

LOCATION: 102-124 Station Road and car park to rear, Edgware, HA8 7BJ

REFERENCE: H/05793/13 **Received:** 10/12/2013
Accepted: 10/12/2013

WARD: Edgware **Expiry:** 11/03/2014

APPLICANT: Erinastar Limited

PROPOSAL: Demolition of 120-124 Station Road and outline planning permission (with all matters other than access reserved) for new buildings from 7 to 19 storeys with podium level to provide up to 165 flats (Use Class C3), up to 1,450sqm flexible community floorspace (Use Class D1/D2), 275sqm of retail / restaurant floorspace (Use Class A1/A2/A3), and new shopfront to the Church Way facade of the existing retail unit at 102-106 Station Road. The provision of pedestrian site access from Station Road and Church Way, and vehicular access from Church Way.

RECOMMENDATION

The application being one of strategic importance to London it must be referred to the Mayor of London. As such any resolution by the committee will be subject to no direction to call in or refuse the application being received from the Mayor of London.

It is recommended that subject to no direction being received from the Mayor of London to call in the application or to refuse it for different reasons to those set out here, the Assistant Director for Development Management and Building Control be instructed to **REFUSE** planning application reference H/05793/13 under delegated powers for the following reasons:

1. The proposal would, by reason of its physical relationship to Station Road, lack of proposals to improve the appearance of the street frontage and Premier House, coupled with a lack of a formal undertaking to secure public realm and transport infrastructure, fail to adequately contribute towards the Council's objectives for the regeneration and renewal of Edgware Major Centre. The proposal would therefore be contrary to policy CS6 of the Barnet Local Plan Core Strategy (September 2012), policy 2.15 of the London Plan (July 2011, October 2013 and January 2014) and the Edgware Town Centre Framework (June 2013).
2. The proposed tall buildings would, by reason of design, height, scale and mass coupled with the parameters sought and failure to provide adequate justification or a robust framework for future reserved matters submissions, represent visually prominent and obtrusive features on the skyline and could cause unacceptable harm to the setting of heritage assets and local microclimatic conditions. The proposal would therefore not constitute a sustainable form of development and would be contrary to policies CS NPPF, CS5, DM01, DM05 and DM06 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policies 3.4, 7.4, 7.6 and 7.7 of the London Plan (July 2011, October 2013 and January 2014) and the Barnet Sustainable Design and Construction

and Residential Design Guidance Supplementary Planning Documents (April 2013).

3. The proposal would, by reason of its design, height, scale and mass coupled with the parameters sought and failure to provide a robust framework for future reserved matters submissions, represent a discordant and visually obtrusive form of development that would fail to respect its local context and the pattern of development in Edgware Major Centre, to such an extent that it would be detrimental to the character and appearance of the area. The proposal would therefore not constitute a sustainable form of development and would be contrary to policies CS NPPF, CS5, DM01 and DM05 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policies 3.4, 7.4, 7.6 and 7.7 of the London Plan (July 2011, October 2013 and January 2014) and the Barnet Residential Design Guidance Supplementary Planning Document (April 2013).
4. The proposal would, by reason of its layout, design, height, scale and mass coupled with the parameters sought, represent a cramped form of development that would result in inadequate daylight and sunlight being received at a significant proportion of the proposed flats, to the detriment of the amenities of future occupiers of the development. The application would therefore not constitute a sustainable form of development and is found to be unacceptable and contrary to policies CS NPPF and DM01 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policy 3.5 of the London Plan (July 2011, October 2013 and January 2014) and the Barnet Sustainable Design and Construction and Residential Design Guidance Supplementary Planning Documents (April 2013).
5. The proposal would, by reason of its lack of outdoor amenity space provision and lack of justification for the usability of the proposed roof terraces and rooftop play space, result in a poor standard of accommodation for future occupiers of the development and would fail to make adequate provision for children's play and informal recreation, to the detriment of their amenities. The application would therefore not constitute a sustainable form of development and is found to be unacceptable and contrary to policies CS NPPF, DM01 and DM02 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policy 3.5 and 3.6 of the London Plan (July 2011, October 2013 and January 2014), the Barnet Sustainable Design and Construction and Residential Design Guidance Supplementary Planning Documents (April 2013) and Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (September 2012).

6. The proposal would, by reason of its layout and proximity to the Broadwalk Shopping Centre and Station Road properties, coupled with the parameters sought, represent a cramped form of development that would result in poor outlook from a significant proportion of the proposed flats and a lack of privacy, to the detriment of the amenities of future occupiers of the development. The application would therefore not constitute a sustainable form of development and is found to be unacceptable and contrary to policies CS NPPF and DM01 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policy 3.5 of the London Plan (July 2011, October 2013 and January 2014) and the Barnet Sustainable Design and Construction and Residential Design Guidance Supplementary Planning Documents (April 2013).
7. The proposal, by reason of insufficient car parking provision for the proposed residential and community centre uses, would be likely to lead to increased kerbside parking outside of the Controlled Parking Zone to the detriment of free flow of traffic and highway and pedestrian safety. The application is therefore unacceptable and contrary to policies DM17 and CS9 of the Barnet Local Plan Core Strategy and Development Management Policies (both adopted September 2012).
8. The proposal, by reason of unsatisfactory assessment of trip generation and the Church Way/Station Road junction, would be likely to result in adverse conditions impacting on highway safety. The application is therefore unacceptable and contrary to policies DM17 and CS9 of the Barnet Local Plan Core Strategy and Development Management Policies (both adopted September 2012).
9. The application does not include a formal undertaking to secure a contribution to affordable housing provision to meet the demand for such housing in the area despite the application proposing to make such a contribution. The application is therefore unacceptable and contrary to policies CS NPPF, CS4, CS15 and DM10 of the Barnet Local Plan Core Strategy and Development Management Policies Document (both adopted September 2012), policies 3.12 and 3.13 of the London Plan (adopted July 2011 and October 2013), the Barnet Planning Obligations (adopted April 2013) and Affordable Housing (adopted February 2007 and August 2010) Supplementary Planning Documents and the Mayoral Housing (adopted November 2012) Supplementary Planning Guidance.
10. The application does not include a formal undertaking to secure the delivery of a Travel Plan for the development proposed, to minimise increases in road traffic from the proposal and encourage the use of sustainable modes of transport, and the provision of the funding needed to monitor and review a Travel Plan of this nature. The application is therefore unacceptable and contrary to policies CS NPPF, CS9, CS15 and DM17 of the Barnet Local Plan Core Strategy and Development Management Policies Document (both adopted September 2012); policies 6.1 and 6.3 of the London Plan (adopted July 2011 and October 2013); and the Barnet Planning Obligations (adopted April 2013) Supplementary Planning Document.

11. The proposal, by reason of the provision of long sections of blank ground floor frontage along the north east and south east elevations and lack of definition between public and private space, would not provide a safe and secure environment for people to live and work in and would not reduce opportunities for crime and fear of crime. The application would therefore not constitute a sustainable form of development and is found to be unacceptable and contrary to policies CS NPPF, CS12 and DM02 of the Barnet Local Plan Core Strategy and Development Management Policies (September 2012), policy 7.3 of the London Plan (July 2011, October 2013 and January 2014) and the Barnet Sustainable Design and Construction and Residential Design Guidance Supplementary Planning Documents (April 2013).
12. The application does not include a formal undertaking to secure the making of a financial contribution needed to ensure the delivery of the planning obligations which are necessary for the development to be found acceptable:
- Junction improvements along Station Road;
 - Improved public open space around Edgware Station;
 - Improved public realm along Station Road;
 - Improved bus interchange;
 - Pedestrian and cycle environment improvements, including Legible London; and
 - Improvements to local bus stops, including DDA compliance.

The application is therefore unacceptable and contrary to London Plan policies 6.3, 6.9 and 6.10, policies DM17 and CS9 of the Barnet Local Plan Core Strategy and Development Management Policies Document (adopted September 2012), the Barnet Planning Obligations (adopted April 2013) Supplementary Planning Document and the Edgware Town Centre Framework (June 2012).

Informatives:

The informatives that it is recommended be included on the decision notice in respect of this application are set out in **Appendix 2** of this report.

1. MATERIAL CONSIDERATIONS

1.1 Key Relevant Planning Policy

Introduction

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that development proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan is The London Plan (published July 2011) and the development plan documents in the Barnet Local Plan (adopted September 2012). These statutory development plans are the main policy basis for the consideration of this planning application. A number of other documents, including supplementary planning guidance and national planning guidance, are also material to the determination of the application.

More detail on the policy framework relevant to the determination of this development and an appraisal of the proposal against the development plan policies of most relevance to the application is set out in subsequent sections of this report dealing with specific policy and topic areas. This is not repeated here.

The officers have considered the development proposals very carefully against the relevant policy criteria and, for the reasons set out in this report, have concluded that that the development would not fulfil them to a satisfactory level, for the reasons set out above and expanded upon in the appraisal. The proposed development is therefore considered not to comply with the requirements of the development plan and is recommended for refusal.

The London Plan

The London Plan (adopted July 2011) is the development plan in terms of strategic planning policy for the purposes of the Planning and Compulsory Purchase Act (2004). On 11th October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA are operative as formal alterations to the London Plan and accordingly form part of the development plan for Greater London. Subsequently, on 15th January 2014, the Mayor published Draft Further Alterations to the London Plan (FALP) for 12 week period of public consultation.

The London Plan policies (arranged by chapter) most relevant to the determination of this application are:

Context and Strategy:

1.1 (Delivering the Strategic Vision and Objectives for London)

London's Places:

2.6 (Outer London: Vision and Strategy); 2.7 (Outer London: Economy); 2.8 (Outer London: Transport); 2.15 (Town Centres); and 2.18 (Green Infrastructure: the Network of Open and Green Spaces)

London's People:

3.1 (Ensuring Equal Life Chances for All); 3.2 (Improving Health and

Addressing Health Inequalities); 3.3 (Increasing Housing Supply); 3.4 (Optimising Housing Potential); 3.5 (Quality and Design of Housing Developments); 3.6 (Children and Young People's Play and Informal Recreation Facilities); 3.8 (Housing Choice); 3.9 (Mixed and Balanced Communities); 3.10 (Definition of Affordable Housing); 3.11 (Affordable Housing Targets); 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes); 3.13 (Affordable Housing Thresholds); 3.16 (Protection and Enhancement of Social Infrastructure); and 3.17 (Health and Social Care Facilities)

London's Economy:

4.1 (Developing London's Economy); 4.7 (Retail and Town Centre Development); 4.8 (Supporting a Successful and Diverse Retail Sector); 4.9 (Small Shops); and 4.12 (Improving Opportunities for All)

London's Response to Climate Change:

5.1 (Climate Change Mitigation); 5.2 (Minimising Carbon Dioxide Emissions); 5.3 (Sustainable Design and Construction); 5.6 (Decentralised Energy in Development Proposals); 5.7 (Renewable Energy); 5.9 (Overheating and Cooling); 5.10 (Urban Greening); 5.11 (Green Roofs and Development Site Environments); 5.12 (Flood Risk Management); 5.13 (Sustainable Drainage); 5.14 (Water Quality and Wastewater Infrastructure); 5.15 (Water Use and Supplies); 5.17 (Waste Capacity); and 5.21 (Contaminated Land)

London's Transport:

6.1 (Strategic Approach); 6.2 (Providing Public Transport Capacity and Safeguarding Land for Transport); 6.3 (Assessing Effects of Development on Transport Capacity); 6.5 (Funding Crossrail and Other Strategically Important Transport Infrastructure); 6.7 (Better Streets and Surface Transport); 6.9 (Cycling); 6.10 (Walking); 6.12 (Road Network Capacity); and 6.13 (Parking)

London's Living Places and Spaces:

7.1 (Building London's Neighbourhoods and Communities); 7.2 (Inclusive Environment); 7.3 (Designing Out Crime); 7.4 (Local Character); 7.5 (Public Realm); 7.6 (Architecture); 7.7 (Location and Design of Tall and Large Buildings); 7.8 (Heritage Assets and Archaeology); 7.13 (Safety, Security and Resilience to Emergency); 7.14 (Improving Air Quality); 7.15 (Reducing Noise); 7.18 (Protecting Local Open Space and Addressing Local Deficiency); and 7.19 (Biodiversity and Access to Nature)

Implementation, Monitoring and Review:

8.2 (Planning Obligations); and 8.3 (Community Infrastructure Levy)

Barnet Local Plan

The development plan documents in the Barnet Local Plan constitute the development plan in terms of local planning policy for the purposes of the Planning and Compulsory Purchase Act (2004). The relevant documents comprise the Core Strategy and Development Management Policies documents, which were both adopted in September 2012. The Local Plan development plan policies of most relevance to the determination of this application are:

Core Strategy (Adopted 2012):

CS NPPF (National Planning Policy Framework – Presumption in favour of sustainable development)

CS1 (Barnet's Place Shaping Strategy – Protection, enhancement and consolidated growth – The three strands approach)

CS3 (Distribution of growth in meeting housing aspirations)

CS4 (Providing quality homes and housing choice in Barnet)

CS5 (Protecting and enhancing Barnet's character to create high quality places)

CS6 (Promoting Barnet's Town Centres)

CS7 (Enhancing and protecting Barnet's open spaces)

CS8 (Promoting a strong and prosperous Barnet)

CS9 (Providing safe, effective and efficient travel)

CS10 (Enabling inclusive and integrated community facilities and uses)

CS11 (Improving health and well being in Barnet)

CS12 (Making Barnet a safer place)

CS13 (Ensuring the efficient use of natural resources)

CS14 (Dealing with our waste)

CS15 (Delivering the Core Strategy)

Development Management Policies (Adopted 2012):

DM01 (Protecting Barnet's character and amenity)

DM02 (Development standards)

DM03 (Accessibility and inclusive design)

DM04 (Environmental considerations for development)

DM05 (Tall buildings)

DM06 (Barnet's heritage and conservation)

DM08 (Ensuring a variety of sizes of new homes to meet housing need)

DM10 (Affordable housing contributions)

DM11 (Development principles for Barnet's town centres)

DM13 (Community and education uses)

DM14 (New and existing employment space)

DM15 (Green belt and open spaces)

DM16 (Biodiversity)

DM17 (Travel impact and parking standards)

Supplementary Planning Guidance and Documents

A number of local and strategic supplementary planning guidance and documents are material to the determination of the application.

Local Supplementary Planning Documents and Guidance:

Planning Obligations (April 2013)

Sustainable Design and Construction (April 2013)

Affordable Housing (February 2007)

Residential Design Guidance (April 2013)

Edgware Town Centre Framework (June 2013)

Strategic Supplementary Planning Documents and Guidance:

Accessible London: Achieving an Inclusive Environment (April 2004)

Sustainable Design and Construction (May 2006)

Health Issues in Planning (June 2007)

Wheelchair Accessible Housing (September 2007)

Planning for Equality and Diversity in London (October 2007)
All London Green Grid (March 2012)
Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
Land for Industry and Transport SPG (September 2012)
Housing (November 2012)
London Housing Design Guide

National Planning Guidance

National planning policies are set out in the National Planning Policy Framework (NPPF). This 65 page document was published in March 2012 and it replaces 44 documents, including Planning Policy Guidance Notes, Planning Policy Statements and a range of other national planning guidance. The NPPF is a key part of reforms to make the planning system less complex and more accessible.

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The document includes a 'presumption in favour of sustainable development'. This is taken to mean approving applications, such as this proposal, which are considered to accord with the development plan.

The Community Infrastructure Levy Regulations 2010

Planning obligations need to meet the requirements of regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) to be lawful. Officers have concluded that a number of planning obligations are required and are legitimate and appropriate under these regulations. There is no legal agreement to secure these obligations and this is unacceptable, as discussed in section 3.17 of this report. The proposed development would also be liable for both the Mayoral and Barnet Community Infrastructure Levy (CIL) and this is discussed in sections 3.18 and 3.19 of this report.

1.2 Key Relevant Planning History

The planning history mainly comprises historic applications relating to the various uses that have occupied the Station Road commercial units and Premier House. There is considered to be no application history that is of significant relevance to this proposal, nor are there any large scale committed developments in the vicinity of the site that would have relevance to this proposal.

1.3 Public Consultations and Views Expressed

Public Consultation

A total of 850 local properties and other bodies were consulted on the application by letter and email in January 2014. The application was also advertised on site and in the local press at that time.

The section below provides a summary of the comments received on the application. Responses are provided in the relevant section of the report, unless specifically addressed below.

