GREATER**LONDON**AUTHORITY

Planning report GLA/2024/0416/S1/01

16 September 2024

Edgware Town Centre

Local Planning Authority: Barnet

Local Planning Authority reference: 24/2686/OUT

Strategic planning application stage 1 referral
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal
Outline Application for the comprehensive, phased mixed-use redevelopment of the site to deliver building up to 161.95 metres (AOD) in height comprising residential units, co-living or purpose-built student accommodation, older persons' housing, and a range of town centre uses (commercial, retail, food and beverage, health, food superstore, cinema, cultural, office, gym, hotel, library), together with a new transport interchange, basement bus garage, public realm and other associated works.
With full details in respect of access for phases 1, 3 and (in part) 2 and (in respect of part of phase 1) landscaping).

The applicant
The applicant is **Ballymore (Edgware) Ltd (a partnership between the Ballymore Group and TTL Properties (TTLP)),** the architect is **Howells** and the planning agent is **Savills**.

Strategic issues summary
Land use principles: The proposal, for a comprehensive redevelopment of the site for a mixed-use, residential-led development, transport infrastructure by virtue of bus station and bus garage, on a brownfield site within a Major Town Centre responds well to London Plan objectives in terms of land use principles. However, significant strategic matters require addressing regarding the delivery of the Bus Station and Bus Garage to operational standards, reduction in general car parking and phasing and relocation strategies for the existing social infrastructure.
Affordable Housing: The applicant has committed to delivering a minimum of 35% affordable housing by habitable room, with a tenure split of 50% Low-Cost Rent (minimum) / 50% Intermediate (maximum). The FVA is being reviewed by GLA officers. Early, mid and late-stage reviews will be required, with eligibility and affordability criteria appropriately secured.
Transport: Significant transport matters remain outstanding and must be resolved prior to decision. This includes removal of general car parking, reconsidering the front-loaded approach of the MSCP, ensuring blue badge parking is accessibly located. Further engagement is required with TfL on the design of the bus station, bus garage, interchange, passenger experience and ensuring the bus garage will be delivered fully electric, in both the interim and permanent scheme. It is noted this may impact upon the parameter plans and design of Station Square.
Other issues on **equalities, urban design, heritage, sustainable development** and **environmental matters** also require resolution prior to the Mayor's decision making stage.

Recommendation
That Barnet Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 101. Possible remedies set out in this report could address these deficiencies.

Context

1. On 6 August 2024 the Mayor of London received documents from Barnet Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following Category/categories of the Schedule to the Order 2008:

   - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."

   - Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."

   - Category 1C(c): "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."

   - Category 2C: "Development for a use which includes the keeping or storage of buses or coaches where - it is proposed to store 70 or more buses or coaches or buses and coaches; or the part of the development that is to be used for keeping or storing buses or coaches or buses and coaches occupies more than 0.7 hectares."

3. Once Barnet Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://glaplanningapps.commonplace.is/

Site description

6. The application site comprises the Broadwalk Shopping Centre (BSC) site (including a Sainsbury's store and large area of surface level parking), and Edgware Station Site which includes Edgware Bus Station and Edgware Bus Garage, Redhill Medical Centre, and Deans Brook Nature Reserve (part of London Underground operational land). It is understood the land ownership is

split, with Ballymore owning the BSC site and TfL including Places for London (a Transport for London commercial property company) the remaining portion of the redline boundary. The application site includes operational transport land owned by London Underground and London Bus Services Limited. Collectively, the application site comprises 10.3 hectares as outlined below.

Figure 1: Redline boundary of the site

7. The site is located within the Edgware Major Town Centre in the London Plan and adopted Local Plan. In the emerging Local Plan, the site falls partially within the boundary of draft allocations (Site 27 and 28) related to the delivery of house (Site 27 – 2,379 units; Site 28 – 2,316 units), mix of town centre commercial uses, entertainment, community, car parking and transport infrastructure. Deans Brook Nature Park is a Site of Importance for Nature Conservation (SINC).

8. To the north and west the site faces onto Station Road with retail frontages. To the south is Edgware Primary School, Church Way, and residential properties. To the east are the Railway lines and sidings associated with Edgware Station, which forms part of London Underground land.

9. The majority of the site has a Public Transport Accessibility Level (PTAL) of 6a or 6b, on a scale of 0 to 6b, where 6b is the highest. There are parts of the site to the south and east, with much lower PTAL of 1a. Edgware is served by approximately 20 bus routes along Station Road and the A5 Edgware Road. The latter of which, is part of London's Strategic Road Network. Edgware Station is northern terminus of the Northern Line, and a step free station.

Details of this proposal

10. The hybrid application seeks the comprehensive, phased mixed-use redevelopment of the site to deliver building up to 161.95 metres (AOD) in height (29-storeys illustratively) and a total floorspace of 425,375 sq.m. (GIA).

11. The applicant seeks to deliver the scheme in four phases. The detailed element includes the access for Phases 1, 3 and (in part) 2 and landscaping for part of Phase 1.

