

Our reference: MGLA300924-1989

18 November 2024

Thank you for your request for information which the Greater London Authority (GLA) received on 23 September 2024. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

We have reviewed your Stage 1 report available on the GLA portal. Following this, we kindly request the following information:

1. Any reports, papers, or communications from GLA or TfL officers that contributed to the content of your Stage 1 report.
2. Any past or planned communications with Ballymore, TfL, their agents, Barnet Council, or any other relevant bodies in relation to the recommendations of the Stage 1 report.

Our response to your request is as follows:

I can confirm that the GLA holds information within the scope of your request. Some of this information is already publicly available:

1. GLA 2024.0416 Edgware Energy Memo (Stage 1)
2. GLA 2024.0416 Edgware Circular Economy Memo (Stage 1)
3. GLA 2024.0416 Edgware Air Quality Memo (Stage 1)

Please also find attached:

1. Suggested wording for Stage 1 report
2. Urban design comments
3. Green Infrastructure comments
4. Heritage and Conservation comments
5. Water comments
6. Energy GLA arcus comments
7. CE GLA arcus comments
8. WLC GLA arcus comments
9. Correspondence with LB Barnet.

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We also hold correspondence between GLA officers (internal) and TfL and GLA officers which fall within part 1 of your request. We consider that these communications fall under the exception to disclose at Regulation 12(4)(e) and Regulation 12 (5)(b) (The course of justice and inquiries exception) and Regulation 12(5)(f) (Disclosure would adversely affect the interests of the person who provided the Information).

Regulation 12(4)(e) applies to communications explicitly whereby GLA officials have engaged in free and frank discussions with each other on matters pertaining to a 'live' planning case and under which the GLA is within a period of negotiation with the applicant up until the Stage II review. Disclosing such discussions at this stage would reveal to the applicant our deliberations which would be likely to enable the applicant to obtain an unfair advantage and potentially select certain arguments which may circumvent GLA priorities. An example of this would be around viability whereby the GLA must maximise affordable housing delivery.

The exception is engaged in order to protect the necessary space to explore ideas in private against the backdrop of a project which is under great public, media and political scrutiny.

Regulation 12 (5)(b) is very wide in coverage; in this instance it is used to cover material covered by legal professional privilege (LPP). LPP is a principle on UK common law and exists to protect the exchange of legal advice between a lawyer (TfL Legal) and their client. For the exception to be engaged, disclosure of the requested information must have an adverse effect on the course of justice. In this case, the information you have requested relates to a matter which is ongoing and for which the legal advice is still relevant; the release of which would also undermine the public confidence in the efficacy of LPP generally.

Regulation 12(5)(f) applies when disclosure would adversely affect the interests of someone who supplied the information. The information was provided to the GLA as a consultee and were not under any legal duty to provide it. In this instance, the communications involve discussions between the GLA and TfL for the purpose of incorporating transport related advice for the stage I review. Again, these comments could impact upon future recommendations.

It is not necessary for the GLA to demonstrate where disclosure might have a particular adverse effect in order to engage the exceptions, but any adverse effects of disclosure may be relevant in the public interest considerations which the GLA is required to balance in order to decide whether the information should be withheld.

The above Regulations constitute as qualified exemptions from our duty to disclose information under the EIR, and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information.

Effective decision making should be informed by engaging with the public and key stakeholders; however, this engagement needs to be structured to be effective. Release of this information at this time would divert attention and resources away from the task at hand and towards responding to external thoughts whilst discussions are still ongoing. This in turn would also be likely to have an adverse effect on the GLA's ability to engage in free-flowing and

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candour of views in the future as it is likely that officials would become reluctant to explore all options.

The GLA acknowledges that there is a public interest in transparency in relation to planning and development matters, disclosure would enable the local community to understand more fully the decision-making process.

However, it is also in the public interest to protect the principle of Legal Professional Privilege by allowing clients to have discussions with their lawyers in confidence. The best interest of the public – i.e. the public interest – is best served by ensuring that public authorities continue to debate robustly and comprehensively, considering all options and their potential impacts, for the best possible decisions to be taken.

In relation to part 2 of your request, no meetings were held with the GLA case officer which would impact upon the recommendations of the Stage 1 report.

