



Main Modifications Local Plan

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Representations Form

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number 109 Policy Related to GSS05

Paragraph All

Figure/Table Policies Map change

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Explanation (Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.)

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

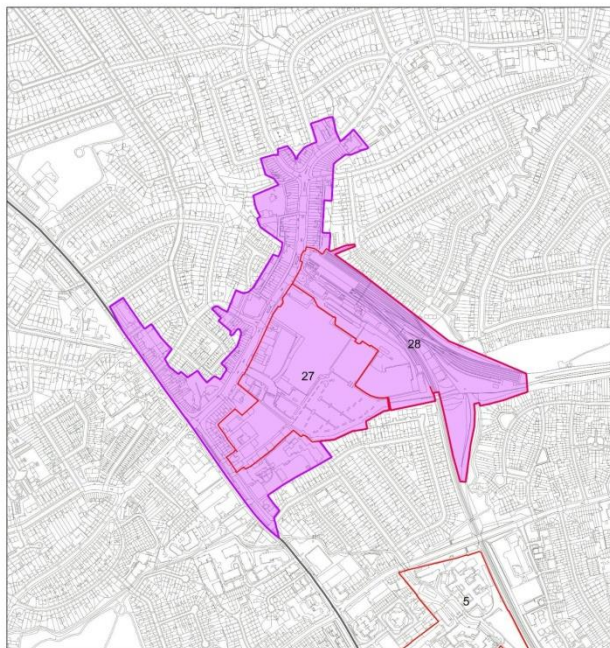
**Continue on a separate sheet if
necessary**

Summary: Site 28 is unsuitability for major development

Edgware Growth Area, which is assigned a target of 4,740 homes, is based on the assumption that 2 sites can deliver 4,695 (2,379 + 2,316) homes.

- Site 27 Edgware Town Centre, i.e. Broadwalk Shopping Centre and Car Park can deliver 2,379 homes and
- Site 28 Edgware Underground and Bus Station can deliver 2,316 homes.

Map 3C - Edgware Growth Area



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LEGEND
■ Growth Area
■ Site Allocations
— London Borough of Barnet Boundary

Scale 1 : 5,000

Figure 1. Map 3C - Edgware Growth Area, (Local Plan, 2024)

Among the Main Modifications 109 (*concerning Site 28 Edgware Underground & Bus Stations*) to the Draft Local Plan are that the indicative residential capacity for site 28 should be reduced from 2,317 dwellings to 2,316.

We feel that this site is not suitable for major development at all and the figure should be reduced to 0 dwellings. Site 28 (8.17 hectares) basically comprises three components:

1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a [covered bus station including weatherproof seating for 68 passengers, a café/kiosk and a timetable board indicator](#). ([see separate paper on the impact to passengers with the loss of the Bus Station](#))
2. **Yellow Area** (2.96 hectares): Edgware tube station and operational Northern Line infrastructure (mainly railway tracks).
3. **Purple Area** (2.54 hectares): The Deans Brook Nature Reserve, which is classified as a Site of importance for Nature Conservation (SINC, grade II), closed to the public in order to preserve protected species that live there such as bats.



Figure 2: Site 28 Edgware Underground and Bus Station, size 8.17 hectare

The allocation of 2,316 dwellings is derived from a calculation based on the density matrix outlined in the London Plan 2016.

Edgware housing numbers allocation is explained in [\(Barnet - Exam 36 Barnet Local Plan EIP – Note on Housing Numbers \(Including Supporting Table AA page 7\), n.d.\)](#)

	Edgware Policy GSS05	5,000	<p>Site 27 – Edgware Town Centre – 7.83 ha site with high PTAL supporting highest Central densities of 405 units per ha. Assumption that 25% of site is non residential.</p> <p>7.83 x 405/100 x 75 = 2,378 units</p> <p>-----</p> <p>Site 28 – Edgware Underground and Bus Stations – 8.17 ha site with high PTAL supporting highest Central densities of 405 units per ha. Assumption that 30% of site is non residential.</p> <p>8.17 x 405/100 x 70 = 2,316 units from Local Plan</p> <p>-----</p> <p>Sub Total = 4,694 units</p>	<p>Within Site 27 120 – 124 Station Road (Premier Place) U/C (19/6697/FUL) 122 units (incl. within Density Matrix numbers for Site 27)</p> <p>-----</p> <p>Within Growth Area 30 High Street (19/6697/FUL) 14 units</p> <p>-----</p> <p>Equity House (19/3729/PNO) 18 units</p> <p>-----</p> <p>The Rectory, Rectory Lane (18/2839/FUL) 52 units</p> <p>-----</p> <p>Sub Total = 84 units</p>	<p>An uplift of 225 units has been added to reflect size of Growth Area and town centre windfall</p> <p>Plus</p> <p>Indicative Capacity of Growth Area reflects Density Matrix</p> <p>4,694 units</p> <p>Plus</p> <p>Consents</p> <p>84 units</p> <p>Total = 5,003</p>
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7

2,316 units are derived from 8.17 hectares land x 405 housing units/hectare x 70% residential to commercial ratio.

Note: 405 housing units / hectare is the highest density defined by the Density Matrix in the London Plan 2016 (Policy 3.4 Optimising Housing Potential | London City Hall, n.d.)

The unsuitability of developing the Edgware tube station and Northern Line infrastructure is evident, considering the paramount importance of maintaining public safety and the integrity of London Underground operations. Similarly, the existing layout and functionality of the Edgware bus station make it a crucial asset for passengers, especially the elderly and vulnerable. The proposed redevelopment of these transport hubs fails to address essential questions regarding replacement facilities and operational continuity.

Moreover, plans to relocate the bus garage underground raise significant safety concerns, particularly regarding the risks associated with lithium batteries in electric buses. The absence of viable solutions and regulatory standards further compounds the impracticality of this proposal. Furthermore, the lack of clarity regarding interim arrangements and capacity considerations exacerbates the uncertainties surrounding the development plan.

Additionally, the proposed housing density for Site 28 is highly excessive, unparalleled across London. According to the density matrix of the London Plan, a density of 405 housing units per hectare is the highest density defined. This level of density is not only unrealistic but also unsustainable for the site, given the operational constraints of the transport infrastructure. The height of the proposed buildings and their location also conflict with guidelines set out in the Greater London Authority (GLA) London Plan, which emphasises the need for developments to be in harmony with their surroundings and not to overwhelm existing infrastructure.

In accordance with the National Planning Policy Framework (NPPF) and London Plan policies, any development proposal must prioritise public safety, accessibility, and the preservation of essential transport functions. The current plan falls short of these standards, jeopardising both the safety and functionality of vital transport infrastructure.

Below are the detailed explanations against the selection of site 28 for housing.

A. Edgware tube station and operational Northern Line infrastructure land is unsuitability for development

Looking at these three elements in detail, the draft Local Plan emphasises the primary importance of maintaining the London Underground infrastructure and public safety. Clearly Edgware tube station and the Northern Line may not be disrupted at all, even temporarily for a build-programme.

Even in the Justification section of the Site 28 in the Local Plan, it states that “The need to maintain the London Underground infrastructure, and the barriers imposed by this infrastructure, make the eastern and southern **parts of the site far more challenging and restricted in terms of potential for redevelopment.**”

The area of the Edgware Tube Station and track area is 2.96 hectares. Barnet council has decided that the whole of this live operational Northline Station and live tracks area can be used to build 839 homes (i.e. 2.96 x 405 u/ha x 70%)! This surely is UNSOUND!

B. Edgware bus station land is unsuitable for development

The present location of the bus station and interchange has a very good layout and is optimal. It has the following features:

1. Taxi rank and drop off in front of Edgware underground station, a few footsteps from the front entrance.



2. The bus stop for alighting is covered and a few footsteps from Edgware station side entrance.
3. The bus station is about 60 footsteps from the station, almost all covered. The interaction between pedestrians and buses at the controlled crossing causes no problems.



