which generally complies with the 10.5m set back distance set out in guidance, although the guidance notes that in regeneration areas less distance may be provided having regard to design. A number of reports have been prepared to assess the impact of the new development on the amenity of the neighbouring properties including, daylight and sun lighting and transport. The scale and massing of the proposals have taken into account the existing context; using a traditional palette of materials and using landscape to tie the new development into the existing area.</p>
<p>10. It is worth noting that existing properties situated at the top of Brent Terrace, close to facing 1-7 Brent Terrace are relatively different in style but are set back from the road approximately 20m. The proposed buildings will overshadow the existing properties and will dominate the road rather than being set back.</p>	<p>The proposals fall within the maximum height permitted for the plots as shown on Parameter Plan 007 of the 2014 Planning Permission. Daylight/sunlight and overshadowing assessments have been undertaken which confirms that the proposed new development will comply with guidelines for impacts on the existing surrounding properties.</p>
<p>11. If the developers continue to go ahead with the proposed development, Brent terrace properties will be dwarfed from all directions.</p>	<p>The proposals fall within the maximum height permitted for the plots as shown on Parameter Plan 007 of the 2014 Planning Permission.</p>

<p>12. The scale of the buildings represents a massive change to Brent Terrace and we question why the plans have moved away from the terraced houses originally conceived (Application No C/1759/08) in the original design</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSF, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting.</p>
<p>13. Would there be enough access for wheelchair users to access this development? And are their needs considered to develop the units?</p>	<p>3 no. wheelchair adaptable units have been provided, all footpaths are wide and shallow enough to be suitable for wheelchair users. 50% of all units have step free access and are located on ground floor. All units are designed to meet the requirements of Life Time Homes. There is the possibility of fitting lifts at a later point. The scheme has been presented to the Consultative Access Forum.</p>
<p>14. The north triangle is 45ha and the south triangle is 32ha. The north will have 30 units and the south will have 17 units. The housing on the north triangle is 16% more dense than on the south triangle. What is the reason for this?</p>	<p>The southern plot has a proportionally larger number of family houses and also contains the doorstep play area. Accounting for these factors the densities on both plots are very similar.</p>

<p>15. Has provision been made for wildlife within the proposed development?</p>	<p>There is to be a replacement native hedge where this is to be removed to accommodate development. In addition there is to be native 'screen' planting along the eastern boundary of the development which will provide both screening and improved habitat opportunities. A number of bird and bat boxes have been proposed and are shown on the drawings, as well as a number of 'log piles ' providing additional habitats. The provision for wildlife and vegetation has been included in the final landscape plans submitted with the RMA. These show the areas of new hedgerow planting to improve the existing ecological value (more biodiverse species), the inclusion of green roofs, native species planting along the boundaries and within the site, bird and bat boxes will be provided along with log piles for invertebrates. The combination of new vegetation with predominantly native species and a greater diversity of species will increase the amount of wildlife attracted to the area, whilst man-made wildlife homes/nests will help to encourage species to not only forage on site but to live and breed here.</p>
<p>16. It appears that excavation of the sites could result in a 2.5m high retaining wall at the back of each site. Please confirm whether or not this is the case.</p>	<p>The scheme has been revised to minimise the need for a retaining wall to the rear of all properties, with most properties having a short bank and terrace with steps from a rear patio. Short lengths of retaining wall are required behind the central parking areas only, and these are to be planted with climbers and trained fruit trees. The maximum retaining wall height to the rear of the carpark areas will be 1.8m. Proposals include a slope up to the retaining wall at 1:20 so this is likely to reduce to 1.2m. The average height of the retaining walls bordering back gardens is below a metre.</p>

<p>17. The proposed development would be dominated by hard standing and there will be no buffer between the new flats and the street.</p>	<p>The green corridor is identified on Parameter Plan 003 and should be a minimum of 3m in width. The proposed green corridor meets this width. The new hedge will be 2m in height at the time of planting and will quickly grow to the height of the existing hedge (5m). The 'green buffer' provided by the hedgerow will only be temporarily lost during construction and the initial years of establishment until the new vegetation matures. Where new properties abut a new footpath, a raised planting bed of minimum 1.5m width is provided as a threshold. There is planting throughout the development, and climbers and/or trained fruit trees to boundary or retaining walls where these face onto communal space.</p>
<p>18. We are not allowed to build loft conversions due to impacts upon the character of the area. Why are 3 three storey blocks of flats acceptable to the character of the area?</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSF, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting.</p>
<p><b><u>Hedgerow</u></b></p>	
<p>1. Mc Guinness once commented that: 'An important part of the design team's work has been the retention and reinstate the hedgerow. A survey was carried out of the existing hedge and trees along Brent Terrace to assess the condition.' The removal of the historical hedge that was specifically acknowledged as an ecologic asset in the outline consent is not in keeping with the stated goals of this development.</p>	<p>The Phase 1 Habitat Survey as reported in the ES Further Information Report found the existing hedgerow to be of low ecological value which was supported by the tree survey report contained in Appendix D of the Design Development Report. It has been necessary to remove sections of the existing hedge to allow for the construction of the development and access to the sites. Where sections of the hedge are to be removed, this is to be replaced with new native hedge planting. This is to be planted as an 'instant' hedge 2m high which will quickly grow to the same height as the existing hedge. The proposed hedge will contain a greater variety of plant species than at present and will provide a richer ecological resource than the existing poor quality hedge does at present. Further ecological enhancements include the screen planting areas along the eastern boundary of the site, as well as the provision of bird and bat boxes throughout the development.</p>

<p>2. Residents have been told that the hedgerow will be taken down where it is in poor condition. The submission suggests that the hedgerow and verge will be replaced, it will take 5 years or more until the hedgerow has grown to anywhere near its current height. In the short term the area will look awful, these hedgerows and green spaces should be enhanced not destroyed and built on to the great detriment of the local community</p>	<p>Short term visual impacts are anticipated during construction when sections of the hedge will need to be removed to obtain access to the site. Despite this, any removed vegetation will be replaced with native hedgerow offering a significant benefit in terms of an improved green corridor and additional screening features. The tree condition report appended to the Design Development Report indicates that without intervention it is likely the hedgerow in its current state would continue to deteriorate.</p>
<p>3. The hedgerow is currently nearly 2 meters higher than street level, if removed it will also impact the habitat for the birds that inhabit the street and change the natural environment, and for those living on the street it will cause a major loss of privacy.</p>	<p>It is not considered that the hedgerow currently supports a notable bird population or one containing protected species, however it is recognised that the local fauna will experience disruption during the construction period for Plots 53 and 54. Vegetation removal would need to be undertaken outside of the bird nesting season and a suitably quality ecologist should be on site during the removal to check all trees for birds and nests prior to cutting.</p> <p>The proposed native hedgerow replacement and surrounding landscaping within the plots and in Claremont Park to the north would offer improved habitat to bird and bat species and should encourage more wildlife to the site. During the construction works birds and other wildlife would be able to temporarily relocate to Claremont Park to the north or other marginal habitat along Brent Terrace and to the south.</p>

