## URGENT: Objection to the Mayor of London to stop the Edgware Town Centre proposals

From: [redacted], RIBA, Development Officer, Canons Park Residents' Association, (CAPRA)

100 Whitchurch Lane, Edgware, Middx, HA8 6QN

To: The Mayor of London, GLA,

**Subject: URGENT: Objection to Planning Application 24/2686/OUT**

NOTE: Please read all the excellent and well considered, expert and professional objections by longstanding Edgware residents, Residents' Associations and 'Save Our Edgware' providing conclusive evidence against this madcap scheme! (Please see my detailed objections below after this letter:

**GENERAL COMMENT:** As a long experienced architect and urban designer, and a resident of Edgware since 1969, I would like to object yet again to this over-dense, impractical, hideous (in concept and design) proposal that is a travesty of urban planning norms and would literally impose planning blight, economic breakdown and terrible suffering for decades on the long-time residents of Edgware. On no account should this scheme be allowed to proceed as it is a catalogue of blunders that would wreck the stability of a well established and well run town centre and important transport interchange that functions as an end-of-the-line hub. It contains facilities like public parking, commuter parking, the Broadwalk which is a popular sheltered mall that links Edgware High Street, the main thoroughfare through Edgware, with a large Sainsbury superstore, the bus station hub, and the car parks, all vital to the running of the town centre. Why this site was chosen to impose a Canary Wharf type of development on a bustling Metroland suburban town centre is beyond imagination. It literally would be a cruel and sadistic abuse of our human rights to cause such a destructive upheaval in our lives, if this plan were to proceed, since many of the elderly population will be subject to great distress and loss of amenity in our last years. Edgware has an equilibrium developed over decades that will be shattered by this unbelievably insane, political and profit-driven Ballymore and TfL proposal worked together with the Barnet Planners, backed by Barnet's Planning Committee, who should all be disciplined for allowing this planning atrocity through to a misbegotten outline proposal. With the current and unending upheavals around the world, it is likely that any developer of such a crazy impractical scheme would go bankrupt, leaving Edgware in an irredeemable mess. No insurer would take on such a project.

Reasons why we urge that the Mayor of London reject this proposal and have this project withdrawn in favour of more sustainable alternatives and a well planned and designed proposal considering all the features that local residents had put forward in all previous consultations for this area. Any new proposal should respect the needs of current residents, over overdevelopment and profit.

**1)** Objectors to the scheme have shown clearly how this scheme does not conform to National Planning Policy Framework (2021), the London Plan, the Local Plan, (please see mine and many others' well considered detailed planning objections) in numerous aspects, with not a single benefit to the local population. It must rank as one of the worst schemes in Barnet's or any UK planning history.

**2)** This is not a brownfield site. It is a live, well functioning, attractive, human scaled, friendly and important suburban centre which should be retained and enhanced with imaginative infill for housing catering to families, couples, and single units of a reasonable density, mainly of low-rise social housing, which is the most needed type of housing for key workers, with additional affordable units catering for all sections of local residents.

**3) Housing:** Using the national project for a million homes to impose arbitrarily any number of housing units, over 4000, the size of a small town itself, on top of an existing town centre is upside down planning. Town Centres should grow organically, especially one like Edgware. The developer type of housing proposed in the project is mostly unaffordable, utterly unsustainable in ecology terms, and is an overcrowded bunch of over tall blocks of flats and 25 skyscrapers in a gated community on top of a supermarket on top of a car park for its customers on ground level, while removing the bulk of the main existing car park, and provided next to nothing in parking for the residents of the towers. This plan is an absurd and destructive move that threatens to drastically alter the area, leading to overcrowding and overwhelming pressure on local infrastructure and services. Adding 3,365 new homes and 463 student or co-living units is an excessive expansion that will strain the community. What is needed is primarily social housing with affordable rents and some additional other types of affordable housing.

**4)** Edgware Underground Station has a forecourt off the High Street for dropping and picking up passengers, and has a side entrance for buses dropping passengers off the main street, and a sheltered walkway that links with the enclosed sheltered waiting area containing seating and a kiosk, for a well run bus interchange, all accessible, safe and inclusive to all users. Numerous important routes into the city centre and to outlying suburbs and town centres would be sacrificed in the new proposals. The transport hub is well functioning heart for commuters, visitors, travellers to all parts of London that should be retained as it is, since moving the numerous bus routes to the front of Edgware Underground Station would cause traffic chaos, congestion and confusion as many routes would be dispersed across the main High Street, with little shelter for waiting passengers, and creating massive accessibility problems. Many studies have shown how well it functions where it is,  in terms of circulation, speed, smoothness of movement and waiting spaces for buses, and the convenience for passengers under shelter. All this would be lost if it were moved. The proposal is direct discrimination for less able-bodied passengers under the Equalities Act. The assumption that new residents of the scheme will predominantly use public transport is flawed, as current services are already at capacity during peak hours. Additionally, the inadequate new transport ‘interchange’ on the High Street, combined with the influx of the project’s new residents, would worsen congestion in an already busy area, leading to severe traffic issues and increased pollution. The confused circulation of bus and cars routes within the scheme is unworkable and fragments the pedestrian routes and spaces, mixed with traffic of delivery and maintenance vehicles causing danger to the residents.

