

18 June 2024



Barnet Planning  
North London Business Park,  
Oakleigh Road South,  
London  
N11 1NP



Dear Sir/Madam,

**LONDON BOROUGH OF BARNET – LOCAL PLAN EXAMINATION – MAIN MODIFICATIONS  
REPRESENTATION ON BEHALF OF BALLYMORE (EDGWARE) LTD**

**Introduction**

This letter is submitted by Savills (UK) Limited (hereafter referred to as ‘Savills’) in response to the London Borough of Barnet Council’s (‘LBB’) invitation to submit comments in respect of a public consultation on the proposed Main Modifications to the draft new Local Plan (‘DNLP’). These comments are submitted on behalf of Ballymore (Edgware) Ltd (‘Ballymore’).

Ballymore has engaged throughout the Local Plan process and has submitted representations to both the Regulation 18 and Regulation 19 DNLP consultations and participated in the Examination in Public. Ballymore welcomes the opportunity to comment on LBB’s Main Modifications (May 2024) to the DNLP, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.

As part of LBB’s ambition to deliver sustainable development, the DNLP directs growth to the most sustainable locations in the borough; these Sites are known as ‘Growth Areas’ and are the locations where the delivery of new homes, jobs, retail floorspace, and community facilities will be directed to meet the borough’s identified needs. These areas also offer a range of investment opportunities through identified developable and deliverable Sites with substantial capacity to accommodate new homes, jobs and infrastructure. This approach to growth seeks to regenerate and develop areas of underutilised brownfield land and buildings, particularly where these are located in areas of good public transport provision.

Ballymore supports LBB’s ambition to produce an up-to-date development plan document which aligns with National and Regional policy and considers the emerging challenges and opportunities for the Borough. Ballymore shares the view that a positive policy framework can and should be used to plan for the scale of growth that London requires in a sustainable and inclusive way.

**Background**

Ballymore (Edgware) Limited is a partnership between the Ballymore Group (‘Ballymore’) and TTL Properties (‘TTLP’). TTLP’s ownership includes Edgware Bus Station, Edgware Bus Garage, and Deans Brook Nature Park. The partnership was established following Ballymore’s acquisition of the Broadwalk Shopping Centre (‘BSC’) in 2020. The two partners have formally committed to combining their landholdings to deliver their

shared vision of a reimagined town centre in Edgware (the site is hereafter referred to as 'Edgware Town Centre').

Edgware Town Centre is located within a Growth Area and designated as a Priority Town Centre and Major Town Centre, as identified in the London Plan. It also contains identified development Sites which have the capacity to deliver a significant number of homes and community facilities for local people. These local and regional designations identify Edgware Town Centre as a key opportunity for regeneration and intensification, and class it as suitable for large-scale development.

Ballymore has appointed a multi-disciplinary team led by Howells Architects to develop proposals for the site and prepare an outline planning application for a residential-led scheme. Ballymore and the design team have been in pre-application discussions with LBB for over two years to develop the proposals. A planning application is programmed for submission in Summer/Autumn 2024.

### **Main Representation**

This representation sets out Ballymore's position in respect of the following Main Modifications relating to Edgware Town Centre:

- MM11
- MM13
- MM20

#### **MM11 – Table 5 (New Homes Delivery – 2021/22 to 2035/36)**

MM11 reduces the quantum of homes to be directed to Edgware from 5,000 to approximately 4,740 new homes. This capacity reduction carries through to MM13 (Policy GSS01) and MM20 (Policy GSS05).

We understand that this modification is proposed for the following reasons:

- The Inspectors are not including the windfall uplift within the approximate capacity for Edgware. This results in a reduction of 225 units from the 5,000 figure; and
- The Inspectors have removed 30 High Street and Equity House from the approximate capacity for Edgware. This results in a reduction of 32 units from the 5,000 figure.

Cumulatively, this results in a figure of 4,743. The Inspectors have then rounded the figure to arrive at 4,740, the number proposed within the Main Modifications as explained in paragraph 4.8.6.

Based on the Inspector's reasoning set out above, Ballymore supports MM13 and MM20 insofar as their relation to the revised approximate capacity figure for Edgware.

#### **MM13 - Policy GSS01 and MM20 – Policy GSS05.**

As set out above, based on the Inspector's reasoning set out under MM11, Ballymore supports MM13 and MM20 insofar as their relation to the revised approximate capacity figure for Edgware. Ballymore also supports the council's clarification that any uplifts beyond the 4,740 approximate capacity should be achieved as part of a design-led approach.

This approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimised through the design-led approach, particularly in well-connected locations, such as Edgware. Edgware is the borough’s only designated Major Town Centre and is therefore an appropriate location for growth and site optimisation.

**Summary**

| Main Modification Reference | Proposed Modification   | Ballymore Comment  |
|-----------------------------|---|--|
| MM11                        | Reduced quantum of homes to be directed to Edgware from 5,000 to approximately 4,740 new homes. | Based on the Inspector’s reasoning set out under MM11, Ballymore supports Edgware’s revised approximate capacity figure. |
| MM13                        | Reduced quantum of homes to be directed to Edgware from 5,000 to approximately 4,740 new homes. |  |
| MM20                        | Reduced quantum of homes to be directed to Edgware from 5,000 to approximately 4,740 new homes. |  |

**Conclusion**

Thank you for the opportunity to comment on the Main Modifications. Ballymore would welcome any further engagement with LBB and the Inspectors as the Local Plan Review progresses. Please do not hesitate to contact us on the details below should you require any further information.

Yours sincerely,

Savills Planning