Drop off next to tube station



Space to park 20+ buses



Covered walk from tube station to



covered bus station with 5 stands



Secure space with 68 seats



24 x 7, Safe, Well lit, Airy



Cafe kiosk



Indicator boards

32	79	107
113	142	186
204	221	240
251	288	292
303	340	384
606	642	N5
N32		N113

20 bus routes

Figure 3: The current Edgware bus station

The bus station is an invaluable facility, particularly for elderly and vulnerable passengers. However, TfL have given no details, despite repeated questioning and a request for a meeting, as to what facilities will be replaced once the existing bus station has been demolished. The draft Local Plan emphasises the need to protect the bus services and transport facilities, yet there is no indication as to how this will be possible if Site 28 is to be totally redeveloped.

By using the whole of the Bus Station land (2.67 hectares) for high density house building, Barnet council has implied that **757 homes (2.67 hectares x 405 u/ha x 70%) can be built on the operational TfL Bus Station and Garage land.**

Ballymore's proposal to the public on July 2023 at the Broadwalk shopping centre showed the existing bus station being demolished and a limited number of bus stops introduced on Station Road. This was deemed to be the replacement of Edgware Bus Station. [See details in this article.](#) (Ianvisits & Edgware-bus-station-set-for-major-redevelopment, n.d.)

However, in Barnet's own "POLICY GSS09 Existing and Major New Public Transport Infrastructure" of the local plan, it states that

"11.11 Delivery of High Quality Transport Systems in Growth Areas

*11.11.1 Major growth across Barnet provides opportunities to deliver high quality **transport improvements** in a planned and structured manner, and closely co-ordinated with other transport authorities, including adjacent boroughs. "*

A new development is supposed to improve the quality of the transport system in the growth area rather than making it much worse.

Hence the only way to ensure that if the bus station is to be replaced there should be a complete replacement of the facilities and configuration of the bus station together with Edgware Station (Northern Line); the Taxi Rank; drop off and pick up facilities and bus alighting stop.

In addition, a more intense bus service will be needed to deal with the loss of the commuter car park, new housing units, extra visitors and population growth. The bus station will need to include an increase in the bus stands to accommodate extra buses.

Save Our Edgware have since tried very hard to have a meeting with London Buses (a subsidiary of TfL) including the assistance of Caroline Pidgeon, past member of the London Assembly and Deputy Chair of GLA Transport Committee, who tried at least 3 times requesting a meeting.

Save Our Edgware have [submitted official complaints](#) (*Save Our Edgware & Save Our Edgware Official Complaints to TfL about Edgware Bus Station, 2023*) to TfL and The Mayor that the public proposals of Ballymore Ltd did not comply with the 4 of the Mayor's transport policies. TfL has not carried out any Equality Impact Assessment as part of their Public Sector Equality Duty, Equality Act 2010.

Neither complaints have received a satisfactory response. We have complained to the Equality And Human Rights Commission that TfL have not complied with the Equality Act 2010.

According to London Plan, Policy T3: Transport capacity, connectivity and safeguarding

"A. Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

B. Development proposals should safeguard existing transport functions."

Site 28 is a critical transport hub. Redevelopment would disrupt transport functions, which contradicts the policy of safeguarding existing transport infrastructure.

According to London Plan Policy T9: Funding transport infrastructure through planning

"A. Development should not undermine the operation of existing transport infrastructure."

Redeveloping Site 28 would undermine the operation of essential transport services, violating the policy that supports and enhances transport infrastructure.

According to the London Plan Policy D5: Inclusive design

"B. Development proposals should achieve the highest standards of accessible and inclusive design."

The current layout of transport infrastructure at Site 28 serves all passengers inclusively. Redevelopment reducing accessibility and inclusiveness violates this policy.

C. Edgware bus garage land is unsuitable for development

Looking at the bus garage, the draft Local Plan emphasises that the connection between the bus services and the Northern Line is of primary importance. If these facilities are to be relocated elsewhere to make way for a major development of 2,316 dwellings on Site 28, they clearly cannot be moved far.

The current proposal (as described in this article by ([lanvisits & edgware-bus-station-set-for-major-redevelopment](#))) is that the bus garage be moved underground. However, we have discovered through a response to our FOI request that the London Fire Brigade stated firmly and comprehensively that this proposal is totally non viable as detailed below:

1. The London Fire Brigade has assessed the proposal for an underground bus garage at Edgware requested by LB Tower Hamlets and came to the conclusion that it was **not viable** because of the impact of any fire caused by the lithium batteries in the electric buses catching fire. ([FOI from London Fire Brigade about the scheme being non viable \(Save Our Edgware & fo-response-foia79611-LFB-verdict-of-non-viable-Edgware-bus-garage, n.d.\)](#)) and articles published on [The Daily Telegraph and The Sun, Barnet Post and Times Series on the Edgware Bus Garage fire risks](#)) ([Brignal & Telegraph - Electric bus station fire could turn high-rise homes into 'volcano', residents warn, 2023](#)) ([Sun & FIRE FEARS We're terrified an EV charging hub will turn £1.7bn newbuild apartment blocks into a 'VOLCANO', n.d.](#)) ([Allin & London Fire Brigade Edgware EV bus garage safety warning, 2023](#))
2. At the meeting on 5 Dec 2023, the Save Our Edgware met with London Fire Brigade Deputy Assistant Commissioner / Prevention and Protection Richard Field, Mike Dewberry (Transport Liaison and Alternative Energy) and Peter Johnson (Borough Commander for Barnet). Richard Field reported that the situation regarding the non viability of building the underground bus garage has not changed.
3. There are no standards for underground garages for electric buses and commercial vehicles and hence no Building Regulations (FOI response from OVEZ). Unless the science of lithium batteries changes, which is unlikely, within the terms of the development plan, it will be impossible to build an underground bus garage.

In responding to this issue, the Ballymore Ltd proposing the underground bus garage have said that the underground garage will not be open until at least 2030. (See [Ballymore's response to our press release that the garage facilities will not be used before 2030. \(Allin & London Fire Brigade Edgware EV bus garage safety warning, 2023\)](#)) However, the ultimate use of the bus garage will depend on scientific breakthrough relating to lithium batteries and their potential to catch fire. This at best is highly speculative. So it may be that no solution can be found that will allow the

proposed underground space to be used as the bus garage. So the situation could be that we have a demolished bus garage and no feasible replacement. This will be totally unacceptable.

The alternative of building a large empty underground space of at least two hectares is crazy because it will add to building cost for no benefit, increase the cost of affordable housing and may well cause investors not to provide the money for any development.

If at the same time, the present bus garage were to be demolished, there would be no alternative for garaging about 190 buses which may need to be increased to provide a more intense timetable due to extra traveller demand.

TfL/ Ballymore Ltd building a huge underground space in the expectation that the science of lithium batteries will change to allow new Building Regulations to be established, to demolish the existing bus garage and somehow to make provision for 190 buses for an unknown number of years, maybe forever, in an unknown place is sheer fantasy.

Clearly the provision of a quality bus service at least to the present standard requires a full operational garage with suitable space and facilities for staff and management. This will have to be provided throughout any development. The existing bus garage with all facilities will be demolished early on in the build programme. If its replacement will not be available before 2030, how will the service be maintained for an interim minimum period of 5 years or so? TfL / Ballymore has refused to make public proposals of a fully operational garage being provided between demolition of the present facilities until at least 2030. This is clearly unsatisfactory.

Furthermore, there is the question of capacity. If the draft Local Plan does indeed promote the redevelopment of sites 27 and 28 for 4,000+ new dwellings, then the Broadwalk car park with its approximately 1250 car parking spaces (including staff parking) will be almost entirely lost and consequently Edgware residents will need to get about using public transport. The proposals also provide for an additional (predicted by Barnet) 10,000 new residents approximately in the new development, almost none of whom will be allowed to have a car, so they too will require public transport.

Finally the the draft Local Plan is predicated on economic and other growth of Edgware, which presumably means more transport activity and hence a requirement for more buses, but the proposals for the new underground bus garage does not allow for any of this additional capacity, let alone the fact that it is acknowledged that

if electric buses are allowed to be stabled underground, they will need at least 50% more room than diesel buses.

Finally it should be observed that the underground bus garage as proposed is not designed for diesel buses anyway and would have insufficient ventilation which would mean that the diesel buses could not use their engines underground either.