<p>4. The green buffer should be widened and extended this would give neighbours privacy, protect the view and offer protection from the prevailing wind, noise, smell and sight of the CHP.</p>	<p>The green corridor is identified on Parameter Plan 003 and should be a minimum of 3m in width. The proposed green corridor meets this width. The new hedge will be 2m in height at the time of planting and will quickly grow to the height of the existing hedge (5m). The 'green buffer' provided by the hedgerow will only be temporarily lost during construction and the initial years of establishment until the new vegetation matures. During this time a degree of visual impact will be experienced by the existing residents at Brent Terrace, however it is considered that this will be comparable to most London neighbour proximities and not subject for concern. The CHP has not been fully assessed in the ES Further Information Report for air quality and noise as details were not available at the time of submission, however it is considered that, due to the scale of the proposals, and the experience of the air quality consultants on assessing the impact of small scale CHP plants, stack emissions will not have a significant impact on nearby residents. There is no expected odour emission which in the consultant's (Waterman) professional opinion is not an issue experienced at most operational CHPs and considered the fuel type of natural gas would be highly unexpected. As for noise, the noise consultant has stated that the proposed CHP plant will have a capacity range of between 58-95 kWth which is expected to have a noise-emission level of 70 dB(A) at 1m. Emissions of noise from the building housing the CHP, will be reduced by means of acoustic treatment and will not exceed 10dB below the background noise level (LA90). Details of the proposed CHP and its compliance with the Revised Energy Strategy will be secured through planning condition.</p>
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<p>5. At a time when England was trying to preserve its hedgerows, the hedgerow running most of the length of Brent Terrace will be mostly destroyed if the ‘triangles’ are built upon. The destruction of the hedgerow will result in a loss of trees and will have a detrimental effect on nature conservation since this hedgerow currently creates a wildlife corridor and haven in an area that suffers from barriers such as the railway line and the A406 and Hendon Way roads.</p>	<p>Where sections of the hedge are to be removed, they will be replaced by a new native hedge, with tree planting. There are currently no trees worthy of retention within the hedge, and new tree planting here will be a significant improvement on the existing situation. It is acknowledged that wildlife may seek refuge in and around this hedgerow at present due to the lack of other surrounding alternatives and the known anti-social behaviour and degraded habitat in Claremont Park. However, the Extended Phase 1 Habitat Survey as reported in the ES Further Information Report found the existing hedgerow to be of low ecological value which was supported by the tree survey report contained in Appendix D of the Plots 53 and 54 DDR. As such, it is considered that the landscaping at Plots 53 and 54 and the proposed improvements to the surrounding open space at Claremont Park and Clitterhouse Playing Fields, will provide considerable benefits to the existing ecology and should attract further wildlife to the area in time.</p>
<p>6. There is an inconsistency with regard to the existing boundary which is acknowledged as being the centreline of the historic hedge whereas the submission uses the back edge of pavement. This is misleading and needs to be made clear.</p>	<p>The redline boundary line is consistent with that of the 2014 Permission.</p>
<p>7. The hedgerow is supposed to be continuous and a green corridor, but it will have 5 new breaks for wide driveways.</p>	<p>The green corridor (GC7) is identified on Parameter Plan 003 and should be a minimum of 3m in width. The 2014 Permission does not require the green corridor to be continuous. The breaks in the hedge provide the access required to the plots and have been kept to a minimum to allow for flora and fauna to move from one length to another.</p>



<p>8. The hedgerow is being given 3 metres width in the new scheme and this is supposed to be a green corridor. How can anything so narrow realistically be a green corridor?</p>	<p>The green corridor is identified on Parameter Plan 003 and should be a minimum of 3m in width. The proposed green corridor meets this width. A green corridor can be any linear open space which allows small mammals, invertebrates and plants to move from one habitat area to another, to 'jump' short distances, or self-seed from one area to another, 3m width is sufficient to facilitate this. The hedge and proposed hedgerow wildflower margins proposed will allow this movement to take place, along the length of the hedge - both existing and proposed new sections.</p>
<p>9. At 5 metres, the hedgerow will probably block light to some of the flats, since the windows facing the street are west facing and therefore receive most of the light during the day. What is stopping the new residents from having it cut down?</p>	<p>LBB have requested that the new sections of hedge are allowed to reach 5m to replicate the height of the existing hedge.</p>
<p><b><u>Impact on wild life</u></b></p> <p>1. The proposed development will have a detrimental impact on the local wildlife. It is not considered that impacts upon protected species affected by the development have been considered. The proposals would result in existing wildlife will be driven away and leading to a sterile environment.</p>	<p>As stated in Chapter 11 of the ES Further Information report, the planting and biodiversity strategy in Plots 53 and 54 has been developed to maximise the opportunity for habitat creation and species diversity with a focus on native species. A number of native semi-mature trees are proposed with associated woodland understorey planting along the eastern boundary. Creating a good structure of trees alongside the remaining areas of existing trees and hedgerow will provide habitat for foraging birds, bats and invertebrates. In addition, bat and bird boxes will be mounted on the existing trees and buildings. The proposed landscaping will considerably improve the biodiversity and ecological value of the Brent Terrace triangles and will link in with the improved Claremont Park once completed.</p>