Number of Responses from Residents and Businesses

16 responses to consultation were received, **13 in objection** (including a petition of 61 signatures) and **2 in support with reservations**. None of the objectors have requested to speak at committee. **1 response** supporting the proposal was received.

Comments on Broadwalk Shopping Centre

Deloitte consultants have submitted objection letters dated 10th February 2014 and 15th April on behalf of Scottish Widows Investment Partnership Property Trust (SWIPPT), owners of the Broadwalk Shopping Centre which adjoins the site. The letter of the 15th April sets out the following comments.

Background to SWIPPT and Investment in Edgware Town Centre

SWIPPT purchased The Broadwalk Shopping Centre in May 2012. SWIPPT was attracted to invest in Edgware Town Centre as an existing successful major town centre with a solid foundation of services and facilities, with excellent growth prospects and benefitting from good transport links including an Underground Station and bus interchange. SWIPPTs interests in the site are investor led, over the long term, to manage the centre and improve its prospects.

It is well known that the shopping centre and the associated land have been earmarked for future development. Indeed previous schemes have been considered and discussed with the Local Planning Authority over the past 10 years by both The Mall Fund and Bridehall Limited. These development aspirations have been identified and supported by local planning policy in the Edgware Town Centre Framework which was adopted in June 2013 by Members as a material consideration in the determination of planning applications in Edgware Town Centre.

The Town Centre Framework identifies land around the Broadwalk Shopping Centre, Forumside area and land around Premier House for potential redevelopment. The car park and land to the rear of the Broadwalk Shopping Centre is considered to be the 'biggest development opportunity within' Edgware, which could potentially accommodate extensions to provide new retail and leisure uses.

Since taking ownership of the Shopping Centre SWIPPT has implemented a number of asset management interventions and improvements. These have included the refurbishment of the entire Station Road frontage and main entrance with a modern facade, new signage and the introduction of

new tenants, SWIPPT is committed to continued long-term investment into Edgware Town Centre.

The Broadwalk Shopping Centre

In addition, SWIPPT has been open about its intentions to pursue a redevelopment of its land ownership centred on the Shopping Centre, in line with the Town Centre Framework. Their plans have been discussed with both the LPA and the Applicants (Erinastar Limited). SWIPPT's advisors have entered into discussions with the Applicants as good neighbours. SWIPPT will work up its initial ideas more fully and undertake public consultation later this year prior to submission of a planning application.

With this in mind, the Applicant's supporting documentation does not give full consideration to SWIPPT's future proposals for the extension of the Broadwalk Shopping Centre or its allocation within the Town Centre Framework. Given the scale of potential future investment in Edgware Town Centre and the combined impact of future development projects upon the town centre's infrastructure and highways it is important to consider the cumulative effects of the two schemes as a basis for good planning.

The Applicant's Planning Statement (paragraph 5.1.10) considers that the Broadwalk Shopping Centre could be demolished to enable 'Phase 2' of the proposal to be implemented, which includes the creation of a small 'city block' and links to the Underground Station.

The Applicant has only considered one option for the future expansion of the proposal onto neighbouring sites, namely demolition. The Broadway Shopping Centre is a £70million commercial scheme which has performed well since ownership (more than 90% let for the duration of the recessionary and recent periods). SWIPPT's rationale on acquisition was for continued investment in the current scheme, building on its core retail offer to strengthen the town centre and therefore demolition is simply not an option.

The Applicant's Planning Statement states (paragraph 3.1.5 and 5.1.9) that Erinastar has been involved in ongoing discussions with the owners of the Broadwalk Shopping Centre. We agree that discussions have been held on the basis that SWIPPT's proposals have been focused on an extension and increase of retail and leisure activities. The Applicant states that there are no conflicts with the neighbouring proposals for the Broadwalk Shopping Centre proposals. We do not agree with this Statement. We set out below raise SWIPPT's concerns on technical and design matters for the planning application as currently submitted.

Representations

We provide the following comments on behalf of SWIPPT which are twofold:

- A) the principle of the proposed re-development of Premier House is generally supported; and*
- B) comments on detailed technical matters.*

A. Principle of the proposals

SWIPPT is generally supportive of the application for the re-development of the existing car park at Premier House to include residential, community facilities and retail. The proposal would provide appropriate town centre uses in Edgware Town Centre to support its vitality and viability and drive footfall to provide activity and customer base throughout the day and evening.

However, for the reasons established above, it is strongly recommended that the Local Planning Authority has regard to the reasonable prospect for the future expansion of the Broadwalk Shopping Centre when determining the application (H/05793/13).

B. Technical Considerations

Notwithstanding SWIPPT's general support for the principle of the proposal, our client has concerns in regard to design and transport matters as set out below.

Transport

Edgware is a major town centre and provides for an important role as a North London transport interchange for bus, tube and access to the national road network via the M1. Accordingly the functionality of the infrastructure, particularly movement and access via Station Road is an important consideration for the future success of Edgware Town Centre.

Transport Assessment

SWIPPT's transport advisor, WSP, has undertaken detailed traffic surveys over the past year and modelled the result. Accordingly, the transport comments are provided from an informed evidence base.

General observations on the Transport Assessment include:

- The derivation of employment trips use traffic data from Premier House and are based on the assumption that the proposed reduction in employee on-site car parking will result in less car travel. This appears to be contrary to other sections of the TA which state that Premier House employees will be able to use Broadwalk Shopping Centre car parking as an alternative, which implies that more employee car parking is required.*
- The Applicant's proposal will result in a 20% reduction in on-site car parking at Premier House.*
- WSP consider this figure is unrealistic given that employment trips are based on existing movements and the office use is understood to be currently underutilised. The TA does not include an assessment of vehicle movements were the offices were to be fully let.*
- The community use trip data has not been analysed. WSP considers that the size of the proposed community use (1,450sqm) is relatively large in comparison to the rest of the proposal; therefore it is a trip generation that should also be assessed.*

Car Parking

The TA confirms that the existing Premier House car park has a total of 145 spaces. A maximum of 133 car parking spaces are currently being used (Premier House only being partially occupied (Table 3.7). It is unclear from the TA whether Premier House car parking is only available to employees, or open to other users. As a result of the Applicant's proposed development the amount of car parking at the site will be reduced to 107 spaces, of which only 47 will be for employees of Premier House. Overall, the proposal will significantly reduce car parking provisions at Premier House.

The Town Centre Framework requires car parking at Premier House to be maintained at the current quantum. WSP considers that the Applicant is proposing lower levels of car parking than would be required following the redevelopment of the site.

The consequence of low parking provision is that future residents and employees of Premier House are more likely to use the Broadwalk Shopping Centre car park. WSP has calculated that even if no new residents of Premier House use the Broadwalk Shopping Centre car park, Premier House employees will result in an 98 additional cars (145 existing spaces minus 47 proposed spaces), which equates to 10% of the car parking spaces within the Broadwalk Shopping Centre.

The TA (paragraph 4.24) believes that the Control Parking Zone will deter residents, visitors and employees with no allocated parking spaces at Premier House from owning a car. However, WSP considers this will only dissuade a small number from parking at the Broadwalk Shopping Centre. Any limitations in the car parking provision for the proposed development will need to be mitigated on site.

The Applicants have no long term control over the Broadwalk Shopping Centre car park and no reliance can be placed upon mitigation measures outside of their ownership.

The Broadwalk Shopping Centre car park is a private car park, owned by SWIPPT, as an integral part of the shopping centre and fulfilling an important town centre role to attract and provide for short term shopper use. The acquisition of the Shopping Centre and its customer base was predicated on shopper usage and any departure from this will have an impact upon its investment value.

It is the only town centre car park for public use and contributes to Edgware Town Centre successfully attracting shoppers. SWIPPT actively maximise protection of parking spaces for core shopping use. The priority for SWIPPT, therefore, will be to continue to support town centre retail and leisure uses, through use of tariffs if appropriate to prevent long-term non shopper usage of the available spaces.

Road Network

The TA suggests that during peak morning traffic flows there are no significant queues or delays along Station Road, including its junction with the A5 and Edgwarebury Lane. However, WSP has video evidence which demonstrates that the two junctions are highly congested at these times.

WSP believes that the LINSIG model for Church Way included within the TA needs to be reviewed. The LINSIG model excludes the A5 junction interactions and does not appear to have a pedestrian phase in the signal model. The TA (paragraph 3.11) confirms that Church Way crossing is in constant demand and called every cycle, however the results provided for the model do not allow for this to be checked.

The Applicant's traffic flow diagrams, used to assess the future network as a result of the proposed development, assume a reduction in traffic due to the expected reduction in on-site car parking and people switching to sustainable modes. However, if traffic increases WSP expects there to be a greater impact on the Church Way / Station Road junction on the Broadwalk Shopping Centre car park.

The Applicant's proposal and the Broadwalk Shopping Centre will share vehicle access via Church Way which adjoins Station Road. The Applicant's TA does not take into account future proposals to extend the Broadwalk Shopping Centre. SWIPPT recommends that the TA considers the uplift in vehicle movements (visitors, servicing and delivery) that will result from the expansion of the Broadwalk Shopping Centre, as this will have significant implications for highway and junction capacity.

Servicing

It appears from the TA that service and delivery vehicles to the site will use the same access as residential and employee vehicles via Church Way. This access is already used 24 hours a day by servicing and delivery vehicles associated with the Broadwalk Shopping Centre and by shoppers and commuters.

WSP recommends that a separate vehicle access is provided for service and delivery vehicles to Premier House. WSP considers that the number and scale of vehicles would be too large and this approach is likely to result in congestion on Church Way, especially when taking into account the future expansion of the Broadwalk Shopping Centre. The TA also gives limited assurance that a Delivery and Servicing Plan will be agreed prior to occupation of Premier House.

Transport Conclusion

The proposal will result in a significant reduction in the number of car parking spaces at Premier House, whilst increasing the number of proposed uses on the site. The Applicant has not proposed any off-site improvements to enhance existing car parking within the town centre or to encourage non car travel modes, other than to restrict on-site car parking. The consequence of this is that future residents and employees of Premier House are likely to use Broadwalk Shopping Centre car park instead. SWIPPT is concerned that the TA has not taken into account the

implications in terms of parking or network capacity, if Premier House were to be fully let or if proposals to extend the Broadwalk Shopping Centre were implemented. SWIPPT have also identified concerns with the robustness of the TA's transport modelling.

Noise

The Applicant's Design and Access Statement (DAS) shows that residential tower blocks are proposed directly along the south western boundary of the site, which abuts the boundary of the Broadwalk Shopping Centre. SWIPPT has concerns about the quality of residential amenity within the units which will overlook the service ramp and plant rooms on the roof of the existing Broadwalk Shopping Centre.

The Applicant's Design and Access Statement (page 14) reiterates that the 'rear of the site is compromised by existing service roads and ramps that currently fall outside our site demise and are serving the rear of shops in Broadwalk Shopping Centre'. The London Plan Review (2014) (paragraph 7.52) highlights the importance of 'reducing noise pollution and protecting good soundscape quality where it exists, contributes to improving quality of life'.

Existing servicing and deliveries to the Broadwalk Shopping Centre currently take place along the servicing ramp via Station Road. The frequency of these vehicles movements is likely to significantly increase in the future, following the expansion of the Broadwalk Shopping Centre. Despite the Applicant's Planning Statement (paragraph 5.2) stating that 'the Proposed Development is acceptable with regard to internal noise conditions for future residents', SWIPPT is concerned that a future intensification of its service ramp use or any increase in plant, has not been considered by the Applicant.

SWIPPT is concerned that the introduction of a residential use in this location, so close to the service yard of an established, major shopping centre will introduce an uncomfortable relationship and poor amenity for residents. Suitable mitigation measures should be designed in to the residential scheme at the outset to reflect the existing commercial uses and expected expansion and intensification of those uses.

Design Considerations

The London Plan (Table A2.1) identifies Edgware as a 'Major Centre' which are 'typically found in inner and some parts of outer London with a borough-wide catchment. The proposed density of the proposal is considered to be more akin to a Central London proposal, than that which would normally be found in an Outer London Borough. Notwithstanding the appropriateness of accommodating high density residential development within town centres to meet London's housing needs; the design and amenity for future occupiers should not be compromised as a result.

In order to overcome issues regarding aspect, noise and residential amenity SWIPPT requests that the proposed design is re-considered in terms of its relationship to the existing Broadwalk Shopping Centre and in

conjunction with the intensified Shopping Centre use that is proposed in the future.

Retail

The Applicant's proposal seeks to extend the existing retail frontage along Station Road and create a new active frontage along Church Way (Planning Statement paragraph 3.2.11). SWIPPT supports proposals for new retail ground floor units along Station Road to add to the choice of units for occupiers and add to the viability of Edgware Town Centre.

Summary

In summary, SWIPPT is generally supportive of the principle of the proposed (residential, community and retail) land uses. However it remains concerned about the impact of the density of the proposal on the day to day operations and functions of The Broadwalk Centre (and Edgware Town Centre), together with the quality of the environment created for future residents.

Comments from Garden City & Manns Road Residents Association

- Existing building causes a blight on the landscape should be refurbished or redeveloped.
- The proposed development is too dense for the site, would have an unacceptable visual impact and would result in a loss of privacy.
- New buildings could create a vortex that would make Station Road unpleasant to be in.
- Buildings would impact on sunlight to neighbouring properties.
- The development would result in unacceptable additional traffic congestion and injudicious parking.
- The development would have an unacceptable impact on local infrastructure.
- Concern that the proposed community facility would not genuinely serve the community.
- Concern over the security of the courtyard space.

Comments from Residents

The comments made by residents are summarised below:

Visual impact and design (section 3.2)

- The development would be out of keeping with the local area, which is generally low scale, and the tower would be visible from a wide area.
- The development is excessively dense and constitutes overdevelopment.
- Tall buildings will amplify wind for pedestrians.
- The design would not be of a high standard and would dwarf surrounding buildings, being excessively high and bulky.
- The development should be well landscaped and this should be maintained.
- Premier House should be refurbished as part of the proposals.
- General concern over the quality of the town centre environment.

Officer response: It is noted that comments relating to street cleaning are not strictly material to this decision. However, officer's agree that the

town centre environment along Station Road needs enhancement.

Amenity (section 3.6)

- The development would overlook and cause loss of light to neighbouring properties.

Transport (section 3.9)

- There is inadequate parking proposed and the scheme would put pressure on the CPZ and on other areas.
- Traffic is already gridlocked and this development would worsen the situation.
- Loss of Premier House car park could affect existing businesses
Officer response: It is considered that adequate parking would remain to serve Premier House, with parking provision complying with current London Plan standards.

Other

- The access road to the Broadwalk Shopping Centre is not called Church Way. Church Way is actually the pedestrian footpath adjacent to the Railway Hotel
Officer response: Comment noted, but this is not a material planning consideration.
- Impact on property values.
Officer response: This is not a material planning consideration.
- High rise buildings would interfere with TV and radio signal.
Officer response: There is no evidence to suggest that any such impact would be significant.
- Support for new development, provision of A3 floorspace, raising town centre population, enhancing quality of shops, active frontages and evening economy.

Consultation Responses from Statutory Consultees and Other Bodies

Greater London Authority – Stage 1 Response

The stage 1 response (dated 19 March 2014) from the GLA finds that the application does not comply with the London Plan. The conclusions section of the GLA stage 1 report on the application makes the following points:

Housing:

Confirmation from Barnet Council's independent viability consultants that the scheme offers the maximum reasonable amount of affordable housing, further information to be provided in relation to children's play space.

Urban Design:

The applicant is asked to set out measures to secure the southern edges of the development; consider closing off public access to the podium level courtyard and treat it as a secure and private communal space for use by residents and children within the development. Lift access should be provided to the podium level courtyard from Church Way.

Tall buildings:

A views assessment should be conducted to demonstrate that the proposed tall building does not adversely affect local views and conservation areas. The applicant is urged to engage with English Heritage/local design panel to ensure proposed parameters and design principles for the proposed tall building are robust and will provide a high quality development.

Energy:

Further information should be provided on monthly heat and electricity demand profiles to support the CHP sizing along with the management arrangements and electricity sale strategy for the scheme before the carbon savings can be verified.

Transport:

The applicant is strongly encouraged to further reduce the number of car parking spaces, contribute towards the provision of Legible London and DDA compliant bus stops if required and provide a travel plan. The applicant is required to increase visitor cycle parking to 50, submit the final version of residential and employee travel plan, Construction Logistics Plan (CLP) and Delivery and Servicing Plan to be secured by condition and confirm CIL contributions once the components of the development have been finalised.