**5) Parking:** A 70% reduction in public parking will hinder Edgware’s functionality as a town centre. The reduction from 1,035 public spaces to only 248 for Sainsbury’s shoppers and 44 for disabled and parent/child, for all other town users, with no commuter parking spaces. This is likely to mean much of the parking space in the neighbouring streets will be taken up by visitors and residents. Where are people meant to park after this monstrous project is built, which would take two to three decades to complete?

**6) Character & Context: Height, Bulk, and Massing: Impact on Historic Buildings and Conservation Areas:** The proposed development’s height, bulk, and massing are inappropriate for Edgware, leading to a significant visual impact on the surrounding area. This contradicts the National Planning Policy Framework (Section 11b), which discourages new buildings at densities significantly out of character with the existing area. It is totally out of character and scale with nearby heritage buildings. And would dwarf surrounding two to three storey streets and buildings. The impact of the huge congested cluster of housing towers would have a terrible impact on the local skyline and landscape and destroy the character of the area. The proposed towers will overshadow Grade II Listed buildings like the Railway Hotel and St Margaret’s Church, violating national planning policies. The bulk and height of the buildings will detract from nearby Conservation Areas, such as Edgware High Street, Canons Park Estate and Watling Estate. The inner-city “Canary

Wharf" style development is incompatible with Edgware's suburban character, altering its visual and cultural identity. The proposed 29-story buildings are incompatible with Edgware's character and infrastructure. Such high-density structures will irreparably alter the town's skyline and diminish the aesthetic and historical value of our community.

**7) Loss of the shopping mall:** The demolition of the Broadwalk Centre will remove local retail and dining options, requiring longer travel to access these amenities. The closure of the centre for several years will severely negatively impact local businesses. It is a sheltered and well run centre with popular, and affordable shops, has traders in the circulation areas creating a market atmosphere. A Costa's coffee shop which is a popular meeting and recreational space is at the nexus of the shopping street, while seating is provided for the elderly and those waiting for friends. It links with all the main circulation routes. Building a few storeys of flats over the existing building is quite feasible, and the Centre itself could be made even more pleasant with a facelift. It must be retained in any scheme.

**8) Fire Safety Concerns:** The proposed underground electric bus-charging garage poses significant fire risks, particularly under thousands of new homes. The whole core cluster of towers will be built over top of a massive basement for the relocated maintenance depot and garage for 190 electric buses in a basement that the London Fire Brigade has warned can be like an unexploded bomb. It has precedent and almost impossible to create safety regulations to deal with emergencies and escape. No scheme should be passed on the basis of *possibly* sorting out the fire emergency risk. It must be based on a clear guarantee that it is buildable, which of course could never be given. So this lunatic idea, the basis of the whole scheme, should be scrapped.

**9) Threat to Biodiversity:** Building on Deans Brook Nature Reserve endangers protected species such as bats and slow-worms, violating environmental regulations. Construction will cause substantial pollution, damaging the Reserve. Increased carbon emissions and waste management challenges will harm local wildlife. This area should be safeguarded from public access to protect biodiversity. It should not be taken into account as part of the green space provided in the project. **Lack of Green Space**: The development fails to meet environmental standards, lacking sufficient green space. This diminishes the quality of life for future residents and does not comply with London Plan requirements. Pretty landscaping drawings cannot hide the paucity of the green space provided that would be dwarfed by the claustrophobic towers, causing windswept spaces and blocking out of light and sunlight.

**10) Sustainability:** This project, with all the demolitions, excavations and intricate power hungry construction and engineering required, would create a massive carbon footprint even in sustaining and maintenance of all the buildings and services. It would create a huge drain on the statutory services including water, requiring new electricity and sewage mains to be laid along Whitchurch Lane, causing huge upheaval and inconvenience. Maintaining sewage and water services in the tower blocks would create a real headache and cost in its maintenance, as has already occurred in many of Ballymore's developments in Canary Wharf and elsewhere. Ecologically this scheme is a disaster.

**11) Education and health:** These services are already under strain while the impact on roads, schools, and healthcare has not been adequately addressed. It's clear this proposal would overwhelm the area's capacity to support such a significant increase in population and activity. Community infrastructure, including schools and healthcare facilities, will be overwhelmed by the population surge, resulting in overcrowded classrooms, extended medical waiting times, and overall degradation of community welfare.

**12) An existential threat to Edgware:** This proposal represents nothing less than an existential threat to Edgware as we know it. Our community is under sustained attack from the Council and developers who place profit above people, and we demand the protection of the Mayor and the GLA. If this scheme is allowed to proceed, the Edgware that generations of residents have called home — its character, its community, its humanity — will be gone forever. We call on the Mayor to act as the guardian of London's communities, not the enabler of their destruction.

The list of the disasters that this poorly conceived and manipulated project would wreak on the community for decades is actually endless. The scale and nature of this project pose severe threats to our community, infrastructure, and environment. The provision of mainly unaffordable housing that caters for the rich and foreign investors, and an absurd and unsupportable transport interchange and underground maintenance depot and bus garage, and the damage it would cause, far outweighs any benefit to the area and its local residents that the London Plan requires of any scheme. It must be rejected by the Mayor and the GLA.