<p>2. The protection of green spaces trees and in particular the existing Hedges must be a principal of the proposed development to provide appropriate habitat within the wider cityscape. Wildlife not only teaches children about nature but is considered as key attraction in this local area. The proposed development is not sympathetic to the existing wildlife and has not addressed the impact it would potentially have.</p>	<p>The landscape proposals and buildings at Plots 53 and 54 which include green roofs will provide many wildlife opportunities for the site through enhancements such as invertebrate log piles and bird and bat boxes. The additional committed open spaces on the project at Claremont Park and Clitterhouse Playing Fields will also provide excellent wildlife opportunities and educational areas for children to visit and learn more about their local area and wildlife. Please also see response above.</p>
<p><b><u>Noise and pollution</u></b></p>	
<p>1. Concerns have been raised that the proposed development would increase noise and disturbance both from influx of additional residents and construction. The increase in noise levels will completely change the dynamic of the street.</p>	<p>The proposed Development provides for a relatively small number of units and associated vehicular trips, as such there is expected to be a minimal change in traffic flows along the road, resulting in negligible noise increases. Pedestrian traffic is in general not known to give rise to a change in noise levels. With regards to construction there may be the potential for some temporary short term increases in noise levels during the construction of the apartments, however, these would be short-lived and would not permanently impact the dynamic of the street. In the 'Do Minimum' scenario there would also be increases in traffic on the local roads without the development in place due to natural population growth over time, therefore the increases are not entirely accredited to the development which as mentioned is small scale in this locality.</p>

<p>2. The number of properties will inevitably lead to noise nuisance problems for new and existing residents on Brent Terrace. This will lead to tension between residents which will affect community cohesion.</p>	<p>. The apartments would be designed so as to minimise the potential for any noise break out from within the apartments. The potential for noise nuisance would be no greater than currently exists between local residents. Furthermore, the area as it stands is open land which could potentially be subject to anti-social behaviour which may in fact give rise to greater disturbance than the future scenario where the land would be developed and as such managed with improved security.</p>
<p>3. The new houses will act as a reflector for any noise from the railway and the British rail encampment this will reflect directly back on to Brent Terrace and cause major disturbances. A reduction in height would overcome this issue.</p>	<p>. The potential for reflections to arise has been modelled as part of the ES. Much of the rail noise is in fact screened from the proposed development by Brent Terrace its self (existing properties and gardens). Given the distance of the proposed residential units from the rail and the orientation and design of the buildings the effects of reflections on ambient noise levels would be minimal.</p>

<p>4. The poorer air quality and increased pollution from the proposed traffic will be detrimental to the health of our children. We need the green spaces to soak up and limit pollution from the heavy traffic in the sounding area (M1, A406).</p>	<p>Chapter 14 of the ES Further Information Report assessed the change in air pollution due to forecast changes in traffic along the local road network, which included the M1 and the A406. The assessment was based on detailed dispersion modelling of pollutant emissions from road traffic (focusing on the two main pollutants of concern - particulate matter (PM) and nitrogen dioxide (NO<sub>2</sub>)), to calculate pollutant concentrations at sensitive receptors, including residential properties and schools. The assessment concluded that, for the vast majority of receptors, there will be no significant change in air pollution and the impact will be Negligible (see Tables 14.19, 14.21 and 14.22). Only small increases in NO<sub>2</sub> were predicted by the model at a number of receptors, and the impact at most of these is considered Slight Adverse (see details in Table 14.20 and Figure 14.8). Those receptors with adverse impacts identified were not located on Brent Terrace. All results were compared against the Air Quality Strategy (AQS) objectives, set out for the protection of human health.</p>
<p>5. There is little information about the CHP unit. This raises concerns are about the noise, pollution and air quality. More information must be provided for this detailed planning application.</p>	<p>The CHP would be subject to planning conditions for the detail of this element of the scheme and limiting noise emissions to 10dB below existing ambient noise level so as to ensure noise impacts would be minimal.</p> <p>As mentioned in Chapter 14 of the ES Further Information Report, it was not possible to fully assess the impact of the proposed CHP on Plots 53/54 as details were not available. It is however considered that, due to the scale of the proposals, and the experience of the air quality consultants on assessing the impact of small scale CHP plants, stack emissions will not have a significant impact on nearby residents.</p>

<p><b><u>Secure by Design</u></b></p> <p>Widening the verge in parts could improve the overall appearance of Brent Terrace and with some landscape and improved lighting where Brent Terrace has been neglected. Such improvements would help work towards crime reduction in the area. Crime spikes coincide with increased non-residential activity in the vicinity and evidence shows that landscaping or streetscape has beneficial effects on safer streets and reducing crime and disorder, taking note to the Barnet housing Strategy 2010 could reduce anti-social behaviour</p>	<p>The Reserved Matters Application relates solely to the development of Plots 53 and 54.</p>
<p><b><u>Compliance of the Proposed Development with the Outline Application</u></b></p>	
<p>1. The outline application proposed terraced houses on the Brent Terrace Triangles. The homes currently proposed are utterly different from those proposed and this conflicts with the form of surrounding existing development. Terraced houses would have respected the existing two storey Victorian character of the street.</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSF, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting.</p>

<p>2. The documentation states that the RMA is not required to comply with parameter plan 015 (Indicative Layout Plan) provided that they comply with other parameters. This plan forms the base plan for the Reconciliation Process and preparation of an Illustrative Reconciliation Plan (Condition 1.17), which is to demonstrate how the scheme gradually evolves during ongoing phases. It seems like they could make changes to the plans for Brent Terrace but they choose not to.</p>	<p>The Illustrative Reconciliation Plan will be revised through Condition 1.17. It is likely to be revised a number of times to reflect the detail of proposals coming forward as part of the multi-phased scheme.</p>
<p>3. We were always led to believe that the proposal was for 36 units, since the BX Partners documentation always talked about these units being in keeping with the rest of the street, it seems from the Explanatory Report that we were misled all these years, despite having continuously asked for clarification on this issue. The width has also been amended to 12m to 24m so that instead of building terraced housing they can build big block of flats. We require clarification for this.</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSE, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting. It is recommended that the width parameter be revised to 24m and the reasons for this are discussed in the main report.</p>

<p>4. In relation to the Non-technical Environmental statement and the outline planning permission F/04687/13 which was consulted upon Page 29 and Page 30 of the Non Tech Enviro Statement. The energy strategy appears to have completely changed and we have not been given an adequate opportunity to respond to this new proposal which will now directly impact upon our property.</p>	<p>The applicant submitted a Revised Energy Strategy in accordance with the provision in the consented scheme as the proposed advanced technology energy from waste plant was found to be unviable. The revised approach still delivers the reductions in carbon emissions requires by the London Plan and LBB policies including reducing emissions by 35% against the building regulations. The revised strategy is largely unchanged in terms of energy efficiency and the use of heat networks however the choice of fuel has changed to natural gas and a small additional low emissions combined heat and power plant energy centre has been added in order to enable the delivery of the northern phase in compliance with the London Plan targets whilst a developer for the southern phases is being procured by LBB. The ultimate aim is to link the energy centres and serve the entire site from the main energy centre in the southern part of the site.</p>
<p>5. Concerns are raised that the southern developer will be able to make changes to the master plan in the same manner that the northern developer is currently proposing, these do not appear to be satisfactorily controlled within the parameters and controls of the existing outline planning permission.</p>	<p>Condition 2.4 and 2.5 attached to the 2014 Permission provides the ability for minor revisions to the RDSF, RDAS and RDG to be submitted and approved by the LPA, subject to confirmation that there will be no significant adverse environmental impacts.</p>
<p>6. All residential development should meet Lifetime Home standards; does the proposed development meet this standard?</p>	<p>All units are be designed to comply with 'Lifetime Homes' standards.</p>
<p><b><u>Consideration of alternatives</u></b></p>	