Three, without prejudice, calls were held with the case officer prior to formal consideration by the Deputy Mayor:

1. Wednesday 11 September: Barnet case officer and GLA case officer to summarise the Stage 1 report officer recommendations, prior to formal consideration. This is standard procedure.
2. Thursday 12 September: TfL case officer and GLA case officer to discuss Equalities Impact Assessment (outline the procedural duty of the Mayor as a Public Sector Authority) and discuss the lack of submission of sustainability templates at time of submission and next steps (Agreed best to receive Stage 1 report formally to then submit templates).
3. Friday 13 September: TfL, Places for London and GLA to summarise the Stage 1 report officer recommendations, prior to formal consideration.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA300924-1989.

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

2024/0416 Edgware Town Centre energy Stage 1 wording

The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

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 is required to 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 the S106 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;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Carbon savings

For the domestic element, the development is estimated to achieve a 63% reduction in CO2 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 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 calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Memo: UD-DM Consultation

2024/0416

Edgware Town Centre

London Borough of Barnet

Case Officer: [REDACTED]

Urban Design Officer: [REDACTED]

Site Address: Broadwalk Shopping Centre And Associated Surface Level Car Park, Edgware Bus Station, Edgware Bus Garage And Redhill Medical Centre And Deans Brook Nature Reserve Edgware HA8

Application Stage: S1

Proposal Description

Outline application for Residential led mixed use development

Reason(s) for Referral

Quantum, Height

Design Code

General

There is a level of discrepancy between the parameter plans and the illustrative scheme extracts indicated in the design code that means there is no clear understanding of the proposed mass form and ground plane public spaces that approval is being sought for.

This should be addressed prior to stage 2.

The 'looseness' of the parameter plans is a concern as raised above therefore the wording of the design code must be robust enough to secure as a minimum the design aspirations set out in the masterplan. The use of the word 'should' in many clauses does not robustly secure control over the design intent.

DC Volume 1

DZ clauses generally:

GLA officers raised concerns at pre-app re: the small amount of public space proposed and the proportions of these. Concerns appear not to have not been addressed and furthermore the design code clauses do not robustly secure those that are proposed.

DZ.3 minimum public realm widths should be stated as such on PP04 key.

Minimum sqm areas for public realm spaces should be stated in the DC.

BL clauses generally:

GLA officers raised concerns at pre-app re: building lines, avoiding 'clumping' and insufficient gaps between buildings. These appear not to have not been addressed and furthermore the design code clauses do not robustly secure the form described.

BL.4.2 replace should with **must**

BL.4.3 this clause does not align with the intent to provide a podium

Pages 32-35: add a whole site key to easily identify the blocks referred to within the masterplan

BL.5: clauses do not sufficiently secure a built form that may be acceptable in townscape terms:

- replace should with **must**; and
- correct the reference to the parameter plan (pp05 does not include any reference to min 18m gaps referred to in clause BL.5.1)

BL.7: replace should with **must**

BL.8: GLA officers consider that zone D should not be a single building volume.

BL.9.1: the description of the podium as 'between 2 and 7 storeys' is too vague to secure acceptable townscape quality. A podium of 7 storeys would not be acceptable in terms of overbearingness, excessive enclosure and significant impact on the quality of the ground plane public realm.

BL9.2: replace should with **must**

BL.10.1 and BL.10.2: As BL 9 clauses above

AC generally:

Pedestrian routes and access generally: add a clause stating pedestrian routes and spaces must be safe and inclusion for all including those who may feel vulnerable; add a clause stating pedestrian routes and spaces should be flanked by active frontages

AC.4.1 pedestrian and cyclist route hierarchy - replace should with **must**

LU.3.2 GLA officers do not agree with the statement 'the width of residential lobbies should be minimised'. It is important that residential lobbies are legible for wayfinding purposes and have a strong welcoming street presence, as well as being sized to be functional for the volume of people who will use them, including peak time use.

MH.3 As highlighted previously, a podium height variance of 3-7storeys is not considered precise enough to secure townscape quality and understand what quality of public realm will be delivered.

MH.5.1 replace should with **must**

MH.6 replace should not with **must not** and should with **must**

MH.9.1.and MH.9.2 replace should with **must**

MH.9.3 As highlighted previously, a podium height variance of 3-7storeys is not considered precise enough to secure townscape quality and understand what quality of public realm will be delivered.

MH.10 replace should with **must**

MH.11 replace should with **must**

DC Volume 2

P.1 GLA officers welcome the inclusion of robust clauses to secure public engagement in the design process

P.1.5 replace should with **must** to make this clause as strong as the preceding ones as under-represented groups are as important as those others listed.

