



**Main Modifications
Local Plan**

Representations Form

Ref:

(For official use
only)

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

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"/> |

- The modified residential capacity of 2316 dwellings is unsound for several reasons. First, it is an unfavourable and extortionate number to fit in such a small space. Edgware is a suburban town on the edge of London and it is not appropriate for such an inner-city like number of homes on such a small space – to reach this high rise buildings would be necessary, something not in Edgware’s suburban design, heritage or community aspects. Furthermore, combined with the site 27, this would almost double the ward’s population without the necessary infrastructure in place to hold this.
- Also, As well as a stain on the wider areas skyline, these intrusive tower block heights would cast shadows across the town centre. Plus, these buildings present unique challenges in terms of safety, particularly during emergency situations. The local fire ladders are 32m; there are three 64m ladders in all of London and these buildings are 100m+. The plan for buildings so tall in this area are unsound and should be capped.
- Scrapping the sheltered bus waiting area, whilst increasing the population so dramatically with reduced parking, places an enormous pressure on public transport – it is unsound to reduce the size or quality of bus passenger facilities when you expect so many more people to use them. This has not been thought out, nor has the underground bus garage where there is no evidence to affirm EV charging under flats is a sound idea. Obviously, this idea should be confirmed BEFORE the Local Plan is finalised – as if its not, then it the results of so many dwellings without bus space would be disastrous.
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- CONT.
- Whilst the new Brent Cross Town has 6,700 new homes in 180 acres, Edgware would unnecessarily be cramming in 3,800 units in 26 acres. On the same metric the Broadwalk should only get 967 units.
- Also, the London Plan identifies two main Opportunity Areas along the A5 corridor, at Colindale/Burnt Oak and Cricklewood/Brent Cross. "In these areas of growth, there will be opportunity to intensify development, which may be by increasing height in appropriate locations." Edgware is not one of those.
- Residents don't want this development (source: <https://www.edgwarevoice.org/comments>). This is a suburban town NOT a city. The plans do not match the local architecture, heritage, wishes of the community, nor are there enough space in these plans for matching and increased infrastructure to meet them. Please rethink the large scale you are imposing onto our town, which will ultimately change the entire nature and purpose of the area into a very different one. Residents views MUST be at the forefront of any changes to the plan when it comes to these major changes to Edgware Town Centre.

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.

[See above boxes, due to formatting]

Continue on a separate sheet if necessary

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.

Proposed modifications:

Remove Site No. 28 Edgware Underground & Bus Stations (Edgware Growth Area) section altogether.

Proposed modifications:

change Context Type from Central to Suburban

Context Type: Central Suburban

Proposed modifications:

Site description (Revision to MM109, Site Description section - last sentence of 1st paragraph):

In Site Description, remove: "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. "
and replace it with:

"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 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.”

Proposed modifications:

Change indicative residential capacity from 2316 to 0

Indicative residential capacity: 2316 0 dwellings

Proposed modifications:

In Justification: (remove) The western parts of the site are highly accessible and provide a town centre location which is currently underused.

and replace it with: The site can not be justified for housing let alone high density highrise development.

This is because none of the site 28 land is underused. They are TfL’s operational land.

Proposed modifications:

In Proposed uses/ allocation, do not remove the 1st sentence “70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. “

Reinstate the text:

“70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. “

The removal of the residential and commercial fix will only increase the residential housing and reduce the available commuter car parks.

Proposed modifications:

Do not insert the new MM text: “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.”

The reduction of commuter car parking is going to have a very detrimental effect on the people using Edgware tube station due to Edgware being the termini of the Northern Line.

Proposed modifications:

Site requirements and development guidelines: (do not remove the 3rd paragraph from bottom) 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.

Reinstate the text:

“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 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 description: 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 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. Applicable Draft Local Plan policies: GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03

Proposed uses/ allocation (as a proportion of floorspace): 70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure. 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. None. The site is not suitable for housing. Indicative residential capacity: 2317 0 dwellings. Justification: The site can not be justified for housing let alone high density highrise development.

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

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 JThomas Date 07/06/2024