According to NPPF, Paragraph 110: Considering Development Proposals

"Applications for development should... create places that are safe, secure and attractive"

The plan to build homes on operational bus and rail infrastructure fails to ensure public safety and disrupts essential services. The underground bus garage proposal, with its associated fire risks, further highlights the unsuitability of this site for residential development.

D. Deans Brook Nature Reserve land is unsuitable for development

The fourth element of Site 28 is the Deans Brook Nature Reserve which is a precious habitat to protected species such as Bats and Slow Worms and on which the public are excluded, so this can scarcely be considered part of a major development site either.

Even in the Site 28 description of the Local Plan, it states that **“Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook.”**

In [Barnet Unitary Development Plan - Open Environment document](#) (*Barnet - Chapter 5 Open Environment, n.d.*), it states that

“Protection of Species

5.3.37 Some plant and animal species are afforded varying degrees of protection under the Wildlife and Countryside Act 1981 (as amended in 1985 and by the Countryside and Rights of Way Act 2000). Other animals such as badgers, wild mammals and **bats** are specially protected under their own legislation. In Barnet, the main specially-protected species that are likely to be encountered are **bats**, great crested newts, grass snakes, the common lizard

and **slow worms**. The Mayor's Biodiversity Strategy – Connecting with London's Nature (2002) encourages the protection of habitats/species that are of nature conservation importance via planning controls."

Site 28 proposes to use all the land of the Deans Brook Nature Reserve (2.54 hectares) to build high density housing of **720 homes (2.54 x 405 u/ha x 70%) is a complete disregard of the protected wildlife species such as Bats and Slow Worms.**

According to the Government Guidance on **Bats: protection and licences** ([Natural England](#) and [Department for Environment, Food & Rural Affairs](#)) (*Natural England and Department for Environment, Food & Rural Affairs, n.d.*)

"All bat species, their breeding sites and resting places are fully protected by law - they're European protected species."

What you must not do

You're breaking the law if you do certain things including:

- damage or destroy a breeding or resting place
- obstruct access to their resting or sheltering places
- intentionally or recklessly disturb a bat while it's in a structure or place of shelter or protection

Activities that can harm bats

Activities that can affect bats include:

- renovating, converting or demolishing a building
- cutting down or removing branches from a mature tree
- repairing or replacing a roof
- repointing brickwork
- insulating or converting a loft
- installing lighting in a roost, or outside if it lights up the entrance to the roost
- removing 'commuting habitats' like hedgerows, watercourses or woodland
- changing or removing bats' foraging areas"

Government has introduced a new regulation of increasing biodiversity by 10% for large development. To build thousands of new homes with a reduced biodiversity of endangering wildlife goes against the new regulation.

Under the **Environment Act 2021**, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from 12 February 2024. [Biodiversity net Gain BNG](#) will be required for small sites from 2 April 2024. BNG will be measured using Defra's biodiversity metric and all off-site and significant on-site habitats will need to be secured for at least 30 years. This sits alongside:

- a strengthened legal duty for public bodies to conserve and enhance biodiversity,
- new biodiversity reporting requirements for local authorities, and
- mandatory spatial strategies for nature: Local Nature Recovery Strategies or 'LNRS'.

Further information about mandatory BNG and the Environment Act is available on our [Biodiversity net gain now and in the future](#) page."

Barnet council knew about the presence of protected Bats as information obtained by Save Our Edgware via FOI ([Barnet FOI Edgware-Town-Centre-Team-LBB-Meeting-Notes REDACTED-About-Deans-Brooks-And-Bats, n.d.](#)). A meeting was held between Ballymore and the Barnet Biodiversity team in March 2023 to discuss what to do with the bats in Deans Brook.

"Impact on local wildlife:

- Further to the above, the impact on local wildlife, **specifically bats, must be considered when implementing public lighting to ensure that it doesn't negatively impact bats communication systems.**
- Moving forward, xxx and xxx highlighted the importance of robust baseline boundary assessment for species and habitats in the sink. "

There has been no satisfactory protection and mitigation measures put in place yet ([Barnet - Reply to Theresa Villiers on Deans Brook Nature Reserve, 2024](#)).

" 21 March 2024 Subject: FW: Deans Brook and Stoneyfields Park (Case Ref: TV168055) - Your Ref: 101002436498

Dear Theresa Villiers MP

Thank you for your email regarding the Deans Brook and Stoneyfields Park land that has been designated sites of borough importance for nature conservation, a non-statutory nature conservation area raised by Save Our Edgware campaign.

The site, as far as we are aware has an access route through to for Transport of London staff to Edge Tube Station and associated land.

Currently there is no public access to the land. I understand that the Ballymore development may be proposing public access to this site under the current schemes I have assessed.

To ensure that the nature conservation area is not harmed by this proposal I have requested supporting ecological evidence, in the form of surveys for the species that may potentially be present. Once this information has been provided appropriate ecological mitigation measures will need to be submitted that are in accordance with the Ecological Mitigation Hierarchy. This hierarchy starts with **avoid**, mitigate, remediate, compensate, and finally offset on another site any identified harms during this evaluation. **Without such information the LPA will be unable to discharge our statutory duty of care for Biodiversity under Section 40 of the Natural Environment and Rural Communities Act 2006.**

We are alert to the concerns raised by the Save Our Edgware campaign and working with the developers to ensure that the scheme will not harm the natural areas and designated sites for nature conservation.

Yours sincerely

xxx MRTPI Transparency & Complaints Officer Planning & Building Control,
Customer and Place London Borough of Barnet, 2 Bristol Avenue, Colindale,
NW9 4EW"

The first action should be to AVOID the harming of bats rather than going for the last one which is COMPENSATE.

Still Barnet council is going ahead with recommending the building of 720 homes which will destroy bats habitats. Barnet Local Plan has added Main Modification in MM70, Chapter 10 Environment and Climate Change, Policy ECC06 to water down the commitment to protecting wildlife and make it easier to buy their way out of the commitment.

“Where significant harm to biodiversity resulting adverse impacts from a development ~~on biodiversity~~ cannot be avoided, measures must be taken to ~~ensure that they are appropriately managed so as to reduce and/or to~~ adequately mitigate any that harm disturbance to wildlife as appropriate. These measures should be included as part of a planning application and a monitoring schedule agreed at the time of planning permission. Applications will be refused where adverse impacts cannot be avoided, adequately mitigated or as a last resort compensated for.”

10.256.6 Development proposals should consider any impact on biodiversity. areas designated for nature conservation, protected species and habitat/species prevent loss and provide mitigation to these areas as well as providing opportunities to create or improve habitat and linkages for wildlife. Development should first aim to avoid significant harm to biodiversity. Where such harm cannot be avoided then adequate mitigation should be provided, or compensation provided as a last resort, planning permission will be refused. Financial contributions to provide mitigation may be secured through planning obligations or utilising the Community Infrastructure Levy Infrastructure Payments Policy. “

“Where a development proposal would be likely to result in harm to a protected species or its habitat, an ecological survey and details of any necessary mitigation must be provided to the Council as part of the application process.”

“10.15.6 The Council wants to open up public access to all river corridors within the Borough to provide strategic green chains and walking routes. An example of this work is the Silk Stream, a segmented and closed-off watercourse in the west of the Borough. In response to growth in the west of Barnet there is an opportunity to create a new strategic green chain and walking route from Edgware to the Welsh Harp (Brent Reservoir). ”

To fortify our representation against the objection of developing Site 28, which encompasses Deans Brook, a habitat for bats and slow worms, we can invoke the **statutory duty of care for biodiversity under Section 40 of the Natural Environment and Rural Communities Act 2006**. This legal mandate imposes upon public authorities the responsibility to **conserve biodiversity, specifically safeguarding habitats of protected species like bats and slow worms**. As we advocate against opening up Deans Brook or constructing high-density homes atop

it, we underscore that any action compromising the habitat of these species directly violates this duty. Constructing high-density homes on Deans Brook without adequate consideration for the habitat of bats and slow worms would not only breach this statutory duty but also risk irreversible damage to the local ecosystem, undermining conservation objectives and community welfare.