OS.2 clauses: replace should with **must**

OS.4 residential entrances

It is noted that the illustrative images indicate extensive green or 'living' walls to the building entrances – the applicant should consider the implication of these in terms of fire spread and combustibility **Sally, have we got some standard wording for this?**

OS.4.4 replace should with **must**

OS.5.2 and 5.3 replace should with **must**

OS.7.3, 7.6, 7.7 and 7.8 replace should with **must** – these clauses are all important to secure a safe inclusive public realm and need to be robust

OS.10 Lighting: should include a clause about balancing safety and day into evening use of public space with minimising light pollution in line with LP2021 policy D8; and a clause about excessive light spill from buildings in line with LP2021 policy D9

NH.3 GLA officers welcome the aspiration to exceed minimum UGF requirements

EW.4 clauses: replace should with **must**

EW.5.1 replace should with **must**

EW.17.3 replace should with **must**

EG.4 clauses: replace should with **must**

EG.5.2 replace should with **must**

EG.26.3 replace should with **must**

FP.4.1 and 4.2 clauses: replace should with **must**

FP.5.2 replace should with **must**

FP.27.4 replace should with **must**

SS.4.1 and 4.2 clauses: replace should with **must**

SS.5.2 replace should with **must**

SS.19.3 replace should with **must**

DT.4.2 replace should with **must**

DT.5.1 replace should with **must**

DT.17.3 replace should with **must**

NS.4.2 and 4.3 clauses: replace should with **must**

NS.5.1 and 5.2 clauses: replace should with **must**

NS .19.3: replace should with **must**

PG.1 include a clause stating Edgware Gardens (podium garden) must be accessible for all residents

PG.1.1 refers to adhering to minimum widths and area for Edgware Gardens (podium garden) given in the parameter plans, however the parameter plans do not include this information. Minimum widths and areas should be indicated in this clause and on the parameter plan for clarity.

PG 4.1: replace should with **must**

PG.8.1: replace should with **must**

PG.19.3: replace should with **must**

DC Volume 3

TP: all clauses relating to delivery of exemplary architectural design: replace should with **must**

AP.13.1 - 13.3: replace should with **must**

CU.1 clauses: replace should with **must**

Parameter Plans

General

- The proposed building footprints and heights indicated on all parameter plans vary significantly from the illustrative scheme indicated in the Design Code. For example, the Deans Brook Terrace illustrative scheme indicates 5 individual blocks with ground level landscaped space between but the parameter plan at C2 allows for a continuous block of development approx. 31m high from the ground level at the boundary; and the Edgware Gardens illustrative scheme indicates individual point blocks around a podium level garden the flows between the blocks but the parameter plan allows continuous blocks of development of 80-88m high.
- The level of discrepancy between the parameter plans and the illustrative scheme extracts indicated in the design code means there is no clear understanding of the proposed mass form and ground plane public spaces that approval is being sought for.
- Where parameter plans are not listed below, UD have no comments

01 site location

- Deans Brook Nature Park (DBNP), a Site of Borough Importance (grade II) for Nature Conservation (SINC) is included in the red line application boundary but is public land not owned by the applicant. The inclusion of this is important to the support the quantum of development being proposed however how this is secured is not clear.

02 phasing

- Supportive of the proposed works and public access to DBNP being delivered in Ph1.

03 demolition

- An Outline consent, if granted, for the proposed demolition should not eliminate the need for phase-by-phase detailed exploration of retention and justification for demolition in future RMA's.

04 development zones and public realm

- As highlighted above, the continuous built form footprints described in the parameter plan is not in line with the masterplan indicated at pre-app meetings. The parameter plan as indicated promotes a principle of continuous walls of development being acceptable. This is not supported.
- The proposed max building lines indicated are excessive and not in line with discussions at GLA pre-app. The DC does not robustly set out how built form will be managed within the indicated building zones.
- Dimensions given for public realm must be clarified as Minimums on the key.
- The proximities indicated between built forms on the site remain concerning. The proportions of the open spaces remain small, and the large proportions of the building footprints are dominant.
- Phase on phase, the minimum dimensions and spaces indicated should be tested for environmental and functional quality prior to RMA approval.
- The zones of deviation stated (+/- 3m) are too great to give a clear understanding of the proposed footprints. These should be reviewed, particularly where they are adjacent to pinch points in the plan.
- The minimum extent of public realm should be clarified – is this a minimum by overall area only or are the locations, proportions and dimensions indicated controlled? The former does not give sufficient understanding of what may be delivered.
- Minimum spatial dimensions should be provided for all key public realm areas (squares etc); and also sqm areas for these spaces.
- Only a narrow access route within Deans Brook Nature Park is being committed to. This seems insufficient to be of significant benefit to the development. Additional publicly accessible space should be considered as a minimum, notwithstanding the need to preserve the nature of the SIN.