Transport for London

It is recommended that parking provision is further reduced and that future occupants are excluded from applying for a parking permit. Electric vehicle charging points should be provided in accordance with London Plan standards, to be secured by condition. Request an audit of local bus stops and if necessary a contribution towards access improvements. Request that contribution is made towards improved pedestrian and cycle environment in the vicinity of the site. Visitor cycle parking spaces should be increased by 4, whilst 50 spaces should be provided for the retained office space, along with changing and shower facilities. Final versions of residential and employee travel plan, Construction Logistics Plan (CLP) and Delivery and Servicing Plan to be secured by condition/legal agreement.

Natural England

The LPA should assess and consider the possible impacts resulting from this proposal when determining the application.

English Heritage

The application should be determined in accordance with national and local policy guidance, and the basis of your specialist conservation advice.

London Fire and Emergency Planning Authority

Access to the cores for fire appliances should be provided in open air and in accordance with the Building Regulations.

Metropolitan Police

Concerns that there would be no clear distinction between the public and private spaces proposed on the podium courtyard, which would result in a risk of crime.

Environment Agency

Did not need to be consulted on this application.

Internal Consultation responses

Traffic and Development Team: The submitted Transport Assessment does not accurately assess the impact on the Church Way/Station Road junction and the proposed level of car parking is insufficient. The proposal would therefore be likely to lead to adverse highway conditions in the locality and increased kerbside parking outside of the Controlled Parking Zone to the detriment of free flow of traffic and highway and pedestrian safety.

Environmental Health Service: Conditions recommended to control the impact from surrounding noise sources, air quality and contaminated land on the amenities of future occupiers.

2. DESCRIPTION OF THE SITE, SURROUNDINGS AND PROPOSAL

2.1 Site Description and Surroundings

The application site comprises ground floor commercial units 102-124 Station Road and the surface car park to the rear. The site also includes Premier House, a 14 storey building comprising a mixture of uses, predominantly office. The surface car park to the rear is accessed from Church Way and has capacity for 145 car parking spaces, primarily for occupants of Premier House, although approximately 40 spaces are leased to off-site users. The site has a total area of 0.57 hectares.

The site is bounded to the north and east by the Broadwalk Shopping Centre and to the south by Church Way, which serves as an access to the Broadwalk car park. To the west is Station Road (A5100), the main commercial street in Edgware town centre, which is mainly made up of 2 and 3 storey buildings, generally with retail and food and drink uses on the ground floor and offices/residential above. Nos.102-124 Station Road are located within the primary shopping frontage. The closest residential properties to the site are flats above commercial properties on the north western side of Station Road.

Edgware Underground Station (Northern Line) and local bus station are located some 200m to the north of the site, giving the site a public transport accessibility level (PTAL) of 6a (on a scale of 1-6, where 1 is poor and 6 is excellent). The site is within Flood Zone 1, with a low annual probability of flooding.

Edgware is designated as one of 35 major centres in the London Plan and the only one in Barnet. A Town Centre Framework (ETCF) was adopted by the Council in June 2013, which provides specific guidance on the implementation of development plan policies in the town centre.

2.2 Description of the Proposed Development

Outline planning permission is sought (with all matters other than access reserved) for four new buildings on the rear car park from 7 to 19 storeys to provide up to 165 flats, up to 1,450sqm of flexible community floorspace and 275sqm of retail/restaurant floorspace in a new unit fronting Church Way. The

proposal would also entail the demolition of Nos.120-124 Station Road to provide a pedestrian access to a courtyard area on a first floor podium above the car park. External alterations are also proposed to the retail unit at 102-106 Station Road to provide a new shopfront to the Church Way elevation. A plan showing the indicative proposed layout of the site is provided in **Appendix 1** of this report.

In physical terms the scheme would involve development over the rear car park to provide a podium courtyard at first floor level, accessed via steps from Station Road and Church Way. Above the podium, there would be 4 development plots (labelled A-D) and these would increase in height from south to north, with development plot D comprising a 19 storey tower. The proposal is in outline, with only the access points to be fixed at this stage. Reserved matters submissions would need to comply with the parameter plans (discussed in more detail below).

Housing

The application seeks to fix the housing mix and this is set out in the table below. A total of 38 affordable housing units are proposed on site, equivalent to 23% of the number of units. All the new dwellings would be built to Lifetime Homes standards, 10% being Wheelchair Standard units.

Type	No. of Units	No. of Habrooms	% by Unit Type	% by Habroom
1 Bed	57	171	34	28
2 Bed	90	360	55	58
3 Bed	18	90	11	14
Total	165	621	100	100

Community

1,450sqm of flexible community floorspace (Use Classes D1/D2) is proposed at first floor level and accessed from the proposed podium courtyard. This facility would be run by a management team and could accommodate the following types of uses:

- Multi-function hall for leisure, sport, conferences and cultural events;
- Social activities (lunch clubs, bingo, dance class);
- Flexible meeting rooms for community use/exhibitions;
- Child care (day nursery, crèche or playgroup);
- Doctors surgery or PCT Centre;
- Education and training facilities.

Retail

A new double height 275sqm flexible retail/restaurant (Use Classes A1/A3) unit is proposed fronting Church Way. Also proposed is the demolition of Nos.120-124 Station Road, currently in use as a restaurant and external alterations to provide a new shopfront to the Church Way elevation of Nos.102-106 (currently occupied by Iceland).

Access and Parking

The main vehicle access would be provided via an amended access point from Church Way to the undercroft car park. Pedestrian access to the podium

courtyard space would also be provided from Church Way and Station Road. A total of 107 car parking spaces would be provided, comprising:

- 47 employee spaces including 4 disabled spaces;
- 58 residents spaces including 17 disabled spaces;
- 2 disabled spaces for community centre visitors.

A total of 241 cycle parking spaces are proposed, including 219 ground floor cycle spaces and 22 visitor spaces at podium level for the community use. Refuse storage is provided at ground floor level, accessed from the car park.

Energy

Space is also set aside at ground floor level for the provision of a Combined Heat and Power (CHP) system, which would comprise a 90sqm plant room.

Application Documents

In addition to site location plans and existing drawings, the application is accompanied by two sets of drawings, one set of parameter plans that set the constraints future reserved matters submissions must comply with and one set of illustrative drawings that show how the scheme could look when fully designed. Details of these plans are set out below:

Parameter Plans

Proposed Demolition Plan – 138(MP)01 Rev PL1

- Confirms the buildings on site to be demolished as part of the proposal.

Proposed Parameter Plan – 138(MP)02 Rev P1

- Identifies the 4 development plots (A-D) and the podium courtyard space.

Proposed Maximum Plot Height Plan – 138(MP)03 Rev PL1

- Sets the maximum height of each plot envelope, measured in metres AOD (above ordnance datum).

Proposed Plot Dimension Plan – 138(MP)04 Rev PL1

- Sets the parameters for the maximum dimensions of each development plot envelope.

Proposed Ground Floor Access and Circulation Plan – 138(MP)05 Rev PL1

- Sets the ground floor parameters for the main vehicular and pedestrian access points, along with parking allocation, plant rooms, residential cores and refuse stores.

Proposed Podium Access and Circulation Plan – 138(MP)06 Rev PL1

- Sets the podium (first floor) parameters for pedestrian access points and circulation, along with the siting of the residential cores.

Illustrative Plans

Proposed Ground Floor Plan – 138(GA)01 Rev PL1

Proposed First Floor Plan – 138(GA)02 Rev PL1

Proposed Second Floor Plan – 138(GA)03 Rev PL1

Proposed Third-Fifth Floor Plans – 138(GA)04 Rev PL1

Proposed Sixth Floor Plan – 138(GA)05 Rev PL1

Proposed Seventh Floor Plan – 138(GA)06 Rev PL1

Proposed Eighth Floor Plan – 138(GA)07 Rev PL1

Proposed Ninth Floor Plan – 138(GA)08 Rev PL1

Proposed Tenth Floor Plan – 138(GA)09 Rev PL1

Proposed Eleventh-Fourteenth Floor Plans – 138(GA)10 Rev PL1

Proposed Fifteenth and Sixteenth Floor Plans – 138(GA)11 Rev PL1
Proposed Seventeenth and Eighteenth Floor Plans – 138(GA)12 Rev PL1
Proposed West Elevation – 138(GA)20 Rev PL1
Proposed North and South Elevations – 138(GA)21 Rev PL1
Proposed East Elevation – 138(GA)22 Rev PL1
Proposed Section AA – 138(GA)30 Rev PL1
Proposed Section BB – 138(GA)31 Rev PL1
Proposed Section CC – 138(GA)32 Rev PL1

To accompany the above drawings, a **Design Code** has been submitted, which seeks to lay out mandatory or advisable rules to govern future detailed design. A **Design and Access Statement** has also been submitted, which explains the rationale behind the design approach adopted.

In addition to the application drawings the supporting documents accompanying the submission include the following:

- Planning Statement
- Transport Assessment, Appendices and Travel Plan
- Statement of Consultation
- Affordable Housing Viability Assessment (Confidential)
- Noise Impact Assessment
- Air Quality Assessment
- Daylight and Sunlight Assessment
- Energy Strategy
- Sustainability Statement
- Foul Sewage and Utilities Assessment

3. PLANNING CONSIDERATIONS

3.1 Principle of the uses proposed and delivery of ETCF objectives

This outline submission seeks to establish the principle of the uses proposed. The scheme would be residential led, involving the construction of 165 new flats, but would also provide 1,450sqm of floorspace on the first floor for flexible community uses (Use Classes D1/D2) and a new 275sqm ground floor retail/restaurant (Use Classes A1/A2/A3). All these uses are appropriate to a town centre location and are therefore acceptable in principle. The Barnet Local Plan provides more detailed policy guidance on these uses and the ETCF provides specific guidance relating to this site and Edgware Major Centre more widely.

The London Plan (2011) identifies Edgware as a Major Centre. Policy 2.15 requires development proposals to:

- a) Sustain and enhance the vitality and viability of the centre;
- b) Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations;
- c) Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services;
- d) Be in scale with the centre;
- e) Promote access by public transport, walking and cycling;
- f) Promote safety, security and lifetime neighbourhoods;

- g) Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure;
- h) Reduce delivery, servicing and road user conflict.

With its excellent public transport accessibility, Edgware is well placed to deliver high density mixed use development that can deliver the above objectives.

Barnet Local Plan policy CS6 seeks to realise development opportunities for Edgware, as well as promoting the distribution of new convenience and comparison retail growth to this town centre. In 2008, the Council produced a Suburban Town Centre Strategy, which identifies opportunities for enhancement of retail, leisure and entertainment uses in Edgware town centre. The ETCF has been prepared in consultation with the community and is a material consideration for planning applications in the area.

Edgware Town Centre Framework

The ETCF sets out a vision for Edgware town centre to be a 'successful and thriving place with new and expanded shops around the Broadwalk Shopping Centre integrated with Station Road and the surrounding residential suburbs by new streets and connections'. It identifies some key sites within the town centre that can contribute to the objectives of the framework, including the application site, as well as a list of infrastructure that requires funding to deliver. The document sets out a number of specific objectives for the development of the application site:

- Provision of improved commercial units along Station Road and transformation of an important section of the building frontage;
- A new mixed use development involving retail at ground floor facing Station Road, with high quality office or residential uses above;
- A modern conference and community function hall facility, to provide a flexible community facility for Edgware;
- Possible comprehensive scheme with the adjacent Broadwalk Shopping Centre with connection to Station Road;
- Part conversion of Premier House to residential uses and refurbishment of dated exterior;
- Improved frontage to the retail unit on the corner of Station Road and the shopping centre car park.

The proposal would provide for an appropriate mix of town centre uses as discussed and would deliver a flexible community facility. The scheme would deliver some of the above objectives, through the provision of a mixed use development with residential over and a new shopfront to the flank elevation of the Iceland store at 102-106 Station Road. However, the site boundary does not include the commercial units 126-140 Station Road and there are no proposals to make general improvements to these units, or to refurbish Premier House.

The siting of the proposed uses and public realm area behind the primary shopping frontage, coupled with the lack of proposals to improve the environment on Station Road results in a form of development that fails to integrate itself with the town centre and contribute to its regeneration and

renewal. With appropriate land assembly of the frontage units 126-140 Station Road, a more comprehensive scheme could be devised that delivers an improved shopping frontage to the street, improved public realm and a better form of development overall. Without the assembly of this wider site the development potential of the car park site is significantly limited and this gives rise to issues around character and amenity, as discussed in more detail in the below sections. Officers therefore consider that the proposal fails to adequately contribute to the regeneration benefits set out in the ETCF, as underpinned by Barnet Local Plan policy CS6.

In addition to the land use and development principles set out in the ETCF, there is also a list of Elements of Infrastructure. Development sites identified in the document would be required to either deliver or contribute funding towards delivery of these items, as listed below:

- 1) A new street from Station Road into the Broadwalk Shopping Centre site
It is intended that this would provide a direct and visible connection from the shopping centre car park to the high street. The proposed shopfront to the flank elevation of 102-106 Station Road and the new retail unit fronting Church Way would provide an active frontage along the northern side of this new route and would therefore adequately contribute to this Element of Infrastructure.
- 2) Junction improvements along Station Road
There are 3 junctions identified for improvement, including the Station Road/Church Way junction. As discussed below in section 3.9 of this report, the assessment of this junction is considered to be unsatisfactory. Furthermore, no contribution has been secured for improvements to this junction.
- 3) A new street through Forumside connecting the Broadwalk Shopping Centre car park site to the A5
This is not connected to the development of this site.
- 4) Improved public open space around Edgware Station
The development is likely to have a proportionate impact on footfall around Edgware Station. No contribution has been offered or secured, see section 3.9 of this report.
- 5) Improved public realm along Station Road
This site has a frontage along Station Road of approximately 100m. The pedestrian environment along this stretch of the street is particularly poor and it would be expected that this scheme would contribute to removal of clutter and improved landscaping. However, the application documents do not include a firm commitment to this, or an indicative public realm improvement scheme. There are also no proposals for comprehensive improvements to the Station Road frontage and there are concerns that the proposals would not take the opportunity to improve the overall quality of the environment along Edgware's main shopping street, or provide new public realm close to existing footfall.

6) Improved bus interchange

The development is likely to have a proportionate impact on footfall and use of the bus interchange. No contribution has been offered or secured, see section 3.9 of this report.

7) A new pedestrian/cycle route from Deans Lane to the town centre.

This is not connected to the development of this site.

Overall therefore, it is considered that the proposal would fail to take the opportunities available to meet the key objectives of the ETCF. In particular, the lack of land assembly with the frontage units along Station Road would restrict the ability of the scheme to provide a comprehensive response to the issues set out in the Framework. Without the assembly of this wider site, the scale of the proposed development would be significantly out of keeping with the surrounding context and would fail to have adequate setting. Furthermore, the inward looking nature of the proposal, coupled with the lack of improvements to the dated facades of the buildings, would not contribute to the improvement of its surroundings. No contributions have been offered or secured for junction improvements, station improvements or bus interchange improvements.

The applicant's Design and Access Statement (DAS) includes a section entitled 'Phase 2 strategy', which aims to show how the properties at 126-140 Station Road could be redeveloped to provide modern shop units, office space and flats. However, this piecemeal form of development could be avoided with proper land assembly, which would also help to address some of the design and amenity concerns that are addressed later in this report. The DAS also recognises that the relationship with the blank frontage of the Broadwalk Shopping Centre is not ideal (pages 22 & 23) and gives an indication of how the ground floor element of the scheme could be altered to address a new street in this area. However, there are no indications that such a scheme would come forward on the Broadwalk site. Furthermore, the proposal to provide active frontages along the ground floor would impact on parking provision and the location of the proposed combined heat and power (CHP) plant.

This further emphasises the need for a comprehensive scheme that encompasses the whole of this town centre block and fully optimises the development potential of this important site, whilst recognising emerging proposals for the adjacent sites identified in the ETCF.

Retail

The proposal would result in the loss of a double commercial unit (120-124 Station Road), which is currently occupied by a restaurant and has a street frontage of 11.5m. A new flexible (Use Class A1/A2/A3) commercial unit is proposed with a frontage of 16.5m, although this would front Church Way and would therefore not be located within the primary shopping frontage as currently defined.

