



6 September 2022

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## 1. Introduction

- 1.1. Savills has been instructed by Ballymore Group and Transport for London (“TTL Properties Limited – TTLP”) to prepare this statement and participate in the forthcoming examination of the London Borough of Barnet (LBB) Local Plan 2021 to 2036 (the Plan).
- 1.2. Ballymore Group and Transport for London (“TTL Properties Limited – TTLP” – the recently established property development arm of Transport for London), are in a Joint Venture (“JV”) to bring the Broadwalk Shopping Centre (“BSC”) and TfL landholdings around Edgware Station forward for redevelopment.
- 1.3. This statement has been drafted on behalf of the JV with regards to Matter 10 – Site Allocations. It specifically refers to Site Allocation 27 (Edgware Town Centre) and Site Allocation 28 (Edgware Underground and Bus Stations) and proposes two modifications to the wording of the Site Allocations that are required to ensure the policies are **justified, effective, and consistent with national policy**. In effect, this statement responds to the issue of Matter 10 which poses the following question:

***“Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?”***

- 1.4. This statement provides contextual information about the site, the landowners and the policy context of Edgware Town Centre in order to demonstrate that, whilst Site Allocations 27 and 28 reflect an accurate growth capacity for Edgware as Barnet’s Major Town Centre and a Growth Area:
  - Site Allocations 27 and 28 - are appropriate locations for the delivery of **“tall and very tall buildings”**; and
  - The height of neighbouring buildings should not be of **“foremost consideration”** when assessing how tall buildings relate to their surroundings and this is not in line with London Plan Policy.
- 1.5. This statement is set out under the following heads:
  - Introduction to the JV
  - Planning Policy Context
  - The Design-led Approach
  - Growth in Town Centres
  - Proposed Changes
  - Conclusions

## 2. Introduction to the JV

- 2.1. Ballymore Group is a family-owned property developer, established by Chairman and Group Chief Executive Sean Mulryan. With a 40 year track record of delivery, Ballymore has a multi-award winning portfolio having pioneered some of Europe's largest and most transformational urban development projects, including:
- Embassy Gardens, Nine Elms, London
  - The Brentford Project, Brentford, London
  - London City Island, Leamouth Peninsula, London
  - Royal Wharf, Royal Docks, London
- 2.2. TTLP owns 5,700 acres of land across London with significant landholdings in the London Borough of Barnet, in areas including Edgware, Finchley Church End, East Finchley and Mill Hill. TTLP is an important partner for the Council in delivering high-quality housing and new public realm in well-connected locations, alongside strategic transport improvements.
- 2.3. TTLP have plans to deliver more than 20,000 homes over the next 10 years, with over 2,000 homes already under construction on sites including:
- Blackhorse View
  - Kidbrooke Station Square
  - Wembley Park
- 2.4. Ballymore Group acquired the BSC site in the summer of 2020. Ballymore has since entered into a Joint Venture with TTLP to bring the combined site forward for a residential-led mixed-use development that optimises the development potential of a significantly underutilised brownfield site in a highly sustainable location, whilst also delivering improvements to the transport network.
- 2.5. TTLP had been historically working with Aberdeen Standard Investments (ASI) as the previous owners of the BSC on a similar development vision.

## 3. Planning policy context

### *National policy*

- 3.1. National policy supports the pursuit of optimal housing density on well-connected brownfield sites.
- 3.2. Paragraph 119 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 3.3. The designation Sites 27 and 28 which are both located in Edgware town centre as a focus for housing growth is therefore **justified, effective** and **consistent** with national policy.

### *The London Plan*

- 3.4. The London Plan emphasises and encourages optimising brownfield sites in sustainable locations, including site allocations, through a design-led approach. Moreover, Table A1.1 of the London Plan identifies Edgware Major Centre as an area with high residential growth potential. This reiterates the Plan's ten-year housing target of 23,640 for Barnet. As Edgware is the borough's only Major Town Centre, it follows that Edgware is identified for high residential output.
- 3.5. London Plan Policy D3 encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site

allocations. It also states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities.

- 3.6. London Plan Policy D9 sets out a framework against which the appropriateness of taller buildings can be assessed. Edgware Town Centre is deemed appropriate for taller buildings and the criteria based approach set out in Policy D9 provides a policy framework which, through the development management system, allows different design solutions to be tested and assessed without defining prescriptive outcomes at the plan making stage.
- 3.7. The spatial strategy to focus housing growth on a town centre, brownfield site with excellent public transport accessibility is therefore **justified, effective and consistent** with the London Plan.