12. The development specification, for the outline element proposes minimum and maximum floor areas in square metres (GIA), as follows:

Table 1: Outline development specification (uses)

Use	Minimum floor area	Maximum floor area
Residential (standard housing)	259,600	324,500
Residential (Class C2, older persons' housing with care)	Nil	22,400
Co-living/PBSA	Nil	17,200
Retail, food and beverage, hot food takeaway, health	7,870	12,240
Food superstore	5,850	19,220
Public house, wine bar	Not set	Not set
Library	1,320	1,700
Cinema/cultural use	800	2,140
Office, gym or hotel	5,050	10,240
Ancillary (inc. bus depot/garage)	22,640	25,160
Ancillary (inc. car and cycle parking)	Nil	16,370

Case history

13. Multiple pre-application meetings were held with GLA officers from 2022 until the point of formal submission of the application (GLA refs: 2022/0234/P2I, 2022/0713/P2F, 2023/0291/P2F and 2023/0483/P2F). During these meetings discussions were held covering land use, equalities, affordable housing delivery, urban design, heritage, transport, sustainable development and environmental matters. Whilst the comprehensive development of this brownfield site within a Major Town Centre to provide a range of residential units and commercial uses was considered strategically acceptable in land use terms, matters remained outstanding and unresolved related to existing uses, relocation strategies, social infrastructure, equalities, affordable housing delivery and viability, urban design principles (density, open space and residential quality), heritage, quantum of car parking, transport and infrastructure delivery, and ability to connect to a future wider area heat network.

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Barnet Council's Core Strategy (2012); the Development Management Policies DPD (2013); and, the London Plan 2021.

15. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- Edgware Growth Area SPD (June 2021);
- Edgware Town Centre Framework (June 2013); and
- Barnet Draft Local Plan 2021 to 2036 Regulation 24.

16. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Good Growth - London Plan;
- Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
- Opportunity Area - London Plan;
- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy; Affordable Housing draft LPG; Viability draft LPG;
- Student housing - London Plan; Purpose-built Student Accommodation draft LPG;
- Co-living accommodation - London Plan; Large Scale Purpose Built Shared Living draft LPG;
- Retail / Office - London Plan;
- Health facilities - London Plan; Social Infrastructure SPG; the Mayor's Health Inequalities Strategy;
- Transport infrastructure - London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;

- Heritage - London Plan;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling LPG;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Culture / Social Infrastructure - London Plan; Mayor's Cultural Strategy;
- Tourism / Leisure - London Plan;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found *here*. (Link to practice note); and
- A Written Ministerial Statement, for the ongoing consultation on the revised NPPF, was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft National Planning Policy Framework was also published on 30 July 2024. However, given it is still in draft and subject to consultation and change, the weight to attach to it is limited.

Land use principles

17. The proposal, for a comprehensive redevelopment of the site for a mixed-use, residential-led development, transport infrastructure by virtue of a replacement bus station and bus garage, on a brownfield site within a Major Town Centre responds well to London Plan objectives in terms of land use principles. The proposed uses align with the emerging local site allocation and London Plan Objective GG2 and Policies SD6, SD8, T3, H1, H12, H13, H15, H16, E1, E3, S1, S2 and S4.

Residential uses

18. London Plan Policy H1 seeks to increase housing supply and has allocated to Barnet Council a target of 23,640 net additional homes for the period 2019/20 to 2028/29. The proposed residential-led scheme would deliver new residential units (minimum 259,600 sq.m. and illustratively up to 3,365). This would positively contribute towards housing delivery in response to local and strategic targets.

19. The scheme seeks flexibility for purpose-built student accommodation or large-scale purpose built-shared living units (up to 17,200 sq.m. and illustratively up to 463-beds or 500 units). The site is well located for flexibility of uses, however given the outline nature of the application, the Council should ensure the provision would meet local need and secure the uses to align with London Plan Policies H15, H16 and London Plan Guidance under reserved matters applications. This includes management plans, nominations agreements and provision for affordable student-beds (as relevant).

20. The scheme also allows for provision of older persons' accommodation, with a care element (up to 22,400 sq.m. and illustratively up to 188 units). This should be secured in line with London Plan Policy H13 (noting the 'care home accommodation' specifications outlined in para. 4.13.4) and London Plan Guidance. It is noted the matters related to inclusive and accessible design and pick-up drop-off facilities in this report require resolution to ensure the use is in line with London Plan Policy H13.

21. The variety of residential uses would contribute to mixed and balanced communities on site and does not raise strategic concern. However, the mechanisms to secure the uses requires careful consideration, to ensure the future uses, under reserved matters applications are delivered in line with London Plan Policies H15, H16 and as relevant H13 and Guidance.

Non-residential (existing uses and relocation strategies)

Bus Garage and Bus Station

22. The current at-grade Edgware Bus Garage is utilised by two bus companies (Metroline and RATP Dev Transit London) with a combined capacity of 190 buses and 700 employees (bus drivers, engineering, maintenance, administrative and/or supervisory staff). The garage incorporates administration, engineering, fuelling and bus wash facilities within each bus operators' demise, with shared use of the main bus movement area, as well as electric charging facilities.

