



23 August 2022

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 and specifically addresses Question 10 of Matter 2 which states the following:

“Taking account of the evidence accompanying the Plan, the levels of housing growth sought in the Edgware Growth Area appear particularly ambitious when considering the site opportunities identified (Sites 27 and 28) on Map 3C and other relevant policy considerations relating to matters such as tall buildings, flood risk and heritage assets:

- a) ***Is Policy GSS05, justified, effective and consistent with national policy in those respects?***
 - b) ***If not, would the Council’s proposed modifications be sufficient to achieve soundness or would further changes to the policy be required?”***
- 1.4. This statement outlines why Policy GSS05 is **justified, effective, and consistent with national policy**, particularly in relation to the target for 5,000 new homes within the Edgware Growth Area. Notwithstanding, we have previously sought a change to the wording of GSS05 at the Regulation 19 stage consultation. This is set out below:

Policy GSS05– suggested change

To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:

- ***At least 5,000 new homes;***

- 1.5. We maintain that a more flexible approach to the growth targets maximises the Council’s ability to meet its housing targets in the context of a persistent and significant need for new housing locally and across London, which is a single housing market.
- 1.6. This statement seeks to respond to Question 10 by providing contextual information about the site, the landowners and their delivery ambitions in order to demonstrate that while ambitious, the level of housing growth sought in policy GSS05 is deliverable within the plan period.
- 1.7. This statement is set out under the following heads:
 - Introduction to the JV
 - The Site
 - Planning Context
 - Existing Site Constraints
 - Precedent Portfolio
 - Capacity Assumptions

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. The Site

Edgware town centre

- 3.1. Within the London Plan hierarchy of town centres, Edgware is classified a major town centre which is at the upper end of the town centre hierarchy. It is the only major town centre in Barnet.
- 3.2. Edgware is a public transport hub owing to the presence of Edgware underground station (which terminates the Northern Line) and also Edgware Bus Station.
- 3.3. The town centre is described in the draft Local Plan (paragraph 4.18.3) and adopted Edgware Growth Area SPD (paragraph 1.3) as an important commercial driver of the local economy. The evidence underpinning the Edgware Growth Area SPD sets out that there are opportunities for new developments to help bolster the role and function of Edgware. Further, the SPD identifies the shopping centre and station sites as the main development opportunity in the town centre.
- 3.4. The scale of growth directed to Edgware in the draft Local Plan, is therefore consistent with its position at the top of the town centre hierarchy in Barnet.

Site ownership

- 3.5. The land under Ballymore's ownership comprises the BSC and car park, totalling approximately 6 hectares. The BSC is the focus for comparison retail activity in Edgware, providing approximately 18,000 square metres of floorspace across 36 units. The car park has capacity for approximately 1,250 vehicles. The BSC is anchored by an approximately 6,000 square metre Sainsbury's superstore.

- 3.6. The TTLP landholding comprises a London Underground depot, two London Buses garages and one bus station with standing facilities, all of which serve as an interchange with the terminus Northern line station, totalling approximately 8 hectares.
- 3.7. Ballymore and TTLP have formalised their JV arrangement, following detailed feasibility testing, due diligence and board approval processes, and are committed to working collaboratively to ensure the delivery of both sites.
- 3.8. There are therefore no ownership constraints on the delivery of the BSC and station sites.
- 3.9. The nature reserve located to the south east of the site runs parallel to the railway tracks and is a Borough Site of Importance for Nature Conservation (SINC). This land is owned and controlled by TfL. There is an opportunity to consider how this area is enhanced as part of a site wide strategy for amenity, public realm, urban greening and biodiversity to support housing growth.



Figure 1 JV project boundary in Edgware Town Centre

4. Pre-application engagement

- 4.1. The JV is engaged in pre-application discussions with LBB and Greater London Authority (GLA).
- 4.2. The JV has appointed a multi-disciplinary team led by Glenn Howells Architects to develop proposals for the site and prepare a planning application for a residential-led scheme. Initial design-led capacity studies demonstrate how the capacity of the site can be optimised in line with the ambition of the emerging site allocation. The planning application is programmed for submission in spring 2023.
- 4.3. The JV's objective is to work with the Council and other key stakeholders to develop a comprehensive scheme which:
 - Optimises the capacity of the site through a design-led approach;
 - Makes best use of publicly owned land to deliver against the Mayor of London's housing targets
 - Makes best use of land to deliver against Barnet's housing targets on a sustainable brownfield site,
 - Enhances the vitality and viability of Barnet's only Major Town Centre; and
 - Enables the delivery of a new bus garage equipped with infrastructure for an electric fleet.