#### **4. The design-led approach**

- 4.1. The Council's housing targets for Edgware are set in the context of a shift towards a design led approach to optimising site capacity. The design-led approach is advocated in London Plan policy D3 and replaces the density matrix in previous versions of the London Plan. The supporting text to policy D3 recognises that in order for London's growth to be accommodated, every new development needs to make the most efficient use of land by optimising site capacity.
- 4.2. In the context of London Plan policy D3, policy GSS05 in the draft Local Plan provides a framework for the promotion of high density development in a town centre location that is well connected to jobs, services, infrastructure and amenities by sustainable modes. This approach is therefore **consistent** with the London Plan.
- 4.3. The design-led approach requires consideration of a range of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. The design led approach also advocates peer review of design early in the preparation process and to this end, the JV has already engaged the Mayor's Design Advocates.
- 4.4. Ultimately, it is for the development management process to determine the most appropriate form of development for the site. The growth targets are capable of being delivered on site in a number of ways, including with tall buildings, the siting of which in the Edgware Growth Area is supported by policy CDH04 in the draft Local Plan.
- 4.5. The principle of intensification in Edgware Town Centre is aligned with regional and local policy. The site represents an opportunity to create a high-density residential cluster, adjacent to a major transport hub, to promote sustainable travel and contribute to Barnet's housing targets. The site is relatively unencumbered by heritage assets compared to many similar town centre opportunities in London. The site has a PTAL of 6, yet it is severely underutilised and underperforming against its development potential. Policy directs growth to this location and a design-led approach can facilitate the delivery of c.5,000 homes in a way that responds to the site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 4.6. As a result, policy GSS05 in the draft Local Plan is **justified, effective and consistent with national policy and the London Plan.**

#### **5. Growth in town centres**

- 5.1. The design-led approach is one of the tools for delivering a planned programme of growth across London's network of town centres. This network is defined by the London Plan where at Annex 1, the growth potential of each of these centres is identified.
- 5.2. Edgware is identified as a major centre with high potential for residential growth. This categorisation is informed by the Strategic Housing Land Availability Assessment and Town

Centre Health Check and takes into consideration the potential for impacts on heritage assets.

- 5.3. Other major town centres in addition to Edgware are identified as having potential for high residential growth. These include Wembley, Wimbledon and Wandsworth reflecting the strategic approach to focussing housing growth in well-connected town centre locations.

## 6. Proposed Changes

- 6.1. Whilst this statement has outlined our support for Site Allocation 27 (Edgware Town Centre) and Site Allocation 28 (Edgware Underground and Bus Station) with regards to their capacity for growth, we consider two modifications are required to ensure the site allocations are **justified, effective and consistent with national policy and the London Plan**. We set these out below.
- 6.2. In June 2022, Barnet Council published a schedule of Proposed Modifications to the draft Plan. MM354 and MM356 proposed the following change to the wording of Site Allocations 27 and 28:

**“Tall Buildings may be appropriate, however, all tall building proposals will be subject to a detailed assessment of how the proposed building relates to its surroundings (with height of neighbouring buildings being of foremost consideration) responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD.”**

- 6.3. This additional wording places undue emphasis on the consideration that should be given to the height of neighbouring buildings. The suggestion that the height of neighbouring buildings should be of foremost consideration is inconsistent with the London Plan and appears to be policy biased towards maintaining status quo rather than positively planning for growth.
- 6.4. London Plan Policy D9 outlines a list of criteria that should be considered when proposing the development of tall buildings, which includes the impact on local context amongst a range of other visual, functional, environmental and cumulative impacts. Policy D9 does not place the same emphasis on the height of neighbouring buildings as MM354 and MM356 seeks to introduce.
- 6.5. We therefore suggest the wording for Site Allocations 27 and 28 is amended as below (additional text in purple; text to remove shown in strikethrough red):

**“Tall and Very Tall Buildings may be appropriate, however, all tall building proposals will be subject to a detailed assessment of how the proposed building relates to its surroundings ~~(with height of neighbouring buildings being of foremost consideration)~~ responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD.”**

This change is required to ensure that Site Allocation 27 and 28 are **justified, effective and consistent with national policy and the London Plan**.

- 6.6. Policy CDH04 states that tall buildings of 15 storeys or more (‘Very Tall’) will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area or Growth Area. Site Allocation 27 and 28 are located within a Growth Area and therefore qualifies as “exceptional circumstances”.

- 6.7. As such, we suggest that the wording of Site Allocation 27 and 28 is amended to read as follows (additional wording in purple):

***“The site’s high accessibility, town centre context and potential for tall and very tall buildings support a high density of redevelopment. Proposals must consider existing site uses, including retail, offices and residents. Car parking requirements must be assessed and re-provided as needed.”***

## **7. Conclusions**

- 7.1. This statement has sought to respond to the issue of Matter 10. In relation to Site Allocation 27 (Edgware Town Centre) and 28 (Edgware Underground and Bus Station). This Statement demonstrates that:
- Site Allocations 27 and 28 are appropriate locations for the delivery of **“tall and very tall buildings”**; and
  - The height of neighbouring buildings should not be of **“foremost consideration”** when assessing how tall buildings relate to their surroundings and this is not in line with London Plan Policy D1 and D9.
- 7.2. We consider that the changes outlined above are required to ensure that the draft Plan has been **positively prepared**, is **justified, effective** and **consistent with national policy**, and in **general conformity with the London Plan**.
- 7.3. We would welcome the opportunity to participate in the hearing session for Matter 10 to assist the Inspectors in their assessment of the soundness of the plan.