<p>1. A more appropriate location for development would be the block between the Millennium Green and the shop on the corner of Brent Terrace and Claremont Rd. This would provide enough space for Whitefield residents and Rosa Freedman sheltered housing. It is convenient for bus stops and on a well-lit road (which answers some of the reasons cited by Whitefield residents for not wanting to move to Brent Terrace). It is also near shops and overlooks the Millennium Green which would give Whitefield residents a similar outlook to the green outlook they currently enjoy.</p>	<p>The development of the triangle sites for housing is supported in the adopted Development Framework and is permitted in the 2010 and 2014 Planning Permissions.</p>
<p>2. Bringing phases forward which include the proposals to develop the land at the south/ entrance of Brent Terrace and provide replacement shops, apartments and a range of garages would allow for a further reduction in the density of Brent Terrace.</p>	<p>Notwithstanding the maximum parameters permitted in the 2014 Planning Permission, which are adhered to, the scheme has evolved through a series of workshops with the local planning authority and as a result the proposed massing and density has been reduced by over 20% from that originally proposed and the minimum distances from the boundary line have been doubled. In light of this process of scheme refinement, proposals are of a comparable height to the surrounding residential properties. The buildings are therefore considered appropriate for the existing environment, whilst also having regard to the fact that the site falls within a defined Opportunity Area in the London Plan and Local Plan which is to undergo significant and comprehensive regeneration.</p>



<b><u>Pre RMA Consultation</u></b>	
<p>1. Residents feel they have not been consulted properly and plans are different to what was shown in Pre application meetings.</p>	<p>The Development Partners have undertaken extensive consultation with local residents ahead of submitting the Reserved Matters Application for Plots 53 and 54. This included seven days of fully-staffed, heavily-promoted public exhibition events across three local venues - Brent Cross Shopping Centre, The Crown Moran Hotel and Hendon Leisure Centre - as well as meetings with individual residents and local groups.</p> <p>The exhibition events, staffed by the consultation team at all times, included large scale display boards (with information about the proposals for Plots 53 and 54) as well as a summary leaflet and a comments card. All of the exhibition materials were also available on the Brent Cross Cricklewood consultation website - <a href="http://www.brentcrosscricklewood.com">www.brentcrosscricklewood.com</a> - as well as an online version of the comments card.</p> <p>The exhibition events were promoted via press adverts in local newspapers for two weeks running, letters to local stakeholders, residents' groups and local politicians and a flyer distribution to 34,000 local households and businesses. Almost 2,000 people attended the exhibition events and many more visited the consultation website.</p> <p>In addition, a significant part of the consultation included individual meetings with local groups. For example, the Development Partners engaged directly with the Clitterhouse Farm project, Brent Terrace and Clitterhouse Crescent residents, Whitefield Estate residents, local cycling groups and inclusive access stakeholders through the Consultative Access Forum. Ahead of submitting the Reserved Matters Application for Plots 53 and 54, the Development Partners presented the proposals to Brent Terrace and Clitterhouse Crescent residents in an open meeting and answered questions from residents. The Development Partners also engaged with Whitefield residents on the design of the homes on four separate occasions.</p> <p>In total 138 people submitted formal feedback to the consultation and all of those</p>

	<p>that asked a question of the Development Partners received a written response to their questions or comments. As a result of the pre-application consultation process a number of elements of the proposed designs for Plots 53 and 54 have been amended. In order to ensure that local residents were aware of these changes, in mid-February 2015 the Development Partners sent a five page Question and Answer sheet to Brent Terrace and Clitterhouse Crescent residents outlining the changes made to the proposals since the start of consultation. This document also answered questions asked by residents about Plots 53 and 54 during the consultation period.</p> <p>At the same time, Whitefield Residents also received information about the submitted application for Plots 53 and 54 and the changes that had been made during the consultation period. There was a further meeting with Whitefield residents in mid-March 2015 to explain the submitted plans further.</p>
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<p>2. Documentations up to and including at the end of 2013 confirmed the intention to build only terrace houses and retain a community green. These latest plans are a material change to the S73 Outline Planning permission (F/04687/13).</p>	<p>The 2014 Permission does not fix the nature of the residential development on Plots 53 and 54. Instead the RDSF, RDAS and RDG set out parameters for the detailed design of the plots, which includes the application of a terrace typology and applying it in a contemporary fashion. The current design reflects this. Other design approaches have been considered but the contemporary form of terraces proposed are considered to be appropriate within this setting.</p>
<p>3. After many years of discussion about possible plans for Brent Terrace and the Cricklewood area these plans are being rushed through without the opportunity for fair consultation with local people who will be directly affected by the proposals. Residents have voiced their disagreement, however, all of our comments have been ignored and none of our questions have been answered. Questions posed between 2008 and 2013 have not been directly answered with direction simply being made to the content of the BX partner's website.</p>	<p>See answer provided in response to comment 1. Consultation on Plots 53 and 54 originally took place in 2006 and 2007, with an outline Planning Permission secured in 2010. In October 2013, the Development Partners widely consulted on proposed amendments to the conditions attached to the 2010 Permission. This included revisions to the first phase, included Plots 53 and 54. In July 2014 a new Planning Permission was secured. The 2014 Planning Permission has enabled the Development Partners to start detailed design work on Plots 53 and 54 and there has been widespread and detailed consultation on this element of the masterplan since October 2014. .</p>
<p>4. There has been insufficient engagement of residents leading up to the RMA submission. The lack of proper consultation and engagement of runs contrary to LBB's statement of community involvement as well as implicit requirement to engage incorporated within the Equality Act 2010 public sector Equality Duty.</p>	<p>See answer provided in response to comment 1. There has been a widespread consultation on the proposals for Plots 53 and 54 and almost 2,000 local residents attended the heavily-promoted public exhibition events in October 2014. Full information about the proposals has been provided on the consultation website and the Development Partners have also directly engaged with local residents groups and other stakeholders as part of the design process for these plots.</p>