23. The current Edgware Bus Station has 18 stands and 5 stops which serves 15 bus routes, plus 3 school and 3 night-bus routes. This bus station is 15th busiest out of London's 60 bus stations, under management by Transport for London (TfL). The station provides a consolidated location for buses, as well as interchange between buses and other modes, with totem and other signage within the Town Centre and to-from Edgware station. Bus driver toilet facilities are provided in a leased section of the shopping centre building, accessed from

the bus station side of the shopping centre. Bus driver mess room facilities are provided within the bus station concourse building.

24. The proposed relocation and replacement of the bus facilities unlocks significant development opportunities and is acknowledged to be critical to optimising this site. However, the applicant must further address the requirements of London Plan Policy T3 to ensure operational TfL infrastructure is safeguarded and re-provided. The successful delivery of this scheme depends on how both the interim and permanent bus facilities will meet TfL operational requirements and deliver the new bus interchange, new bus garage and stands, enabling electric bus operation including bus stand opportunity charging and overnight charging, maintenance, and mitigating vision zero risks. It is also an opportunity to facilitate the continued conversion of the buses to an electric fleet, zero and low emission vehicles, and help improve the passenger experience.

25. Whilst the delivery of a new bus garage and bus station is welcomed in line with London Plan Policy T3, prior to Council Planning Committee, confirmation that the new bus station, bus garage and capacity for electric charging will meet with TfL operational requirements, designed in accordance with TfL Engineering's Bus Station Accommodation Guidance (March 2022) is required. The applicant is strongly encouraged to further engage with TfL to resolve this key land use matter.

Car parking

26. The approach to reducing overall car parking in this highly accessible location is welcomed. However, the delivery of a minimum 663 (maximum 764) including general residential car parking spaces within the first phase and a multi-storey car park is contrary to London Plan Policy T1. This is further detailed in the transport section.

Health, social and cultural infrastructure

27. As outlined further in the below equalities section, the applicant must confirm the relocation strategy for the existing Redhill Clinic and any loss of social infrastructure. It is acknowledged the applicant outlines a minimum of 7,870 sq.m. of floorspace which could come forward for health uses. However, it is recommended to separate health facilities (from retail, food and beverage and hot food takeaway) to ensure no loss of provision and confirm the relocation strategy of the Clinic.

28. It is acknowledged the development specification incorporates a library (min. 1,320 sq.m.) and opportunity for a flexible community/cultural space (min. 800 sq.m. - cinema illustratively), which is welcomed. The details including rent levels and management should be secured to understand the public benefit of this provision.

Commercial (retail)

29. The proposed redevelopment of the Broadwalk Shopping Centre, introducing a mix of uses is welcomed in line with London Plan Policies SD6, SD8 and E9 and the local intent of the Edgware Growth Area SPD. This includes an uplift from 17,650 sq.m. existing commercial, to a minimum 18,770 sq.m (maximum

41,700 sq.m.). Further detail is required on the decant strategy, supporting independent retailers and phased construction to maintain operation of the Town Centre. This should have regard to existing rent levels and securing opportunities to support the local commercial offering.

Equalities

30. The Equality Act 2010 places a duty on public bodies, including the GLA and the Mayor, in the exercise of their functions, to have due regard to the need to advance the quality of opportunity between persons who share a relevant protected characteristic and persons who do not share. London Plan Objective GG1 supports and promotes the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challengers and inequalities they face.

31. Given that the development involves the redevelopment of a site with numerous current uses including: social infrastructure (Redhill Clinic and 'Park Tuition' a temporary educational unit), Broadwalk Shopping Centre, reduction in car parking as well as a replacement and relocated bus station and bus garage, an Equalities Impact Assessment (EqIA) has been prepared. The EqIA outlines how certain aspects of the development may have impacts on protected characteristics, including: age, sex, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and maternity, race, religion and belief, and disability. The EqIA also considered deprivation.

32. It is acknowledged the scheme is located within the London Borough of Barnet, with the EqIA considering the characteristics of this borough, however the site is located close to the London Borough of Harrow and the EqIA should be widened to be site specific, rather than borough specific. This is particularly relevant given the transport interchange on-site and adjacent, by virtue of the LU station. The EqIA outlines several uses which have differential effect on likely protected characteristics being the displacement (reduction) of car parking, the Redhill Clinic, temporary displacement of the transport infrastructure and displacement of the Park Tuition Learning Hub. It is acknowledged the 4 existing residential units on-site are either vacant, unsuitable for living or have tenancies due to expire prior to construction, thus would not result in displaced residents.

33. The EqIA has made recommendations and proposed mitigation which should be considered, including relocation strategies, on-going engagement, and planning obligations surrounding the effect on buses. The mitigation measures surrounding transport infrastructure and bus services are further considered in the below transport section, which require further resolution prior to decision. The relocation strategy for Redhill Clinic should be confirmed given the disproportionate impact for protected characteristics, and secured appropriately. GLA officers recommend the applicant provide an updated EqIA to take into account the adjacent borough, specific users of the site and how

these impacts will be addressed within the proposal for the Council to consider prior to decision.