Barnet Local Plan policy DM11 states that 'a development proposal which reduces the combined proportion of class A1 retail use at ground floor level (including vacant) in the primary frontage below 75% will not be permitted'. At

present, the percentage of A1 use is around 66%, so below what would usually be permitted. However, the double unit to be demolished is occupied by a restaurant (Use Class A3), so there would be no additional loss of class A1 retail in the primary frontage as a result of this proposal and there would therefore be no conflict with Barnet Local Plan policy. Furthermore, the proposed flexible (Use Class A1/A2/A3) commercial unit fronting Church Way would contribute to the creation of a new street linking Station Road with Broadwalk Shopping Centre, which is supported in line with the objectives of the ETCF.

Community

The proposal includes a 1,450sqm flexible community building (Use Classes D1/D2), which could accommodate uses including:

- Multi-function hall for leisure, sport, conferences and cultural events;
- Social activities (lunch clubs, bingo, dance class);
- Flexible meeting rooms for community use/exhibitions;
- Child care (day nursery, crèche or playgroup);
- Doctors surgery or PCT centre;
- Education and training facilities.

Whilst it is questionable whether many of the above activities are appropriate to a community facility, the proposal is submitted in outline and, subject to appropriate controls that could be imposed through planning conditions or legal agreement, officers are satisfied that a flexible community facility for Edgware could be delivered. The principle of a facility of this nature and potential uses is therefore supported.

Residential

The National Planning Policy Framework (NPPF) recognises that residential development can play an important role in ensuring the vitality of centres (para 23). This is re-iterated in Barnet Local Plan policy CS6, which seeks to make efficient use of land in town centres and encourage a mix of compatible uses, including residential. The supporting text to Barnet Local Plan policy CS3 (para 8.1.7) states that 'choices and opportunities for town centre enhancement and infill will be identified through the programme of priority town centre frameworks', such as Edgware.

The ETCF recognises that this site can accommodate residential uses, but the emphasis is firmly on delivery of improved public realm, community facilities and other infrastructure. The principle of residential uses on this site is therefore accepted, provided that this helps to deliver the objectives of the ETCF and that the housing provided would be of high quality and meet other relevant standards. There are concerns over housing quality and this is discussed in more detail in the below appraisal sections, particularly section 3.5.

Conclusion

In summary, whilst the proposal would deliver some of the ETCF objectives, the scheme would fail to integrate itself with Station Road, would not result in an improved appearance for Premier House and the Station Road frontage and fails to secure the necessary contributions through S.106 as set out above. The proposal would therefore fail to adequately contribute towards the

Council's objectives for the regeneration and renewal of Edgware Major Centre and would be contrary to policy CS6 of the Barnet Local Plan Core Strategy, policy 2.15 of the London Plan and the Edgware Town Centre Framework.

3.2 Design and visual impact:

Tall buildings

The application proposes a predominantly residential tower of up to 19 storeys as part of development plot D. Development in plots B and C would also be above 7 storeys and would therefore be considered a tall building under Barnet Local Plan policy. Both local (Barnet Local Plan) and strategic policy (the London Plan 2011) seeks to establish the situations in which tall buildings may be considered appropriate.

London Plan policy 7.7 states that tall and large buildings should (criteria C):

- a) Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
- b) Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- c) Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- d) Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
- e) Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
- f) Have ground floor activities that provide a positive relationship to the surrounding streets;
- g) Contribute to improving the permeability of the site and wider area, where possible;
- h) Incorporate publicly accessible areas on the upper floors, where appropriate;
- i) Make a significant contribution to local regeneration.

Barnet Local Plan policy CS5 identifies Edgware town centre as being appropriate in principle for the provision of a tall building (defined in Barnet as being 8 storeys or more). Proposals for tall buildings are to be considered in accordance with Barnet Local Plan policy DM05 and the Guidance on Tall Buildings Document (2007) produced by CABI and English Heritage.

Outline application procedure

The CABI and English Heritage Guidance state that 'outline planning applications for tall buildings are appropriate only in exceptional cases where the applicant is seeking to establish the principle of a tall building as an important element within a robust and credible masterplan for an area to be developed over a long period of time' (para 5.1). In this instance, the scheme proposes tall buildings on high ground directly abutting adjacent properties in a visually prominent town centre location. The proposed scheme is a stand alone development for 165 flats and does not form part of an outline

masterplan for a larger development, whereby the scale and design can be assimilated into an overall scheme layout for the regeneration/creation of a neighbourhood.

Accordingly, it is considered that there are no exceptional circumstances that would justify the positive consideration of an outline application for tall buildings on this site contrary to policy. Furthermore, the submitted Parameter Plans and Design Code do not provide a robust framework for ensuring high design quality. The Parameter Plans restrict the footprint of the development plots and maximum building heights within those plots for the proposed buildings, along with the buildings to be demolished. Vehicle and pedestrian access points are also set by the Parameter Plans. Illustrative plans and elevations are also submitted, which give an indication of how the scheme could be developed in line with the Parameter Plans. However, whilst the Parameter Plan limitations would give control over the overall layout, scale and massing of the buildings, there is little to guide the detailed design.

The submitted Design Code would not provide the additional control required to ensure a high quality finished development, instead it simply gives additional detail on floor layout configurations, landscaping, servicing and sustainability, as well as reiterating information from the Design and Access Statement and application drawings. The majority of the individually referenced requirements are reiterated from other guidance documents, such as the London Housing Design Guide or the Lifetime Homes standards and do not therefore set rigorous standards for future reserved matters submissions to adhere to.

The supporting text to Barnet Local Plan policy DM05 recognises the importance of varying heights, proportion, silhouette and facing materials to the impact of a tall building. The criteria for evaluation set out in the CABE Guidance reiterates these important characteristics of architectural quality and also makes it clear that the detailed design of the top and the base of the tall buildings will be particularly important when considering the effect on the skyline and streetscape respectively. The articulation and modulation of the tower is considered to be particularly important and the suite of documents that accompany the application do not provide the specific written or graphic rules to guarantee acceptable proportions and visual relief. There would be insufficient controls in the Design Code to refer to detailing such as window and balcony reveals and recessed storeys, which will be very important to break up the mass of what would be a very large and bulky building compared to those adjacent. The illustrative elevations do not give officers the confidence of a high quality design coming forward.

Overall, the outline application procedure is considered to be inappropriate for this development and a detailed design should be drawn up in consultation with officers and the local community. Accordingly, the proposal is considered to be contrary to London Plan policy 7.7 and Barnet Local Plan policies CS5 and DM05 in this regard.

Visual and other impact of the proposed tall buildings

In terms of the impact of tall buildings on this site, Barnet Local Plan policy DM05 sets out five criteria for the assessment of tall buildings. Proposals will

need to demonstrate:

- (i) An active street frontage where appropriate;
- (ii) Successful integration into the existing urban fabric;
- (iii) A regard to topography and no adverse impact on local viewing corridors, local views and the skyline;
- (iv) Not cause harm to heritage assets and their setting;
- (v) That the potential microclimatic effect does not adversely affect existing levels of comfort in the public realm.

Whilst the scheme would not incorporate an active frontage at ground floor level, this is due to the siting to the rear of the Station Road frontage, away from the footfall of the town centre and facing out onto the blank elevations of the Broadwalk Shopping Centre. The submitted Design and Access Statement demonstrates that active frontages could be provided along the north and east ground floor elevations in future, should a scheme come forward for the shopping centre. The proposal seeks to overcome the constrained siting through the provision of a publically accessible podium courtyard at first floor level, accessed from Station Road and Church Way, with active frontages facing onto the space from the proposed community facility and from the existing Premier House. As discussed, the proposal to provide public realm in this 'back of shops' location is not supported. However, the principle of the tall building being sited behind the Station Road frontage to reduce its visual impact is accepted, so it would not necessarily be appropriate for the tower to provide an active frontage itself.

The site is located in an urban context, close to other tall buildings and surrounded on two sides by a shopping centre. The proposal seeks to reduce the impact of the scale of the development by setting the buildings behind Premier House and the main shopping frontage along Station Road. The Tall Buildings Study of London Borough of Barnet (2010) recognises that tall buildings typically relate better to the urban form in these areas, particularly where they are more sensitively located relative to the public realm. Therefore, whilst the proposal as presented would not ensure an acceptable standard of design, the concept of siting the tall buildings behind the Station Road frontage would minimise the impact on the existing urban fabric.

Criteria (iii) requires regard to be had to topography and no adverse impact on local viewing corridors, local views and the skyline. Whilst the scheme would not be sited within any local viewing corridors, consideration still needs to be given to the impact of the proposal on local public views and the skyline of Edgware more generally. The application is not accompanied by a visual impact assessment of any description. The CGI images that are included only show the scheme from the immediate locality and not in any detail due to the outline nature of the submission. Furthermore, as mentioned the outline nature of the proposal means that the scheme has not been fully designed, so the wider visual impact cannot therefore be fully considered. The site is prominently located relative to local topography and the buildings would be highly visible over a wide area, the 19 storey tower in particular. The way the buildings would relate to the adjacent Premier House, in terms of the formation of a cluster, also requires further consideration. A rationale and justification for 19 storeys has not been provided. It is critical that officers fully understand the visual impact of the proposal and, in the absence of a full

scheme design and visual impact assessment, the proposal fails to comply with this criteria.

The closest heritage assets to the site are the Grade II listed St Margaret's Church and Railway Hotel on Station Road (some 50m to the south of the site) and the Watling Estate Conservation Area (some 350m to the south east). Edgware High Street Conservation Area, which also contains a number of listed buildings, is located some 100m to the west of the site, within the London Borough of Harrow. As mentioned, the outline nature of the proposal means that the buildings have not been fully designed, so the wider visual impact cannot therefore be fully considered. Officers cannot therefore be satisfied that the impact of the tall buildings on the setting of local heritage assets would be acceptable and the proposal therefore fails to comply with criteria (iv). Criteria 4.1.2 of the CABE Guidance states that 'tall building proposals must address their effect on the setting of, and views to and from historic buildings, sites and landscapes over a wide area'. The application documents do not include adequate detail in relation to this aspect and the visual impact of the proposal on the setting of heritage assets cannot therefore be fully understood.

Criteria (v) requires tall buildings not to adversely impact on nearby spaces, in terms of microclimatic effects and this is also required by criteria 4.1.9 of the CABE Guidance. Section 2.5 of the Council's Sustainable Design and Construction SPD (2013) refers to the impact of development on wind and thermal conditions. It is important that new tall buildings do not lead to adverse conditions in the nearby public realm. Equally, it is important that high level amenity areas, such as those proposed as part of this scheme, are comfortable for people to use. Tall freestanding buildings can create eddies, channel wind into nearby streets or cause vortexes in adjacent spaces. These effects could also be amplified due to the siting close to Premier House. The Lawson Criteria for Distress and Comfort (set out in the below table) provides a set of principles to follow in terms of acceptable wind conditions for different types of activities.

Hourly average wind speed	Description	Activity
0 – 4 m/s	Long term sitting	Reading a newspaper, eating or drinking
4 – 6 m/s	Standing or short term sitting	Appropriate for bus stops, window shopping and building entrances
6 – 8 m/s	Walking and strolling	General areas of walking and sightseeing
8 – 10 m/s	Business walking	Local areas around tall buildings where people are not likely to linger

The proposed tower and lower buildings would be sited adjacent to the proposed courtyard space and the main shopping street in Edgware would be close by, so the appropriate wind speeds around the buildings should not regularly exceed 4 – 6 m/s. The submitted Sustainability Statement contains a short paragraph asserting that there would be no wind-tunnelling effects as a result of the proposal. However, this statement does not appear to be supported by any evidence in the form of a scientific study and there is no mention of potential eddies or vortexes within the proposed courtyard space.

No assessment has been made of the usability of the roof terraces proposed. Furthermore, it is stated that wind conditions would be considered at detailed design stage and appropriate mitigation measures put in place. However, the documents accompanying this outline application seek to fix the footprint, massing and height of the buildings, so this assessment should be undertaken at the outset in order to confirm that the impact would be acceptable. Thermal conditions must also be considered. In the absence of this information, the proposal would fail to comply with criteria (v).

In summary, the tall buildings as proposed would be unacceptable as they would fail to comply with the criteria set out in Barnet Local Plan policy DM05. The potential visual impact of the proposal would be significant and, in the absence of a detailed design proposal and supporting justification mentioned above, the proposal could unacceptably harm local views and the skyline of Edgware generally, views of the wider landscape, the setting of nearby heritage assets and levels of comfort in the public realm.

Scale, bulk and massing of buildings

As mentioned, in addition to the proposed 19 storey tower, the application proposes lower buildings of between 7-10 storeys. These would wrap around the proposed podium courtyard and almost abut the south eastern boundary with the Broadwalk Shopping Centre. The submitted Design and Access Statement (DAS) includes an explanation of the design rationale that has been adopted for the scheme. However, the final design of the scheme does not appear to flow clearly from the design concept set out in the DAS. For example, p.10 looks at 3 options for the massing of the development:

Groundscraper option: A single block of 8 storeys above podium across the site. This was ruled out due to the excessive scale adjacent to Church Way, the general lack of conformity with the surrounding scale of development and overshadowing of the courtyard space.

Tower option: A 20 storey tower in the north of the site, with 3 storey townhouses. This was felt to be incompatible with the urban setting.

Stepped option: Buildings stepping up from 6 storeys fronting Church Way. This was the chosen option as it was felt to be the most appropriate in terms of scale and makes it easy to create a series of south facing roof terraces.

By contrast, the final design approach includes elements of all 3 concepts. The overall scale of the blocks is similar or higher than the groundscraper option, the tower is included and the stepped design approach has also been adopted. Furthermore, the diagram on p.8 of the DAS suggests that views through the development should be incorporated, in order to break up the mass, whereas what is proposed is a solid wall of development. The proposal does not therefore seem to be informed by its own design development and, coupled with the outline nature of the submission, this gives rise to concerns over the design rationale.

Overall, the design approach is considered to be unacceptable. Edgware town centre is generally characterised by low scale (2 and 3 storey) buildings with some taller buildings. The application site and surroundings is typical of this

pattern of development, comprising 2 storey shop units and the single exception in the case of the 14 storey Premier House. The proposed stepped design approach would result in an awkward, digressive form of development that would be at odds with the pattern of existing development in Edgware. This would be contrary to Barnet Local Plan policy DM01, which requires development proposals to be based on an understanding of local characteristics and states that 'proposals should preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets'.

The external alterations to the corner unit at 102-106 Station Road would increase the active frontage of this retail shop (currently occupied by Iceland) and would introduce a shop front on the return frontage facing Church Way. This would contribute to the vitality of Edgware town centre generally and would provide an appropriate frontage to the new street that could be created, as envisaged by the Edgware Town Centre Framework (ETCF).

The new A1/A2/A3 unit fronting Church Way would also contribute to these objectives, but there is concern over the scale of this new building, which would be 7 storeys in height. At present, Church Way serves as an access to the Broadwalk Shopping Centre car park and service areas. It is fronted onto by the two storey flat roofed retail unit at 102-106 Station Road, the two storey Emmanuel Centre opposite to the south west and boundary fencing to surface car parks. This part of the site is located adjacent to the Broadwalk Shopping Centre and Forumside sites, which are the other two main sites forming the spatial strategy in the ETCF and it is noted that the character of this area may change in the future if proposals are brought forward for other sites fronting Church Way. However, as set out in the ETCF, development proposals in this area would need to 'be of an appropriate scale to respect the existing buildings along Station Road and the setting of the Grade II listed Railway Hotel'. The proposed 7 storey development fronting Church Way would be significantly higher than surrounding buildings in this area and would be very apparent in public views. This part of the proposal would therefore fail to respect the scale, mass and height of surrounding buildings, contrary to Barnet Local Plan policy DM01.

It is acknowledged that strict repetition of the scale and form of surrounding development would not necessarily be appropriate. This is a priority town centre, where high density enabling residential development may be appropriate in order to deliver the objectives of the ETCF. However, officers are concerned that the scale and form of the development as currently proposed has not been fully assessed or justified, and combined with the outline nature of the submission, which would not give the necessary assurances of a high quality design.

Public realm and relationship with Station Road

The ETCF talks about a comprehensive scheme being devised to include the commercial units fronting Station Road. This would transform and renew an important section of the building frontage in the town centre and would enable the scheme to make a better contribution to public realm improvement along Station Road. However, the application site does not incorporate the commercial units 126-140 Station Road and instead proposes its own area of

public realm in the form of a podium courtyard accessed from Station Road following demolition of the restaurant unit at 120-124. This space is also intended to provide communal amenity space for occupants of the residential flats and it would also serve as the main access for the residential cores and community facility.