Kind regards

[redacted]
Planning Development Representative (CAPRA)

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**IMPORTANT:**

Here is my original detailed objection to this application which supplements my comments to the Mayor of London and the GLA:

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**Objection to Edgware Broadwalk Development: Planning Application 24/2686/OUT**

To:Planning Officers, London Borough of Barnet Planning & Building Control 2 Bristol Avenue, NW9 4EW

From: [redacted]
Development Representative
Canons Park Residents Association (CAPRA) 100 Whitchurch Lane
Edgware, Middx,
HA8 6QN

(Please do not show my address on the Planning Portal)
For the attention of Josh Maclean
**Re: Edgware Town Centre Planning Application 24/2686/OUT OBJECTION to this application by Ballymore Construction**

**1) INTRODUCTION:**

I am writing to formally object to this application, as a representative of CAPRA and in a personal capacity, as a resident of Whitchurch Lane.
I have lived in Edgware for 55 years with my family since 1969, and am deeply acquainted with the area. I have worked as a Local Authority architect for over 25 years in the London Boroughs of Islington and Lambeth, building small and large scale council housing projects, landscaping of large estates , and also acted as a consultant in urban design and planning. I am also an Access Consultant dealing with disability design and access audits under the Equality Act (2010)

**2) CAUTIONARY NOTE:**

i) The Barnet Planning Portal was very difficult to use, with permission being refused to access documents and plans, especially with the mass of material to wade through. Many people may have been discouraged to object, especially those not technology competent.

ii) There has been a close collaboration by the Barnet Planners with the developers and their architects in the formulation of this project, and one wonders how objective you will be in the adjudication of the application. Also, in obtaining support for the scheme, PR firms (Your Shout) acting for Ballymore, have been collecting signatures at the car park entrance to the Broadwalk, by people who may not be acquainted with the details of this scheme. Many of the comment letters supporting the scheme without knowing what it is, come via an online site, sponsored by big developers including Ballymore, called “Just Build Houses” who live in all parts of London, claiming to be neighbours.

All these factors need to investigated as whether these signatories are valid in surmising support for the application.

iii) I consider this application as contrary to the competence, professional and ethical approach that the RTPI Code of Conduct requires of their members. The forcing through of controversial elements in the **Policy GSSO5 for-building 4,740 homes in the Edgware Growth Area and classification of Edgware as Barnet’s only Major Town,** to allow this grotesque application with its indigestible conglomeration of 25 tall blacks of flats squeezed together, is grossly negligent and irresponsible, and fails in its duty to serve the public interest as recipients of these plans. An example Barnet’s previous appalling decisions that have been so damaging for Edgware, is the 18 storey grim brick tower block and gated community on a podium in Premier Place in a very prominent site on Station Road, creating a gated community that removes street level life in the heart of Edgware.

**3) GENERAL**

This is a most **outrageous, impractical and destructive** application which will devastate Edgware, and will bring unsolicited upheaval for over a decade or two. Whole chunks of people’s lives will be affected to their detriment. There is so much wrong with the scheme, it is an encyclopaedia of planning blunders, imposing a potential emasculation of an area.

It should be withdrawn by the planners and the Council before it is given outline planning permission, and most importantly, **permission should not be given to**

**demolish the Broadwalk Centre**, or the Bus Station, as an alternative and more human approach should be looked at instead to preserve this centre and also the best aspects of this suburban town that will be destroyed if this appalling application goes through.

This application is **contrary to the London Plan (Spatial Development Strategy of Greater London) 2021** which places importance of the creation and maintenance of a high quality environment in London, which is sadly lacking in the Ballymore proposals.

**4) CONSULTATION**

This was a sham, as over the years, residents have voiced their strong opposition to high rise housing in blocks of flats as out of keeping with the character of Edgware and for the preservation of the Broadwalk over the years, and yet LB Barnet and Ballymore have not listened to their objections, and even after the consultation exercises, the current application has consolidated all these opposed aspects of the scheme and caused much concern and distress. The development plan lacks community input and does not align with the suburban character of Edgware, leading to negative impacts. If allowed it will cause chaos and disruption for possibly two decades, which is unacceptable in human and planning terms.

**5) OBJECTIONS :** I would like to support the objections and representations made by **Save Our Edgware and the Edgware Community Association** as expressing my own concerns. Their websites should be studied and used as containing all the analysis and valid objections to this Ballymore scheme. Also the high standard and professional objections from many Edgware residents that make it urgent that this application is withdrawn, but if not, refused by both Barnet's planners and by Barnet Council's planning committee, if they wish to salvage their damaged and professional reputation in allowing the progress of such an obviously disastrous proposal.

The new proposals currently shown looks like it was pre-determined by Barnet's Planning Department, working closely with developers, ignoring all the sterile schemes that they have allowed through that have ruined the environment in Barnet including huge areas of Colindale. This does not indicate a true understanding of what really constitutes professional urban design.

