



Main Modifications
Local Plan

Ref:

(For official use
only)

MM109 Site 28 Edgware

Underground & Bus Stations

(Ref:SOE-Objection01-Site28)

Save Our Edgware and Edgware Community Association's representation relating to Main Modifications 109 concerning the selection of Site 28 Edgware Underground & Bus Stations



Preserving Edgware
Building Tomorrow Together

**SAVE OUR
EDGWARE**

Representations Form

PART B - Your representation

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

1 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 ([to read MM109 click here](#)) _____ Policy _____ Related to
GSS05 _____ Paragraph All _____

Figure/Table _____ Policies Map change _____

2 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"/> |

3 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

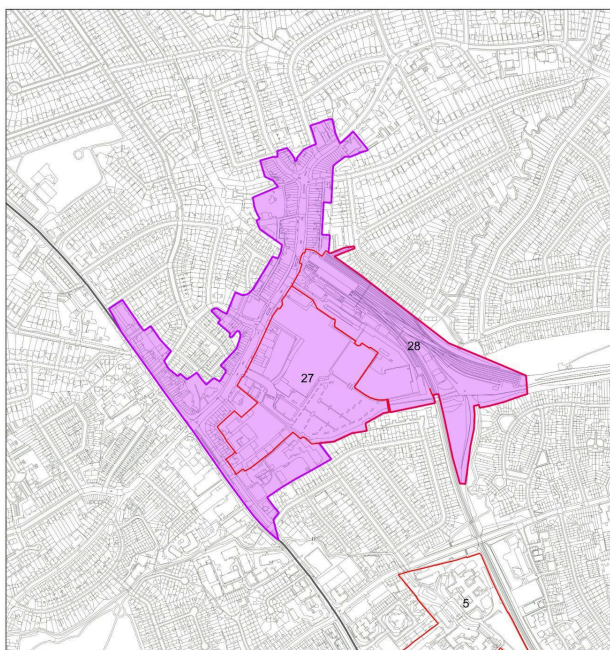
3.1 Site 28 Edgware Underground and Bus Station

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 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.\)](#)

	<p>Edgware Policy GSS05</p>	<p>5,000</p>	<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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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.

3.1.2 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. $2.96 \times 405 \text{ u/ha} \times 70\%$)! This surely is UNSOUND!

A. 3.1.3 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.

3.1.4 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 \(Save Our Edgware & foi-response-foia79611-LFB-verdict-of-non-viable-Edgware-bus-garage, n.d.\)](#) 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.

3.1.5 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..."

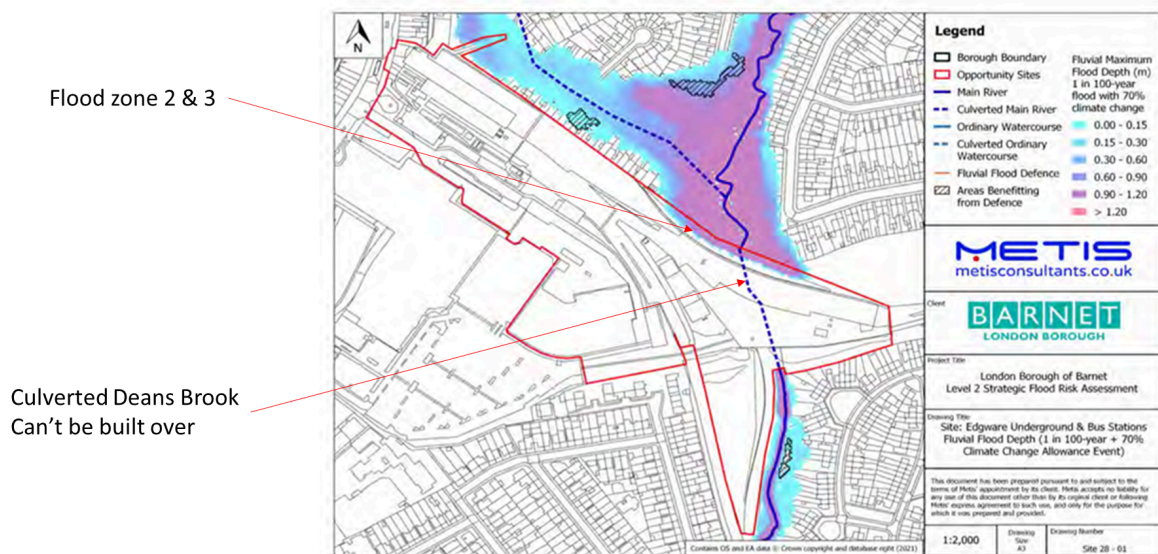
Building on the Deans Brook Nature Reserve contradicts this principle. The presence of protected species necessitates strict adherence to conservation laws, and the goal of a 10% net biodiversity gain further supports the case against development on this site.