The benefits of this space to Edgware town centre, in terms of providing a green space for people to gather away from the busy shopping areas, are acknowledged. However, its location at podium level reduces its visibility and legibility from Station Road and officers question how much this space would be used. It would also conflict with its other intention to serve as private amenity space for the proposed residential units, as discussed below in appraisal section 3.5. A more comprehensive scheme should be devised, which incorporates the parade at 126-140 Station Road. This would enable a new piece of public realm to be created at street level and an improved shopping frontage to the benefit of the town centre more widely. As discussed in appraisal section 3.1, improved public realm along Station Road is Item 5 in the Council's list of Elements of Infrastructure (EoI) expected to be delivered through the ETCF. The supporting text to this EoI explains that space between buildings along Station Road is generous and currently underutilised. The ETCF seeks to ensure that the Station Road frontage of this site is transformed and that this should be co-ordinated with improvements to the public space in front of Edgware Underground Station. The lack of a comprehensive scheme for the whole site and adequate dialogue with adjoining landowners, TfL and the Council regarding transport and public realm improvements has resulted in a scheme that fails to address the objectives of the Edgware Town Centre and Barnet Local Plan policy CS6.

The applicant's Design and Access Statement includes a section entitled 'Phase 2 strategy', which aims to show how the properties at 126-140 Station Road could be redeveloped to provide modern shop units, office space and flats. However, this hypothetical design exercise does not appear to optimise the development of the site, rather it seems to be used to reduce the overall density of the development proposed on the application site. This further emphasises the need for a comprehensive scheme that encompasses the whole of this town centre block and fully optimises the development potential of this important site.

Conclusion

In summary, the proposed tall buildings would be unacceptable in the absence of a detailed design and a lack of justification for the potential impact on local public views, nearby heritage assets and microclimate. The scale and design of the development would also be unacceptable in the context of the existing pattern of development in Edgware more generally. The inward facing nature of the scheme and proposed public realm fails to optimise the potential of this important site and this is also unacceptable.

3.3 Dwelling mix

London Plan policy 3.8 seeks to ensure that 'new developments offer a range of housing choices, in terms of the mix of housing sizes and types'. Barnet Local Plan policy DM08 requires development to provide a mix of dwelling

types and sizes, where appropriate. There is an emphasis on the provision of family sized housing, with 3 and 4 bedroom dwellings a priority across all tenures. It is important to clarify that the definition of 'family housing' in Appendix D of the Core Strategy (as referred to by the GLA in paragraph 26 of the Stage 1 response) defines family housing as '**usually** consisting of two or more bedrooms'. For the avoidance of doubt, the priority dwelling sizes are set out in policy DM08. The proposed housing mix by tenure is set out in the table below:

Tenure	1 bed (unit/%)	2 bed (unit/%)	3 bed (unit/%)	Total
Social	8 (36%)	12 (55%)	2 (9%)	22
Intermediate	5 (31%)	10 (63%)	1 (6%)	16
Market	44 (35%)	68 (54%)	15 (12%)	127
Total	57 (34.5%)	90 (54.5%)	18 (11%)	165

The above figures show that the scheme would not provide any 4 bed units at all and only a small percentage of 3 bed units. The proposal would therefore not provide a significant contribution to the Council's identified shortfall. However, given the high density nature of the scheme and location within a town centre, it is considered that it would not be appropriate to provide a significant proportion of 3 and 4 bed units. The proposed housing mix is therefore considered to be acceptable in this instance, given the nature of the scheme proposed.

3.4 Density of development

London Plan policy 3.4 seeks to optimise the housing potential of sites and references the density matrix contained in Table 3.2 set out below. This provides a guide to appropriate density ranges for particular locations, depending on accessibility and setting.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/hr	100-240 u/ha	215-405 u/ha

The application site is in a location with a PTAL of 6 and is within a central setting, as defined in the London Plan. The scheme averages 3.8 habitable rooms per unit. Taking these factors into consideration the London Plan density matrix would suggest a range of somewhere between 140 and 290

units per hectare or 650 to 1100 habitable rooms per hectare (see table above). On the basis of a site area of 0.57 hectares, the proposed development, based on the illustrative plans and schedule of accommodation submitted, would have a density of 289 dwellings per hectare and 1089 habitable rooms per hectare, which would be within the 'optimum' density ranges in the London Plan albeit right at the upper end. However, when the site area occupied by retained developments is taken out, the density equates to 522 units per hectare and 1,968 habitable rooms per hectare, which is significantly higher than the upper end of the London Plan range.

Furthermore, a large community facility and undercroft parking area is proposed, which also has an impact on the scale of the development. The key message as set out in the Mayor's Housing SPG (2012) is that the objective is to '**optimise**' housing potential, rather than 'maximise'. In instances such as this, where densities are at the top end of the range or beyond, they should only be considered appropriate where a high quality design is proposed and where the proposed residential accommodation meets other relevant standards. As other sections of this report set out in more detail, there are a number of serious concerns with the design of the development proposed in the application. While this is an outline application, these concerns relate to matters which the local planning authority would have accepted under the parameter plans submitted for approval (if outline consent was granted). In light of this position, officers are unable to conclude that the submission has demonstrated that the density of development proposed is acceptable or compliant with development plan policy.

It should also be noted that there are no maximum parameters for residential floorspace and the application does not seek to fix the dwelling mix. The scheme therefore, when constructed within the maximum parameters sought for approval, could deliver more habitable rooms and residential floorspace than the illustrative mix indicates. This could raise a number of potential issues with regards to standard of accommodation.

3.5 Standard of accommodation provided and amenities of future occupiers of the proposed dwellings

Local Plan policies require high quality design in all new development that creates attractive places which are welcoming, accessible and inviting. Policy DM01 states that proposals should be designed to allow for adequate daylight, sunlight, privacy and outlook for potential occupiers. Policy DM02 identifies standards that development will be expected to meet in relation to a number of matters, including the internal floorspace of new dwellings, outdoor amenity space and play space. Policy DM04 states that buildings should be designed to minimise exposure to air pollutants. The same policy states that proposals to locate noise sensitive development in areas with high levels of noise will not normally be permitted and also that the mitigation of any noise impacts will be expected where appropriate.

The London Plan contains a number of policies relevant to the provision of adequate amenities for future occupiers of new dwellings. These include requirements to provide high quality indoor and outdoor spaces, set minimum internal space standards for different types of unit and seek accommodation

which has an appropriate layout and meets the needs of its occupiers over their lifetime.

The council's adopted supplementary planning documents (SPDs), Sustainable Design and Construction and Residential Design Guidance, and the Mayors adopted supplementary planning guidance, Housing, provide more detailed guidance on a range of matters related to creating new dwellings that have adequate amenities for their future occupiers. These include, in both documents, identifying minimum sizes for private external amenity space (balconies or terraces). The Barnet standards in this regard equate to 3m² for 1 person or 2 person dwellings with an extra 1m² expected for each additional bed space proposed. The Mayoral standards on this matter are more onerous and equate to 5m² for 1 person or 2 person dwellings with an extra 1m² expected for each additional bed space proposed.

The Residential Design Guidance SPD identifies that there should be minimum distances of about 21m between properties with facing windows to habitable rooms and 10.5m to a neighbouring garden, in order to avoid overlooking in new developments.

Dwelling size

Table 3.3 in the London Plan provides a minimum gross internal floor area for different types of dwelling, as set out in the below table, which shows the areas relevant to the unit types in this proposal as set out in the schedule of accommodation.

Table 3.3 Minimum Space standards for new dwellings (adapted from London Plan)

	Dwelling Type (bedroom/persons- bed spaces)	Gross Internal Area Standard (m ²)
Flats	1 bedroom 2 person	50
	2 bedroom 3 person	61
	2 bedroom 4 person	70
	3 bedroom 5 person	86
	3 bedroom 6 person	95

It should be noted that, as the proposal is submitted in outline, the floor plan layouts are not fixed at this stage and the accommodation schedule is based on the illustrative plans. All the proposed units comply with or exceed these minimum standards and the individual room sizes in all of the units would comply with the standards in the Mayors Housing SPG/London Housing Design Guide. Officers are therefore satisfied that future detailed applications would be capable of complying with these standards within the parameters set by this outline submission.

Dwelling outlook

Development plan policy requires that new dwellings are provided with adequate outlook. It is important to maximise the outlook of occupiers of the new dwellings, while also taking account of the need to prevent unacceptable levels of overlooking at neighbouring properties. According to the illustrative plans, the majority of the proposed flats would be dual aspect and would have appropriate fenestration throughout. The single aspect units that would have a northern orientation (16 in total) would face north west and would have an acceptable outlook over the podium courtyard.

The north eastern and south eastern elevations would face out onto the Broadwalk Shopping Centre, which consists of a two commercial storey (13m) blank wall and an access ramp to a rooftop car park. The high floor to ceiling heights of the undercroft parking area and community centre would mean that the lowest level of residential accommodation (second floor) would be just below the height of the shopping centre and would be set some 13m away at its closest point. The south east facing units would face out onto the access ramp to the rooftop car park and rooftop plant, which could result in some noise and disturbance as a result of activity associated with the shopping centre, possibly at unsocial hours. The proposed indicative layout plans show that all the flats facing the Broadwalk are either single aspect, or rely on this aspect for outlook from sensitive rooms, such as bedrooms. Overall, having regard to the proposed layout, it is considered that the occupiers of the lower floor residential flats facing the Broadwalk Shopping Centre would have a poor outlook.

The north western elevations would face out over the podium courtyard space, the rear of Premier House and the back of the shopping parade on Station Road. Overall, the separation distances across this courtyard between buildings and neighbouring uses are considered to be adequate to ensure an acceptable outlook for future occupiers of these units.

External amenity space provision

Guidance in Barnet's Residential Design Guidance SPD sets out minimum standards for outdoor amenity space provision in new residential developments. Flats are expected to be provided with 5m² of usable outdoor communal or private amenity space per habitable room proposed. Kitchens over 13m² are counted as a habitable room and habitable rooms over 20m² are counted as two habitable rooms for the purposes of calculating amenity space requirements.

Private amenity space for each flat would be provided in the form of a balcony. However, the private balcony/terrace provision for most units, except those with large roof terraces, would fall below Barnet SPD standards. Outdoor terraces are also proposed on the rooftops of Blocks B, C and D, which would provide supplementary communal amenity space for residents. The table below sets out the number of units in each block that comply with SPD standards on the basis of their private balcony/terrace provision, the amount of communal terrace provision per block and finally the communal terrace provision divided by the number of flats in the each block that have a shortfall of private amenity space.

Block	Units with compliant amenity	Communal terrace provision	Communal terrace / no units
A	2	0 sqm	0 sqm
B	1	55 sqm	3.7 sqm
C	16	75 sqm	5 sqm
D	0	620 sqm	6.5 sqm

As the table shows, only 19 of the 165 flats proposed would be compliant with

Council standards on the basis of their private amenity space provision. The scheme is therefore reliant upon communal amenity space provision to make up for this shortfall, which is not unusual in high density developments. However, Block A would provide no communal amenity space at all, whilst there would be a shortfall of around 6-9sqm per unit for Block B, 8-9sqm per unit for Block C and between 3.5-9.5sqm per unit for Block D. Furthermore, inadequate justification has been provided to demonstrate that these rooftop amenity areas would be genuinely usable, given their height and the possibility of being affected by adverse weather conditions, particularly wind. Therefore, the quantum of usable space could reduce further.

The submitted Design Code sets out a strategy for amenity space provision. This includes 500sqm of space on the podium courtyard, which it is stated could be used for informal gatherings of residents or community centre users. However, this space would also serve as an access to the community centre and could be a noisy and busy thoroughfare depending on events being held. SPD paragraph 8.4 states that 'in designing high quality amenity space, consideration should be given to privacy, outlook, sunlight, trees and planting, materials (including paving), lighting and boundary treatment'. Furthermore, the SPD makes it clear that 'all dwellings should have access to outdoor amenity space that is not overlooked from the public realm and provides a reasonable level of privacy'. The podium courtyard proposed would also provide a new area of public realm and would be overlooked by the community centre and by Premier House. Therefore this space would actually serve as public realm and be directly overlooked by adjacent office and community uses. This would not therefore ensure adequate privacy for users of this space and this area cannot be counted towards residential amenity space provision.

In summary, the proposed amenity space provision would fall significantly below the standards set by the SPD, both in terms of quantum and usability. This would lead to poor living conditions for future occupiers of many of the flats, which would be contrary to Barnet Local Plan policy DM02(7) and the Residential Design Guidance and Sustainable Design and Construction SPDs. This would be an unacceptable impact in isolation, but is further compounded by the scheme's inadequate daylight and sunlight.

Play space

Barnet Local Plan policy DM02 and London Plan policy 3.6 state that proposals for dwellings should make provision for play and informal recreation based on the expected child population generated and an assessment of future needs. According to the multipliers in the Barnet Planning Obligations SPD, the total child yield of the development would be 31 and the detailed breakdown of this child yield is included in appraisal section 3.16. The Mayor's Supplementary Planning Guidance 'Providing for children and young people's play and informal recreation', sets a benchmark standard of a minimum 10sqm per child, so the requirement for on site provision here would be a minimum of 310sqm. The submitted Design Code allows for a total of 325sqm of play space, with 225sqm to be provided at the podium courtyard level and a further 100sqm provided at the roof level of Block D. However, as mentioned above there are concerns over the usability of the roof terraces and in the absence of a justification concerning the likely microclimatic

conditions in these areas, officers are equally concerned over the usability of this 10th floor play space. Furthermore, this space would only be accessible from the Block D core, which would not be satisfactory given that the majority of the child yield would be likely to arise from the social rented Block A.

Accordingly, the proposed play space provision would fall below the standards set by the Mayor's SPD, both in terms of quantum and usability. The development would therefore fail to make adequate provision for children's play space, contrary to Barnet Local Plan policy DM02(9) and London Plan policy 3.6.

Privacy and overlooking

Barnet's Residential Design Guidance Supplementary Planning Document (SPD) provides guidance on safeguarding the amenities of residents and the standards set out therein also apply to the impact of existing buildings on the privacy of future occupiers of proposed developments. There should be minimum distances of about 21m between properties with facing windows to habitable rooms and 10.5m to a neighbouring garden, in order to avoid overlooking in new developments.

The scheme has been designed to ensure that the relationship between the new build development and Premier House is acceptable, with a minimum of 21m separation distance maintained. However, the north west facing windows and balconies on Block D would directly face the rear windows of the properties at 130-140 Station Road, being between 7-14m away. This is significantly below the 21m minimum standard and, although these are not residential properties, this would not affect the perception of overlooking that future occupiers of these units would experience. Whilst it is noted that the impact would diminish as the height of the building increases, habitable rooms and balconies for the lower floor units would be unduly affected. This would affect the usability of the balconies and living areas for these units and would have an unacceptable impact on the living conditions of future occupiers.

Daylight and sunlight

The submission includes an assessment of the daylight that would be received in the habitable rooms of the dwellings proposed, based on the illustrative layout plans submitted. Using the methodology found in guidance from the Building Research Establishment (BRE) this evaluation found that only 61.2% of the habitable rooms proposed would meet the relevant daylight standards. This is considered to be unsatisfactory, particularly given that the majority of the scheme would project above adjacent buildings and would therefore not be unduly constrained. The justification given is that the BRE guidelines should be applied flexibly and it appears that one of the main reasons for the extent of non-compliance is the provision of recessed balconies. However, this is not considered to be an adequate justification for such low compliance, particularly given that alternative balcony designs could be incorporated. Furthermore, 41 of the units would include two or more habitable rooms that fail the standards and 22 of these units do not meet the standards in any room. In respect of sunlight, whilst 92.1% of the flats would achieve the recommended probable winter sunlight hours, only 113 (68.5%) would achieve the recommended annual probable sunlight hours. Again, this is considered to be unacceptable.

Furthermore, according to the illustrative drawings, many of the habitable rooms proposed would fail to incorporate glazing of up to 20% of floor area, as required by the Sustainable Design and Construction SPD (table 2.4).

In summary and taken in the round, the levels of daylight and sunlight received by the proposed flats would be grossly inadequate. This would lead to poor living conditions for future occupiers of many of the flats, which would be contrary to Barnet Local Plan policy DM01(e) and the Residential Design Guidance and Sustainable Design and Construction SPDs. This would be an unacceptable impact in isolation, but is further compounded by the scheme's inadequate provision of amenity space.