05 proposed level 00 building lines

- The DC states that this parameter plan indicates minimum gaps between building lines within development zones however this is not the case. These should be added to this plan, or to the appropriate plan if not this one.

08 proposed level 00 vehicular routes

- The parameter plan is 'loose' and does not give an understanding of where future vehicular entrances and parking will be provided. This is not defined clearly in the DC either, so it is not possible to understand the quality of the future public realm and how pedestrians, cycles and vehicles will co-use the spaces.

10 proposed level 00 uses

- The ground floor uses parameter plan does not secure active frontages to facilitate safe and inclusive public routes and spaces. A parameter plan should be included that indicates where active frontages must be provided.
- A minimum sqm area for community use ground floor space should be included.

13 proposed upper level uses

- The note on the key 'development zone terminates below this level' is not understood and requires clarifying.

14 & 15 existing and proposed site levels

- Proposed site levels are typically significantly higher than existing across most of the site. This will exacerbate perceived heights of buildings on the site.
- Where level changes are proposed within the nature park, any future RMA application should include information on protection of existing tree routes.

16 proposed maximum heights

- As highlighted above, the continuous built form at mid-rise upwards described in the parameter plan is not in line with the masterplan indicated at pre-app meetings, or with illustrative scheme extracts in the design code. The parameter plan as indicated promotes a principle of continuous walls of tall development being acceptable. This is not supported.
- Approximate heights in storeys (G+X storeys) should be provided as a supplement to the AOD information provided. A note should clarify that the AOD takes priority if there appears to be a discrepancy.

Development Specification

- Target dwelling mix: this table should include a summary of % range of 1B 2B 3B etc across all tenures ie for the whole site, as well as the per tenure ranges given currently; and compliance with LPA local plan housing policy and housing need should be confirmed.
- The family homes provision is weighted heavily to provision within the affordable homes. As the amount of affordable housing is not known currently, there is concern that the development as a whole will be dominated by 1B and 2B homes and will not facilitate a balanced mixed community that includes family housing in convenient well-connected locations.

Green Infrastructure: GLA Consultation

Case details

Case name:	Edgware Town Centre
Date of review:	15.08.24
GLA case officer:	[REDACTED]
GLA GI reviewer:	[REDACTED]
London Borough:	Barnet
GLA case number:	2024/0416/S1
Application type (Full/Hybrid/Outline):	Outline
Applicant:	Ballymore (Edgware) Ltd Edgware Town Centre Site Plan Proposed Illustrative Scheme; Illustrative Landscape Masterplan pg 59 Edgware Design and Access Statement
Landscape Plan reference:	
DAS reference:	Edgware Town Centre Landscape Design and Access Statement

Development proposal

Comprehensive, phased mixed-use redevelopment of the site comprising of residential (C2, C3, and Sui Generis) and a range of town centre uses; flexible commercial business and service, hotel, learning and non-residential (Use Classes E/C1/ F1/ Sui Generis), within a range of tall buildings, together with a new transport interchange, basement bus depot, public realm, car and bicycle parking, public open space, hard and soft landscaping and other associated works. (OUTLINE APPLICATION with full details in respect of access for phases 1, 3 and (in part) 2 and (in respect of part of phase 1) landscaping).

Further information provided by the applicant for consultation purposes only (not forming part of the formal description of development set out below):

The Outline Planning Application includes an Illustrative Scheme which indicates one way in which the development for which planning permission is being sought could be delivered. The Illustrative Scheme contains:

- New buildings including tall buildings up to 29 storeys
- 3,365 new homes (Use Class C3)
- 463 student or co-living units (Sui Generis)

in addition to a new transport interchange commercial, hotel, learning and non-residential uses, streets, open space, landscaping and public realm including improvements and public access to the Deans Brook Nature Reserve

The following table outlines the key requirements for London Plan Policies G1 to G7. This should be edited only by the GLA Green Infrastructure Officer