According to NPPF, Paragraph 174: Conserving and Enhancing the Natural Environment

"Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils..."

The Deans Brook Nature Reserve, which is a Site of Importance for Nature Conservation (SINC), should be preserved. Development that threatens the habitat of protected species such as bats and slow worms directly contradicts this policy.

According to NPPF, Paragraph 179: Biodiversity

"To protect and enhance biodiversity and geodiversity, plans should... promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species..."

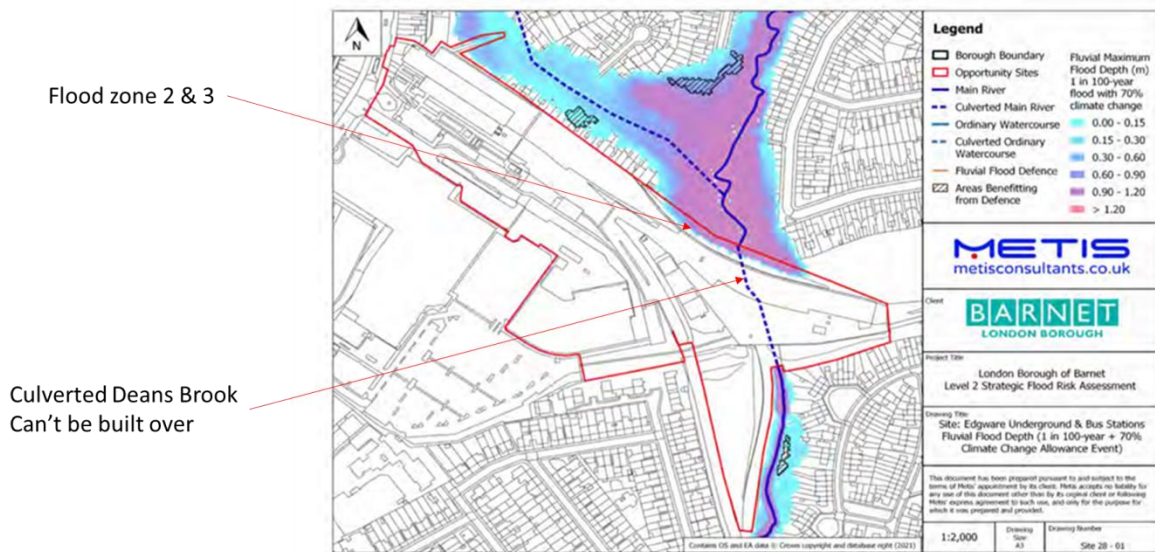
Building on the Deans Brook Nature Reserve contradicts this principle. The presence of protected species necessitates strict adherence to conservation laws, and the goal of a 10% net biodiversity gain further supports the case against development on this site.

E. Flood risk on site 28

The fifth element is that site 28 has the culverted Deans Brook running through it, and is in the flood risk zone levels 2 and 3. It is stated in the Local Plan that **"Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length."**

If under no circumstances should built development be allowed on top of the culvert which runs across site 28, how can the complete land of site 28 be used for high density housing. In particular, 720 homes on top of the culvert and the flood zone 3. This is against Barnet's own Flood protection policy. (*Barnet Strategic Flood Risk Assessment - Level 2, n.d.*)

Figure 1 - Fluvial Flood Depth Map



https://www.barnet.gov.uk/sites/default/files/sfra_level_2_report_-_appendix_b.pdf

Strategic Flood Risk Assessment - Level 2

According to NPPF, Paragraph 159: Planning and Flood Risk

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk..."

Since Site 28 includes areas within flood risk zones 2 and 3 and the Deans Brook culvert, building high-density housing here is inconsistent with this policy. The risk of flooding must be managed to protect future residents and properties.

According to The London Plan, Policy SI 12: Flood risk management

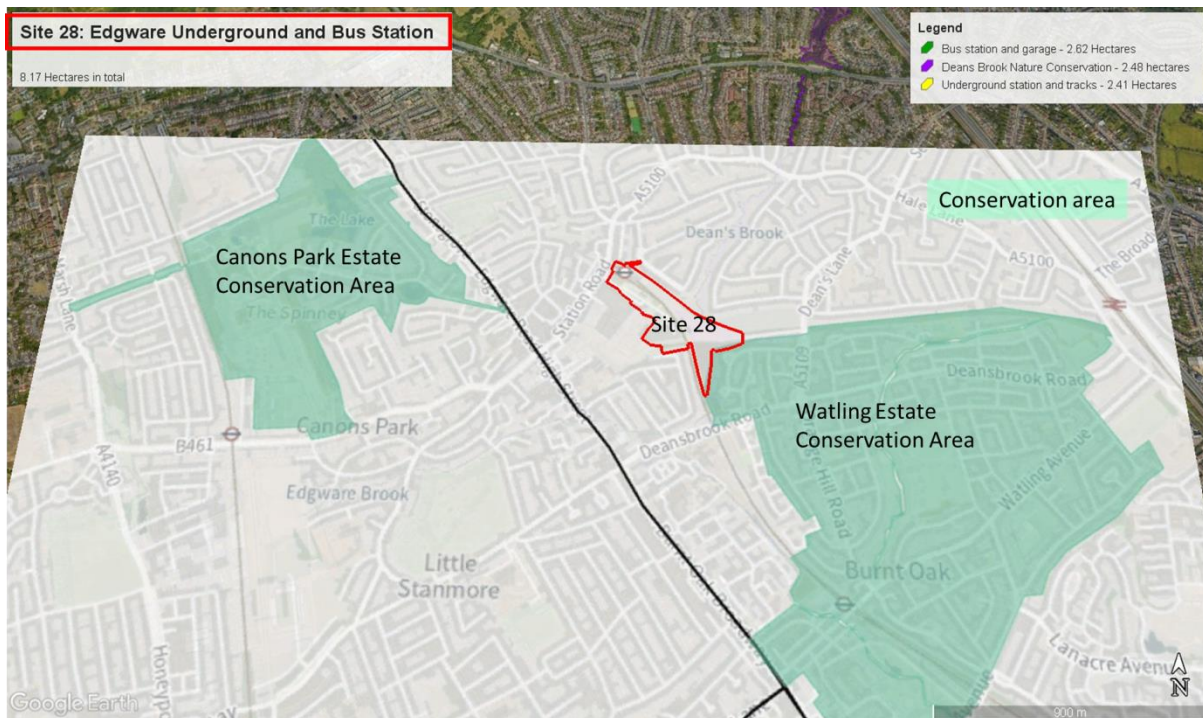
"B. Development proposals should ensure that flood risk is minimised and mitigated."

Site 28 includes areas within flood risk zones 2 and 3. Building here would increase flood risk, which is contrary to the policy's aim to minimise and mitigate flood risks.

F. Risk to adjacent Conservation Area:

Next to site 28 is the Watling Estate Conservation Area and nearby the Canons Park Estate Conservation Area. It is stated in the site description that "**Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, to ensure that the significance of nearby heritage assets are conserved or enhanced, and the relationship with surrounding low-rise suburban housing.**"

As a result, high density highrise buildings using the highest density matrix of 405 u/ha should not be allowed next to the Conversation Areas.



Edgware has many heritage sites. Building highrise so near to so many heritage buildings poses a risk to the heritage assets of both Barnet and Harrow.

According to NPPF, Paragraph 190: Conserving and Enhancing the Historic Environment

"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment..."

The proximity of Site 28 to the Watling Estate Conservation Area and other heritage sites necessitates careful consideration to ensure that the significance of these heritage assets is not compromised by inappropriate development.

According to the London Plan, Policy HC1: Heritage conservation and growth

"C. Development proposals affecting heritage assets, and their settings, should conserve their significance."

Site 28 is near conservation areas. High-density development would risk the character of these heritage sites, contrary to the policy's aim to conserve heritage significance.

Save Our Edgware produced a video illustrating the inappropriateness of building nearly 4000 homes in the Edgware Town Centre so close to the Conservation Areas.