**6) According to the National Planning Policy Framework (2021)**

i) the purpose of the planning system is to contribute to the achievements of sustainable development that must meet interdependent **economic, social and environmental objectives.** The Ballymore application will be very damaging to these objectives by the removal of the Broadwalk Centre, which is a covered shopping arcade that also functions as a social and community hub, with cafes, large stores, a supermarket, and much valued by families, the elderly and the disabled in a warm and comfortable environment. Further, **NPPF 8** is to promote high- quality built environments, and sustainable development "to protect and enhance our natural, built and historic environment , mitigating and adapting to climate change including moving to a low carbon economy". This application will do just the opposite.

ii) To respond to climate change and need for sustainability, many local authorities, such as Westminster, are writing into their planning policies a clear presumption

against demolition and propose the re-use of existing buildings via retrofit or refurbishment as a fundamental part of reducing both carbon emissions and the use of new resources. When a site already includes buildings, the first action should be to examine how best to reuse them. The Ballymore application

follows exactly the opposite intention, that itself is extremely destructive to communities and the environment.

**7) NPPF Paragraph 130** recommends creating places that are safe, inclusive and accessible which promotes health and well being with a high standard of amenity for existing and future users. The Ballymore proposals would wipe away all the elements that exist in Edgware that provide this, and create a project that is unsustainable, with a huge carbon footprint, a heavy drain on the local infrastructure, a huge devouring of energy, water and fuel, needing high maintenance and very damaging to the much loved Metro-land and historic character of Edgware. This is also emphasised in **NPPF paragraphs 190.**

**8) I object to the demolition of Edgware Bus Station and Maintenance depot**

i)The proposal to move the bus garage and maintenance depot into a basement is t**he most madcap and impractical proposal** on which the whole development depends. It will involve huge excavations, complicated logistics and expensive engineering, and will create high pollution and a massive carbon footprint.The underground electric bus-charging garage poses significant fire risks, particularly under thousands of new homes. Whilst this has been recognised by the developers, they have failed to seek a solution. They propose to continue with their plan to dig a basement which they hope can one day actually be used as a bus garage, but until technology provides their hoped-for solution, they merely propose that the bus fleet will be stabled on the former Broadwalk car park and that the electric buses will be charged in the open air by contamination-spewing diesel generators. So much for TfL's stated intention that the sole reason for joining in with this redevelopment proposal is to change the bus fleet over to electric power in order to reduce contamination in Central Edgware. This idea should also be scrapped as unworkable. This makes the whole application unviable, and why it should be refused.

ii) The danger of charging the electric buses with lithium batteries which if they overheat, will be like living under a volcano, let alone the dependence of energy guzzling mechanical ventilation and heating needed. Fire escape would be extremely difficult, and the union and operatives in the underground maintenance depot who would have to spend the working lives in this artificial environment have not been consulted by TfI, would have their health and safety compromised.

**9) I object to the proposed new Station Square to replace the existing Bus Station.**

i) Edgware is an important terminal for rail and bus transport and needs the important commuter parking, the bus terminal and the bus servicing garage, on the level. All this should be retained because it works well, instead of imposing yet another greedy TfL scheme on station car parks that have been so controversial and unworkable.

Removing them would cause massive disruption and inconvenience to Edgware as a whole.

ii) The present arrangement is one entry and exit point for buses to turn off Station Road, deposit passengers at the side entrance of Edgware LU station , and then go on and around the sheltered waiting room, where passengers are picked up from the buses to various destinations. This all works like clockwork and passengers can also consult the bus time tables in the warm in winter and under shelter, and have coffee and snacks at the kiosk. Demolishing the 68-seater covered bus station and relocating stops to Station Road will cause severe congestion, **contradicting Barnet Council's policy for integrated transport services.** The removal of a covered bus station will negatively impact passengers, especially the elderly and disabled.

iii) **The proposed new Station Square**, featuring in attractive illustrations in the Landscape proposals, show well planted islands with trees that in practice would be lost with the chaos of buses, taxis and cars dropping passengers swirling around, all mixed in with pedestrian crossings, **making it a dangerous arrangement,** especially at rush hours, and especially for children, the elderly and disabled, who have to wait in the open.

iv) **Section 2.8 of the Local Plan regards Transport**, and the significant challenges faced to tackle traffic congestion. The proposed development will result in buses queuing on Station Road due to the increase in the number of bus stops that will be introduced due to the loss of the bus station.

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v) **Buses Obstructing Pedestrian Crossings**: Buses will frequently be blocking the crossing while waiting to turn from Station Square Interchange onto Station Road. Multiple buses queuing could obstruct the second signalled pedestrian crossing as well, further endangering pedestrians and increase congestion.

vi) **Insufficient Sheltered Capacity**: The limited shelter at stands D2, F2, and G2 will encourage passengers to wait for their bus under the canopy outside Edgware Underground Station during adverse weather. This scenario may prompt passengers to dash across the road at inopportune moments, either disregarding pedestrian crossings or not waiting for traffic signals when their bus arrives.

vii) **Stop GS2 only has capacity to hold one bus at a time.** Five routes will use the stop to terminate. When a second bus turns up, it will block the road and a pedestrian crossing whilst it waits for the bus to depart. This is likely to occur as drivers will need more time at the stop to ensure their bus is empty.