<p>5. Brent terrace could be usefully developed in a way that is agreeable and sets a local standard of good neighbourhood planning and design. Many residents are willing to get involved but the information is sporadic and opportunities have not been provided. The entire process for such as large scheme is immensely difficult for the non-professional to grasp without help.</p>	<p>See answer provided in response to comment 1.</p> <p>There has been a widespread consultation on the proposals for Plots 53 and 54 and almost 2,000 local residents attended the heavily-promoted public exhibition events in October 2014. Full information about the proposals has been provided on the consultation website and the Development Partners have also directly engaged with local residents groups and other stakeholders as part of the design process for these plots..</p>
<p>6. The Residential Association does not feel a fair or adequate consultation process has been offered. Developer led consultation meetings lead to confusion and no effort has been made. Conversations with Mike Mc Guinness at the consultation last year held at Hendon Sports Centre were misleading. It was clear from his responses that he had not seen representations by BTRA to earlier versions of BCX. When asked how building over the children's green spaces and introducing nearly half as much traffic to the road was going improve things he had no response.</p>	<p>See answer provided in response to comment 1. There has been a widespread consultation on the proposals for Plots 53 and 54 and almost 2,000 local residents attended the heavily-promoted public exhibition events in October 2014. Full information about the proposals has been provided on the consultation website and the Development Partners have also directly engaged with local residents groups and other stakeholders as part of the design process for these plots.</p>

<p>7. Views of children have not been considered. Under Article 12 of the UN convention on the rights of the child (UNCRC) includes requirements to engage and involve children where a decision affects them. The green triangles are formally designated park spaces for children's play and this has not been taken in account in the proposed plans.</p>	<p>See answer provided in response to comment 1.</p> <p>There has been a widespread consultation on the proposals for Plots 53 and 54 and almost 2,000 local residents attended the heavily-promoted public exhibition events in October 2014. Full information about the proposals has been provided on the consultation website and the Development Partners have also directly engaged with local residents groups and other stakeholders as part of the design process for these plots.</p>
<p>8. Residents of Brent Terrace were not consulted on the most recent change in Jan 2015, where the development of the Brent Terrace triangles/fields was moved from phase 1C to phase 1A (NORTH) (the plots are south!). No consultation was undertaken with residents when considering under Condition 4.2 to change of the phasing to bring forward Plots 53 and 54 into Phase 1A (North) from Phase 1C. This was considered by the Council within the Explanatory Report considered under application 'F/05552/14'.</p>	<p>LBB does not normally consult on the discharge of conditions. This potential change in phasing was anticipated by the 2014 planning permission where Condition 4.2 anticipates the need for this change in phasing to provide new homes for Whitefield Estate residents.</p>
<p>9. The introduction of the Combined Heat and Power Plant to the current proposals was never discussed in pre submission proposals.</p>	<p>The principle of CHP is permitted in the 2010 and 2014 Planning Permissions.</p>

<b><u>RMA Consultation</u></b>	
1. The short consultation period has not allowed local resident to fully consider the impacts of the proposed development making this an unfair process. This is particularly concerning given the complexity and expanse of the associated documentation. The consultation time frame should have been extended.	The timescales for consultation on the proposals for Brent Terrace exceed statutory requirements
2. Although some drawings are incorrectly scaled and could mislead, the 'triangles' are on a higher elevation. The height of the proposed buildings is unacceptable it will be intrusive, dominating and radically differs from the Character of the existing streetscene.	The drawings are accurately scaled. The triangles will be excavated to reduce floor levels and reduce the height of the new development. The height of the buildings will be as shown on the drawings and are up to 2m lower than the maximum permitted height under the 2014 Permission. As noted above the proposals reflecti the scale of the existing houses on Brent Terrace and the fall across the site from Clitterhouse Crescent will reduce the impact of the new development from this aspect.
3. No guidance has been given specific to the submission of the several connected planning applications which were submitted at the same time.	Four separate Reserved Matter Applications were submitted to the local planning authority at the same time. (Two have since been withdrawn). It is appreciated that this is a complicated application for residents to comment on. The planning case officer is available (on the telephone) to discuss and explain the planning application to local residents
4. No reasonable adjustments have been made for those residents for whom English is not their first language.	It is not LBB policy to translate planning documents.
5. Information was not easily accessible on the council's website and documentations are so large that most computers will struggle.	It is appreciated that these are large documents and efforts are made to load documents on the councils website in a number of parts to make them easier to access.
6. On occasion documentation was found to be inaccessible online.	No examples of this were raised with the case officer.

<p>7. I note that as directed through Barnet Councils' planning portal members of the public are asked to leave their comments in a space on your website that has a limited capacity of 2000 Characters this leads to obvious concerns about the limitation. The Aarhus Convention of which the UK is a signatory requires that public bodies enable members of the public to 'participate effectively in decision making in environmental matters' such a restriction does not allow effective participation.</p>	<p>Comments can also be made in an email or letter to the case officer. The consultation letter to local residents makes this clear.</p>
<p><b><u>Interpreting Plans</u></b></p>	
<p>1. This is a detail planning application but aspects of the documents remain unclear or incomplete.</p>	<p>The level of detail is appropriate for this stage of the development process. Where further detail is required this will be secured through planning condition.</p>
<p>2. No help has been provided to help understand the architect's drawings and scales.</p>	<p>The residents of the Whitefield Estate were consulted on four occasions most recently to run through the current proposals. One consultation with the residents of Brent Terrace and Clitterhouse Crescent took place. At these events the architects were available to answer queries raised. All the drawings are to scale and are labelled and there are a number of CGIs showing 3D artists impressions of the proposals in context.</p> <p>There has been a widespread consultation on the proposals for Plots 53 and 54 and almost 2,000 local residents attended the public exhibition events in October 2014. Full information about the proposals has been provided on the consultation website and the Development Partners have also directly engaged with local residents groups and other stakeholders as part of the design process for these plots..</p>
<p>3. There is inconsistency between the plans and the artist's impression. For example the artists impression of the CHP, car park and bike store at the end of Clitterhouse Crescent Gardens (Plot 53/54) are contradictory. Those that struggle with interpreting the written info will not have an accurate representation through the images.</p>	<p>The bike store has been moved in the updated scheme and the CGI has not been updated. This is a minor inconsistency and not relevant to obtaining an accurate representation of the scheme</p>