<https://www.youtube.com/watch?v=thqgysBG42U>

Conclusion

In summary, Site 28 is wholly unsuitable for major development and we would suggest that the number of dwellings be reduced from 2,316 to 0. In fact, site 28 should be completely removed from house development.

- Deans Brook Nature Reserve - 0 dwellings
- London Underground (Northern Line) Station (tracks) - 0 dwellings
- Bus Station - 0 dwellings
- Bus Garage - 0 dwellings
- Total on site 28 - 0 dwellings

Legal and Procedural Compliance

According to NPPF, Paragraph 16: Plan-Making

"Plans should be: a) prepared with the objective of contributing to the achievement of sustainable development;

b) prepared positively, in a way that is aspirational but deliverable;..."

The current allocation of 2,316 homes to Site 28 appears unrealistic given the constraints and risks detailed. This allocation may fail the deliverability test, undermining the plan's overall soundness and legal compliance.

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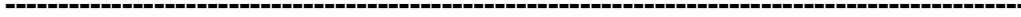
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series.co.uk/news/23945050.london-fire-brigade-edgware-ev-bus-garage-
safety-warning/



Proposed Modifications (Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Main Modification Local Plan
Representation Form B

MM	Original	Proposed modifications	Notes
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Main Modification Local Plan
Representation Form B

MM 20	Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area)	Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area)	Remove Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area) section altogether.
MM 20	Context Type: Central	Context Type: Central <u>Suburban</u>	See Edgware Major Town Centre rebuttal
MM 20	In Site Description section: Edgware is <u>identified as a strategic location for where</u> tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.	Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre. <u>Site 28 Edgware Underground and Bus Station (8.17 hectares) is made up of 3 areas, none of which are suitable for housing:</u>	

Main Modification Local Plan
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1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a covered bus station including weatherproof seating for 68 passengers, a café/kiosk and a timetable board indicator.
2. **Yellow Area** (2.96 hectares): Edgware tube station and operational Northern Line infrastructure (mainly railway tracks).
3. **Purple Area** (2.54 hectares): The Deans Brook Nature Reserve, which is classified as a Site of importance for Nature Conservation (SINC, grade II), closed to the public in order to preserve protected species that live there such as bats.”

MM 20	Indicative residential capacity: 2317 <u>2316 dwellings.</u>	Indicative residential capacity: 2316 <u>0 dwellings</u>	0 housing should be allowed on site 28
MM 20	Justification: The western parts of the site are highly accessible and provide a town centre location which is currently underused.	In Justification: The western parts of the site are highly accessible and provide a town centre location which is currently underused. <u>The site can not be justified for housing let alone high density highrise development.</u>	This is because none of the site 28 land is underused. They are TfL's operational land.
MM 20	<i>In Proposed uses/ allocation:</i> 70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. <u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential,</u>	In Proposed uses/ allocation: "70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. " <u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u>	The removal of the residential and commercial fix will only increase the residential housing and reduce the available commuter car parks.

	<u>for example for disabled persons or operational reasons.</u>		
MM 20	<p>Site requirements and development guidelines:</p> <p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site.</p>	<p>Site requirements and development guidelines:</p> <p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site.</p>	<p>Edgware is not a Major Town Centre therefore unsuitable for high density housing.</p>
MM 20	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential,</u></p>	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. "</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>	<p>The removal of the residential and commercial fix will only increase the residential housing and reduce the available commuter car parks.</p>

	<u>for example for disabled persons or operational reasons.</u>		
MM 20	<u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</u>	<u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</u>	The opening up of Deans Brook will damage protected Bats habitat.

The Site No 28 description after our proposed Modifications

Site No. 28	Edgware Underground & Bus Stations (Edgware Growth Area)		
Site Address:	Station Rd, Edgware, HA8 7AW		
Map retained as submitted	Ward:	Edgware	Image retained as submitted
	PTAL 2019:	6B	

Main Modification Local Plan
Representation Form B

	PTAL 2031:	6B	
	Site Size:	8.17 ha	
	Ownership:	TfL	
	Site source:	Call for Sites and Edgware Town Centre Framework (2013)	
	Context type:	Central Suburban	
	Existing or most recent site use/s:	Transport operations	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre; Site of Borough Importance for Nature Conservation	
	Relevant planning applications:	None	

Site
descripti
on:

The northern part is within Edgware Town Centre, facing onto the main shopping street, including Primary Shopping Frontage. The site encompasses Edgware Station, platforms and tracks, the bus garage with parking and access, along with areas of open land to the south and east. To the west is the Broadwalk Shopping Centre, classified as Primary Retail Frontage, with associated car parking. To the south and east is low-rise suburban housing, with the Watling Street Conservation Area adjacent to part of the site. Public transport accessibility is high for the northern and western elements of the site. The culverted Deans Brook runs through part of the site, and flood risk zone levels 2 and 3 overlaps the north eastern boundary of the site in some places. There is also some surface water flood risk. A Site of Borough Importance for Nature Conservation covers the south eastern parts of the site. ~~Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.~~

Site 28 Edgware Underground and Bus Station (8.17 hectares) is made up of 3 areas, none of which are suitable for housing:



1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a covered bus station, including weatherproof seating for 68

Main Modification Local Plan
Representation Form B

	Applicable Draft Local Plan policies:	GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, EGY01, EGY03, ECC02, ECC02A, TRC01, TRC02, TRC03
	Proposed uses/ allocation (as a proportion of floorspace):	<p><u>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</u></p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>
	Indicative residential capacity:	2317 <u>2316-0 dwellings.</u>
	Justification:	<u>The site can not be justified for housing let alone high density highrise development.</u>

<p>Site requirements and development guidelines:</p>	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site. <u>Consistent with Policy CDH04, all tall buildings will be subject to a detailed assessment of how the proposed building relates to its surroundings, responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD. Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, to ensure that the significance of nearby heritage assets are conserved or enhanced, and the relationship with surrounding low-rise suburban housing.</u></p> <p><u>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02.</u> Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.</p> <p><u>Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</u></p> <p>Proposals must be subject to an archaeological assessment.</p> <p><u>Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook.</u> The SFRA Level 2 provides a detailed assessment of flood risks and the impact from climate change and shows parts of the site are in Flood Zone 3 and at surface water flood risk. Where possible, proposals for the site should consider de-culverting of Deans Brook and <u>inclusion of an appropriate buffer zone either side of the main river.</u> Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p><u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</u></p> <p>Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area and surrounding low-rise suburban housing.</p> <p>The emerging Edgware Growth Area SPD (2021) provides further guidance.</p>
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**Continue on a separate sheet if
necessary**

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).

Declaration of consent


The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature  Date 15/06/2024

Appendix: Original MM109 Site 28 Edgware Underground and Bus Stations

<p>MM1 09</p>	<p>Site 28</p>	<p>Edgware Underground & Bus Stations</p>
<p>Reason for MM</p> <ul style="list-style-type: none"> Remove the selected policies previously identified as relevant in the Plan as submitted. When planning permission is sought for development proposals, compliance will be assessed in terms of any relevant policies of the Plan and its accordance with the development plan as whole. Reduce indicative residential capacity to 2316 dwellings to be consistent with the most up-to-date calculation provided in EXAM75 and EXAM87. Remove percentages for proposed uses to provide necessary flexibility for a design-led approach and ensure certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure and an approach to car parking that meets the requirements of TRC02, TRC03, and has regard to Policy GSS12. Clarify approach to tall buildings in a manner consistent with Policy CDH04 and the relationship with nearby heritage assets, and provide certainty that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto. 		