vi) **Inadequate Length of Stand F2:** Stand F2 insufficient length may hinder the departure of the rear bus if the first bus is still at the stand. To avoid this, the rear bus will need to stop further back, covering the first signalled pedestrian crossing, increasing collision risk with pedestrians. This is likely to occur with bus routes such as route 142 requiring long dwell time at Edgware to allow for a driver change.

vii) **Proximity of second signalled crossing to Stand F2**: The close proximity of the second signalled crossing to Stand F2 will require buses to remain at the stand if the crossing signal is red, even when the bus is ready to depart. During the wait,

pedestrians crossing the road may attempt to board the bus, causing further delays and potentially causing the bus to miss the green light. The close proximity could also allow passengers to put themselves in danger as it would be easy to hold up the bus by blocking the crossing as a means to encourage the driver to let them on.

viii) **Frequent Stops:** Buses will encounter four stops in a short distance: to turn right onto Station Square, to wait at a red light at the first pedestrian crossing, at stand F2/ second pedestrian crossing, and to turn back onto Station Road. These repeated stops will impede the smooth flow of buses, likely leading to backlogs on Station Road and surrounding areas.

ix)**Lane Merge Issues**: After the second pedestrian crossing, the two lanes merge into one. This bottleneck will prevent buses from departing promptly and will add further congestion.

These factors undermine the effectiveness of the interchange and pose significant safety risks.

**The Interchange will not achieve the objectives set out in the planning application.**

x) This will inevitably lead to **an increase in traffic congestion** once the development is completed. As stated in paragraph 2.8.3 of the Local Plan, Barnet is above the average for public transport use in Outer London with 29%. This will dramatically reduce if the convenience of public transport is taken away. Removing the bus station will make it less appealing for people to use the buses. The increase in population in Colindale has made travelling by tube from Edgware into London less comfortable at peak times with it being standing room only by Hendon Central. The dramatic increase in population to Edgware Town Centre will result in queues forming at Edgware station with standing room only before the tube has left the platform. This will discourage use of public transport.

It is obviously better and less disruptive to keep the existing arrangement as it functions well.

**10) Housing Density**

i) I object to the proposed high-density development which contradicts the London Plan's vision to conserve and enhance London's distinctive character and heritage (section GG1; 1.2.7). It fails

to align with Edgware's suburban character and infrastructure capacity (Policy SD1; 2.1.3). **The London Plan's Policy D1 (parts A and B)** about London's form, character, and capacity for growth should conclude that Edgware is not suitable for such high-density regeneration.The density of the development is unsustainable for the town centre. Barnet has approximately 4500 people per square kilometres, this development will cram in 10,000 people in an area of 0.103 square kilometres, that is over 97,000 per square kilometre. Over 20 times the existing density of Barnet. This contradicts **Barnet's Local Plan.**

NOTE: The argument for huge numbers of housing units to be approved in planning applications is if the benefits out weigh the inconveniences of such drastic upheaval. It is clear that the existing situation of equilibrium, that keeps Edgware functioning smoothly, is much more important than meeting nationwide housing numbers, urged by the Government and the GLA. The Ballymore application is in Barnet borough where there is a glut of new housing units built and in the pipeline, and where this type of massive development will only suit the developer's profits, where the bulk of the housing is way beyond the average or first time buyers, and will probably be bought up by foreign investors, and let at highly unaffordable rents. It does not satisfy the needs of the type of housing urgently needed, **which is council or social housing** at low rental, of which there is a derisory number of units in this scheme. The 430 student and co-housing, which are totally misplaced in this development, and Edgware should not have to bear the brunt of Middlesex University's housing needs They cannot be counted in the housing needs in the location of this application. Further, Barnet has over 2000 properties that are empty and these should be considered qfor bringing into use.

ii) The proposed high-density development contradicts t**he London Plan's vision to conserve and enhance London's distinctive character and heritage (section GG1; 1.2.7)**. It fails to align

with Edgware's suburban character and infrastructure capacity (Policy SD1; 2.1.3). The London Plan's Policy D1 (parts A and B) about London's form, character, and capacity for growth should conclude that Edgware is not suitable for such high-density regeneration.

iii) The housing target of **2,379** for Site 27 (Edgware Town Centre) is deemed unsound. The target is based on an i**nappropriate Central Density of 405 units/ha.** Instead, a Suburban density of 130 units/ha should be applied, reducing the housing target to **763 homes.**

iv) **There is no infrastructure to deal with such gross overdevelopment.** Local services like utilities, schools, dentists and GP surgeries would not cope with the huge influx of population, a 50% increase for Edgware ward. The 3,828 units would bring in 10,000 new residents .This project is a disaster and it looks like the planners of Barnet once again have allowed it to develop contrary to what the general consultations have requested which is no high buildings, with a height limit of 6 to 8 storeys, but with more homes with gardens for larger families.