<p>4. Much of the documentation lacks clear measurements and not all drawings include a scale bar. Measurements and other aspects must be really clear, otherwise the consultation has failed to fulfil its brief and involve the residents in the planning process.</p>	<p>All drawings clearly state the scale on the title blocks, so clear measurement is possible.</p>
<p>5. A professional architect reviewed some of the drawings. It was not clear whether some measurements are for A4 or A3 paper. e.g. documentation states that the northern most Clitterhouse house is supposed to be 21m from the nearest new building. It is clear from the diagrams that it is much closer to the new build than all the other Clitterhouse houses. When measured with a scaled ruler it appears to be more like 16m from the new build; these drawings are misleading and require clarification.</p>	<p>All drawing title heads clearly state the scale in relation to the paper size. The main elevations of the 2 storey cottages on Brent Terrace are 21m from the new development. The single storey extensions are on average 18m from new development, but these are generally blank gables.</p>
<p><b><u>Construction</u></b></p>	



<p>1. There will be problems with all the heavy trucks coming down our narrow street during the construction periods, constantly they will endanger the children playing in the street and dust and damage will cause problems for drivers.</p>	<p>The movement of construction vehicles will be considered in the Construction Transport Management Plan (Condition 12.1) which is a pre-commencement condition. Materials to construct the units will be required. These provision of these materials, in and out of the site will be done using best construction practice and the contractor would be part of the national Considerate Constructors scheme. All traffic will be marshalled to and from site along Brent Terrace. Wagons will not be allowed to reverse without a banksman present. Deliveries to the site will be controlled through a web based ordering system to ensure that only materials required in the short term are delivered and stored on site. Use of a Construction Consolidation Centre will assist in this. Dust will be suppressed by damping down the access and egress to the site, and noise continually monitored to ensure it is within acceptable limits. The methods for controlling dust will be identified in the Code of Construction Practice (Condition 8.1) and the Construction Environmental Management Plan.</p>
<p>2. How will heavy vehicles access the site during construction and where will equipment be placed?</p>	<p>The movement of construction vehicles will be considered in the Construction Transport Management Plan (Condition 12.1) which is a pre-commencement condition.</p>
<p>3. How many Brent Terrace road closures will there be and for how long?</p>	<p>The movement of construction vehicles will be considered in the Construction Transport Management Plan (Condition 12.1) which is a pre-commencement condition.</p>
<p>4. How will resident drivers &amp; emergency vehicles will access Brent Terrace during road closures?</p>	<p>At all times an emergency access will be provided, access for the residents will be maintained at all times.</p>
<p>5. How many times will Brent Terrace be dug up as a result of the proposed development?</p>	<p>It is envisaged at this stage that Brent Terrace will be excavated and re-laid once in order to facilitate the laying of services and to create the access and egress to the plots,.</p>

6. Why would the build take two years? This seems to be unrespectable to existing residents.	The space in which to constrict the buildings within the plots is congested and without the ability to store on site materials and limited access and egress the build itself will be quite slow.
7. Would build works be carried out during the night?	It is not intended for construction to take place at night. Hours of building operation will be controlled by conditions attached to the S73 Consent.
8. Would build works be carried out during the night?	See response above.
<b><u>Questions:</u></b>	
<i>Other:</i>	
1. Do the proposals meet current guidelines on air quality?	Air quality 'guidelines' are described in Chapter 14 (Section 14.2) of the ES Further Information Report (namely, the national Air Quality Strategy (AQS) objectives shown in Table 14.1). Changes in air pollution due to the proposals have been assessed against these AQS objectives. Although a small number of exceedances of the nitrogen dioxide (NO2) annual mean AQS objective are predicted with the Development in place by 2031 (the expected completion year), these exceedances are also predicted without the Development in place. Therefore, the Development will not create any new exceedance of the AQS objectives, compared to future air quality conditions without the Development. It is also important to note that by 2031, results show that air quality will significantly improve compared to current conditions (which show a large number of exceedances of the NO2 annual mean), due to improvements in vehicle technologies leading to emission reductions, and forecast reductions in background air pollution.
2. Why are the Brent Terrance triangles on the same planning application to expand the Brent Cross Shopping Centre?	The overall aim of the 2014 Permission is to provide for the regeneration of the Brent Cross Crickelwood area. The triangles are within the site boundary and are located within the Brent Terrace Development Zone. They were identified in the outline application as areas where housing development could take place.

<p>3. Will the BX Partners hand this development to the southern developers?</p>	<p>The BX Partners will not be handing responsibility of the development of the plots to the southern developer. The BX Partners will ensure that a contract will be agreed with a Registered Housing Provider who will deliver the units and then operate the site.</p>
<p>4. The pavements are broken and everywhere you look there is litter. How can you ensure that the area including the new development will be maintained to a sufficient standard when the rest of Brent Terrace has been so poorly maintained?</p>	<p>Appropriate management agreements will be put in place to ensure that these areas are appropriately managed and maintained.</p>
<p>5. After the developers have gone, will the council have to maintain these buildings?</p>	<p>See response above.</p>
<p>7. The proposal to install an additional substation next to the doorstep play area on Brent Terrace would cause potential risks. What safety assessments were considered before deciding upon this proposed location. Why is this not shown in all plans?</p>	<p>Additional substation is next to the car parking and not doorstep play, this is shown on all relevant plans. The substation will be controlled by the statutory undertakers who are responsible for the safe management of these facilities.</p>
<p>8. Will rent be increased to incorporate the required maintenance?</p>	<p>The rents will be in line with rest of the borough as the RHPs are assuming Barnet Rents in their calculations.</p>
<p>9. The plans state that the flat roofs will be more suitable but this is not the case, they will need to be serviced to ensure that the soil, leaves etc. do not block the drainage ducts which will result in flooding. Flat roofs even those with a pitch to gather water to some extent could cause leakage and this kind of roofing will damage the interiors of the properties below and will lead to structural problems.</p>	<p>The flat roofs will require periodic maintenance to ensure roof outlets are cleared. All roofs will have overflows to stop flooding of roofs. If properly installed and maintained modern flat roofs can have a warrant backed design life of in excess of 25 years.</p>