<p>Site No. 28</p>	<p>Edgware Underground & Bus Stations (Edgware Growth Area)</p>
<p>Site Address:</p>	<p>Station Rd, Edgware, HA8 7AW</p>

Map retained as submitted

Ward:	Edgware	Image retained as submitted
PTAL 2019:	6B	
PTAL 2031:	6B	
Site Size:	8.17 ha	
Ownership:	TfL	
Site source:	Call for Sites and Edgware Town Centre Framework (2013)	
Context type:	Central	
Existing or most recent site use/s:	Transport operations	

	Development timeframe:	6-10 years
	Planning designations:	Town Centre; Site of Borough Importance for Nature Conservation
	Relevant planning applications:	None
	Site description:	<p>The northern part is within Edgware Town Centre, facing onto the main shopping street, including Primary Shopping Frontage. The site encompasses Edgware Station, platforms and tracks, the bus garage with parking and access, along with areas of open land to the south and east. To the west is the Broadwalk Shopping Centre, classified as Primary Retail Frontage, with associated car parking. To the south and east is low-rise suburban housing, with the Watling Street Conservation Area adjacent to part of the site. Public transport accessibility is high for the northern and western elements of the site. The culverted Deans Brook runs through part of the site, and flood risk zone levels 2 and 3 overlaps the north eastern boundary of the site in some places. There is</p>

	<p>also some surface water flood risk. A Site of Borough Importance for Nature Conservation covers the south eastern parts of the site. Edware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.</p>		
	<table border="1"> <tr> <td data-bbox="1093 683 1485 1005"> <p>Applicable Draft Local Plan policies:</p> </td> <td data-bbox="1485 683 2016 1005"> <p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p> </td> </tr> </table>	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p>
<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p>		
	<table border="1"> <tr> <td data-bbox="1093 1005 1597 1380"> <p>Proposed uses/ allocation (as a proportion of floorspace):</p> </td> <td data-bbox="1597 1005 2016 1380"> <p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</p> <p><u>Residential led mixed use development with town</u></p> </td> </tr> </table>	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</p> <p><u>Residential led mixed use development with town</u></p>
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</p> <p><u>Residential led mixed use development with town</u></p>		

	<p><u>centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>
<p>Indicative residential capacity:</p>	<p><u>2317 2316 dwellings.</u></p>
<p>Justification:</p>	<p>The western parts of the site are highly accessible and provide a town centre location which is currently underused. The need to maintain the London Underground infrastructure, and the barriers imposed by this infrastructure, make the eastern and southern parts of the site far more challenging and restricted in terms of potential for redevelopment.</p>

Site requirements and development guidelines:

The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site. Consistent with Policy CDH04, all tall buildings will be subject to a detailed assessment of how the proposed building relates to its surroundings, responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD. Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, to ensure that the significance of nearby heritage assets are conserved or enhanced, and the relationship with surrounding low-rise suburban housing.

Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02. Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.

Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.

Proposals must be subject to an archaeological assessment.

Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook. The SFRA Level 2 provides a detailed assessment of flood risks and the impact from climate change and shows parts of the site are in Flood Zone 3 and at surface water flood risk. Where possible, proposals for the site should consider de-culverting of Deans Brook and inclusion of an appropriate buffer zone either side of the main river. Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.

The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.

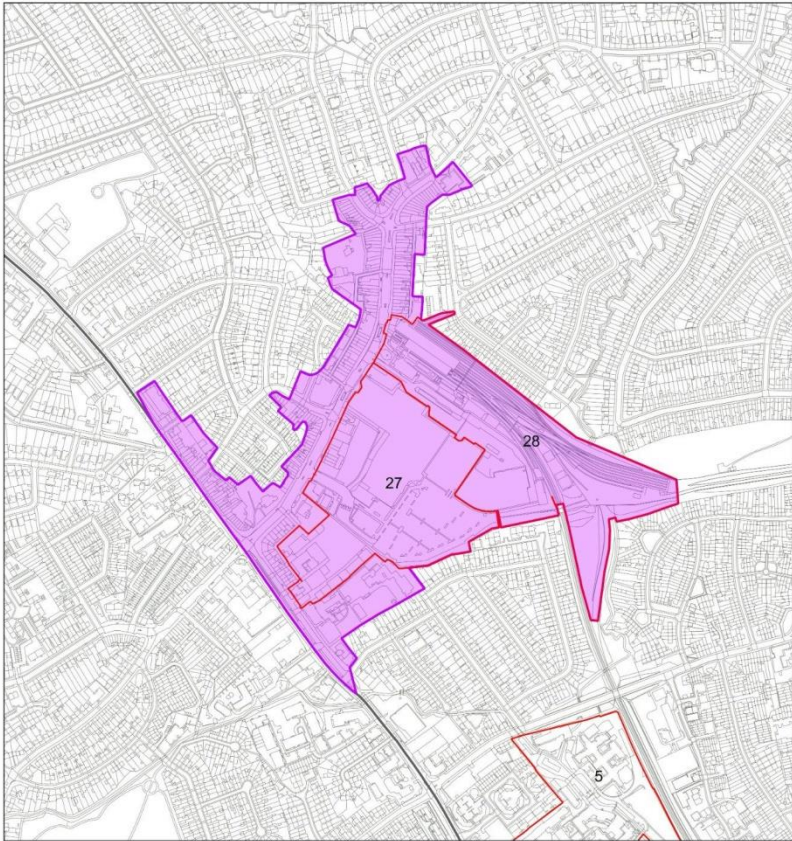
This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.

~~Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area and surrounding low-~~

~~rise suburban housing.~~

The ~~emerging~~ Edgware Growth Area SPD (2021) provides further guidance.

Map 3C - Edgware Growth Area



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- LEGEND**
- Growth Area
 - Site Allocations
 - London Borough of Barnet Boundary

Scale 1 : 5,000



**Main Modifications
Local Plan**

**Site 28 Edgware Underground and Bus
Station Selection for building 2,316 homes**

Representations Form

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number 109 Site 28 Selection ([to read MM109 click here](#)) _____ Policy
Related to GSS05 Paragraph All

Figure/Table _____ Policies Map change _____

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

a) Legally compliant

Yes

No

b) Sound Yes No

c) Compliant with the Duty to Co-operate Yes No

Explanation (Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.)

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Continue on a separate sheet if necessary

I wish to support the representation (Ref: SOE-Objection01-Site28) from Save Our Edgware and the Edgware Community Association concerning the selection of Site 28 Edgware Underground and Bus Station for building 2,316 new homes.

I wish to support the Proposed Modifications (Question 4) and revised words in the representation (Ref: SOE-Objection01-Site28) from Save Our Edgware and the Edgware Community Association.

Proposed Modifications (Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Main Modification Local Plan
Representation Form B

M M	Original	Proposed modifications	Notes
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Main Modification Local Plan
Representation Form B

MM 20	Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area)	Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area)	Remove Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area) section altogether.
MM 20	Context Type: Central	Context Type: Central <u>Suburban</u>	See Edgware Major Town Centre rebuttal
MM 20	In Site Description section: Edgware is <u>identified as a strategic location for where</u> tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.	Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre. <u>Site 28 Edgware Underground and Bus Station (8.17 hectares) is made up of 3 areas, none of which are suitable for housing:</u>	

Main Modification Local Plan
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1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a covered bus station including weatherproof seating for 68 passengers, a café/kiosk and a timetable board indicator.
2. **Yellow Area** (2.96 hectares): Edgware tube station and operational Northern Line infrastructure (mainly railway tracks).
3. **Purple Area** (2.54 hectares): The Deans Brook Nature Reserve, which is classified as a Site of importance for Nature Conservation (SINC, grade II),

Main Modification Local Plan
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		<p><u>closed to the public in order to preserve protected species that live there such as bats.”</u></p>	
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MM 20	Indicative residential capacity: 2317 <u>2316 dwellings.</u>	Indicative residential capacity: 2316 <u>0</u> dwellings	0 housing should be allowed on site 28
MM 20	Justification: The western parts of the site are highly accessible and provide a town centre location which is currently underused.	In Justification: The western parts of the site are highly accessible and provide a town centre location which is currently underused. <u>The site can not be justified for housing let alone high density highrise development.</u>	This is because none of the site 28 land is underused. They are TfL's operational land.
MM 20	<i>In Proposed uses/ allocation:</i> 70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. <u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or</u>	In Proposed uses/ allocation: "70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. " <u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u>	The removal of the residential and commercial fix will only increase the residential housing and reduce the available commuter car parks.