Affordable housing

34. London Plan Policies H4, H5 and the Affordable Housing and Viability SPG seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. As the site is part private and part public land, a blended affordable housing threshold applies would apply (alongside other criteria) for the scheme to follow the Fast Track Route.

35. The applicant has committed to delivering a minimum of 35% affordable housing by habitable room, for the residential (C3) units. Under the illustrative scheme, this could reflect 1,188 affordable units. As such, the application is proceeding under the Viability Tested Route. A Viability assessment has been submitted alongside the application which is being reviewed by the GLA Viability Team. Once GLA officers have concluded their initial assessment of the submitted Financial Viability Assessment (FVA), the findings will be shared with the applicant and Council officers. The Council's independent review of the FVA should also be provided to the GLA for review.

36. The applicant has committed to a tenure split of 50% Low-Cost Rent (minimum) / 50% Intermediate (maximum). This includes a commitment to delivering low-cost rent homes as social rent and intermediate homes as shared ownership and London Living Rent.

37. As the application is following the Viability Tested Route it will be subject to early, mid and late-stage reviews. Given the long-term nature of the scheme the reviews should assess all scheme values and costs except for benchmark land value and the target return, which should not exceed 13% IRR. Affordable housing should not be capped at less than 50% across the whole scheme.

38. Affordability and eligibility criteria should be secured in line the London Plan and Annual Monitoring Report. Restrictions should be included to ensure affordable housing is distributed throughout the scheme, including occupation restrictions on private homes in each phase.

39. Prior to Stage II, the applicant and Council should work with GLA officers to ensure the scheme secures the maximum affordable housing delivery and a draft legal agreement must be provided to allow officers to ensure all eligibility, affordability criteria and review mechanisms are secured. The Council should also consider including provisions in the legal agreement (or subsequent agreements) that bind any subsequent Section 73 consent to the obligations in the original agreement.

Urban design

40. In line with London Plan Policy D4, the applicant confirmed the scheme underwent design review prior to submission.

41. There is a level of discrepancy between the illustrative scheme and development specification, parameter plans, and design code. This means that the proposed massing, form, ground floor plane and public spaces being brought forward is unclear. The Council should carefully scrutinise these documents, particularly on the use of 'should' for clauses in lieu of 'must' in the design code where they relate to policy requirements and relevant guidance.

Development layout

42. Whilst the overall development layout appears to be logical, as part of a masterplan approach, allowing links to the wider Town Centre and Deans Brook and noting the pinch points on transport infrastructure, the scheme has yet to demonstrate a successful balance of public space and activation. GLA officers welcome further discussions with the Council and applicant to resolve this.

43. The masterplan incorporates landscaping and public realm, part in detail and outline, which outlines nine distinct areas, namely Edgware Walk, Edgware Green, Fairfields Play Park, Deans Brook Walk, Terraces and Square, South Street, North Street and Railway Terraces, Edgware (Podium) Gardens and Nature Park.

44. The development specification seeks a minimum delivery of Public Open Space of 17,252 sq.m. Given the extent of development, local policies and guidance identifying the area as deficiency for open spaces, the minimum extent appears lacking. The Design Code should robustly secure public spaces and successful public realm delivery, including considering securing minimum areas for each of the nine character area and minimum widths. This could also be controlled by phasing to ensure adequate public space delivery.

45. The proposed building lines, reliant on maximums may result in extensive built form, with limited breaks. The Council should address, via amendments to the parameter plans and design code to ensure the proposed maximum building footprint does not dominate the streetscape. It is noted resolving the outstanding transport operational requirements may impact the parameter plans and development layout. Active uses and frontages should also be embedded into the Design Code and parameter plans.

46. Given the intended construction programme, the phasing parameter plan should secure phased demolition and support meanwhile uses.

Tall buildings, scale and massing

47. The outline scheme includes opportunity for buildings up to 161.95 metres (AOD) (29-storeys illustratively). This constitutes a tall building according to the borough's local definition. The site is identified in the local plan as a site where tall buildings could be appropriate given the Priority Town Centre designation. However, the adopted Local Plan does not designate height parameters, in line with the locational requirements of London Plan Policy D9 (Part B). Due regard is given the emerging Local Plan which outlines appropriate building heights of

8 to 14-storeys in the Edgware Growth Area and 15-storeys or more in exceptional circumstances. The scheme has been considered in line with the visual, functional, environmental and cumulative impacts of Policy D9 (Part C).

48. In considering visual impacts, the continuous built form at mid-rise upwards outlined in the parameter plans, albeit as a maximum parameter, potentially promotes continuous walls and podiums at a height of 2-7 storeys. Without enforced breaks in the massing of the masterplan and limitations on managing minimum and maximum heights, the visual, functional, environmental and cumulative impacts outlined in Policy D9 are not fully addressed. Whilst the tallest element (Plot E1), on Station Square is logical at 29-storeys (161.95 metres AOD), given Plots E2, E3, E4 and E5 also permit heights up to 151.7 metres (AOD), with a podium of up to 75 metres (AOD, 2-7 storeys) it may not successfully address spatial hierarchy and result in substantial massing central to the scheme. To further address visual matters, clauses related to exemplary architectural design within the Design Code should be further strengthened.