**SECOND CONSULTATION RESPONSES CONSULTATION PERIOD ENDING 13/04/2015**

COMMENTS	OFFICER RESPONSE
<p>Brent Terrace Resident: 1. Inappropriate that the first Reserved Matter application concerns building on open space</p>	<p>The Brent Terrace triangles are required early in the BXC development programme as housing sites for Whitefield Estate residents displaced by the development proposals. A condition is proposed to make sure that the qualitative improvements at Claremont Park and Clitterhouse Playing fields (which are the subject of a separate Reserved Matter Application) are delivered at the appropriate time in relation to the proposed housing development on the Brent Terrace Triangles.</p>
<p>2. Three weeks is insufficient time to respond to the second round of consultation. Some residents were not informed and difficulties were experienced with the size of documents loaded on the website.</p>	<p>The period of consultation exceeded the statutory minimum and a covering letter was submitted by the applicant outlining the changes made in the resubmitted proposal. All those who commented on the original proposal were sent a consultation letter in respect of the resubmitted proposal. It is inevitable that some residents will experience problems downloading documents and for this reason paper copies are made available in Barnet House and in local libraries.</p>
<p>3. A number of strategies and documents are required to be submitted prior to the submission of the RMA. Why has this application been submitted in advance of these strategies?</p>	<p>This issue is dealt with in the main report. All pre-reserved matter applications relevant to plots 53 and 54 have been submitted and have either been discharged or the relevant sections agreed with planning officers.</p>
<p>4. There was no public consultation on the conditions application to change the phasing of Plots 53 and 54 from Phase 1C to Phase 1AN.</p>	<p>It is not council policy to consult on the discharge of conditions. In this case conditions attached to the Section 73 application anticipated this change which is to provide accommodation for Whitefield Residents displaced by the provision of highways infrastructure necessary for the development.</p>
<p>5. Residents should have been consulted about how our green spaces were to be used along the lines of the Localism Act 2011.</p>	<p>The principle of the development of these sites for housing purposes was approved in outline in 2010 and again in 2014. There is no specific provision in the Localism Act 2011 which relates to consultation on green spaces. Section 122 of the Act inserted a new section 61W into the TCPA 1990. That section places a duty on developers to carry out pre-application consultation with local communities before applying for planning permission for certain types of development. Article 3 of the Town and Country Planning (Development Management</p>

	<p>Procedure) Order 2015 states that the duty to consult introduced by the Act only applies to developments for wind farms.</p> <p>Since the Brent Cross scheme is not such a development, the duty to consult under section 122 of the Act does not arise.</p> <p>Developer consultation as detailed in the submitted Public Consultation Strategy is considered to meet their requirement to consult.</p>
<p>6. Brent Terrace Triangles should be shown in the context of all the Green Spaces in the Brent Cross Development. This application needs to be seen in the context of other recent applications (Hendon FC) and the rest of the BXC development.</p>	<p>The outline Master Plan for the BXC development approved in 2010 and amended by the Section 73 application in 2014 will result in an increase (from the existing amount of open space) of approximately 9 ha at the end of the development period.</p> <p>It was recognised that a number of existing parks would be lost to development (e.g. Clarefield Park) as well as a number of informal open spaces such as the Brent Terrace Triangles. New parks will be created such as Eastern Park and Brent Terrace Park (the new park closest to the Brent Terrace Triangles).</p> <p>Open Space in Phase 1A N</p> <p>The various Reserved Matter Applications for Phase 1A N (if approved) will result in the loss of Clarefield Park and the loss of the Brent Terrace Triangle informal open space. Clarefield Park will be lost to enable the construction of highways infrastructure as will a number of properties on the Whitefield Estate. The early development of housing on the Brent Terrace triangles in order to provide housing for the Whitefield Residents is anticipated in Condition 4.2 attached to the Section 73 permission. This change in phasing was approved in January 2015.</p> <p>New and improved open spaces will also be provided as part of the Reserved Matter Applications for Phase 1AN. These include the Brent Riverside Park and improvements at Clitterhouse Playing Fields and Claremont Open Space.</p> <p>Officers recognise that residents of Brent Terrace will lose the informal open spaces on the Triangles relatively early in the overall development and are recommending that a condition be imposed on this application to make sure that the qualitative improvements at Claremont Park and Clitterhouse Playing fields are delivered at the appropriate time in relation to the proposed housing development on the Brent Terrace Triangles.</p>
<p>7. Revised Refuse truck access may lead to accidents and difficulties in collecting refuse from both plots.</p>	<p>The inclusion of a turning head in Plot 53 will significantly improve the situation for refuse collection along Brent Terrace by providing a location for refuse and other large vehicles to turn located near to the northern extent of the cul-de-sac thereby</p>

	preventing the need for an extended period of reversing down the length of Brent Terrace. Submission of details of Refuse collection measures have been conditioned.
8. Too much hard surface on the Brent Terrace entrance to Claremont Park.	This will be considered in the separate Reserved Matter Application under consideration for Claremont Park. This will come before the committee at a later date.
9. Hedge is to be removed. Will the developers maintain the area of hedge they are not removing.	Estate management matters are still under consideration. It is likely that the Registered Social Landlord who will be managing the housing on the Brent Terrace triangles will maintain the hedge in front of the new properties but not that on the rest of Brent Terrace.
10. The 180m2 under 5s door step play is bisected by a public footpath and the landscape and access arrangements make it inappropriate for play space	This issue is dealt with in the main report.
11. Why are 47 units being constructed? And what is an investor unit?	Please see the main report for an analysis of the proposed scheme. Planning officers consider that 47 units can be accommodated on this site. The 'investor' unit is provided in excess of units required for rehousing existing Council tenants and freeholder and leaseholder residents in occupation within the Whitefield Estate units that require decanting to accommodate infrastructure associated with Phase 1A (North).
12. What does the 'commuted sum' mean in respect of the Rosa Freedman Centre	As permitted by the S106 the council will accept a sum of money equivalent to the cost of providing 25 extra care units (a commuted sum). This will mean that no direct replacement for Rosa Freedman will be constructed. The current residents of the Rosa Freedman Centre will be rehoused elsewhere in the Borough and Barnet Homes will continue to liaise with current residents.
13. The masterplan in 2010 and 2014 showed 36 terraced units for illustrative purposes and the Design and Access Statement refers to terraced houses on Brent Terrace. However, the current proposal builds to the maximum parameter which we consider is ridiculous on these awkward spaces on this awkward street.	This issue is dealt with in the main report
14. Confusion as to what design standards are being applied in relation to distances between properties.	These issues are discussed in the main report.