**11) Height, Bulk, and Massing**. i) Edgware's Suburban Character:

The proposal does not align with Edgware's low-density suburban character and identity. Edgware's history and development have been characterised by low-density residential estates comprising mainly of semi-detached and detached private housing. The suburban character is further recognized in the Characterisation Study of Barnet, which identifies Edgware's primary urban typologies as "residential streets" and "suburban." The study emphasises the low density and architectural coherence of suburban streets in Edgware, which the proposed high-density development contradicts.

ii) **Policy GSS05 Housing Target Issues**: Site 28's critical infrastructure and nature reserve make it unsuitable for development. Site 27's proposed density does not align with Edgware's suburban nature, recommending a reduction to 763 homes from 2,379.

ii) This scheme which looks like Canary Wharf, Manhattan or 'Metropolis' brought to a distinctively suburban area, is grotesque and faceless, out of scale and character with the area, and will not cater to real housing need which is for council and more affordable housing. **The super-density of 3828 + units, the size of a small town**, is unsustainable and will bring Edgware to a standstill.

iii) The Ballymore proposal is a massive overdevelopment. It contains rings and clusters of blocks of flats, 19 of them over 12 to 29 storeys, with 9 of the highest from 21 to 29 storeys in a three storey high podium, consisting of a gated community. There is no precedent in any UK
suburban town for buildings this tall, with such condensed living -- and that's just using official occupancy rather than the typical headcount per home. Moreover, t**his scheme contradicts the National Planning Policy Framework (Section 11b),** which discourages new buildings at densities significantly out of keeping, as this does, with the surrounding area. At 15 to 18 storeys, the existing towers at Premier Place already blight and overshadow, more-so in winter.

iv) This is a most outrageous scheme, led by developers for profit rather than people. It is the development equivalent of HS2 and will bring unsolicited upheaval to Edgware for a decade or two. It is generic developers' fare with luxury flats stacked into blocks and towers, with other characterless commercial buildings that have no sense of place or distinctiveness or with regard to planning an attractive environment or proper streets and accessible neighbourhoods. Where are the environmental impact studies for this grandiose scheme that would be out of scale even in central London?

**12) Tall buildings are not an appropriate type of housing for families.** Paragraph 3.2.2 of the Local Plan refers to strong and cohesive family communities and the promotion of healthy living and wellbeing as part of Barnet's "Visions and Objectives". The development fails to deliver on the Local Plan objectives. Major studies have shown that **high-rise living is not suited to families** and that there is "little evidence of families living in London's high-rise private apartment blocks, even when three or more bedrooms are provided." The Greater London Authority ("GLA") recognise that high-rise buildings are costly to build, operate and maintain and are not best suited to family housing. **Paragraph 2.3.1 of the Local Plan** refers to an important part of Barnet's character is that it is a "family friendly place". The proposed development is not family friendly and goes against this characteristic of Barnet.

**13) Design of the Ballymore application:**

- i) Apart from the overbearing conglomeration of tower blocks in this scheme, the layout in rings of only blocks of flats in various heights, the lowest in 6 to 16 storeys in the outer ring and the highest in 24 to 29 in the inner ring around a podium, is monotonous and disorientating, and lacks a grain of streets and houses that characterise interesting and human scaled environments that are found in village, suburban and city centres.These relate in scale and character to the location which in Edgware is best described as Metroland. The Ballymore

scheme is more appropriate to city centres or areas like Canary Wharf, and is totally out of scale, character and place in suburban Edgware.

- ii) The use of brick is claimed to relate to the brick built 'heritage' buildings in Edgware, but their use in huge housing towers increases their heaviness and bulk, and appear even more heavy and dominating. The best squares in cities are created by a matrix of buildings, but the squares in the scheme are dominated by 25 storey towers which dominate the spaces in front of them and are too overbearing in scale. The elements and details, just be using brick, does not necessarily relate to the local architecture, and the whole scheme in its self looks very commercial, characterless and more like office blocks.

- iii) Both the Student housing in 27 storeys and the Civic Building in 8 storeys are completely overscaled and will crush and dominate Station Road and the pedestrians and surrounding

streets. The scheme in general bears no relation to the area, its heritage or its historic buildings and would be unacceptable as a placemaking of decent architecture and urban design that relates to the very human suburban scale of Edgware.

iv) **14) Podium developments form gated privatised communities:**

i) Policy D9 in the London Plan : Environmental impact states that "Wind around building and neighbourhoods must be carefully considered and not compromise comfort and enjoyment of open spaces, High-rise towers going up to 29 storeys, on a podium, three storeys above ground, so they form a private gated community with its own postage- stamp landscaped garden is **the worst form of selfish housing**, vertical sprawl, that will look utterly incongruous, claustrophobic and oppressive.The green space for the podium, three storeys above ground would be dwarfed by the 30 storey blocks and would be impossible to use with **the massive downwind that would be created.** This is despite the studies in a wind tunnel on a small scale model of the scheme, which suggested the wind effect would be moderate. It is challenging to strictly model a wind environment of a specific location, as natural wind properties such as turbulence in real environments are difficult to replicate in wind tunnels. Anyone knows, standing next to tall buildings, the wind effect which will be exacerbated on a windy day and especially in driving rain.

ii) The podium part of the project is the bulky core of the towers is on the third floor, above the proposed new Sainsbury's supermarket on the second floor, which sits over the car park for Sainsbury's on the main street level. This car park will not be available for the housing above, for which totally inadequate parking spaces have been provided.

iii) This policy of tall buildings has literally wrecked the whole of Colindale and large areas of Barnet, creating hostile fortresses, many looking like prison blocks of flats in concrete and brick. Far from catering to housing need, there seems to be a glut of buildings, many standing empty. The Barnet planners don't seem to have a clue that they have already wrecked Edgware with Premium House (with an approved further 3

storeys added!) and the second 17 storey monstrosity that is under construction, again built on a podium, when it should have been a public square on street level.