49. Functional impacts remain unresolved, with matters raised regarding transport, including maintaining the operation of the transport network, promoting active travel, walking and cycling networks. Environmental matters should be carefully reviewed and secured to ensure any reserved matters applications will achieve appropriate mitigation The cumulative impacts of the tall buildings, when delivered under the maximum parameters (rather than illustratively) should be further reviewed by the Council to ensure this is acceptable, or otherwise amended.

50. In summary, whilst the site could be appropriate for tall buildings, additional thought should be given to the parameter plans and design code to ensure the intent of the illustrative masterplan is realised. GLA officers will consider the visual, functional, environmental and cumulative impacts of the proposal at Stage II.

Inclusive access

51. The applicant is yet to demonstrate a successfully inclusive design nor has submitted an inclusive design statement in line with London Plan Policy D5. Further consideration should be given to the masterplan principles surrounding inclusive design, including embedding inclusive design principles as ‘must’ in the Design Code. The location of blue badge parking and level, easy access to lift cores requires further consideration.

52. The application documents confirm that 10% of the dwellings would be designed to be accessible or adaptable for wheelchair users in accordance with London Plan Policy D7. The Council must secure M4(2) and M4(3) requirements by condition as part of any permission.

Fire safety

53. In line with London Plan Policy D12 the application is accompanied by an outline fire safety statement and fire strategy, prepared by a suitably qualified

third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The statement and strategy confirm it will incorporate safe and dignified emergency evacuation for all building users and two stairs for all buildings over 18 metres.

54. It is noted that the scheme is in outline, with the subsequent Reserved Matters Applications confirmed to be accompanied by Fire Statements. The outline fire statement outlines the key features of a Stage 2 design, including an approach to achieving fire safety for the Bus Garage (which is not sought for detailed permission under this application, however acknowledging the outline intent to deliver a fully electrified bus garage by 2038). The early engagement with London Fire Brigade and Building Control is welcomed, noting the scheme will be subject to a QDR Assessment. The phasing plan must be carefully considered, to ensure the wider delivery of the masterplan, which is contingent on successful transport infrastructure delivery, can be brought forward and meet the highest standards of fire safety.

55. GLA officers understand the LFB and HSE have been consulted on this proposal and welcome their comments, to report on compliance with London Plan Policies D5 and D12 at Stage II.

Heritage

56. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.

57. The Railway Hotel, listed Grade II, near the site, is on the Heritage at Risk Register. GLA officers have considered the indirect (nearby) heritage assets and level of harm caused by the proposed development (in all cases the assessment is based on the cumulative scenario) as outlined in the following table:

Table 2: Indirect (setting) impacts

Designated heritage asset	Category of harm	Extent of harm	View reference
Church of St Lawrence, listed Grade I;	Less than substantial	Very low	Views 16 and 17, 35
Church of St Margaret, listed Grade II;	Less than substantial	Low	Views 1, 9, 37 and Appendix 4
The Railway Hotel, Station Road, listed Grade II;	Less than substantial	Middle	Views 1, 9 and 37
A group of scattered Grade II listed buildings along Edgware Road High	Less than substantial	Low	Views 1, 14 and Appendix 4

Street including Edgware House, White Hart Hotel, Nos. 65-67, 85-89, 95, 97 and 99 to 101 the War Memorial, the gate piers on the High Street, a pair of telephone kiosks and the Bee Hive;			
The Barn and Days Almshouses, listed Grade II;	Less than substantial	Low	View 20
10 to 12 Ruddock Close and 1 to 9 Buckle Court, listed Grade II;	Less than substantial	Low	Appendix 4
John Keble Church, listed Grade II;	Less than substantial	Low to middle	Appendix 4
Church of St William of York, listed Grade II	No harm	No harm	Appendix 4
Convent of St Mary at the Cross, listed Grade II;	Less than substantial	Low	Appendix 4
A group of assets centred on Canons Park and associated structures and buildings (including Canons House, gate piers and 10-14 Canons Drive), listed Grade II; the Canons Park Registered Park and Garden, Grade II and the Canons Park Conservation Area;	Less than substantial	Very low	Views 2, 3, 16, 17, 18, 19, 35, 36 and Appendix 4
Watling Park Estate Conservation Area;	Less than substantial	Middle	Views 10, 11, 12, 23, 24, 25, 26, 27
Edgware High Street Conservation Area.	Less than substantial	Low to middle	View 1

58. Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings, GLA officers consider that there would be instances of less than substantial harm to the significance of heritage assets. The harm identified must be given considerable importance and weight.

59. As harm has been identified, the proposals do not comply with London Plan Policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. GLA officers acknowledge the relocation of Edgware bus station, in favour of 'Station Square' would be a welcomed minor heritage benefit to the scheme and there are numerous public benefits related to optimising the site, affordable housing delivery and public realm improvements. However, a balancing exercise will be undertaken at Stage II once the secured public benefits package is clear and further comments have been received from Historic England and the Council.