	<u>operational reasons.</u>		
MM 20	<p>Site requirements and development guidelines:</p> <p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site.</p>	<p>Site requirements and development guidelines:</p> <p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site.</p>	<p>Edgware is not a Major Town Centre therefore unsuitable for high density housing.</p>
MM 20	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or</u></p>	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. "</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>	<p>The removal of the residential and commercial fix will only increase the residential housing and reduce the available commuter car parks.</p>

	<u>operational reasons.</u>		
MM 20	<u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</u>	This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.	The opening up of Deans Brook will damage protected Bats habitat.

The Site No 28 description after our proposed Modifications

Site No. 28	Edgware Underground & Bus Stations (Edgware Growth Area)		
Site Address:	Station Rd, Edgware, HA8 7AW		
Map retained as submitted	Ward:	Edgware	Image retained as submitted
	PTAL 2019:	6B	
	PTAL 2031:	6B	

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	Site Size:	8.17 ha	
	Ownership:	TfL	
	Site source:	Call for Sites and Edgware Town Centre Framework (2013)	
	Context type:	Central <u>Suburban</u>	
	Existing or most recent site use/s:	Transport operations	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre; Site of Borough Importance for Nature Conservation	
	Relevant planning applications:	None	

Site
descripti
on:

The northern part is within Edgware Town Centre, facing onto the main shopping street, including Primary Shopping Frontage. The site encompasses Edgware Station, platforms and tracks, the bus garage with parking and access, along with areas of open land to the south and east. To the west is the Broadwalk Shopping Centre, classified as Primary Retail Frontage, with associated car parking. To the south and east is low-rise suburban housing, with the Watling Street Conservation Area adjacent to part of the site. Public transport accessibility is high for the northern and western elements of the site. The culverted Deans Brook runs through part of the site, and flood risk zone levels 2 and 3 overlaps the north eastern boundary of the site in some places. There is also some surface water flood risk. A Site of Borough Importance for Nature Conservation covers the south eastern parts of the site. ~~Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.~~

Site 28 Edgware Underground and Bus Station (8.17 hectares) is made up of 3 areas, none of which are suitable for housing:



1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a covered bus station, including weatherproof seating for 68

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	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, EGY01, EGY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p><u>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</u></p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>
	<p>Indicative residential capacity:</p>	<p>2317 <u>2316-0 dwellings.</u></p>
	<p>Justification:</p>	<p><u>The site can not be justified for housing let alone high density highrise development.</u></p>

<p>Site requirements and development guidelines:</p>	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site. <u>Consistent with Policy CDH04, all tall buildings will be subject to a detailed assessment of how the proposed building relates to its surroundings, responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD. Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, to ensure that the significance of nearby heritage assets are conserved or enhanced, and the relationship with surrounding low-rise suburban housing.</u></p> <p><u>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02.</u> Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.</p> <p><u>Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</u></p> <p>Proposals must be subject to an archaeological assessment.</p> <p><u>Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook.</u> The SFRA Level 2 provides a detailed assessment of flood risks and the impact from climate change and shows parts of the site are in Flood Zone 3 and at surface water flood risk. Where possible, proposals for the site should consider de-culverting of Deans Brook and <u>inclusion of an appropriate buffer zone either side of the main river.</u> Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p><u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</u></p> <p>Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area and surrounding low-rise suburban housing.</p> <p>The emerging Edgware Growth Area SPD (2021) provides further guidance.</p>
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**Continue on a separate sheet if
necessary**

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

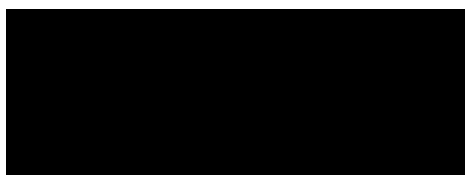
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature _____



Date _____

15/06/2024 _____

**Edgware is wrongly
classified as a Major
Town Centre. It is a
Suburban District Centre.**

Representations Form

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number ___MM11,20,26,53_____ Policy ___Related to GSS05, GSS07,
Policy TOW01_____ Paragraph ___All_____

Figure/Table _____ Policies Map change _____

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Explanation (*Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.*)

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Continue on a separate sheet if necessary

I wish to support the representation (Ref: SOE-Objection03-MajorCentre) from Save Our Edgware and the Edgware Community Association concerning the wrong classification of Edgware as a Major Town Centre.

I wish to support the Proposed Modifications (Question 4) and revised words in the representation (Ref: SOE-Objection03-MajorCentre) from Save Our Edgware and the Edgware Community Association.

Classification as a Major Town Centre vs. District Centre

1. Characteristics of Major Town Centres:

- According to the London Plan, Major Town Centres are typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure, and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service, and civic functions.

2. Edgware's Actual Characteristics does not qualify for a Major Centre:

- **Retail Floorspace:** Edgware has a total retail floorspace of 40,472 sqm, which is substantially below the 50,000 sqm threshold required for Major Town Centres. Furthermore, Edgware's comparison retail floorspace (4,139 sqm) is significantly lower than its convenience retail floorspace (24,463 sqm). This indicates a mismatch with the characteristic of a Major Town Centre where comparison floorspace typically dominates.
- **Leisure and Civic Functions:** Edgware lacks significant leisure functions such as a cinema or bowling alley and has minimal civic functions, which are crucial for a Major Town Centre classification.
- **Employment Functions:** There is a lack of substantial employment opportunities that would be expected in a Major Town Centre.

3. Comparison with District Centre Criteria:

- District Centres provide convenience goods and services and social infrastructure for more local communities. They typically contain 5,000–50,000 sqm of retail, leisure, and service floorspace.
- Given Edgware's retail floorspace and its focus on convenience retail, it fits well within the District Centre category rather than a Major Town Centre.

Classification as a Central Area vs. Suburban Area

1. Definition of Central Areas:

- Central areas have very dense development, a mix of different uses, large building footprints, and buildings typically of four to six storeys.

2. Edgware's Urban Form:

- Edgware is predominantly suburban, characterised by lower-density developments such as detached and semi-detached houses, small building footprints, and typically buildings of two to three storeys. This matches the suburban setting rather than a central area.
- Historical documents and local plans (e.g., Barnet Local Plan 2012 and Edgware Town Centre Framework 2013) consistently describe Edgware as a suburban town with suburban characteristics.

Conclusion

The evidence clearly indicates that Edgware does not meet the criteria for a Major Town Centre or a Central area as defined by the London Plan. Instead, Edgware aligns more closely with the characteristics of a District Centre in a suburban setting. Consequently, the calculations for housing capacity based on Edgware being a Major Town Centre with a Central definition are invalid. Therefore, the London Plan's classification and associated density calculations should be revised to reflect Edgware's true status as a suburban District Centre.

Major centres definition in London Plan – typically found in inner and some parts of outer London with a **borough-wide catchment**. They generally contain over **50,000 sq.m of retail, leisure and service floorspace** with a relatively **high proportion of comparison goods relative to convenience goods**. They may also have **significant employment, leisure, service and civic functions**.

Table showing the absence of Major Centre characteristics for Edgware

Major Centres characteristics	Edgware	Met Criteria?
borough-wide catchment	Does not provide borough wide catchment	No
50,000 sq.m of retail, leisure and service floorspace	only 40,472 sqm	No
high proportion of comparison goods relative to convenience goods	10.23% comparison vs 60.44% Convenience Edgware comparison turnover is below North Finchley	No
Significant employment, leisure, service and civic functions	No employment function No leisure function Yes, 22.73% floor space is Service No civic function	No

Edgware Comparison Floorspace is well below Convenience
 Edgware Convenience retail = 24,463 sq.m
 Edgware Comparison retail = 4,139 sq.m

To qualify as a Major Centre, comparison floorspace needs to be more than convenience floorspace. By this definition, Edgware is not a Major Centre. It is a District Centre.


Definition: ("[Glossary](#)")

Comparison retail

Floorspace dedicated to providing a range of comparison goods, including clothing, shoes, furniture, household appliances, tools, medical goods, games and toys, books and stationery, jewellery and other personal effects.

Convenience retail

Floorspace dedicated to providing a range of convenience goods such as food and non-alcoholic beverages, tobacco, alcoholic beverages, newspapers and periodicals and non-durable household goods.