**15) Heritage Risks**

**The proposed towers will overshadow Grade II Listed buildings** like the Railway Hotel and St Margaret's Church, violating national planning policies. The bulk and height of the buildings will detract from nearby Conservation Areas, such as Edgware High Street, Canons Park Estate, and Watling Estate. The huge 8 Storey Civic Building in the application looms in huge scale over Station Road, and the 463 Student Flats and co-housing in a bulky and dominating 22 storey bang on Station Road shows a disregard of respect for the surrounding buildings or the historic ones, and are totally out of scale, character and context in contradiction of NPPF (Section 11b)

There is nothing in the previous Ballymore 'consultation' that suggested support for the horrendous bunch of 25 tower blocks that wreck not only the suburban Metroland character of Edgware, but will have a terrible impact on the landscape and skyline, so close to the Green Belt

**16) Provision of Green Space**

i) There is a historical lack of open spaces in Edgware, exacerbated by recent losses and future population growth. Development proposals must adhere to specific open space standards to ensure adequate provision for residents. This application does not provide sufficient green spaces for such a high density proposal. The Landscape drawings show attractive planting in pocket parks between blocks and pedestrian routes, but these will need very high maintenance, and will

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be dominated by t**he mass conglomeration of high tower blocks, which will overshadow the whole scheme and the green spaces.**

**ii) This development contradicts Barnet's Local Plan Paragraph 2.6.2 of the Barnet Local Plan** states that an important element of Barnet's character is its "green spaces and low-density suburban development". The proposed development provides minimal green spaces (10 times less than the Borough's per person average), is high-density (97,000 per sqkm), the Borough's average is less than 5000 per sqkm) and has described itself as an 'urban' development, which contradicts the suburban character. It is not providing adequate public open spaces for the new residents and is not providing adequate space for community activities and leisure.

iii) Paragraph 2.3.2 equates to 30m2 of public open space that is currently available per resident of the Borough of Barnet. This development is providing between 2.3 to 3m2 of public open space for each resident of this development. The London average of public open space per person is 32m2 per person. Therefore, by reducing the available public open space further does not "optimise the opportunity to use the Borough's open spaces assets to improve the health and wellbeing of its residents..." and is contrary to the Local Plan.

iv) In this project, the nine towers forming a private gated community, which forms the core of the housing tower complex, has its private green space which is the largest of

the green spaces in the scheme, called Edgware Green, while other green spaces are pocket parks in between the lower blocks of housing, and one triangular space called Edgware Fields. This will be available only to the podium residents in a privatised space.

**17) Roads and Parking**

i) Where will all the current large areas of car parks which seem to be a necessity for the functioning of the Broadwalk, and Edgware go? Reductions in parking spaces threaten the town centre's viability. We hear that there will only be 800 cars spaces provided to replace it, and this should also cater for the 4,000+ housing units. This removal of vital car parks seems to be the current TfL and developers' trend that is pie in the sky since no-one believes this is the answer to traffic and parking in a massive overdevelopment. Massing cars into a multi- storey car park is horribly inconvenient and would again be faceless and out of scale for Edgware Town Centre.

ii) It seems to be a bonanza for developers to reduce car parking to practically nothing, so they don't have to bother to provide much, and let the whole area bear the brunt of hundreds of people chasing the spaces that would deplete parking for the existing residents.

iii) The car parks must be retained as an essential resource and necessity for the decent functioning of people's social, economic and social needs in Edgware, which is already needs more parking space around the area. This one in particular, with its plane trees planted in between the cars, creates a green car park, which absorbs carbon and pollution, and is very pleasant to use. People actually look happy circulating through it and it functions more or less as a square.

iv) Parts of it can be tightened up and some space liberated to create green spaces and small squares.

**18) Affordable Housing:**

ii) The privatised podium of towers like a hostile fortress will obviously be marketed as luxury flats, and forms the largest proportion of the housing provided, hence not available to low income families and key workers. These luxury high profit developers make no contribution to the real housing need which is low rental properties, for which only 17.5% of total number of units are provided. (70 homes per year) hardly fulfilling Barnet's requirement in its local plan for 420 such homes per year.

