



Main Modifications
Local Plan

Ref:

(For official use
only)

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.

I visit Edgware to shop at Sainsbury's, Poundland, TK Maxx, Boots and Superdrug as well as the independent florist Isabella Flowers. Given the local weather it is important to have a space to shelter from the rain and wind whilst waiting for a bus as well as for school children to have a meeting place.

I also use Edgware bus station as the first part of my commute to work before onward travel via the northern line to Portland Place W1 and Stratford.

The reasons on why the selection of Site 28 for building 2,316 homes are unsound in my view is:

3.1 Site 28 Edgware Underground and Bus Station

3.1.1 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 two 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.

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. I 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), 4Main Modification Local Plan Representation Form B closed to the public to preserve protected species that live there such as bats.

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.

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MM	Original	Proposed modifications	Notes
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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 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.

~~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><u>passengers, a café/kiosk and a timetable board indicator.</u></p> <p>2. <u>Yellow Area (2.96 hectares): Edgware tube station and operational Northern Line infrastructure (mainly railway tracks).</u></p> <p>3. <u>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.”</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.

<p>MM 20</p>	<p><i>In Proposed uses/ allocation:</i> 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>In Proposed uses/ allocation:</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>
<p>MM 20</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>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>

<p>MM 20</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>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>
<p>MM 20</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><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>The opening up of Deans Brook will damage protected Bats habitat.</p>

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)	

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	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 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 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.</p> <p><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></p>
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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.

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	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):	<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>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.</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>
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	<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 (<u>2021</u>) 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



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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 ___MM72 , _____ Policy ___Related to _ - Chapter 11 **Policy TRC02 – Transport Infrastructure** _____ 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 from Save Our Edgware and the Edgware Community Association (Ref: SOE-Objection02-BUS) concerning the protection of Edgware Bus Station and its services.

I wish to support the Proposed Modifications (Question 4) and revised words in the representation from Save Our Edgware and the Edgware Community Association (Ref: SOE-Objection02-BUS).

I visit Edgware to shop at Sainsbury's, Poundland, TK Maxx, Boots and Superdrug as well as the independent florist Isabella Flowers. Given the local weather it is important to have a space to shelter from the rain and wind whilst waiting for a bus as well as for school children to have a meeting place.

I also use Edgware bus station as the first part of my commute to work before onward travel via the northern line to Portland Place W1 and Stratford.

I believe that no Equality Impact Assessment (EQIA) has been carried out regarding the proposed removal of the above ground bus station. This is an important part of the Public Sector Equality Duty for both TfL and for Barnet Council. Therefore, any proposed changes cannot be issued until they include a thorough EQIA.

The London Fire Brigade have stated firmly and comprehensively that to move Edgware Bus Station underground is totally non-viable.

Ballymore Ltd have stated that any new bus garage will not be open until at least 2030. However, the use of an underground bus garage will depend on a scientific breakthrough on electric buses, as current

designs of electric buses use lithium batteries which have the potential to catch fire. This year TfL took 17 electric buses out of service as a safety precaution – see

<https://tfl.gov.uk/corporate/transparency/freedom-of-information/foi-request-detail?referenceId=FOI-3709-232>

In Paris, RATP took 149 electric buses out of service due to a couple of fire events. See <https://www.sustainable-bus.com/news/tfl-remove-electric-buses-service-fire/>

It may be that no solution can be found that will allow the proposed underground space to be used as the bus garage. This could result in the demolition of the current with no feasible replacement. This will be totally unacceptable to residents and local businesses and particularly impact people with mobility issues, pregnant people and those with caring responsibilities. This would result in an adverse impact on people with some of the 9 protected characteristics which would be evidenced by an EQIA if one were to be produced.

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.

Revise item A, g) in MM72 as follows:

1. A, g) Interchange improvements at Edgware. Bus operations and the function of the bus station and the garage must be protected or re-provided with facilities greater than the existing ones as part of any redevelopment. London Underground infrastructure and operations must also be maintained at all times.
2. A new bus station and interchange at Edgware must be worthy of the 21 st century.
3. The present facilities and services that need replacing are:
 - 3.1. Enclosed weatherproof indoor space with at least 68 seats
 - 3.2. Accessible 24/7
 - 3.3. Short covered walk from tube station
 - 3.4. Staff offering assistance
 - 3.5. Next to Broadwalk shopping centre
 - 3.6. Well lit and airy indoor space
 - 3.7. Café kiosk
 - 3.8. Timetable indicator
 - 3.9. Bus routes: 32, 79, 107, 113, 142, 186, 204, 221, 240, 251, 288, 292, 303, 340, 384, 606, 642, N5, N32, N113
4. In addition, new bus station should include as minimum:
 - 4.1. Interactive information technology
 - 4.2. Toilets
 - 4.3. Space for exhibitions and stands such as for public health and home safety.
 - 4.4. Temperature controlled with net zero energy generation
5. The bus station should have a design to accommodate a more intense bus service that will be needed to deal with a loss of the commuter car park, new housing units, extra visitors and population Growth.
6. Any new bus station should be designed to the highest standards to enhance accessibility and to make full provision for vulnerable people and people with the 9 protected characteristics. This means there would have to be a full consultation with the public and community organisations and compliance with the Public Sector Equality duty.
7. Bus garage must be provided above ground with no housing built on top for fire safety reasons. The above ground bus garage must have to capacity to house 20% more buses than the current

capacity of 200 buses. This capacity will be required in response to the abolition of the commuter car park, reduction of car parking spaces for shopping and visitors and the expansion of the population through any housing development and existing population.

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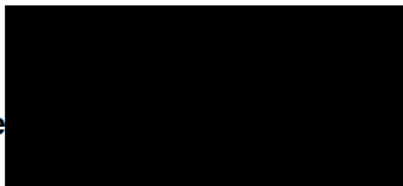
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take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

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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.

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Signature



Date 15/06/2024

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



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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 ___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. 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.

2. 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.

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
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, <u>and 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	Original	Proposed modifications
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 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</u> floorspace for community, retail and office uses; <u>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>	<p><u>A, c)</u></p> <p><u>Edgware Major District Town Centre.</u></p>

MM	Original	Proposed modifications
MM 20	<p>4.18 Edgware Growth Area</p> <p>4.18.1 Edgware has evolved from a small market town into a major town centre 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 major district 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 town centres,</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
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 Streets Approach.</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
MM 26	<p data-bbox="387 309 891 341"><u>4.21 Barnet's District Town Centres</u></p> <p data-bbox="387 384 1223 756"><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>	<p data-bbox="1279 277 2083 341">We fully support this text, which shows that Edgware is a District Town Centre.</p>

MM	Original	Proposed modifications
MM 53	<p><u>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p>a) ...</p> <p>b) <u>Edgware Major Town Centre (see in accordance with Policy GSS05) where regeneration will consolidate the quantum together of retail floorspace alongside with qualitative 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>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p>a) ...</p> <p>b) <u>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 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>	<p>Major Town Centre 1. Edgware</p> <p>District Town Centres</p>

MM	Original	Proposed modifications
	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 13. Temple Fortune 14. Whetstone	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 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

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.

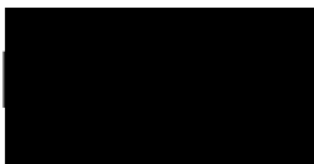
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The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal 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 16/06/2024