Policy	Policy Sub-Area	Key Requirements	Status
Policy G1: Green Infrastructure	Multifunctional green infrastructure	Integrated green infrastructure that supports multifunctionality	Information provided, no action required
		Links to the wider green infrastructure network	No strategic comments issued, no action required
		Contribution to the greening of the public highway	Information provided, no action required
Policy G2: London's Green Belt OR Policy G3: Metropolitan Open Land	Recreational and biodiversity value	Enhancement to the recreational value of the designation	No strategic comments issued, no action required
		Enhancement to the biodiversity value of the designation	No strategic comments issued, no action required
Policy G4: Open space	Public Open Space	Promote the creation of new areas of publicly-accessible open space, particularly green space	Information provided, no action required
Policy G5: Urban greening	Urban Greening Factor (UGF)	UGF calculation that meets the London Plan target	Information provided, no action required
		Surface cover type drawing to accompany the UGF calculation	Strategic comments issued, action required
Policy G6: Biodiversity and access to nature	Sites of Importance for Nature Conservation (SINCs)	Avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts	Information provided, no action required
	Biodiversity Net Gain (BNG)	Quantitative evidence that the proposed development secures a net biodiversity gain	Information provided, no action required
		Trading Rules satisfied	Information provided, no action required
Policy G7: Trees and woodlands	Replacement valuation	The use of 'i-tree' or 'CAVAT', or another appropriate valuation system, to calculate the change in valuation	Strategic comments issued, action required

GLA Stage 1 comments
Date: 15/08/24

Relevant Resources

[London Plan](#)

The following information provides detailed comments on compliance with Policies G1 - G7 of the London Plan. The applicant should provide responses to all comments where 'response required' is indicated. Any wider supporting material submitted should be referenced within the applicant's response.

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

For information only

Policy G1: Green Infrastructure

The proposed development presents a well-considered approach to integrating green infrastructure and urban greening which is supported. This includes the incorporation of new community green spaces, such as Edgware Gardens, and public realm, Station Walk. The design also includes SuDs features and biosolar roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan.

For information only

As the site boundaries front onto the public highway, Station Road, the applicant has considered the opportunity to contribute to the greening of the public realm through the creation of public realm space, Station Square, which incorporates greening, which is supported.

For information only

Policy G4: Open space

The applicant demonstrates consideration of access to public open space across the site, including specific areas such as a place for play along with community space and ecological areas which are publicly accessible and incorporate greening, in accordance with Policy G4 of the London Plan. This is particularly important as the site is located in an area identified as being deficient in public open space within the London Green Infrastructure Focus Map.

Green Infrastructure Focus Mapping:
<https://data.london.gov.uk/dataset/green-infrastructure-focus-map>

For information only

Policy G5: Urban Greening

The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.59, which exceeds the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible. A surface cover type drawing should be provided to accompany the UGF calculation in order to determine compliance with Policy G5.

[London Plan Guidance on the Urban Greening Factor:](#)
<https://www.london.gov.uk/sites/default/files/2023-02/London%20Plan%20Guidance%20-%20Urban%20Greening%20Factor.pdf>

Response required

Being an outline application, it is important that the current quality and quantity of greening is secured and delivered through subsequent stages of planning. Delivery of the UGF at reserved matters should be secured by planning condition and within the design code for subsequent phases of the proposed development.

[London Plan Guidance on the Urban Greening Factor:](#)
<https://www.london.gov.uk/sites/default/files/2023-02/London%20Plan%20Guidance%20-%20Urban%20Greening%20Factor.pdf>

For information only

Policy G6: Biodiversity and access to nature

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. In accordance with Policy G6 of the London Plan the applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. If avoidance of impacts is not possible the applicant should set out how they have followed the mitigation hierarchy to minimise development impacts.

[Urban Greening For Biodiversity Net Gain: A Design Guide.](#)
https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf

For information only

The applicant considers the adjoining SINC within the masterplan design, incorporating a green buffer to the south of the development, which is considered positively.

London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.

The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 101.13%, equating to an increase in 5.83 habitat units and 0.27 hedgerow units, in accordance with Policy G6 of the London Plan. The applicant has also confirmed that trading rules have been satisfied. No further information on this matter is required.

For information only

The applicant should review whether unit gain would be more appropriate than percentage gain and this should be discussed with the borough.

For information only

Policy G7: Trees and woodlands

There are a number of existing trees on site. The Biodiversity Net Gain Report states that 188 trees are present on site. A Tree Survey and Arboricultural Statement is provided, however the applicant should clarify the number of trees to be removed and proposed. Wherever possible, trees of value should be retained.

If trees of value are to be lost, the application should provide an appropriate valuation system and set out how tree loss has been accounted for through replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be determined.

Response required

Recommendations in the Tree Survey and Arboricultural Statement should be adhered to, or robust justification should be given as to why they cannot be.

