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Dear Sir/Madam,

**London Borough of Barnet Draft Regulation 19 Local Plan Public Consultation – comments submitted on behalf of The Ballymore Group and Transport for London Commercial Development.**

**Introduction**

This letter is submitted by Savills (UK) Limited (hereafter known 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 Regulation 19 draft of the new Local Plan. These comments are submitted on behalf of The Ballymore Group (‘Ballymore’) and Transport for London Commercial Development (‘TfL CD’).

Ballymore is a major national and international developer, with considerable experience in delivering sustainable, much sought-after homes and communities. Ballymore is committed to the development of the sites it owns with a multi award-winning portfolio of some of Europe’s largest and most transformative urban development projects, for example London City Island (completed) and the Brentford Project (under construction). Ballymore has worked with numerous industry leading partners to develop mixed-use regeneration schemes, creating partnerships with similar ideals has become our core strategy, to create authentic places which all stakeholders are proud of.

TfL CD is already working with the Council to deliver mixed-use development and new homes across the borough. All of TfL CD’s projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice.

Ballymore acquired the Broadwalk Shopping Centre in Edgware in 2020 which together with the Forumside sites is subject to a site allocation in the draft local plan with an indicative residential capacity of 2,379 (Site 27). The neighbouring Edgware Stations site is also subject to an allocation with an indicative residential capacity of 2,317 (Site 28). Ballymore and TfL CD are forming a partnership in order to bring the two sites forward concurrently for a comprehensive redevelopment in the heart of the town centre. This joint approach to the delivery of both sites will maximise planning benefits and opportunities for coordinated master-planning and design.

In addition to new housing, public realm and commercial floorspace, a fundamental element of the development brief is the provision of new public transport infrastructure including a new bus depot, bus stops and other upgrades. Investment on this scale aligns with the Mayor’s transport strategy for London, which in general terms commits TfL to increasing passenger capacity across its network and reducing emissions through a shift to electrification.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The significance of Edgware's capacity for growth is reflected in the recently adopted Edgware Growth Area SPD. This identifies the shopping centre and stations as the largest site with high development potential in the town centre where both the SPD and the emerging Local Plan set out a target for 5,000 new homes.

The Local Plan seeks to shape growth and change in Barnet over the next 15 years as the borough seeks to meet a pressing need for new housing and recover from the effects of the global pandemic. We are looking forward to continuing to work with the Council to realise these growth ambitions, particularly in Edgware. In that vein, we have undertaken a review of the draft Local Plan and our individual comments on a number of policies are set out below, with suggestions to delete the text with a ~~strike through~~ and add the additional text in red.

### **Policy GSS01 and GSS05**

Policy GSS01 states that new homes will be directed to a number of Growth Areas including Edgware Town Centre where the target is 5,000 new homes.

This is amplified in policy GSS05 which sets out the Council's requirements for development proposals in the Edgware Growth Area and which includes the target of 5,000 new homes. We support this ambition for growth in the borough and consider this target to be both deliverable and consistent with the Council's ambitions as set out in the adopted Edgware Growth Area SPD.

We welcome the Council identifying Edgware Town Centre as an opportunity for regeneration and intensification and the importance placed on enabling economic recovery from the impacts of the COVID-19. However, following the Government's publication of the new Standard Methodology for calculating housing need which applies a cities and urban centre uplift for cities including London, we can reasonably anticipate an increase to Barnet's housing targets within the plan period. This new Standard Methodology will increase the borough's housing target to over 5,000 units per annum from its current 2,364 units per annum. Therefore, draft Policies GSS01 and GSS05 should be appropriately worded and introduce flexibility to its application by presenting housing figures as minimums as suggested below. This approach maximises the Council's ability to achieve its housing target by relying on its plan to govern housing delivery, whilst ensuring the Local Plan is effective in its delivery throughout the plan period.

#### *Policy GSS01 – suggested change*

- a) Growth Areas (*at least* 23,300 homes):
- Brent Cross Cricklewood Opportunity Area – *at least* 9,500 homes (Policy GSS02)
  - Brent Cross West– *at least* 1,800 homes (Policy GSS03)
  - Cricklewood Town Centre – *at least* 1,400 homes (Policy GSS04)
  - Edgware Town Centre – *at least* 5,000 homes (Policy GSS05)
  - Colindale Opportunity Area – *at least* 4,100 homes (Policy GSS06)
  - Mill Hill – *at least* 1,500 homes (Policy GSS07)"

#### *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;

## Policy CDH04

We support the Council's ambition regarding 'Very Tall Buildings' as per draft Policy CDH04. This policy supports, Very Tall Buildings (15+ storeys) in a designated Growth Area including the Edgware Growth Area. 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. Edgware is the borough's only designated Major Town Centre as per the London Plan's town centre hierarchy and is therefore an appropriate location for growth. We therefore agree with the Council's ambition that the Edgware Town Centre is appropriate for Very Tall Buildings.