Daylight and sunlight studies show that much of the outdoor space get less than 2 hours sunlight a day due to overshadowing.	
15. Are roof terraces provided	A single 1st floor roof terraces is provided in the 2nd floor break of blocks A, B and C. There is no proposal for the second floor roof to be used as amenity space.
16. Health Impact of excavation works.	Normal construction management protocols will apply to protect local residents and will be subject to detailed consideration under condition 28.1 of the S73 Consent.
17. Even after the excavation works the proposed height of the new buildings combined with the existing changes in level will make the proposed development feel like a 5 storey building to residents of Brent Terrace.	This issue is dealt with in the main body of the report.
18. Cycling and Pedestrian paths along the front of each triangle lead nowhere.	This issue is dealt with in the main body of the report.
19. More detail on time scale for construction	This detail is not currently available.
20. Who will own the BT triangles, how long will the lease be, how much has been paid and to whom? This land is public land and there should be transparency.	This is not a matter for the planning committee.
21. The Granville Estate proposals were rejected by the planning committee and many comments made in relation to that scheme are true of the BT scheme.	Each planning application is considered on its own merits.
<p><b>Brent Terrace Residents Association:</b></p> <p>1. Statement of Community Involvement/Consultation Absence of formal pre-planning consultation and shortened periods of consultation. Inadequate consultation with Brent Terrace residents. Developers' pre application consultation focussed on transport issues and failed to clearly identify the Brent Terrace triangles. September 2014 Assets and Growth Committee made no reference to this proposal. First reference to this high density proposal was in</p>	The consultation processes both pre and post application are dealt with in the main report.

February 2015.	
2. Cumulative Impacts. The cumulative impacts assessment and the Environmental Impact Assessment has not been updated to take account of material impacts,	There are no additional cumulative or environmental impacts not already assessed caused by the development of plots 53 and 54 for housing purposes.
3. Equality and Rights Impact. No mention of the various UN Conventions of Rights that apply to the regeneration programme. Specifically to the Rights of the Child in relation to the removal of play space for children.	<p>Equalities Impacts were considered by the Planning Committee in relation to the Section 73 application approved in 2014 and are assessed in relation to this Reserved Matters Application in the main report.</p> <p>The UN Convention on the Rights of the Child is a treaty that sets out universally accepted rights for children. It is a benchmark against which a nation’s treatment of its children are measured. The Convention places an obligation on member states to protect and enhance the basic rights of children through their policies, programs and services. The Convention was ratified by the British Government in 1991 and it recognises that play and recreation are essential to the health and well-being of children.</p> <p>The key provision of the Convention is Article 31 which states:  “That every child has the right to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and arts. That member governments shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity”</p> <p>It is considered that the scheme has made adequate provision for play spaces for children as part of the overall design. It’s important to point out that the Convention does not seek to protect play spaces; rather its aim is to protect the right of children to play. The BXC scheme provides opportunities for children to engage in outdoor play and recreation in accordance with London Plan and local policy, the objectives of the Convention are therefore considered to have been complied with.</p>
4. Construction and Transport Impacts. These have not been updated to reflect the higher number of units now proposed on Plots 53 and 54.	The current proposal for Plots 53 and 54 is within the residential floorspace allowance for this Development Zone approved by the Section 73 application. The transport and construction impacts of this amount of floorspace will already have been assessed



(Comment is also made in relation to the S73 Transport Assessment)	as part of that application. Transport and Highways issues in relation to this scheme are discussed further in the main report.
5. The height and modern 'brutalist' design does not respect the existing design of Brent Terrace. The taking away of green space from one set of residents to provide housing for another is divisive.	The design of the proposed development is dealt with in the main report as is the phased provision of open space.
6. Privacy and overlooking is dealt with in relation to properties in Clitterhouse Crescent but not in relation to Brent Terrace.	This issue is dealt with in the main report.
7. Landscape Design. Bat and bird boxes are within the new development (not Brent Terrace) and more hedgerow and trees are removed to accommodate parking. Mention is made of the creation of a 'home zone'. Inconsistencies remain in the application drawings.	The extent of the removal of the hedgerow and its impact on both privacy and wildlife are dealt with in the main report. Although the possibility of a 'home zone' in Brent Terrace is discussed in the application documents there are no current proposals to formally designate Brent Terrace as a 'home zone.' Officers are satisfied that any remaining inconsistencies between drawings in the revised submission are minor and non-material.
8. Size and Scale. Increase in the number of units proposed equated to a 30% increase over that indicated in the 2014 application and a 45% increase in the number of units in Brent Terrace as a whole. The parameters for the wider Brent Terrace zone are not relevant to these particular plots.	The size, scale and density of this proposal are assessed in the main report. Officers consider that the proposal is acceptable. Scale parameters are applicable for plots 53 and 54, separate larger scale parameters are applicable for plots bordering the railway where a higher density form of development is anticipated. (It should be noted that a separate application accompanying this Reserved Matter Application to the planning committee proposes that the width parameter be varied in the context of this Reserved Matter Application) This is addressed within the main report.
9. Daylighting and Flooding Assessments. Daylight assessments were not completed for the existing properties which are at a lower level. Building on the Brent Terrace triangles may result in flooding in Brent Terrace.	Daylight assessments for the existing Brent Terrace properties are included in the revised submission and these demonstrate that acceptable levels of daylighting are achieved. There are no flooding risks likely to result from development on the triangles. Details of drainage will need to be provided as part of the Building Control process.
10. Deviation from policies and standards. Failure to meet Lifetime Home standards and play standards. New	The main report considers this proposal in respect of all applicable standards. It is considered acceptable in relation to these standards. Lifetime Home Standards are

<p>play area does not provide play space for existing residents.</p>	<p>met in all Proposed units. Play space issues are considered in the main report.</p>
<p>11. Access. Reference is made to the RMA Phase Transport Report (and the construction impacts assessment) and the failure to clearly identify the impacts on Brent Terrace.</p>	<p>The Phase Transport Report deals with Phase 1A North as a whole – including the withdrawn highways infrastructure application which proposes significant changes to the road network. The highways and parking issues relevant to this application are dealt with in the main report.</p>
<p>12. Quality of the application. Inconsistencies and lack of detail undermines local residents belief that a high quality sustainable development will be delivered.</p>	<p>Planning officers carefully consider the planning application documents submitted to them by applicants. Where these are inconsistent or inaccurate, revised application documents are requested as has happened with this application. Additional planning conditions can be applied to any approved application make sure that a high quality development compliant with appropriate standards is delivered.</p>