Noise and air quality

The submitted Noise Impact Assessment identifies that traffic on the local road network and shopping centre service areas is the main noise source to the site, along with plant and machinery associated with surrounding town centre uses. An indicative scheme of noise insulation for the uses proposed has been included, detailing glazing specifications and mechanical ventilation systems. The Council's Environmental Health Service considers the mitigation measures to be acceptable, subject to conditions requiring details of these noise insulation measures to be approved, in addition to mitigation measures to control the impact of any new plant and machinery installed as part of the development.

In terms of air quality, the submitted Air Quality Assessment concludes that the potential for poor air quality to the proposed flats would be minimised due to the set back away from Station Road. There would be a potential impact on air quality arising from construction activity, but mitigation measures could be secured through a Construction Management Plan. The Council's Environmental Health Service considers the impact to be acceptable and conditions would have been recommended to secure mitigation measures were the proposal otherwise considered acceptable. The proposal is therefore found to be acceptable in respect of the noise and air quality environment that it would provide for the occupiers of the dwellings proposed.

Conclusions on the amenities of future occupiers

In summary, the proposal would fail to provide adequate, usable amenity space or children's play space. The level of daylight and sunlight received by a significant proportion of the residential units proposed would also be unsatisfactory. The scheme would provide poor outlook for some of the units and a lack of privacy. The proposal would therefore not provide acceptable living conditions for future occupiers and would be contrary to policies DM01 and DM02 of the Barnet Local Plan in this regard, as well as the Residential Design Guide and Sustainable Design and Construction SPDs. The scheme's failure to provide adequate living standards for future residents highlights concerns in relation to the density of the development as currently proposed

3.6 Impacts on amenities of neighbouring and surrounding occupiers and users:

Local Plan policies seek broadly to promote quality environments and protect the amenity of neighbouring occupiers and users through requiring a high standard of design in new development. More specifically policy DM01 states that proposals should be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining occupiers and users. Policy DM04 identifies that proposals to locate development that is likely to generate unacceptable noise levels close to noise sensitive uses will not normally be permitted.

Barnet's Residential Design Guidance Supplementary Planning Document (SPD) provides further guidance on safeguarding the amenities of neighbouring and surrounding occupiers and users. This includes stating that there should be minimum distances of about 21m between properties with facing windows to habitable rooms and 10.5m to a neighbouring garden, in order to avoid overlooking in new developments.

The nearest residential properties to the application site are located above commercial premises on the north western side of Station Road/Manor Park Crescent and beyond on Garden City.

Overlooking and loss of privacy

Concerns have been raised by residents of properties on Garden City with regard to overlooking and loss of privacy from the proposed development. At its closest points (Block A and Block D), the buildings would be some 100m from the rear of the closest properties on Garden City (nos.20 and 22). There would also be a minimum separation distance of 60m between the proposed buildings and the front habitable room windows of the flats on Station Road, which face the site. These separation distances comfortably comply with the recommended distances of 21m between habitable rooms and 10.5m between habitable rooms and gardens set out in paragraph 7.3 of the SPD. The proposal would therefore not result in unacceptable overlooking of neighbouring residential properties and neighbouring residents' privacy would not be unduly affected.

Daylight and sunlight

The application is accompanied by an assessment of the proposals impact on the daylight and sunlight received at neighbouring residential properties. This report finds that the relevant criteria relating to daylight and sunlight would be met at all neighbouring properties. It is therefore reasonable to conclude that there would be no significant adverse effects on the daylight or sunlight received at neighbouring residential properties. For the reasons outlined officers find that the application is acceptable in this regard.

Outlook and visual impact

The documents submitted with the application include images showing the impact of the proposed development on properties in the area surrounding the site and the drawings show the relationship of the proposed buildings with neighbouring properties and spaces. As discussed, the closest existing residential properties to the application site are located above commercial premises on the north western side of Station Road/Manor Park Crescent and beyond on Garden City. Concerns have been raised by a number of local

residents in relation to the potential overbearing impact of the development when viewed from neighbouring properties.

It is acknowledged that the proposed development would be higher and larger than most surrounding buildings in this area and would be very apparent in public views, as well as from neighbouring residential properties. This is discussed in more detail in section 3.2 of this report where the development was found to have an unacceptable impact on the character and appearance of the area by reason of design, height, scale and massing. However, whilst officers consider the design response to be unacceptable in this instance, the buildings would be set well away from residential properties. The separation distance to flats above commercial properties on Station Road would be around 60m and the buildings would be around 100m from the dwellings on Garden City. It should also be noted that this is a town centre location, where taller and larger buildings such as Premier House are typically located. Therefore, notwithstanding the scale of development proposed and its impact on the character and appearance of the area as discussed in section 3.2 of this report, it is considered that the separation distances would ameliorate the visual impact of the scheme and that no undue amenity impact would result in terms of loss of outlook from neighbouring residential dwellings.

Overall, it is considered that the siting of the proposed buildings well away from neighbouring residential properties is such that they would not result in any significant loss of outlook to residents. The application is therefore considered to be acceptable and compliant with development plan policy in these regards.

Noise

The residential dwellings proposed in the development are of a nature that they would be expected not to generate unacceptably high levels of noise and disturbance to the extent that they would harm the amenities of the occupiers of neighbouring properties in the normal course of their occupation. The proposed community centre and retail/restaurant unit would be appropriate to this town centre location, and hours of use and nature of activities could be restricted by condition were this proposal otherwise considered acceptable. The proposed parking area would be in the same location as the existing, but would be covered so would be likely to have less of an impact. The Council's Environmental Health Officer considers that the impact on neighbouring amenity in respect of noise would be acceptable, subject to conditions to control the nature of any plant and machinery installed as part of the development.

In addition to this, conditions would have been recommended to ensure that the construction of the development does not result in unacceptable levels of noise and disturbance. This would include the carrying out of the works within certain hours and in accordance with a Construction Management and Logistics Plan to agreed with the Local Planning Authority. Subject to these mitigation measures the proposal would be acceptable in terms of noise impacts.

Impacts from lighting associated with the development

Policy DM01 of the Barnet Local Plan requires new lighting schemes to not impact upon amenity. A condition would have been recommended requiring the implementation of the development in accordance with details of the external lighting installed as part of the development, were the proposal otherwise considered acceptable. Subject to this condition the proposal is considered to be acceptable and compliant with the objectives of policy in terms of preventing unacceptable lighting impacts from new development.

Conclusion

In summary, the proposed development is considered to be acceptable and compliant with the relevant development plan policies as they relate to the protection of the amenities of neighbouring and surrounding occupiers and users.

3.7 Affordable housing

London Plan Policy 3.12 requires the maximum reasonable amount of affordable housing to be sought when negotiating on individual residential schemes, having regard to:

- Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11.
- Affordable housing targets adopted in line with Policy 3.11.
- The need to encourage rather than restrain residential development (Policy 3.3).
- The need to promote mixed and balanced communities (Policy 3.9).
- The size and type of affordable housing needed in particular locations.
- The specific circumstances of individual sites.
- Resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor.
- The priority to be accorded to provision of affordable family housing in policies 3.8 and 3.11.

It suggests that negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, phasing and other scheme requirements. This approach is reflected in Local Plan policy DM10 which requires the maximum reasonable amount of affordable housing to be provided on site, subject to viability, having regard to a borough wide target that 40% of housing provision should be affordable.

To explain and justify this position the applicant has submitted a confidential report which evaluates the economic viability of the proposed development making a contribution to affordable housing provision. The Council has then commissioned the VOA to independently review the viability report provided and examine its findings.

The application proposes a total of 38 affordable units within Blocks A and B, which accounts for 23% of the total number of units proposed. Block A would be affordable rented and would comprise 22 units (58%), whilst Block B would comprise 16 intermediate units (42%). The applicant has submitted a viability assessment, which concludes that there would be a substantial deficit of over

£5.5 million with the proposed level of affordable housing. The VOA, acting on the Council's behalf, are broadly in agreement with this conclusion.

It is explained that the 38 units are offered on an ex-gratia basis, based on the desire to secure a planning consent and the support of the GLA. The applicant hopes that sales values increase over the lifetime of the permission to ensure that the development becomes viable. However, officers consider this to be an indication of a poorly conceived scheme, which fails to take proper consideration of what can be delivered on the site. Furthermore, there is no indication of an offer having been discussed with a registered provider (RP), which should be carried out prior to an application being submitted. The supporting text to London Plan policy 3.12 states that 'developers should engage with a registered provider prior to progressing the scheme and secure from them a commitment to provision'. This is reinforced in the London Housing SPG, which gives more detail on the types of funding streams available. The applicant has not engaged with any RP prior to submission and there is therefore no commitment to deliver the affordable housing units proposed. It is also unclear therefore whether further resources are available and officers consider that a more comprehensive scheme should be developed in partnership with an RP, in order to maximise investment towards the provision of affordable housing.

Were the proposal otherwise considered acceptable, a legal agreement would have been entered into to secure these units as affordable housing. In the absence of a S.106 agreement to ensure that the proposed affordable housing offer is delivered as such, the proposal is considered to be unacceptable and contrary to policies DM10, CS NPPF, CS4 and CS15 of the Barnet Local Plan and policies 3.12 and 3.13 of the London Plan.

3.8 Impact on existing trees and proposed planting:

There are no trees on, or within the vicinity of the site, so there would therefore be no undue impact on trees as a result of the proposal.

Policy DM01 identifies that proposals will be required to include hard and soft landscaping that:

- Is well laid out in terms of access, car parking and landscaping.
- Considers the impact of hardstandings on character.
- Achieves a suitable visual setting for buildings.
- Provides appropriate levels of new habitat including tree and shrub planting.
- Contributes to biodiversity including the retention of existing wildlife habitat and trees.
- Adequately protects existing trees and their root systems.
- Makes a positive contribution to the surrounding area.

The scheme is submitted in outline, so detailed planting plans are not included. However, the Design and Access Statement submitted includes a commitment to planting as part of providing suitable landscaping for the development more widely, particularly on the courtyard space and roof terraces. Given that the site currently has no planting, this would have the

potential to result in a significant improvement in terms of urban greening, which is supported. As mentioned, officers consider that a full planning application should be submitted for the development. This would typically be accompanied by more detailed proposals for planting, including specifications for planter depths on the podium courtyard and roof terraces. However, given the outline nature of the submission, these detailed matters could be considered at reserved matters stage and conditioned accordingly. Matters relating to biodiversity and habitat provision are addressed in section 3.14 of this report in full.

3.9 Transport, parking and highways matters:

Policy context

Policy CS9 of the Barnet Core Strategy (Providing safe, effective and efficient travel) identifies that the Council will seek to ensure more efficient use of the local road network, seek more environmentally friendly transport networks, ensure that development is matched to capacity and promote the delivery of appropriate transport infrastructure. Policy DM17 (Travel impact and parking standards) of the Barnet Development Management Plan Document sets out the parking standards that the Council will apply when assessing new developments. Other sections of policies DM17 and CS9 require proposals to have regard to the safety of all road users and make travel safer, reduce congestion, minimise increases in road traffic, provide suitable and safe access for all users of developments, ensure roads within the borough are used appropriately, require acceptable facilities for pedestrians and cyclists and reduce the need to travel.

Major development proposals with the potential for significant trip generation will be expected to be in locations which are, or will be made, highly accessible by a range of modes of transport and supported by a Transport Assessment that fully assesses the transport implications of the development across all modes. Larger schemes are also required to implement and maintain a satisfactory Travel Plan to minimise increases in road traffic and meet mode split targets.

Site location and description

The site is located within Edgware Town Centre, 200m from Edgware Underground Station and Bus Station. The site is bound by Station Road to the west, Church Way/ The Broadwalk shopping centre to the north and east, and Broadwalk Approach to the south. The A5 High Street which forms part of the Strategic Road Network (SRN) is located less than 200 metres to the southwest of the site.

The application site currently accommodates a mixed use development comprising B1 office use, A1 retail and A3 restaurant use. 145 informal parking spaces are available to employees at a cost of £60.00 per month.

The Public Transport Accessibility Level (PTAL) is graded from 1 for poor accessibility to 6 for excellent accessibility. For the proposed site the PTAL score is 6a. The site is located within a town centre location, close to local amenities, with good public transport accessibility and within Edgware Controlled Parking Zone (CPZ) which operates as follows:

The CPZ has an inner parking zone which is in operation during Monday to Saturday 8am to 6.30pm. Within the inner zone there is a more extensive parking restriction zone which is in operation during Monday to Sunday from 8am to 9pm. Beyond the inner zone, an outer zone operates as a one hour CPZ during Monday to Friday from 10am to 11am.

Pay by Phone short term parking is also available on Station Road. Additional parking is available in the Edgware Town Centre in the Broadwalk Shopping Centre car park and can be accessed from Church Way. The car park also provides some commuter parking spaces at a daily charge.

Edgware Bus Station is adjacent to the development site and is served by bus routes 32, 79, 107, 113, 142, 186, 204, 221, 240, 251, 288, 292, 303, 305 and 340 with bus stops located within walking distance of the site. The development is located approximately 3 minutes' walk from the Edgware Underground Station.

Parking

A total of 107 parking spaces are proposed. 58 parking spaces are proposed for the residential use including 17 disabled parking spaces and 47 parking spaces are proposed for the commercial use including 4 disabled parking spaces.

Residential use:

The assessment of parking provision for a residential development is based on Public Transport Accessibility Level (PTAL) score. For higher PTAL of say 5/6 a parking requirement at the lower end of the council's parking policy range would be considered acceptable.

Barnet's Local Plan Development Management Policies (policy DM17) approved in September 2012 sets out Parking Standards as follows for the residential use:

For 4 or more bedroom units	- 2.0 to 1.5 parking spaces per unit
For 2 and 3 bedroom units -	- 1.5 to 1.0 parking spaces per unit
For 1 bedroom units	- 1.0 to less than 1 parking space per unit

This equates to a range of parking provision of 108 to 219 parking spaces for the residential element of the proposed development to meet the Barnet Local Plan parking standards.

The parking provision as proposed does not therefore meet the parking standards as set out in the Barnet Local Plan Development Management Policies Approved in September 2012.

The parking provision of 58 parking spaces for the residential use is significantly below the minimum 108 parking spaces required. This is likely to encourage illegal parking and may result in overspill of parking on roads immediately outside the Controlled Parking Zone.

It is noted that Barnet Local Plan policy DM17 states that residential development may be acceptable with limited or no parking within a CPZ, as future residents could be excluded from applying for a permit. It is also noted that the GLA/TfL have requested that parking levels be reduced further. However, the proposed level of parking is significantly below the range set out in Barnet Local Plan standards and there are concerns that, despite local parking controls, future residents would park outside of the CPZ, which could result in unacceptable overspill parking in these areas. The specific areas where this would be likely to occur would be to the south and west of the town centre, whereby improved pedestrian links to the town centre envisaged by the ETCF could make these suburban peripheral areas more accessible. Furthermore, the CPZ in the neighbouring borough of Harrow is not as extensive, so there could be parking overspill into these areas.

Non residential uses:

The following table shows the parking assessment for the non-residential uses proposed on the site and compared against the London Plan Parking Standards as recommended in the Barnet Local Plan Development Management Policies.

Parking Assessment	Proposed GFA (m2)	LP Parking Standards	Parking spaces required	Parking Provided	Meets the Parking Standards
- A1/A2/A3 Use	275	1 parking space for 75m2-50m2	Between 3.5-5.5	None Provided	No
-Existing employment use	7430	1 parking space per 100m2 – 600m2	Between 74.3 – 12.4	47 (inc 4 disabled parking spaces)	Yes
- D1/D2 Community use	1450	To be assessed individually Based on TA Submission		2	Parking provided for disabled use only
Total Parking Proposed				49	No

The parking provision for the non-residential uses falls short of London Plan requirements, as no parking is provided for the A1/A2/A3 use and the parking requirements for the D1/D2 community use cannot be fully assessed until the end community user has been identified. For example, a health centre would require a maximum of 1 space per 50 staff + 1 per 10 visitors. However, the proposed A1/A2/A3 unit would essentially be a replacement of the existing unit at 120-124 Station Road to be demolished, so there would be no requirement to provide parking to serve this use.

The Transport Assessment states that users of the community centre could park in the Broadwalk Shopping Centre. However, as discussed in more detail

below, the Broadwalk Shopping Centre expansion proposals are also likely to have an impact on the available parking within the existing shopping centre car park. There could therefore be further overspill parking outside of the CPZ as a result of the proposed community use.

