Outlook

RE: 24/2686/OUT - Edgware Town Centre

From [redacted] <[redacted]@wildlondon.org.uk>
Date Tue 2024-10-01 18:20
To [redacted](LBB) <[redacted]@Barnet.gov.uk>

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Hi [redacted]

EDGWARE TOWN CENTRE ENVIRONS INC DEANS BROOK NATURE RESERVE, EDGWARE, HA8
Reference: 24/2686/OUT
I'm afraid I haven't been able to spend as much time on this as I would have liked, I've missed the deadline for the on-line comments, but have the following points that underpin our views and **concerns** over some aspects of the proposals.

In summary our concerns are due to:

- Loss of and/or reduction of habitats
- Future impacts on the retained habitats through enhanced access and site use
- Under-assessment of the Deans Brook nature reserve's value in the BNG assessment
- Loss of trees (in addition to those associated with above habitats)
- Proposed Biodiversity Net Gain plan underplays existing whole site value
- Unclear details as to how mandatory BNG will be delivered and managed on-site for a minimum of 30 years given how much will be on fully accessible parts of the site.
- Scale and height of the residential blocks and their likely impact on wind tunnelling on some of the proposed landscaping.

Ecological context
The development site contains a significant amount of greenspace including a substantial tract of woodland that has developed on an old railway route. This is identified (and acknowledged by the applicant) as a Site of Borough Importance (Grade II) for Nature Conservation (SINC site BaBII03: *Deans Brook and Stonyfields Park*). We are aware that all SINCs in Barnet will be subject to a review as part of the council's Parks and Open Spaces Strategy review in 2024-25. We have not yet been informed of this, although we manage two SINCs within the borough.

Planning Statement
We acknowledge that enhancement of the existing landscape is a driver for this proposal, indeed the Planning Statement spells out the development's objectives, which include:

- *Create new public links to previously inaccessible green space and improve access to nature in the wider locality;*
- *Revitalise Edgware Town Centre with generous and high-quality new public realm and urban greening.*

The Statement sets out briefly how it will help achieve this:

- *Provision of high-quality landscaped open space including new public access to the Deans Brook Nature Park and 1.8 hectares of new planting*

We support these in principle. Nevertheless, they hide the losses to a lot of existing vegetation and do not, in our view, mitigate for those losses in the current designs (eg the BNG assessment, which we think downplays the existing condition of the woodland – urban woodlands typically score poorly for obvious reasons). However, many of the landscaping details as set out are encouraging for much of the development site; the key will be in the details in each of the development phases.

Ecological Appraisal

Much of the important information is laid out in Chapter 13 *Ecology and Biodiversity* of the Environmental Statement. We believe this assessment is broadly accurate, given the caveats referenced about the time of year of on-site surveys and inability to access parts of the site. However, if permission were granted then more detailed ecological assessments will be required. The scale of the development will unlikely have any shading impacts on the nature reserve apart from evenings in high summer, but the height and density of some of the blocks will undoubtedly incur wind-tunnelling (and hence cooling) impacts on some of the biodiversity (plants and animals).

We note that a number of comments by others relate to the proposed access to the Deans Brook Nature Reserve. We recognise – and are concerned over - the proposed loss of vegetation (8,776m^2 of woodland habitat) through the construction of a cycle path, and remain to be convinced that this can be effectively mitigated for in the current plans. Nevertheless, we do not – in principle – object to the provision of access to a SINC as long as the biodiversity interests can be adequately protected from that access over time – minimising or avoiding such issues as disturbance (people and dogs), soil compaction, vandalism, cutting of new sight-lines, etc. There are examples of accessible paths for bicycles, buggies, assisted wheelchairs, etc, in other parts of London, notably the Parkland Walk Local Nature Reserve between Highgate station and Finsbury Park, the Belmont Nature Reserve in Stanmore, and those around Walthamstow Wetlands. Arrangements would need to be secured to effectively manage the access and the nature reserve's biodiversity interests early in the development's phasing to ensure they are best embedded by the time the first residents move in. We also believe that the development provides an opportunity to significantly improve the Deans Brook river corridor, currently a poor quality culvert, and better integrated into the nature reserve. Indeed, the development should clearly set out how it will not only improve the quality and condition of the SINC, but how it will resource and implement a long-term management regime that can balance some of the inevitable tensions that may arise, but also seek opportunities to enhance its interest for local residents through learning activities and participation through volunteering.

And to be clear the eastern end of the Deans Brook Nature Reserve (Mill Hill Old Railway) is no longer managed by London Wildlife Trust (the reason access to this was restricted was to allay concerns over security to the residents whose gardens backed on to the linear site).

I'm aware this submission is short on detail at present, but if you have any further questions, I'm happy answer to them as best possible.

Kind regards,

[redacted]

[redacted]

Director of Policy & Research

[redacted]

London Wildlife Trust - Protecting London's wildlife for the future

[redacted]@wildlondon.org.uk

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[redacted]
Mob: [redacted]
Direct line: [redacted]

London Wildlife Trust

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From: [redacted] <[redacted]@Barnet.gov.uk>
Sent: Wednesday, September 11, 2024 3:40 PM
To: [redacted] <[redacted]@wildlondon.org.uk>
Subject: Re: 24/2686/OUT - Ballymore Edgware Central

Hi [redacted]

Yes, that's fine to submit your comments by 1st October.

The email we have is enquiries@wildlondon.org.uk - consulted by email on 02.08.2024

[redacted]
Planning Performance & Development Manager

Planning and Building Control

2 Bristol Avenue, Colindale, NW9 4EW
Tel: [redacted] | Web: barnet.gov.uk

My working days are Mondays – Wednesdays & Fridays

Please note that the comments are provisional and represent an informal view by an officer; the views contained within this email do not constitute an official determination, are not legally binding and do not bind the council to a particular course of action.

From: [redacted] <[redacted]@wildlondon.org.uk>
Sent: Wednesday, September 11, 2024 10:00
To: [redacted] (LBB) <[redacted]@Barnet.gov.uk>
Subject: 24/2686/OUT - Ballymore Edgware Central

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Dear [redacted]

We've been alerted to the above application. Your webpage information appears to indicate that 27th September is the deadline for comments. I'd be commenting on behalf of London Wildlife Trust, but away for the next two weeks. Is it possible to submit our comments by 1st October?

I note we are on the list of consultees, but wondered what address you hold for us?

Many thanks,

[redacted]

[redacted]
Director of Policy & Research

[redacted]

London Wildlife Trust - Protecting London's wildlife for the future
[redacted]@wildlondon.org.uk

[redacted]
Mob [redacted]

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