Transport

Car parking

60. The overall intent to reducing the existing circa 1,024 surface level car parking to a maximum 764 spaces, in this highly accessible location is welcomed.

61. However, the first phase of the scheme includes a multi-storey car park (MSCP) which provides 440 general residential spaces (or up to 339 blue badge), accessed from South Road. In addition, there would be podium car park (276 spaces including 28 Blue Badge) below the new Sainsbury's supermarket, plus 22 Blue Badge on street and 26 in-curtilage. This results in a delivery of minimum 663 (or maximum 764) car parking spaces within the first phase, which is contrary to London Plan Policy T1 and not supported.

62. Front loading the construction of the MSCP is strongly discouraged as it embeds private vehicle use into the scheme, rather than supporting a shift to active travel, contrary to London Plan Policy T1. Noting construction practicalities may require this structure built in the early phases, the applicant has not yet robustly demonstrating adapting the MSCP for other meanwhile uses to ensure it is not encouraging the use of private car for residents and visitors to the Town Centre.

Residential car parking

63. The approach to residential car parking should align with London Plan Policy T1, to be car free within a highly accessible major town centre location. To be car free, blue badge parking must not be available for general parking and be truly accessible to the relevant residential block and lift core accounting for level access. The applicant must demonstrate how blue badge car parking, located at distance from building cores meets accessibility needs. The development specification should be updated, prior to decision, to be car free, in line with Policy T1.

Retail car parking

64. The reduction in retail car parking to a maximum 380 car parking spaces is supported. The retail provision for car parking should be separated from the residential in the development specification.

Car parking management

65. The provision of Electric Vehicle Charging Points (EVCP) and management of the car parking should be secured by the Council, requiring a Parking Design and Management Plan to monitor need and allocation. For the retail element, the management plan should charge uses to encourage active travel and reduce congestion. The plan will need to set and monitor car parking charges, determine the level of EVCPs, disabled and other spaces, time limits and linked to the site wide travel in terms of mode split. Given the scale of development and the likely phasing, this could potentially include a progressive reduction and repurposing for other uses.

Cycle parking

66. Cycle parking for both residential and non-residential elements (including long and short stay) should be secured in line with London Plan Policy T5 and designed in line with London Cycle Design Guidance (LCDS). Noting the Major Centre location, higher cycle parking standards apply. Illustrative cycle layouts and building configuration should be provided to confirm if the space set aside within the parameter plans can accommodate the necessary quantum and mix of stands. This should also confirm how the provision can support freight and cargo bikes. The Design Code should be updated prior to decision to capture the requirements for cycle parking to ensure this is embedded in the masterplan.

67. The phased approach to cycle parking is acceptable, subject to supporting mode shift targets in the Travel Plan and development of supporting cycle infrastructure. The provision of showers, lockers and changing facilities for cyclists associated to non-residential uses should be considered.

Door-to-door transport, taxis and dial-a-ride

68. The Broadwalk Shopping centre is a popular destination for Dial-a-ride customers. DAR currently uses the adjacent bus station or the centre car park. The applicant should demonstrate how this service will be maintained during construction and phased delivery aligning with the proposal.

69. There is currently a taxi rank (two taxis) in Edgware station forecourt, which links to feeder ranks (up to 13) on Station Road; the longest rank in the borough. The proposals are to relocate the head of the rank to Station Road. This may be acceptable subject to a visualisation of the proposal to determine the view of the rank for people existing the station.

Bus Service Planning, Station, Garage and Electric Bus Charging

70. As set in the Bus Action Plan, TfL's objective is a zero-emission bus fleet by 2030. The applicant has outlined an intent to deliver the new bus garage and associated fleet to be fully electric by opening year (2038), however this remains unconfirmed. Given the likely phasing and delivery of these proposals, they must enable a fully electrified bus garage in accordance with London Plan Policy T3, noting the two existing bus operators have provision for electric buses at Edgware.

71. The indicative proposals provide for sufficient space for at least a 190 vehicle bus garage for the two bus companies, plus 18 bus stands to support the operation of terminating bus services and supporting infrastructure. The applicant should clarify the extent to which planned bus growth, taking account of the requirements of an electric fleet, would be supported by these proposals. In addition to indicative plans, there should be clarity on the minimum space being allocated for the bus garage, bus driver facilities and TfL operational staff facilities. The minimum bus garage standards, including capacity and supporting infrastructure should be captured in the development specification.

72. The proposed changes to the station interchange and highway have been modelled in line with TfL's Model Audit Process. The applicant should confirm that assumptions in the development specification align with the reasonable worst -case assumption assumed in the TA. For pedestrian modelling, TfL has asked for more detailed information to understand interaction with emerging design, and information on bus stop allocations.