- 4.4. The JV's objectives are aligned with the Council's objectives for Edgware as set out in paragraph 2.2 of the adopted Edgware Growth Area SPD.
- 4.5. LBB officers have expressed strong support for the principle of high-density redevelopment on this site and have made clear their desire for both sites to be brought forward together.
- 4.6. The JV has also engaged with the GLA. The GLA's advice letter in response to a proposal to deliver up to 4,000 new homes across both sites states:

"Whilst further detail is needed on the housing offer, it is likely that the proposal will represent a significant provision of residential homes within the site and make a substantial contribution towards Barnet's housing delivery, which is strongly supported."

5. Programme to submission





- 5.1. The JV is working to a programme which targets the submission of an outline planning application in spring 2023. The proposal will be submitted as an outline application, with access and Phase 1 landscaping matters in detail and all other matters reserved.

6. Deliverability

- 6.1. The draft site allocations identify a development timeframe of 6-10 years. The JV's phasing programme as set out below demonstrates that the sites are capable of being substantially implemented in the next 1 to 6 years with phase 1 being largely completed. Both sites are therefore 'deliverable'.

Phase	Commencement	Completion
Phase 1	Yr 1 to 6	Yr 6
Phase 2		Yr 8
Phase 3		Yr 10
Phase 4		Yr 13

- 6.2. In the last 5 years, Ballymore has delivered 5,000 homes in London with a further 5 projects under construction and 4.5m sqft of commercial space in the planning pipeline.
- 6.3. Ballymore and Glenn Howells Architects have a demonstrable track record of joint working to deliver high quality housing at scale in a number of London boroughs. Examples of these schemes are set out below.

			
Goodluck Hope LB Tower Hamlets	London City Island LB Tower Hamlets	Deanston Wharf LB Newham	The Brentford Project LB Brent
Site area – 2.43Ha Homes – 344 Status – Under construction and partially occupied	Site area – 4.69Ha Homes – 1,706 Status – Completed	Site area – 2.17Ha Homes – 769 Status – Completed	Site area – 4.79Ha Homes - 876 Status – Under construction

- 6.4. Similarly, TTLP is committed to the delivery of housing across its extensive portfolio with 2,000 homes currently on site contributing to the delivery target of over 20,000 homes to be delivered over 10 years. These sites will play a vital role in meeting the Mayor's priorities to build affordable homes, while generating revenue to re-invest in improving London's transport network.

7. Planning policy context

National policy

- 7.1. National policy supports the pursuit of optimal housing density on well-connected brownfield sites.
- 7.2. 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.
- 7.3. The designation of Edgware town centre as a focus for housing growth is therefore **justified, effective** and **consistent** with national policy.

The London Plan

- 7.4. 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.
- 7.5. 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.
- 7.6. 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.
- 7.7. 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.

8. The design-led approach

- 8.1. 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.
- 8.2. 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.
- 8.3. 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.

- 8.4. 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.
- 8.5. 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.
- 8.6. As a result, policy GSS05 in the draft Local Plan is ***justified, effective and consistent with national policy and the London Plan.***

9. Growth in town centres

- 9.1. 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.
- 9.2. 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.
- 9.3. 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.
- 9.4. This further underlines the compliance of policy GSS05 with the London Plan.

10. Development constraints

- 10.1. This section of the statement identifies a number of development constraints affecting the site and the ways in which they can be suitably addressed.

TfL operations

- 10.2. Given that a significant part of the site is occupied by TfL transport infrastructure, the site has some complex operational requirements that will need to be accommodated throughout redevelopment. In addition, there is a need to maintain access to the London Underground assets that are required to support the operation of the Northern Line.
- 10.3. TfL is targeting a fully zero emission bus fleet by 2034, and through the delivery of this development the transition will be significantly accelerated through the provision of a new bus garage.
- 10.4. These constraints are considered to be capable of being addressed in the design and operation of the development and robustly considered by the Local Planning Authority through the development management process.