The applicant appears to demonstrate a consideration of a diverse range of proposed tree species, which is positive in terms of biosecurity and should be brought to fruition. The applicant should also consider large-canopied trees to target urban heat island (UHI) effects.

For information only

Conservation Comments 1

GLA case reference number: 2024/0416/S1

Edgware Town Centre

London Borough of Barnet

LPA planning reference: 24/2686/OUT

Case Officer: [REDACTED]
Conservation Officer: [REDACTED]
Site Address: Broadwalk Shopping Centre And Associated Surface Level Car Park, Edgware Bus Station, Edgware Bus Garage And Redhill Medical Centre And Deans Brook Nature Reserve Edgware HA8
Application Stage: Stage 1
Comments Date: 3rd September 2024

Proposal Description

Comprehensive, phased mixed-use redevelopment of the site comprising of residential (C2, C3, and Sui Generis) and a range of town centre uses; flexible commercial business and service, hotel, learning and non-residential (Use Classes E/C1/ F1/ Sui Generis), within a range of tall buildings, together with a new transport interchange, basement bus depot, public realm, car and bicycle parking, public open space, hard and soft landscaping and other associated works. (OUTLINE APPLICATION with full details in respect of access for phases 1, 3 and (in part) 2 and (in respect of part of phase 1) landscaping). Further information provided by the applicant for consultation purposes only (not forming part of the formal description of development set out below): The Outline Planning Application includes an Illustrative Scheme which indicates one way in which the development for which planning permission is being sought could be delivered. The Illustrative Scheme contains: - New buildings including tall buildings up to 29 storeys - 3,365 new homes (Use Class C3) - 463 student or co-living units (Sui Generis) in addition to a new transport interchange commercial, hotel, learning and non-residential uses, streets, open space, landscaping and public realm including improvements and public access to the Deans Brook Nature Reserve.

Legislation, policy and guidance

The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset's conservation should be avoided or minimised (Para 201). Para 205 and caselaw indicate that great weight should be given to a heritage asset's conservation. Harm should be

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clearly and convincingly justified and, if less than substantial, weighed against any public benefits (Paras 206 and 208).

London Plan Policy HC1 Heritage conservation and growth requires development proposals to conserve significance by being sympathetic to the assets' significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

London Plan Policy D3 Optimising site capacity through the design-led approach requires development proposals to respond to the existing character of a place and respect, enhance and utilise the heritage assets that contribute towards local character.

London Plan Policy D9 C 1) b) requires development proposals for tall buildings to take account of and avoid harm to London's heritage assets and their settings and requires clear and convincing justification for any harm, and demonstration that alternatives have been explored and that clear public benefits outweigh that harm.

Significance of the buildings and area

The site is not in a conservation area and does not contain listed or locally listed buildings. The site contains a range of modern buildings and surface level car parking of no heritage interest.

Immediately adjacent to the northeast is Edgware Station, an excellent group of buildings from the 1920s in a neo-classical style, which are locally listed.

The Railway Hotel, listed Grade II, near the site, is on the Heritage at Risk Register.

The site is in the setting of the designated heritage assets in the table below.

Assessment of impacts

GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of 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 to high	Views 1, 9 and 37
A group of scattered Grade II listed buildings along Edgware Road High Street including Edgware House, White Hart Hotel, Nos. 65-67, 85-89, 95, 97 and 99 to 101 the War	Less than substantial	Low	Views 1, 14 and Appendix 4

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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

Discussion

The proposed development includes heights ranging from 3 storeys to 29 storeys, with multiple tall buildings (13 buildings over 20 storeys and the tallest being “capped” at 29 storeys) and, given the fact that the site is also on a hill, may result in widespread impacts to heritage assets.

Views 10, 11 and 12 show the proposed development in the setting of the Watling Estate Conservation Area. There is a middle extent of less than substantial harm to the setting of the conservation area in this view, caused by the height of the proposals.

View 9 shows a middle to high degree of harm to the setting of the Railway Hotel, because of the severe backdropping of the asset and loss of appreciation of its silhouette. This is less severe in View 37, although the proposed development remains harmful to the setting of the asset.

The proposals include the removal of the bus station in front of Edgware Station and its replacement with an attractively landscaped and welcoming Station Square. This is a small but welcome heritage benefit which goes some way to reinstating the original setting of the locally listed station.

Conservation Conclusions

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National Planning Policy Framework Paragraph 209 states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or the loss and the significance of the heritage asset.” The proposals include a minor heritage benefit to the setting of the locally listed Edgware Station.