**ii)** This sort of development would be way beyond the means of anyone wishing to rent or buy or solve homelessness. The most need is for low rental council or social housing for low-income families and key workers . Developer flats in towers are unreachable to the mass of people and key workers, and will only cater to the rich and to foreign buyers for investment."*Overseas*

*investors now own around £90.7 billion of property in England and Wales. These figures are set to grow further as foreign investors are attracted by the price growth witnessed in the UK property market over the past few years* ." (Quote from "Overseas Property" which helps foreign buyers of UK property.) It should also be noted that Ballymore sold more than 40% of the apartments at their Nine Elms project to overseas

investors that did not live in the UK. The properties remained empty as ‘buy-to -leave’ investments.

iii) According to Policy DM10 in the Barnet Local Plan and Policy H6 of the London Plan, (2021) the provision of 35% of ‘affordable housing’ instead of 50% as required by Barnet’s local plan has been allowed both by the GLA and by Barnet due to the developer’s being allowed to use the ‘viability’ argument, which is again couched with ambiguities to be resolved in RMA’s (Reserved Matters Allocation). This is also to be funded by public subsidy due to high levels of investment “enabling infrastructure works, improvements to public transport, new bus garage, transport interchange and associated infrastructure”. That means the taxpayer will be subsidising the developer in this minimal provision. The 35% is then split between 17.5% for ‘intermediate housing” meaning Shared Ownership, which itself can only be afforded by those with incomes between £60,000 to £90,000. This leaves 17.5% for Low Rental units .

iv) The application maintains it will provide 10% of Barnet’s 10 year affordable housing target of 11,820 units. This would mean 118 units per year, with only **60 to 70 low rental units per year, which is woefully inadequate.** Most of the housing in this application will be for private sale.

What is needed is a much more moderate scheme with much fewer housing units, relating to the scale and needs of the area, arranged in streets rather than a series of blocks, and mainly for council housing for low income families and key workers. Selecting a large number of housing units out of the air and then squeezing them into 29 storey towers and other blocks of high rise flats into much too small a site is upside down planning, and not fit for purpose. The tall building zones should be scrapped as hugely damaging to the environment and the suburban and Green Belt landscape**.**

**19) DEANSBROOK NATURE RESERVE. This area must be preserved as it is and should not be turned into a nature park with pedestrian and cycle routes through it.**

While in the first instance this appears to be attractive, it does give rise to concerns: The land is part of a **Site of Borough Importance for Nature Conservation**. Protected species such as bats and slowworms will be put at risk. The pathway may well be a magnet for anti-social behaviour -especially as it will be on the doorstep of c10,000 people living in high density accommodation.The pathway will back onto Banstock Road creating concerns about security and fly tipping into gardens.

The creation of the cycle path appears to contravene a commitment that the road behind Banstock Road, currently only used by TFL, may not be used by the public.While the developers have included the Nature Park in their population density figures the footprint of the tower blocks, so there will be insufficient green space within the development.

**20) ALTERNATIVE PROPOSALS FOR A SUSTAINABLE APPROACH TO DEVELOPMENT**

Re-design suggestions for the least disruption to Edgware.

i) The existing Broadwalk is a successful, popular arcaded centre with public spaces within it, and should be retained and renovated. The current trend, highlighted by the climate crisis, is to keep existing buildings, renovate and improve them rather than have mass demolitions and urban upheaval.

ii) **The Broadwalk (and Sainsbury's) should be retained as a useful arcaded shopping stree**t .There is much potential for adding additional floors to the Centre, either of shops, commercial or flats. The Sainsbury's should be retained and another floor added if needed.

The Broadwalk can link up with a street of new housing and a new square created at the back of a re- arranged car park, east of the existing Mall. Less used areas of the carpark can create links to other green walks and spaces.

iii) The unfinished tower block near Premium House is another disaster on a podium, with only one staircase for 17 storeys, creating a fire safety danger. This area could have been developed as a town square relating to the main high street (as was suggested at the Planning Committee meeting), with cars parked in a basement (or removed.) This can still be done, by excavating out a basement, and having the square and access to the housing at street level, with shops and cafés at the base of the removed podium, all relating to Station Road.

iv) **The bus station should remain where it is where it works well, and should on no account be moved to the front of Station Road.** This area should be turned into Station Square with improvement to the shelter and proper landscaping.

v) **The existing main tree-planted car parks should be kept as they are, possibly carefully reduced in some areas, as a precious convenience vital to Edgware**. A section of the commuters' car park could also be reduced to create a street of housing, linking from the retained Broadwalk. The area in front of Sainsbury's could become part of a landscaped square, with perhaps a second storey added as an extension to the shops.

Vi) This would create a more sustainable project, with little demolition, and general low-rise high density housing along streets and squares created, (See the social housing in Camden, Islington, Lambeth and Southwark for some ideas.)

vii) The area around the Railway Hotel, together with the old Post Office could become a community centre and a cultural hub, including a cinema. Further low rise housing can be built in Forum side to create a route through to the Edgware Road.

**All in all the proposals are an utter disaster for Edgware,** will create enormous and unnecessary upheaval, and do not take into account local views as expressed in previous 'consultations'.

This scheme must be stopped in its tracks and refused. The Premier House Edgware development endured 10 years of construction misery, characterised by incessant noise and drilling. For over a decade, the constant movement of lorries caused significant disruption in the area.. Barnet's planners must take account for the disasters already created for Edgware, try and repair them, and carefully reconsider a more sustainable approach to this whole project, possibly a subject of a competition.

[redacted]

CAPRA Development Representative.