### Site Allocations: Site No. 27 and Site No. 28

Site No. 27 comprises the Broadwalk Shopping Centre and car park and the Forumside sites (outside of Ballymore and TfL's ownership). The site also includes existing tall buildings at Premier Place which ought to be referenced in the "site description" section.

*Site description: The site is within Edgware Town Centre and includes Primary Retail Frontages. It encompasses the Broadwalk Shopping Centre (with roof car parking), a supermarket and associated car parking. To the north and west the sites faces onto Station Road and A5 Edgware Road with retail frontages in mid-20th Century buildings. The site also includes some office and residential uses. **There are tall buildings on the site including Premier House and Premier Place, currently under construction.** To the south is a mosque and a primary school, along with low-rise housing. To the east are the bus and railway stations. The Grade II listed Railway Hotel – a local landmark building - is close to the north western part of the site. Public transport accessibility is high. Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.*

Site 28 comprises Edgware bus and Underground stations, platforms and tracks and areas of open land to the south and east. Site 28 is in the ownership of TfL and is adjacent to Site 27. Collectively, both sites are intended to be the focus of intensification in the Edgware Growth Area, particularly in terms of housing delivery. Given the importance of these two sites within the town centre and their adjacencies, we consider that there is an opportunity to incorporate both in to one allocation. The separation runs along the ownership lines however, both landowners are working in partnership to deliver comprehensive master-planning and redevelopment of both sites as a singular piece. A consolidated approach to the will ensure that the Local Plan is effective in its delivery.

The Council's approach to the site allocations is set out the Site Selection Background Report (2019). This explains that the indicative residential capacities have been derived using the density matrix from the old London Plan. Notwithstanding, in view of the new Standard Methodology and anticipated increases in Barnet's housing targets over the plan period, we consider that there is merit in presenting the indicative site capacities as minimums to ensure the site allocation policies are sufficiently flexible and effective in their delivery:

#### **Site 27**

*Minimum indicative residential capacity: 2,379*

#### **Site 28**

*Minimum indicative residential capacity: 2,317*

With respect to non-residential uses, we note the following requirements:

**Site 27:** 75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community and car parking.

**Site 28:** 70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure

Paragraph 6.3.3 of the Site Selection Background Report states that an “assessment” on the requirement and suitability of non-residential uses was undertaken but no further detail on the methodology or assumptions is provided. Where the Edgware Town Centre sites (27 and 28) are required to deliver in excess of 4,500 units, a requirement of 25% and 30% non-residential uses respectively may constrain development and the delivery of new housing which would run contrary to the Growth Area objectives.

Policy GSS05 notes the need to support growth in Edgware and enable its recovery from the COVID-19 pandemic. The policy goes on to refer to the need for “appropriate” floorspace for community, retail and office uses. In contrast to the approach in policy GSS05, our view is that the use of percentage figures in the site allocations is overly prescriptive. The approach may have the unintended consequence of constraining housing delivery particularly as the quantum is expressed as a proportion of floorspace, meaning that the requirement for non-residential uses would increase in-step with any increase in housing delivery. Such a constraint on housing delivery could run contrary to the aims of both the Local Plan and London Plan which seek to optimise housing delivery in town centres like Edgware.

In responding to impacts of the pandemic on the borough’s town centres, planning policies, particularly as they relate to town centre uses ought to be sufficiently flexible to ensure that sites can be delivered in the plan period and that objectives for regeneration and economic recovery are realised. In the context of shifting retail patterns, a more justifiable policy approach would seek an *appropriate* mix of uses to activate streets and deliver a resilient and relevant town centre offer. We therefore suggest the following amendments:

**Site 27**

“75% Residential floorspace with 25% *an appropriate* mixed of town centre commercial uses (retail and office), entertainment, community, and car parking”

**Site 28**

“70% Residential floorspace with 30% *an appropriate* mixed of town centre commercial uses (retail and office) and transport infrastructure”

**Conclusion**

Having reviewed the draft Regulation 19 Local Plan, we are generally supportive of the document for its approach to enabling growth in Barnet, delivering much needed housing and facilitating a recovery from the impacts of COVID-19. We have suggested a number of amendments to the wording of policies set out in this document. Specifically, we have suggested a number of changes to the Edgware site allocations in order to facilitate the delivery of these key town centre sites in this plan period.



We look forward to continuing to work with the borough to deliver growth in Edgware and thank you for the opportunity to engage in this consultation. We would be grateful for confirmation of receipt of these representations and trust that these comments will be taken into consideration as officers finalise a submission version of the Local Plan.

Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

Yours faithfully,

A handwritten signature in black ink that reads "Savills". The signature is written in a cursive, flowing style.

**For and on behalf of The Ballymore Group and Transport for London Commercial Development**