73. The proposed layout of Station Square and submitted swept path drawings indicate that it would be insufficient to accommodate two buses. The applicant must therefore provide a revised layout that shows bus stops designed in accord with TfL Bus Stop Accessibility Guidance and agreed with TfL Engineering. This is likely to require more space than shown on the illustrative design. As the relocation of the bus station is key to the principle of the masterplan overall, a workable design must be agreed at this stage as it may affect the parameter plans as noted in the urban design section above, key to this outline scheme.

74. The road network must support an efficient bus network, in line with London Plan Policy T3. Further discussion is required on this matter, including updating usage data.

75. Furthermore, in line with London Plan Objective GG1, the new bus infrastructure must be fully accessible to all bus users. The interchange experience for some passengers could be longer walk distances between buses and to and from the LU station, and an assessment of impact on their journeys, and confirmation of how this change is mitigated through design must be provided.

<u>Interim bus garage and stands</u>

76. Since 2023, Edgware Bus Garage has been operating (at least in part) as an electric garage. Thus, the interim facility must provide electric charging for existing vehicles and support the transition to the new fully electric bus garage. For most bus services, overnight charging is sufficient, however, around 15% of routes need charging throughout the day. This 'opportunity charging' forms a necessary part of the proposal for this site and needs to be secured as part of the outline permission.

77. The proposed development phasing would necessitate the demolition of the existing bus garage and bus station prior to the replacement facilities being available. The interim bus garage, bus stands and welfare facilities therefore need to be in place prior to demolition and in place for at least a five-year period. It must be demonstrated that the interim facilities support continued operation before TfL can confirm continuity of service. This requires further discussion about the interim arrangements to ensure that buses can operate efficiently during the construction phase. In addition, further detail on the temporary garage design, layout, movements, alongside more detailed phasing and Agent of Change consideration.

Station Square, Station Road and Approach Road

78. The proposal results in increased bus-turning movements from Edgware bus loop (Station Square), bus stops and stands (Approach Road) to Station Road, which, in-turn increases the risk of congestion at the junctions and risk of collisions. The supporting modelling shows how the future network will operate and shows that these changes in movement can be accommodated taking the interaction between pedestrian flows and vehicle movements. However, further clarification is required on bus dwell time, interchange distances, desire lines, crossings, spaces for wheelchair ramps, bus shelters, position of bus shelters and interaction with green estate.

79. The applicant must demonstrate how the signalised crossings will successfully mitigate any impacts to buses entering/exiting and passenger experience. Passenger desire lines should be considered, taking full account of the buses in service and those that arrive/leave the bus garage.

80. Any planting in Station Square will need to meet TfL operational, maintenance and safety criteria and should be appropriately secured as such, within the Design Code.

Active Travel Zone

81. It is expected that any changes to the highway will support mode shift, Vision Zero and the Healthy Streets approach, including bus reliability on the A5 and Station Road. The site should imbed pedestrian and cycle friendly design, rather than car and vehicle dominance. On Station Road and the A5, design should promote cycling, provide space for pedestrians and have a neutral to positive impact on buses. A reduction in road speeds should be explored, including introduction of slow streets within the ATZ, in coordination with Barnet and Harrow Councils.

82. Further information and agreement with Barnet Council should be provided regarding new cycle links and integrating the emerging scheme with the interchange, LU station and Station Road.

London Underground infrastructure protection

83. The applicant should further engage with TfL to ensure existing and future operation of LU infrastructure is not impacted by the scheme. This includes the path within the nature reserve segregated from LU operational land and ensuring no balconies or windows are within 3 metres of the railway. London Plan Policy D13 places responsibility to the applicant in mitigating impacts from existing proximity of the railway infrastructure on the new sensitive uses and mitigating risks during construction.

Delivery and servicing plan

84. Further consideration should be given to consolidation and concierge services, with the current strategy not limiting delivery vehicles. The Delivery and

Servicing Plan must be secured by condition, in line with London Plan Policy T7.

Construction logistics and impacts

85. An outline Construction Logistics Plan (CLP) should be provided prior to Council planning committee to ensure current bus facilities can remain operational, interim bus arrangement can be agreed and requirements surrounding the new bus infrastructure operation. It is noted that TfL has a duty to consult the public on changes to the bus network, which may impact scheduling of construction and should be agreed with TfL.

Sustainable development and environmental matters

86. It is noted within the submitted planning statement, the applicant has highlighted the intention to deliver the new bus garage and associated fleet to be fully electric by opening year (2038), however this remains unconfirmed. The following has been considered based on documentation submitted and should the applicant change the strategy, or not be securing a fully electric fleet by opening (as stated) sustainable development and environmental matters may require reconsideration.

Energy strategy

87. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant should further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

    - Be Lean – further evidencing of energy efficiency measures for the domestic and non-domestic element;
    - Be Clean – demonstration that the number of energy centres has been minimised;
    - Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
    - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within a draft legal agreement;
    - Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation; and
    - Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

88. For the domestic element, the development is estimated to achieve a 63% reduction in carbon dioxide emissions compared to 2021 Building Regulations. For the non-domestic element, a 35% reduction is expected. The development falls short of the net zero-carbon target in London Policy SI2, although it meets

the minimum 35% reduction on site required by Policy. As such, a carbon offset payment is required to be secured. This should be secured by the Council within a draft legal agreement.