National Planning Policy Framework Paragraph 208 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...” The proposed development is assessed to cause harm to the heritage assets.

The proposed development is contrary to The London Plan Policy HC1 Heritage conservation and growth Part C: “Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings”.

Relevant known planning history

GLA pre app: 2022/0234/P2i, 2022/0713/P2f, 2023/0291/P2f

Water Memo: Stage I Comments

Edgware Town Centre

28/08/2024

To / Case officer:	██████████
From:	██████████
Case name:	Edgware Town Centre
London Borough:	Barnet
Case number:	2024/0416/S1

Applicant:	Ballymore Group and TTL Properties Limited
Flood Risk Document:	Flood Risk Assessment/ July 2024/ Mott MacDonald
Drainage Document:	Flood Risk Assessment/ July 2024/ Mott MacDonald
Sustainability Document:	Project Sustainability Overview/ July 2024/ Mott MacDonald

Proposal

Comprehensive, phased mixed-use redevelopment of the site comprising of residential (C2, C3, and Sui Generis) and a range of town centre uses; flexible commercial business and service, hotel, learning and non-residential (Use Classes E/C1/ F1/ Sui Generis), within a range of tall buildings, together with a new transport interchange, basement bus depot, public realm, car and bicycle parking, public open space, hard and soft landscaping and other associated works. (OUTLINE APPLICATION with full details in respect of access for phases 1, 3 and (in part) 2 and (in respect of part of phase 1) landscaping).

Summary of Comments

Section	Compliant
Flood Risk	No
Sustainable Drainage	No
Water Efficiency	No

Flood Risk Management (The London Plan 2021 Policy SI.12)

Flood Source	Flood Risk
Rivers and the sea	Flood Zone 1 and 3

Surface water	High
Reservoir	Yes
Groundwater	Low
Sewer	Medium

The LPA must engage with the relevant stakeholders to ensure that any issues relating to tidal, fluvial (main river and ordinary watercourses) and reservoir flood risks are resolved. This should ensure appropriate resilience measures are in place and any residual flood risk is managed over the lifetime of the development. This also includes provision of a Flood Warning and Evacuation Plan (FWEP) where necessary. Attention should be given to delivery of the measures set out in the Thames Estuary 2100 Plan and ensure the protection of the integrity of flood defences.

1. The site is located in both Flood Zone 1 and Flood Zone 3. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF).
2. The Applicant should confirm the proposed FFL, which should be higher than the estimated 100-year pluvial flood level, and should demonstrate that the development would not displace pluvial flood water off site.
3. There is a medium to high risk of surface water flooding to the site. Further information should be provided as to exactly what the mitigation for this will be in section 5 of the report. At the moment it seems like the proposed development is relying on SuDS features to reduce the risk of flooding from this source. However this may not be sufficient mitigation for the severity of the risk of flooding and therefore more information is required.
4. The FRA adequately assesses the risk of flooding from groundwater and sewers, which is considered to be low.
5. The FRA provided for the proposed development does not comply with London Plan Policy SI12. Direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk.

Sustainable Drainage (The London Plan 2021 Policy SI.13)

6. The drainage strategy proposes to restrict runoff to 30.9 l/s up to the 100-year event plus 40% climate change. This provided betterment on the Qbar greenfield runoff rate of 36.4 l/s.
7. The drainage strategy proposes to provide the required attenuation within a combination of green roofs, tree pits, permeable paving, swales and below ground attenuation tanks, which is supported. The appendices include basic attenuation estimates which do not present enough detail at this stage of application. More detailed hydraulic calculations should be provided including a range of storm durations and return periods, in particular for the detailed component of the application. It is also noted that the Flood Studies Report (FSR) method has been used for the estimation of rainfall for simulation of the drainage networks. This

method underpredicts rainfall intensity in the London area. As such, the drainage simulations should instead use the latest Flood Estimation Handbook (FEH22) method.

8. In terms of SuDS, the drainage strategy proposes green roofs, swales and rain gardens, which is welcomed. Rainwater harvesting should be provided to satisfy the requirements of The London Plan 2021 Policy SI.13. The Applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits.
9. The LPA should also review SuDS maintenance arrangements the assessment of exceedance flood flow routes, the use of any pump discharges are appropriate and the completed London Borough's version of the London Sustainable Drainage Proforma.
10. The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI13 with the condition that the SuDS maintenance plan, exceedance flow routes and drainage proforma have been submitted and approved by the relevant stakeholders.