The proposals would therefore provide inadequate parking for the residential and community uses and would be unacceptable in this regard, contrary to Barnet Local Plan policies DM17 and CS9.

Cycle parking

A total of 241 cycle parking spaces are proposed which meets the requirements of the London Plan Parking Standards for cycle parking. However, provision needs to be made for showering and changing facilities for the commercial use to encourage cycling. It is considered that this could be dealt with under planning condition requiring reserved matters submissions to incorporate such facilities. The GLA stage 1 response states that visitor parking should be increased from 30 to 50, to take into account recent amendments to the London Plan. Given the outline nature of the scheme and the modest increase required, it is considered that this could be provided on site and dealt with by condition, were the proposal otherwise considered acceptable.

Vehicle, pedestrian access, deliveries and refuse collection

The vehicular access to the site is from Church Way. Church Way is public highway up to the back of the pedestrian refuge at the signalised junction of Church Way and Station Road. Beyond the pedestrian refuge the road is in private ownership. The applicant would need to seek approval from the owners of Church Way for any highway works associated with the proposed development.

Pedestrian access to the site is from Station Road and Church Way. The pedestrian access across the vehicular access into the site on Church Way is sub-standard as there are no dropped kerbs or tactile paving provided for pedestrians and disabled users across the junction. The pedestrian access to the Broadwalk car park is also unsuitable due to its narrow width and lack of dropped kerbs by the barriers.

Furthermore the junction assessment carried out by the consultants has not taken into account the existing pedestrian phase when assessing the signalised junction of Church Way and Station Road.

Delivery arrangements:

The consultants have confirmed in the TA that full Delivery Service Plan (DSP) will be agreed with London Borough of Barnet prior to occupation. A Construction Logistics Plan (CLP) would have also been required by condition, were the proposal otherwise considered acceptable. All delivery and servicing would be carried out within the ground floor car park. Deliveries for the existing offices will be maintained to the rear of the existing units in the servicing area. This is considered to be acceptable.

Refuse collection arrangements:

The consultants have also confirmed that residents of each block would use refuse chutes to dispose of refuse to the ground floor storage rooms which are accessible by the refuse vehicles and are within 10 metres of reach by refuse vehicles.

Trip generation and impact on public highway

Existing development trips:

The Transport Assessment (TA) submitted with the planning application indicates trip analysis as follows:

The existing employment trip data survey was carried out by the consultants to inform the typical trips during the AM and PM peaks shown in the table below. The table also shows that drivers associated with Premier House currently park in Premier House and the Broadwalk Shopping Centre car park.

	Premier Place Parking			Broadwalk Parking			Total Car Trips		
	In	Out	Total	In	Out	Total	In	Out	Total
am peak	65	3	68	29	1	30	94	4	98
pm peak	7	45	52	3	20	23	10	65	75
all day	269	243	512	118	107	225	387	350	737

Proposed residential trips for the new development:

Residential trip rates were assessed using the industry standard TRAVL database and the following vehicular trips are proposed for the proposed 165 residential units:

Vehicular Trips	AM Peak	PM Peak	All Day Trips
New Residential Trips	20	19	175

Proposed Premier House employment trips:

	Premier Place Parking			Broadwalk Parking			Total Car Trips		
	In	Out	Total	In	Out	Total	In	Out	Total
am peak	23	1	25	50	2	52	74	3	77
pm peak	3	16	19	5	35	40	8	51	59
all day	97	88	185	208	188	395	305	275	580

The applicant states in the TA that due to reduction in Premier House employee parking provision, there will be a net reduction in car trips associated with the site. The table below shows the expected future car trips associated with Premier House.

Expected changes to employment trips due to the proposed development:

Vehicular Trips	AM Peak	PM Peak	All Day Trips
Existing Employment Trips	98	75	737
Proposed Employment Trips	77	59	580
Change in Employment Trips	-21	-16	-157

The overall expected trip generation by the proposed new development for residential and employment use is as shown in the table below:

Vehicular Trips	AM Peak	PM Peak	All Day Trips
New Residential Trips	20	19	175
New Employment Trips	-21	-16	-157
Total New Trips	-1	3	18

The above trip analysis provided in the TA indicates that the trip generation from the proposed development is likely to result in a reduction in the vehicular movements compared to the existing use.

However, it is proposed in the TA that the net reduction in parking provision for Premier House is likely to result in displacement of parking as per table below.

	Existing	Proposed
Premier Place Parking spaces used	133	47
Possible Broadwalk Parking spaces Used	59	103
Total Parking Spaces	192	150

Impact on public highway:

The ETCF identifies the Broadwalk Shopping Centre car park as a key development opportunity and supports the potential expansion of the shopping centre. The owners of the Broadwalk Shopping Centre are yet to finalise their plans, but there is no mention of engagement with this neighbouring landowner in the TA. The trip assessment needs to reflect the combined impact of the proposed development of Premier Place and the Broadwalk Shopping Centre proposals to ensure that the signalised junction at Church Way /Station Road is able to cope with the likely additional trips resulting from the proposed intensification.

The Broadwalk Shopping Centre expansion proposals are also likely to have an impact on the available parking within the existing shopping centre car park. Therefore the displacement of parking as proposed in the table above may not be realistic and could result in overspill of parking onto the public highway on the edge of the CPZ.

Although the TA states there would be a reduction in trips related to the proposed development, the overall trip generation is unlikely to reduce as it is proposed that the car parking will be transferred into the shopping centre car park.

The Linsig assessment of the signals at the junction of Station Road and Church Way has not taken into account the pedestrian phase and the impact of likely increase in trips as a result of the Broadwalk Shopping Centre expansion.

In summary, the applicant has not demonstrated that the parking displacement into the Broadwalk Shopping Centre could be satisfactorily accommodated, having regard to existing parking accumulation and future proposals for this site. In addition, the applicant's assessment of the Church Way/Station Road junction is unsatisfactory and does not account for future proposals for the Broadwalk. The ETCF makes it clear that developers are required to 'work together to coordinate their plans and proposals within the overall context of the spatial strategy' (section 4.3). The proposal could therefore result in an increase in injudicious parking outside of the CPZ area, as well conditions prejudicial to highway safety and convenience in relation to potential impact on the Church Way/Station Road junction. The proposals would therefore be contrary to Barnet Local Plan policies DM17 and CS9 in this regard.

Travel planning

Under the Transport for London Travel Plan guidance 'Travel Planning for new development in London incorporating deliveries and servicing' a framework Travel Plan would have been expected to be submitted for this development as it comprises of more than one use above the travel plan thresholds. However, residential and employee Travel Plans (TPs) have been included in the submission for the application. The Transport Assessment also states correctly the requirement for the community centre to also have a Travel Plan.

Although the employee Travel Plan states that it covers travel to and from the site by employees, visitors and suppliers, the targets that identify changes to the number of people using different modes of transport only relate to employee travel. The focus of the limited number of measures included in the Employee Travel Plan is also on employees with little mention of visitors.

Survey data from existing employees shows that 61% of staff travel to work by single occupancy car so for approximately 300 staff this equates approximately 180 cars. The proposed target, which is suitably challenging, is to reduce this to the average level from the 2011 census for the local area to a mode split of 48%. Due to the reduction in available parking to 47 spaces available during the day this would mean a significant number of vehicles being parked off site. No data or targets are provided for visitors to the commercial and retail elements of the proposed development.

The Residential Travel Plan submitted correctly states that it covers travel movements of residents, visitors to the residential units and suppliers, meaning deliveries and servicing. Predicted residential trips are based on data from the Transport Assessment taken from TRAVL data from residential developments with some similar attributes, although only 1 of the 3 sites used have similar levels of parking. Predicted car use is low at 23% AM peak, 25% PM peak and 21% all day so with 79% predicted for sustainable modes of travel. This compares with the census data (2011) for resident travel to work

of 48% car driver for the Edgware ward and 39% for Barnet-wide. The data has not been split by type of journeys. The target given for the proportion of single occupancy vehicle trips made by residents and visitors of 20% for 2016 and 2018 is not a large reduction however the predicted baseline of 21% is already low, recognising the potential to influence the residents from the start of them taking up residency.

A limited number of appropriate measures are included within the TP although it is suggested that some may not be found appropriate following the completion of surveys. A more extensive range of measures would be expected to be committed to, including the provision of the Travel Plan Incentive fund at £300 per unit to provide the residents with additional incentive to increase sustainable travel. As written the timing of the appointment of the Travel Plan Champion (TPC) and the introduction of the measures is tied to the completion of baseline surveys at 75% occupation. This would be too late. The TPC must be in place prior to occupation to ensure that the appropriate marketing materials, measures and advice is in place before any units are marketed. This will be essential if the low car use is to be achieved.

In line with the TfL TP thresholds the following Travel Plans would have been required through a S106 agreement, were the proposal otherwise considered acceptable:

- Strategic level Residential Travel Plan
- Strategic level Commercial/ Retail Travel Plan – to cover all existing and new commercial and retail uses for staff and visitors
- Strategic level Community Centre Travel Plan

Should the Community Centre incorporate a Nursery then an additional Nursery Travel Plan would also be required. In order for these plans to be monitored by the Council a Travel Plan monitoring fee of £20,000 would also be obligated. As strategic level travel plans the Residential, Commercial/Retail and Community Centre Travel Plans would need to be ATTrBuTE and TRAVL compliant and therefore TRAVL compliant surveys would need to be incorporated rather than just itrace compliant surveys committed to in the submission Travel Plans. Due to the number of travel plans required a Site-wide Travel Plan Champion who is also the Travel Plan Champion for the Residential TP will be required to be in place prior to occupation to ensure a range of measures are in place as future residents search for new homes. Separate TPCs would also be required for the Commercial/ Retail TP and for the Community TP and if there is a Nursery TP.

Were the application considered acceptable in other regards, specific obligations that would have been included in the S.106 terms/conditions include:

- £300 per residential unit (£49,500 total) Travel Plan Incentive fund.
- Travel Plan monitoring fee of £20,000.
- Exclusion from eligibility for on-street car parking permits within the CPZ for future residents.

- Electric vehicle charging points (EVCP): TfL has recommended that for the employment uses 20% of all spaces must be fitted with EVCP with a further 10% having passive provision. For the residential aspect the requirement is for 20% active provision and 20% passive.
- Cycle storage as per application and shower facilities.

Public transport improvements

The ETCF makes it clear that 'developments in Edgware will be required to contribute towards infrastructure projects within the town centre'. Section 4.4 goes on to state that 'planning obligations through S.106 agreements will continue to be used alongside CIL where appropriate to secure the provision of mitigation and compensation for development proposals and their specific associated impacts'. The relevant off-site Elements of Infrastructure (see section 3.3 of the ETCF) that would have required S.106 obligations are set out below:

- Junction improvements along Station Road: As discussed above, the assessment of this junction is considered to be unsatisfactory. Furthermore, no contribution has been secured for improvements to this junction.
- Improved public open space around Edgware Station: The development is likely to have a proportionate impact on footfall around Edgware Station. No contribution has been offered or secured for such improvements.
- Improved bus interchange: The development is likely to have a proportionate impact on footfall and use of the bus interchange. No contribution has been offered or secured for improvements.

Furthermore, TfL and the GLA have requested the following:

- Pedestrian and cycle environment: The applicant should investigate opportunities to deliver improved conditions for pedestrians and cyclists in the vicinity of the site, including the provision of Legible London wayfinding in the town centre. No contribution has been offered or secured for such improvements.
- Bus stops: The applicant should undertake an audit of local bus stops to determine if any improvements are required to make them DDA compliant. No contribution has been offered or secured for such improvements.

The proposal, in the absence of the above obligations, is considered to be unacceptable and contrary to policies DM17 and CS9 of the Barnet Local Plan Core Strategy and Development Management Policies.

Conclusion

In summary, the submitted Transport Assessment does not accurately assess the impact on the Church Way/Station Road junction and the proposed level of car parking is insufficient. The proposal would therefore be likely to lead to adverse highway conditions in the locality and increased kerbside parking outside of the Controlled Parking Zone to the detriment of free flow of traffic and highway and pedestrian safety. The lack of a S.106 agreement to secure the above mentioned obligations is also unacceptable. The proposal is

therefore considered to be unacceptable and contrary to policies DM17 and CS9 of the Barnet Local Plan Core Strategy and Development Management Policies.

3.10 Creating inclusive environments for all members of the community:

Barnet Local Plan policy DM03 requires development proposals to meet the highest standards of accessible and inclusive design, whilst policy DM02 sets out specific considerations for development proposals. With regard to residential developments such as this proposal, all units should comply with Lifetime Homes standards with 10% wheelchair home compliance, as per London Plan policy 3.8. The retail/community units, public realm areas, streets and footpaths should also consider inclusive design principles.

The submitted documents explain that the scheme has been designed with accessibility in mind, with the levels of the courtyard public realm area being flat and accessible by lift from Station Road, as well as clear footpaths of adequate width or shared surfaces providing access to all main entrance doors. According to the illustrative plans, core entrances and the community centre entrance would be easily identified and accessed with level thresholds, whilst all block cores have lifts enabling wheelchair access to all of the accommodation. All of the proposed flats would comply with Lifetime Homes standards, with 10% wheelchair homes compliance, thereby satisfying the 10% requirement set out in the London Plan. 17 wheelchair accessible parking spaces are proposed for the flats, along with 4 for the community and retail uses, which would comply with Lifetime Homes standards. It is noted that there are no detailed internal layouts submitted for the retail or community uses, but each of the units would be of an adequate size to enable wheelchair accessible layouts and facilities to be provided.

Subject to these controls and the requirements in place under other legislation officers conclude that the design and layout of the proposal as submitted in illustrative form is such that it is acceptable in terms of creating a development that is accessible, useable, permeable and inclusive for all members of the community.

3.11 Contaminated land and water quality issues:

No information has been submitted in relation to land contamination. However, the Council's Environmental Health Service considers that the land could be contaminated due to the historic railway use. They have recommended conditions requiring an assessment to be carried out and potential mitigation put in place. Subject to the imposition of these conditions, the proposal would be acceptable in this regard. Any impact on water quality could be ameliorated through the imposition of conditions requiring 'fat traps' to be installed in commercial kitchens and petrol/oil interceptors to be installed in car park areas, as recommended by Thames Water.

3.12 Safety and security matters:

Development plan policies require new developments to provide a safe and secure environment for people to live and work in and reduce opportunities for crime and fear of crime. London Plan policy 7.3 states that 'development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating'. It goes on to set

out a series of principles for development to adhere to, including ensuring clear public/private delineation, natural surveillance, appropriate activity at all times and a sense of ownership over communal spaces. Barnet Local Plan policy DM02 seeks to ensure that Secured by Design is considered in development proposals, in consultation with the Metropolitan Police. Further guidance is provided in *'Safer Places - The Planning System & Crime Prevention'* (2004), which explains the main attributes of safe and sustainable places, including structure, surveillance and ownership.

The proposal incorporates a number of elements that would improve surveillance of public spaces, including the new shop front and new retail unit to the Church Way elevation of 102-106 Station Road. However, the design approach adopted, coupled with the constrained nature of the site, which backs onto dead spaces on two sides, has resulted in a layout that creates narrow spaces that are poorly overlooked. The main areas of concern are located between the proposed buildings and the site boundary with the Broadwalk Shopping Centre, as well as the main vehicle entrance from Church Way.

The proposal would necessitate ground floor undercroft parking, with ventilation grills around the sides of the building. This would result in a long section of blank ground floor frontage close to the south east and north east boundaries of the site with the Broadwalk Shopping Centre. There would therefore be narrow areas of dead space between the proposed development and the shopping centre that would not be adequately overlooked and would provide a secluded area that could potentially be used by persons with criminal intent. The Broadwalk Shopping Centre access and the side road known as Approach Way are not enclosed or gated and fall outside of the applicant's control. Aside from general concerns over increased crime levels in Edgware, this could pose a specific security threat to the proposed community centre and the occupiers of the proposed residential flats above.

The Design and Access Statement includes images of how this blank frontage could be developed in future, should a comprehensive proposal come forward for the redevelopment of the shopping centre. This would comprise ground floor retail frontage to a new shopping street. However, discussions with the Broadwalk Shopping Centre suggest that their development proposals for the Broadwalk site would not involve the demolition of the existing Sainsbury's store or the creation of a new street in this location. Notwithstanding this, the provision of ground floor units would reduce the amount of parking within the scheme, the low levels of which are already a concern, as discussed in section 3.9 above.