Access and permeability

- 10.5. The existing bus station access and loop arrangements result in significant severance to the pedestrian environment around both the underground and bus station, with associated safety issues. The bus station is a vehicle dominated environment not well suited to serve the high street and "tucked behind" the station so not clearly visible. This presents wayfinding challenges and safety concerns with poor clear sight lines from Station Road and poor surveillance.

10.6. To the north and east, the Northern Line acts as a major severance to movement. There are currently limited and poor quality pedestrian connections to Station Road beyond the existing shopping centre entrance. A footpath running along the south-western boundary is poor quality with limited surveillance and cycle use is prohibited.

10.7. These constraints are considered to be capable of being addressed in the design and operation of the development and robustly considered by the Local Planning Authority through the development management process.

Sainsburys

10.8. Sainsburys has an existing commercial interest in Ballymore's land holding at the BSC. A relocation strategy within the proposed masterplan has been agreed that ensures continuity of trade throughout the redevelopment cycle.

10.9. This constraint is considered to be capable of being addressed in the design and operation of the development.

Flood risk

10.10. The site has been assessed with regards to the requirements outlined in the Planning Practice Guidance (PPG) and the associated Technical Guidance to determine the suitability of development on the site. Consideration has been made for fluvial and pluvial flooding and ponding as well as surface water overland flow, sewer capacity, infrastructure failure and tidal and estuary flooding. Key findings relating to Edgware are:

- The Site is located in EA Flood Zone 1 and is categorised as having a low probability of fluvial and sea flooding (less than 1 in 1,000 annual probability)
- On the basis of the PPG Flood Risk Vulnerability Classification, development is considered to be appropriate for land designated as Flood Zone 1
- The remaining sources of flood risk (fluvial, ground, sea, reservoir, tidal and estuary flooding) to the site are considered to be low to negligible; and
- The existing site is developed with the majority covered with impermeable finishes (buildings, asphalt road surfacing). There is an opportunity to remedy this through the introduction of permeable surfaces and green spaces, as well as the introduction of SuDs in-line with the measures outlined in the London Plan.

10.11. This constraint is considered to be capable of being addressed in the design and operation of development.

Heritage and Conservation

10.12. The grade II listed Railway Hotel, St Margaret's Church and the Watling Street Conservation Area are all located within proximity of the site. Areas of Green Belt also lie to the north of the site, north of the A41.

10.13. Any development proposals will need identify and mitigate against harm to heritage assets from the outset in line with London Plan Policy HC1.

10.14. This constraint is considered to be capable of being addressed in the design and operation of the development.

Borough SINC

10.15. TfL's ownership includes a Site of Borough Importance for Nature Conservation to the south east. There is no public access to this land.

10.16. Consideration of facilitating access to the SINC is required to provide new green space for Edgware.

10.17. This constraint is considered to be capable of being addressed in the design and operation of the development.

11. Conclusions

- 11.1. This statement has sought to respond to the Question 10 of Matter 2. In relation to the housing growth targets for Edgware, the Statement demonstrates that:
- The shopping centre and stations sites are in the ownership of a Joint Venture between Ballymore and TTLP who are committed to bringing the site forward for re-development
 - The site is deliverable in the plan period
 - The site is in Barnet's only major town centre which benefits from excellent public transport accessibility
 - The housing targets for Edgware are commensurate with its status as the borough's only major town centre
 - The optimisation of this sustainably located brownfield site satisfies the requirement in the London Plan for delivering growth through a design led approach which can be tested through peer led design review and the development management process
 - Development constraints on the site are capable of being addressed in the design and operation of a future development.
- 11.2. As a result, we consider that policy GSS05 has been **positively prepared**, is **justified, effective** and **consistent with national policy**, and in **general conformity with the London Plan**, in relation to the scale and distribution of the development proposed in the Edgware Growth Area.
- 11.3. We would welcome the opportunity to participate in the hearing session for Matter 2 to assist the Inspectors in their assessment of the soundness of the plan.