Water Efficiency (The London Plan 2021 Policy SI.5)

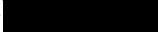

11. No water efficiency information has been provided for the residential components of the development.
12. The Sustainability Statement notes that 3 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 40%, in line with London Plan Policy SI5.
13. Water efficient fittings, water monitoring, leak detection and flow control systems are proposed, which is welcomed.
14. The Applicant should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.
15. The proposed development does not currently meet the requirements of London Plan Policy SI5.

▼ GLA Officer Review

Public 




Text 

Comments by  (AECOM): 



As this is an outline proposal most items have been conditioned for the reserved matters stage however at this stage it would be good to see some evidence of indicative modelling that has been undertaken including the carbon reporting spreadsheet and modelling outputs for be lean and be green scenarios. It would also be good to understand more about the proposed 5th generation ambient loop system and proposed PV array.

**▼ Consultee Comments**Original Text 

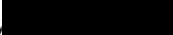
The Applicant has provided a Circular Economy Statement at this stage, which is welcomed. 

The Applicant has not completed the GLA CE template at this stage, stating that this will instead be provided at detailed design application stage. However, the Applicant should make reference to the minimum submission requirements set out in Table 5 of the LPG, ensuring relevant information is provided including the outline application stage tab of the GLA CE template is provided.

The Applicant should also provide a Pre-Redevelopment Audit and a Pre-Demolition Audit at this stage, in line with the minimum submission requirements. The Applicant references this information however does not appear to have been provided.

The information provided by the Applicant at this stage is not sufficient to demonstrate compliance with London Plan Policy SI 7.

Please refer to the attached document for detailed comments.

Comments by  AECOM.



Comment

Edgware Town Centre_GLA WLC_Comments

Text 



▼ Consultee Comments

Original Text 

The applicant has submitted a WLC report which appears to cover much of the assessment requirements, however, an Excel version of the GLA WLC template must also be submitted to allow a full review to be completed against the guidance. The WLC templates are available here:



<https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made.

Created By



[Environment Whole Life Carbon 2](#), 28/08/2024, 18:02

[REDACTED]

From: [REDACTED]@Barnet.gov.uk>
Sent: 23 August 2024 10:37
To: [REDACTED]
Subject: Re: Edgware

[REDACTED],

Yes we did. We received an acknowledgment this week from [REDACTED] below just stating they need more than the 21days set out in our consultation letter.

[REDACTED]
Transport Liaison and Alternative Energy Group Manager
Petroleum and Primary Authority Business Group Manager

[REDACTED]
Planning Performance & Development Manager
Planning and Building Control
2 Bristol Avenue, Colindale, NW9 4EW

[REDACTED]

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]@london.gov.uk>
Sent: Thursday, August 22, 2024 08:58
To: [REDACTED]@Barnet.gov.uk>
Subject: RE: Edgware

** Warning External Email **

[REDACTED]

Did you consult London Fire Brigade for this one?

Cheers,
[REDACTED]

From: [REDACTED]@Barnet.gov.uk>
Sent: Friday, August 16, 2024 2:10 PM
To: [REDACTED]@london.gov.uk>
Subject: Re: Edgware

Yep that works for me

[REDACTED]
Planning Performance & Development Manager
Planning and Building Control
2 Bristol Avenue, Colindale, NW9 4EW
[REDACTED] Web: barnet.gov.uk

[REDACTED]

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]@london.gov.uk>
Sent: Friday, August 16, 2024 14:08
To: [REDACTED]@Barnet.gov.uk>
Subject: RE: Edgware

** Warning External Email **

[REDACTED]

Would 230 suit?

Thanks!

[REDACTED]

From: [REDACTED]@Barnet.gov.uk>
Sent: Friday, August 16, 2024 12:21 PM
To: [REDACTED]@london.gov.uk>
Subject: Re: Edgware

[REDACTED]

Yes free now if suits?

[REDACTED]

Planning Performance & Development Manager
Planning and Building Control
2 Bristol Avenue, Colindale, NW9 4EW
[REDACTED] | Web: barnet.gov.uk

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]@london.gov.uk>
Sent: Friday, August 16, 2024 11:18
To: [REDACTED]@Barnet.gov.uk>
Subject: Edgware

** Warning External Email **

[REDACTED]

Are you around for a quick call on this one ?

[REDACTED]

[REDACTED]

Principal Strategic Planner, Planning

GREATERLONDONAUTHORITY
Union Street, London, SE1 0LL

www.london.gov.uk/what-we-do/planning

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