There is also a concern that the proposed courtyard public realm area would be difficult to control, which could compromise the privacy and sense of safety and security for users of this space. This is a concern shared by the GLA, who have suggested that this space be provided as private communal amenity and play space only. The Metropolitan Police have similar concerns over this space and consider that there should be a clear distinction between the public and private spaces, perhaps in the form of landscape buffers. However, officers consider that this approach would diminish the quality of the courtyard space for both public and private users. This reinforces officer's view that the

shared space concept is unworkable in the current scheme layout. As discussed above in appraisal section 3.1, the scheme as proposed has an inward looking focus. The appropriate location for new and improved public realm would be along Station Road, potentially as widened pavement area, which would result in an enhanced shopping environment for the town centre and would have adequate natural surveillance due to footfall and activity in the street.

In summary, the scheme would not provide a safe and secure environment for people to live and work in, nor reduce opportunities for crime and fear of crime. The proposal would therefore conflict with London Plan policy 7.3 and Barnet Local Plan policies CS12 and DM02.

London Fire and Emergency Planning Authority have been consulted on the application and raised some concerns over access to the residential cores, which according to the plans submitted would only be accessible through the undercroft car park. In response to this, the applicant has submitted a plan demonstrating that access to the cores could be achieved from Approach Way or from the Broadwalk Shopping Centre. Although these areas are outside of the applicant's control, this would be for emergency access only. The Fire Brigade are satisfied that detailed design proposals could overcome this issue, so this could be resolved at reserved matters stage.

3.13 Flooding and water infrastructure matters:

London Plan policy 5.13 sets out a hierarchy for the management of surface water and Barnet Local Plan policy DM04 reinforces this as the starting point for consideration of surface water drainage matters. Barnet Local Plan policy CS13 states that development should utilise Sustainable Urban Drainage (SUDS) where possible, in order to reduce and manage surface water run-off.

The site lies in Flood Zone 1, with a low annual probability of flooding. At present, the surface water drainage from the car park connects to the Thames Water public surface water sewer. The application proposes to attenuate flows from the site to the existing sewer by mean of a hydrobrake flow control and on-site storage. This is considered to be an appropriate response to the Mayor's hierarchy on this site, which would not be suitable for a full SUDS design.

The applicant has submitted a Foul Sewage and Utilities Assessment, which concludes that connections can be made to existing networks, with some reinforcement works potentially required to electricity and foul sewerage systems. Thames Water have concerns over the ability of local wastewater infrastructure to accommodate the proposed development

Conditions would be recommended to ensure that water use by the development is minimised. Subject to these conditions the development is found to be acceptable in this respect. Overall therefore, the proposal is considered to be acceptable and compliant with planning policies on flooding and water infrastructure matters, subject to conditions.

3.14 Energy, climate change, biodiversity and sustainable construction matters:

London Plan Policy 5.2 requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

Residential developments are currently required to achieve a 40% reduction in carbon dioxide emissions when compared to the 2010 Building Regulations. Policy 5.3 of the London Plan goes on to set out the sustainable design and construction measures required in developments. Proposals should achieve the highest standards of sustainable design and construction and demonstrate that sustainable design standards are integral to the proposal, including its construction and operation.

Barnet Local Plan policy DM01 states that all development should demonstrate high levels of environmental awareness and contribute to climate change mitigation and adaptation. Policy DM04 requires all major developments to provide a statement which demonstrates compliance with the Mayor's targets for reductions in carbon dioxide emissions, within the framework of the Mayor's energy hierarchy. Proposals are also expected to comply with the guidance set out in the council's Supplementary Planning Documents (SPD) in respect of the requirements of the Code for Sustainable Homes. The CAAP provides that schemes such as this should achieve Code Level 4 or above against the Code for Sustainable Homes and BREEAM 'Excellent' for non-residential uses.

Carbon dioxide emissions

The application is accompanied by a Sustainability Statement and Energy Statement, which include an assessment of the options considered under the Mayor's hierarchy. The chosen options include built fabric improvements such as high insulation values and low energy lighting. These improvements would reduce the carbon dioxide emissions of the scheme by 16.8%.

There are no district heating systems in the immediate vicinity of the site, but the scheme would be of a suitable size to incorporate a Combined Heat and Power (CHP) system, to provide both the residential and community with heat. A space has been allocated adjacent to the undercroft parking area to house the necessary plant and ducting could be provided to Station Road for future connection to a district heating system. The CHP system would be gas-fired and it is estimated that this would reduce the carbon dioxide emissions of the development by 22.8%.

A feasibility study has been carried out into available and viable low and zero carbon technologies and photovoltaic (PV) panels are proposed for the roof level. A plan is included with the Energy Statement, showing the location of the PV panels. It is noted that some of panels would be located in areas of roof that are relied upon for amenity space provision, so there could be some conflict here. The applicant should bear this in mind for future submissions. The PV systems are expected to reduce carbon dioxide emissions by 8.1%.

These measures taken together would reduce CO2 emissions for the whole development by more than 40%. This would therefore exceed the requirements of London Plan policy 5.2.

Code and BREEAM

The Sustainability Statement sets out the applicant's commitment to achieving level 4 under the Code for Sustainable Homes and BREEAM 'Excellent' for the commercial elements of the scheme. Code for Sustainable Homes and BREEAM pre-assessments have been included, which demonstrate compliance with these standards. Were the proposal otherwise considered acceptable, conditions would have been recommended to ensure that the development meets these requirements as a minimum. Therefore, subject to conditions the proposal is found to be acceptable and policy compliant in respect of reducing carbon dioxide emissions.

Biodiversity matters

Barnet Local Plan policy DM16 states that when it is considering development proposals the council will seek the retention, enhancement or creation of biodiversity. Where development would affect a Site of Importance for Nature Conservation (SINC) or a species of importance the council will apply the following hierarchy:

1. Avoid adverse impact to biodiversity interest.
2. Minimise impact and seek mitigation.
3. Only in exceptional cases, where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

The application site is not designated as a SINC and is unlikely to contain any habitats that could attract protected species, although some works are proposed to existing buildings, including demolition, so it is possible that bats could be affected. The closest SINC is located some 250m to the east, which is Borough level and comprises land around the railway lines.

The application is not accompanied by a phase 1 habitat survey. Natural England's consultation response states that local planning authorities should be satisfied that there would be no impact on protected species as a result of the proposal and has prepared 'standing advice' to be followed in these circumstances. Having followed Natural England's standing advice in respect of this site, officers conclude that there is no requirement at this stage for habitat surveys to be carried out and the proposal would therefore not unduly affect protected species.

However, the Sustainability Statement suggests that it is appropriate for the development to provide biodiversity enhancements. For large buildings in an urban environment, such improvements would typically consist of habitat creation for bats and birds, as well as high quality landscaping and green roofs. Conditions would have been recommended to ensure that bird boxes are erected and appropriate new planting takes place, were the proposal otherwise considered acceptable.

Subject to these controls and the requirements in place under other legislation the proposal is found to be acceptable and compliant with the objectives of planning policy on biodiversity and nature conservation matters.

Other aspects of sustainable design and construction

The proposal includes a number of features that have been incorporated to develop in a sustainable way, mitigate and adapt to climate change, conserve resources and minimise pollution. These include elements such as new planting, the provision of appropriate recycling facilities, the inclusion of energy efficiency measures and the installation of facilities for cycle storage. Conditions would have been recommended requiring a Site Waste Management Plan to be submitted and approved, to ensure that materials are sourced sustainably where possible and measures are put in place to minimise waste, as well as specifications for external lighting

To address policies on urban greening specifically the development includes areas of planting and soft landscaping at a ground level, including new areas of communal amenity space and private rear gardens for each of the houses proposed and the details of this would be subject to condition.

The submitted Sustainability Statement demonstrates that average per person water use within the development would be less than 90 litres/day, in line with the requirements of London Plan policy 5.15. This would be achieved through dual flush WCs, flow restricted taps/showers and standard washing machine settings. Water butts would be provided in communal gardens to collect rainwater for irrigation.

In terms of ambient noise and air quality, as mentioned above the Council's Environmental Health Service considers the site to be suitable for residential use subject to the conditions recommended. In summary, the proposal is considered to be fully compliant with Local Plan and London Plan policies on energy and sustainability.

3.15 Environmental Impact Assessment Regulations:

The development for which consent is sought is not considered to be of a description identified in Schedule 1 of the Regulations (Town and Country Planning (Environmental Impact Assessment) Regulations 2011). However, the development is considered to be of a description identified in column 1 of Schedule 2 of the Regulations. The development described in the submission is deemed to fall within the description of 'urban development projects'.

A Screening Opinion has been adopted by the Council confirming that it was not necessary to carry out an Environmental Impact Assessment in respect of this scheme. Therefore an Environmental Impact Assessment is not necessary and an Environmental Statement, in line with the Regulations, is not required to be submitted with the application.

3.16 Socio-economic impact:

Education and Health

The expected child yield of the development and breakdown is set out in the below table:

Age Group	Block A	Block B	Block C	Block D	Total
0-4	10.52	0.87	2.17	5.14	18.7

5-10	4.24	0.31	0.62	2.39	7.56
11-15	1.9	0.13	0.31	0.82	3.16
16-18	0.94	0.12	0.31	0.67	2.04
Total	17.6	1.43	3.41	9.02	31.46

The proposed development is expected to generate a total child yield of around 31 children. This additional school age population is not expected to give rise to significant concerns in terms of school capacity. The substantial CIL payment associated with this scheme would in part contribute to the provision of local education facilities and the proposal would therefore have an acceptable impact in this regard. The modest population increase associated with the development would give rise to undue impacts on healthcare provision in the area, which could also be mitigated for through CIL funding.

3.17 Planning obligation matters:

Policy CS15 of the Barnet Local Plan states that where appropriate the Council will use planning obligations to support the delivery of infrastructure, facilities and services to meet the needs generated by development and mitigate the impact of development.

In accordance with development plan policies and the Council's supplementary planning documents the following obligations are typically required to be secured through a legal agreement with the developer. However, owing to officer's recommendation for refusal, a S.106 agreement has not been entered into to secure the required mitigation and the proposal is therefore unacceptable. The required obligations are as follows:

Affordable Housing

The provision of the affordable rent/intermediate housing units as proposed, with the Council to have full nomination rights on these units. Review mechanism to reappraise quantum of affordable housing provision, should viability improve prior to implementation of the scheme/submission of reserved matters.

Transportation and Public Realm

Junction improvements along Station Road

There are 3 junctions identified for improvement, including the Station Road/Church Way junction. As discussed below in section 3.9 of this report, the assessment of this junction is considered to be unsatisfactory. This development would be expected to have a proportionate impact on this junction.

Improved public open space around Edgware Station

The development is likely to have a proportionate impact on footfall around Edgware Station. This development would be expected to have a proportionate impact in this regard.

Improved public realm along Station Road

This site has a frontage along Station Road of approximately 100m. There are

also no proposals for comprehensive improvements to the Station Road frontage.

Improved bus interchange

The development is likely to have a proportionate impact on footfall and use of the bus interchange.

Pedestrian and cycle environment

The applicant should investigate opportunities to deliver improved conditions for pedestrians and cyclists in the vicinity of the site, including the provision of Legible London wayfinding in the town centre.

Bus stops

The applicant should undertake an audit of local bus stops to determine if any improvements are required to make them DDA compliant. No contribution has been offered or secured for such improvements.

Strategic level Residential/ Commercial/ Community Centre Travel Plan

To cover all existing and new commercial and retail uses for staff and visitors. Including £300 per residential unit (£49,500 total) Travel Plan Incentive fund and Travel Plan monitoring fee of £20,000. Furthermore, exclusion from eligibility for on-street car parking permits within the CPZ for future residents would need to be secured.

Monitoring

A monitoring contribution would be required in line with the Council's Planning Obligations SPD.

3.18 Barnet Community Infrastructure Levy

The proposed development is liable for charge under the Barnet CIL (at a rate of £135 per square metre). Because of the nature of the way in which CIL is calculated it is only possible to estimate the contribution which will finally be made through the Barnet CIL at the time applications are determined. The applicant has stated that the existing floorspace on the site to be demolished has been occupied lawfully for 6 of the last 12 months. As such it is possible that only additional floorspace generated by the development (less the area of undercroft car parking proposed) would be potentially liable for charge under Barnet CIL. Taking account the relief from a CIL charge which the affordable housing element of the scheme could be eligible for the development might be expected to generate a Barnet CIL charge of **£1,578,690**.

3.19 Mayoral Community Infrastructure Levy

The proposed development is liable for charge under the Mayoral CIL (at a rate of £35 per square metre). Because of the nature of the way in which CIL is calculated it is only possible to estimate the contribution which will finally be made through the Mayoral CIL at the time applications are determined. The applicant has stated that the existing floorspace on the site to be demolished has been occupied lawfully for 6 of the last 12 months. As such it is possible that only additional floorspace generated by the development would be potentially liable for charge under Mayoral CIL. Taking account the relief from a CIL charge which the affordable housing element of the scheme could be

eligible for the development might be expected to generate a Mayoral CIL charge of **£557,305**.

4. EQUALITIES AND DIVERSITY ISSUES

Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:

- “(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*

For the purposes of this obligation the term “protected characteristic” includes:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

Officers have in considering this application and preparing this report had regard to the requirements of this section and have concluded that a decision to refuse planning permission for the proposed development would not conflict with the Council’s statutory duty under this legislation, the Council’s Equalities Policy or the commitments set out in Barnet’s Equality Scheme.

5. COMMENTS ON GROUNDS OF OBJECTIONS

The objections raised are considered in the above appraisal and analysis.

6. CONCLUSION

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Council to determine an application in accordance with the statutory development plan unless material considerations indicate otherwise. All relevant policies contained within The Mayor’s London Plan and the Barnet Local Plan, as well as other relevant guidance and material planning considerations, have been carefully considered and taken into account by officers in their assessment of this application.

For the reasons identified in the reasons for refusal set out at the start of this report and explained in further detail in the planning considerations section of the main body of the report it is found that the proposed development fails to comply with a number of important development plan policies and planning guidance documents. As there are no material planning considerations which

are sufficient to overcome these conflicts with development plan policy and guidance it is considered that there are material planning considerations which justify the refusal of planning permission. The application is therefore recommended for **REFUSAL** for the reasons set out at the start of this report.

APPENDIX 1: PLANS OF THE PROPOSED DEVELOPMENT

Site layout and context as proposed



APPENDIX 2: INFORMATIVES

1. In accordance with paragraphs 186 and 187 of the National Planning Policy Framework (NPPF) the Council takes a positive and proactive approach to development proposals, focussed on solutions. To assist applicants in submitting development proposals the Local Planning Authority has produced planning policies and written guidance. A pre-application advice service is also offered.

In this instance the applicant did not seek formal pre-application advice and, regrettably, the submitted proposals do not constitute sustainable development as envisioned by the NPPF and local/regional policy, for the reasons set out above. Accordingly, it is not possible to approve this application and no amendments can be made to the proposals within the course of this application to overcome these reasons. The applicant is advised to engage with Council officers with a view to proactively working towards a revised submission that overcomes the above reasons for refusal and addresses the relevant policy considerations for this site.

2. The plans and documents accompanying this application are:

138(MP)01 Rev PL1; 138(MP)02 Rev P1; 138(MP)03 Rev PL1;
138(MP)04 Rev PL1; 138(MP)05 Rev PL1; 138(MP)06 Rev PL1;
138(GA)01 Rev PL1; 138(GA)02 Rev PL1; 138(GA)03 Rev PL1;
138(GA)04 Rev PL1; 138(GA)05 Rev PL1; 138(GA)06 Rev PL1;
138(GA)07 Rev PL1; 138(GA)08 Rev PL1; 138(GA)09 Rev PL1;
138(GA)10 Rev PL1; 138(GA)11 Rev PL1; 138(GA)12 Rev PL1;
138(GA)20 Rev PL1; 138(GA)21 Rev PL1; 138(GA)22 Rev PL1;
138(GA)30 Rev PL1; 138(GA)31 Rev PL1; 138(GA)32 Rev PL1; Design
Code; Design and Access Statement; Planning Statement; Transport
Assessment, Appendices and Travel Plan; Statement of Consultation;
Affordable Housing Viability Assessment (Confidential); Noise Impact
Assessment; Air Quality Assessment; Daylight and Sunlight Assessment;
Energy Strategy; Sustainability Statement; Foul Sewage and Utilities
Assessment.

**SITE LOCATION PLAN: 102-124 Station Road and car park to rear,
Edgware, HA8 7BJ**

REFERENCE: H/05793/13