MAJOR OR CANDIDATE MAJOR CENTRES						
EDGWARE (MAJOR CENTRE)						
						Date of survey: 31/05/17
						
Diversity of uses						
Category	No. of units	% of units	UK %	Floorspace (sq.m)	Floorspace (%)	UK %
Convenience	164	56.2	9.41	24,463	60.44	18.34
Comparison	32	11.0	39.10	4,139	10.23	44.18
Service	76	26.0	38.17	9,199	22.73	25.84
Vacant	16	5.5	12.13	2,141	5.29	10.71
Other	4	1.37	1.19	530	1.31	0.97
Total	292	100	100	40,472	100	100
Source: GOAD, PBA						

Source: Appendix A to TCFNA PBA MAPS https://www.barnet.gov.uk/sites/default/files/lb_barnet_tcfna_report_-_final_-_vol_2_appendices_reduced.pdf

This table shows the floorspace of 40,472 sqm is substantially below the threshold of 50,000 sqm for a Major Town Centre. And the Comparison retail floorspace is less than 50% of the Convenience retail floorspace for a Major Town Centre.

(check Broadwalk centre's comparison shops)

Proposed Modifications (*Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.)*

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove all reference in the following MM about Edgware being a Major Centre.
Change Edgware to District Centre.

MM	Original	Proposed modifications
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MM	Original	Proposed modifications
MM 11	<p>4.3 Barnet's Growth Requirements</p> <p>4.4 Housing</p> <p>4.8.2 Delivery of new homes will mostly be in the key Growth Areas of Brent Cross —Cricklewood (Opportunity Area), Colindale (Opportunity Area), Cricklewood, Mill Hill East, Brent Cross West, and Edgware, and Cricklewood alongside new housing in the <u>Mill Hill East Area and within the Borough's District Town Centres</u>. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.</p>	<p>4.3 Barnet's Growth Requirements</p> <p>4.4 Housing</p> <p>4.8.2 Delivery of new homes will mostly be in the key Growth Areas of Brent Cross —Cricklewood (Opportunity Area), Colindale (Opportunity Area), Cricklewood, Mill Hill East, Brent Cross West, and <u>Edgware</u>, and Cricklewood alongside new housing in the <u>Mill Hill East Area and within the Borough's District Town Centres</u>. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.</p>
MM 20	<p>POLICY GSS05 Edgware Growth Area</p> <p><u>A. Level of Development</u></p> <p>To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:</p> <p>a) <u>Approximately 5,000 4,740 new homes, with provision</u></p>	<p><u>A, c)</u></p> <p><u>Edgware Major District Town Centre.</u></p>

MM	Original	Proposed modifications
	<p><u>for uplift through the design-led approach</u></p> <p>b) Improved leisure options such as a new cinema, swimming pool and new eating-out options;</p> <p>c) Appropriate <u>location- based floorspace for community, retail and office uses; other main town centre uses including offices that are proportionate to supporting proposed housing growth and the vitality and viability of Edgware Major Town Centre.</u>Improved public realm, including new public spaces;</p>	
MM 20	<p>4.18 Edgware Growth Area</p> <p>4.18.1 Edgware has evolved from a small market town into a <u>major town centre</u> and <u>has become</u> <u>e</u> a well-known suburban hub of North London.</p>	<p>4.18.1 Edgware has evolved from a small market town into a <u>major district</u> town centre and <u>has become</u> a well-known suburban hub of North London.</p>
MM 20	<p>4.18.4 Edgware is identified in the <u>London Plan town centres hierarchy as Barnet's only Major Centre and is also highlighted in the</u> Growth Strategy as one of Barnet's main</p>	<p>4.18.4 Edgware is identified in the Growth Strategy as one of Barnet's main District town centres;</p>

MM	Original	Proposed modifications
	town centres,	
MM 26	<p><u>POLICY GSS08 Barnet's District Town Centres</u></p> <p><u>Barnet's District Town Centres have a vital role in delivering sustainable growth and enabling post COVID19 recovery from the COVID-19 pandemic. Thriving town centres will support shopping and services, and provide a focus for cohesive communities, while delivering new jobs and homes. The Council will positively consider proposals on suitable sites within the District Town Centres which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3).</u></p> <p><u>In addition to the Major Centre of Edgware, there are 14 District Town Centres identified within Barnet in the London Plan – of these Burnt Oak, Chipping Barnet, Finchley Central, Golders Green and North Finchley form the Council's priorities for investment and revitalisation, supporting local businesses and delivering mixed use development in accordance with the place making policies of the Local Plan and in alignment with the Mayor's Healthy</u></p>	<p><u>POLICY GSS08 Barnet's District Town Centres</u></p> <p><u>Barnet's District Town Centres have a vital role in delivering sustainable growth and enabling post COVID19 recovery from the COVID-19 pandemic. Thriving town centres will support shopping and services, and provide a focus for cohesive communities, while delivering new jobs and homes. The Council will positively consider proposals on suitable sites within the District Town Centres which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3).</u></p> <p>In addition to the Major Centre of Edgware, there are 14 15 District Town Centres identified within Barnet in the London Plan – of these Edgware, Burnt Oak, Chipping Barnet, Finchley Central, Golders Green and North Finchley form the Council's priorities for investment and revitalisation, supporting local businesses and delivering mixed use development in accordance with the place making policies of the Local Plan and in alignment with the Mayor's Healthy Streets Approach.</p>

MM	Original	Proposed modifications
	<u>Streets Approach.</u>	
MM 26	<p><u>4.21 Barnet's District Town Centres</u></p> <p><u>4.21.1 Barnet has an extensive town centre network with a range of locations where appropriate renewal and regeneration can support the Borough's growth needs. Thriving town centres are essential for the Borough to grow sustainably and successfully. Barnet's Growth Strategy highlights those town centres (Burnt Oak, Chipping Barnet, Edgware, Finchley Church End (Finchley Central), Golders Green and North Finchley) that have been prioritised, for improving the town centre offer.</u></p>	We fully support this text, which shows that Edgware is a District Town Centre.
MM 53	<p><u>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p><u>a) ...</u></p> <p><u>b) Edgware Major Town Centre (see in accordance with Policy GSS05) where regeneration will consolidate the quantum together of retail floorspace alongside with qualitative</u></p>	<p><u>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p><u>a) ...</u></p> <p><u>b) Edgware District Town Centre (see policy GSS05) where regeneration will consolidate the quantum of retail floorspace alongside improvements to the quality of the retail and</u></p>

MM	Original	Proposed modifications
	<p><u>improvements to the quality of the retail floorspace. Proposals for and leisure offer, whilst providing a range of community uses and other main town centre uses (including offices and leisure) will be supported where they enhance the Major Town Centre's viability and vitality and complement the delivery of intended levels of .New housing growth will form a key part of significant growth of the local economy.</u></p>	<p><u>leisure offer, whilst providing a range of community uses.</u></p>
MM 53	<p>Major Town Centre 1. Edgware</p> <p>District Town Centres</p> <ol style="list-style-type: none"> 1. Brent Street 2. Burnt Oak 3. Cricklewood 4. Chipping Barnet 5. Colindale - the Hyde 6. East Finchley 7. Finchley Central 8. Golders Green 9. Hendon 10. Mill Hill 11. New Barnet 12. North Finchley 	<p>Major Town Centre 1. Edgware</p> <p>District Town Centres</p> <ol style="list-style-type: none"> 1. Brent Street 2. Burnt Oak 3. Cricklewood 4. Chipping Barnet 5. Colindale - the Hyde 6. East Finchley 6b. Edgware 7. Finchley Central 8. Golders Green 9. Hendon 10. Mill Hill 11. New Barnet

MM	Original	Proposed modifications
	13. Temple Fortune 14. Whetstone	12. North Finchley 13. Temple Fortune 14. Whetstone

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).

Declaration of consent

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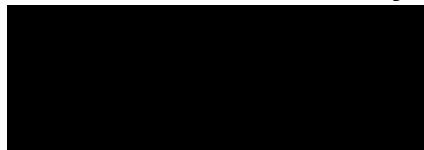
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By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature _____

A large black rectangular box redacting the signature of the data subject.

Date _____

15/06/2024