Whole Life-cycle Carbon

89. The applicant has submitted a whole life-cycle carbon assessment, which broadly aligns with London Plan Policy SI2, demonstrating actions to reduce life-cycle carbon emissions. However, a WLC assessment template should be completed to ensure results are recorded and tracked through to post-construction stages, and to allow a review of results against material quantities and other assumptions made.

90. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[1].

Circular Economy

91. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

92. The applicant has submitted a Circular Economy (CE) Statement in accordance with the GLA guidance, however, at time of submission did not provided a CE assessment template. The Circular Economy Statement does not yet comply with London Plan Policy SI7 and LPG requiring the relevant information at outline stage including a pre-redevelopment audit and pre-demolition audit. A CE assessment template should be provided prior to decision to enable consideration of London Plan Policy SI7.

93. A detailed Circular Economy Statement should be secured by condition for each Reserved Matters application. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[2].

Digital connectivity

94. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

[1] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Urban greening, biodiversity and SINC

95. The proposal presents an integrated approach to urban greening and green infrastructure across the masterplan. The calculated Urban Greening Factor (UGF) of 0.59 and biodiversity net gain of 101.13% which exceeds target outlined in London Plan Policy G5 and G6. Being a hybrid application, the quality and quantity of greening and biodiversity gain, should be secured by the Council, including the successful delivery within future reserved matters applications.

96. The site is partially covered the Deans Brook and Stoney Fields Park Site of Importance for Nature Conservation (SINC), identified as being of Borough Importance. The Council should consider how the applicant has avoided impacts to the SINC and appropriately secure mitigation measures as part of this outline scheme and future reserved matters applications.

Air quality

97. In line with London Policy SI1, the Environmental Statement (Chapter 8) addresses Air Quality which demonstrates compliance with parts A, C and D of the relevant London Plan Policy. However, further consideration should be given to part B in relation to traffic data modelling, traffic movements and assumed neutrality based on previous land use assumptions rather than benchmark rates to ensure the development would not lead to further deterioration of existing poor air quality and be at least Air Quality Neutral. Conditions are recommended related to All Non-Road Mobile Machinery (NRMM), Air Quality and Dust Management Plan, car parking restrictions to align with air quality calculations and screening for car parking. Full detailed and technical air quality comments have been provided to the Council and the applicant under a separate cover.

Local planning authority's position

98. Barnet Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

99. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of

determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

100. There are no financial considerations at this stage.

Conclusion

101. London Plan policies on land use principles, equalities, affordable housing, urban design, heritage, transport, sustainable development and environmental matters are relevant to this application. The proposed residential-led mixed use redevelopment could be supported subject to the outstanding matters related to car parking, successful delivery of the Bus Garage and Station, and the maximum level of affordable housing being secured. The application does not currently comply with the London Plan as summarised below:

- **Land use principles:** The proposal, for a comprehensive redevelopment of the site for a mixed-use, residential-led development, transport infrastructure by virtue of bus station and bus garage, on a brownfield site within a Major Town Centre responds well to London Plan objectives in terms of land use principles. However, significant strategic matters require addressing regarding the delivery of the Bus Station and Bus Garage to operational standards, reduction in general car parking and phasing and relocation strategies for the existing social infrastructure.

- **Equalities:** Further consideration should be given the EqIA and addressing the recommended mitigation measures.

- **Affordable Housing:** The applicant is committed to delivering a minimum of 35% affordable housing by habitable room, with a tenure split of 50% Low-Cost Rent (minimum) / 50% Intermediate (maximum). The FVA is being reviewed by GLA officers. Early, mid and late-stage reviews will be required, with eligibility and affordability criteria appropriately secured.

- **Urban Design:** Whilst the overall layout appears logical, the successful delivery of public realm and inclusive access principles should be enhanced and embedded in the parameter plans and design code. London Plan Policy D9 (Part C) has not been addressed in relation to the tall buildings and maximum parameters proposed. The fire strategy should be carefully scrutinised, given the wider delivery of the masterplan is contingent on the successful delivery of the transport infrastructure to the highest standards of fire safety.

- **Heritage:** As less than substantial harm (very low, low to middle) has been identified to nearby heritage assets and conservation areas, the proposal does not comply with London Plan Policy HC1. A balancing exercise will be undertaken at Stage II once the full benefits package is clear and secured.

- **Transport:** Significant transport matters remain outstanding and must be resolved prior to decision. This includes removal of general car parking, reconsidering the front-loaded approach of the MSCP, ensuring blue badge parking is accessibly located. Further engagement is required with TfL on the design of the bus station, bus garage, interchange, passenger experience and ensuring the bus garage will be delivered fully electric, in both the interim and permanent scheme. It is noted this may impact upon the parameter plans and design of Station Square.

- **Sustainable development and environmental matters:** The strategic matters raised relating to energy, CE, WLC and air quality should be resolved prior to decision, to be secured by the Council. Noting any amendments to deliver a fully electric bus garage and fleet by 2038 may require further consideration of sustainable and environmental matters.

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