3.1.6 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

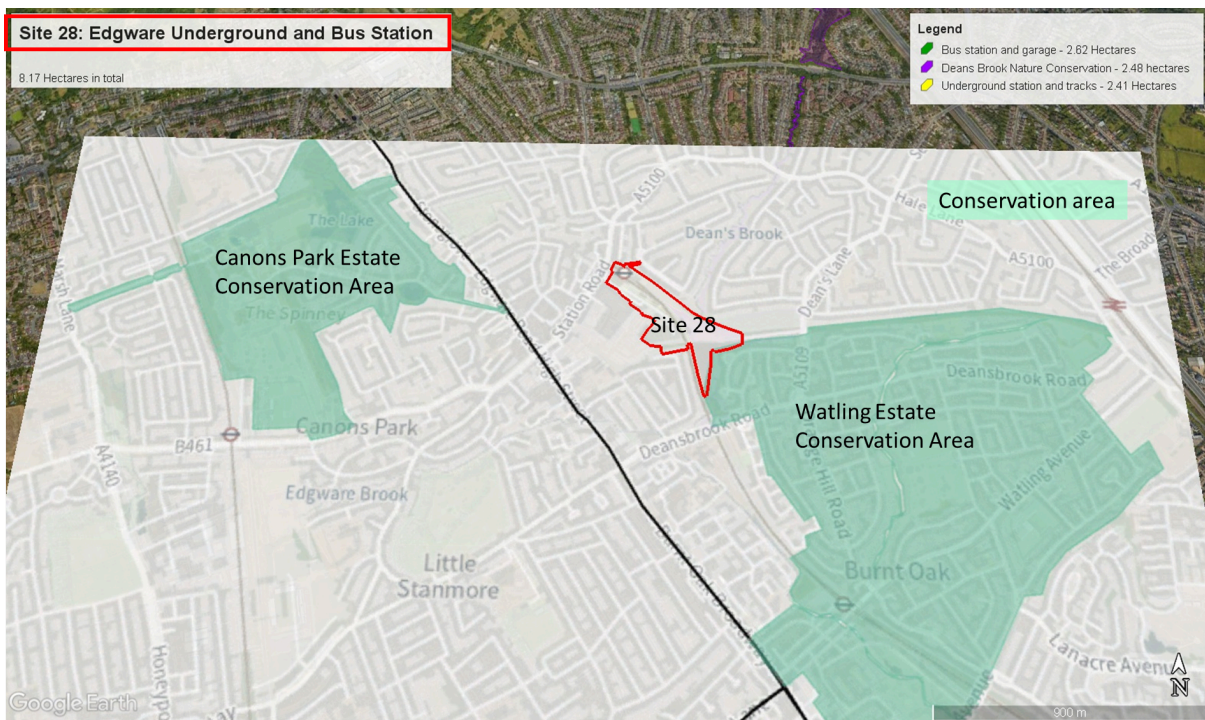
"B. Development proposals should ensure that flood risk is minimised and mitigated."

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.

3.1.7 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>

3.1.8 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.

3.1.9 References

Allin, S., & London Fire Brigade Edgware EV bus garage safety warning. (2023,

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4 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
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</u> location for <u>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
Representation Form B



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.”

Main Modification Local Plan
Representation Form B

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.

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

4.1 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	

Main Modification Local Plan
Representation Form B

	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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Main Modification Local Plan
Representation Form B



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, EGY01, EGY03, ECC02, ECC02A, TRC01, TRC02, TRC03

Main Modification Local Plan
Representation Form B

	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:	<p>2317 <u>2316-0 dwellings.</u></p>
	Justification:	<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. 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.</u></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. 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.</u></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>
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	The emerging Edgware Growth Area SPD (<u>2021</u>) provides further guidance.
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5 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 __Anuta Zack on behalf of Save Our Edgware_____
Date __14 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association_____
Date __14 June 2024_____

6 Appendix: Original MM109 Site 28 Edgware Underground and Bus Stations

MM1 09	Site 28	Edgware Underground & Bus Stations
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Reason for MM

- 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.

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
	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

Main Modification Local Plan
Representation Form B

	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>	

Main Modification Local Plan
Representation Form B

	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS05, HOU01, HOU02, GDH01, GDH02, GDH03, GDH04, GDH07, GDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, EGY01, EGY03, ECG02, ECG02A, TRC01, TRC02, TRC03</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>

Main Modification Local Plan
Representation Form B

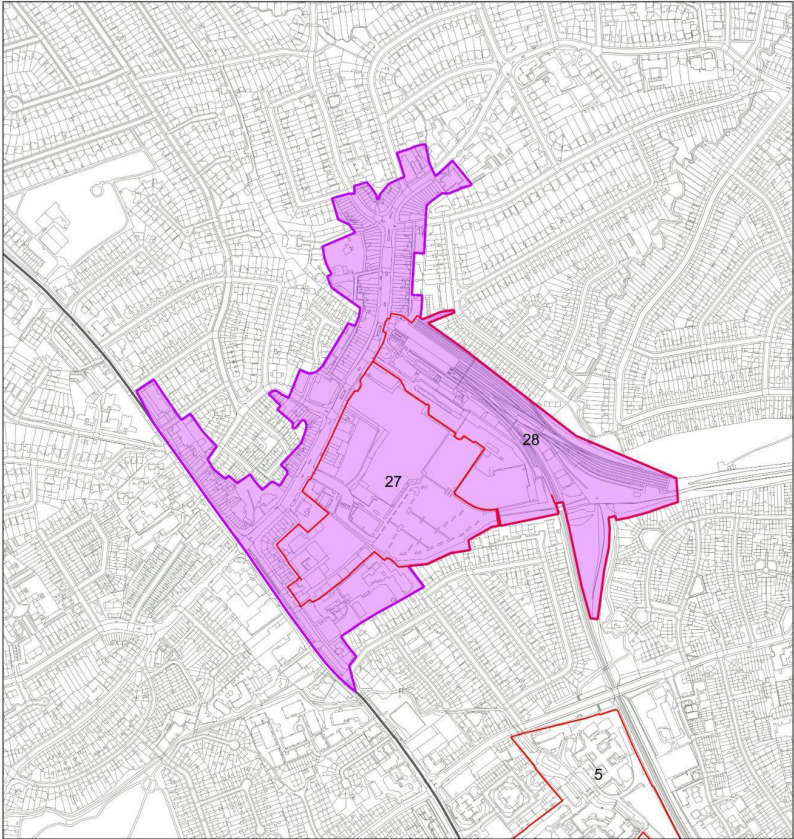
	Indicative residential capacity:	2317 <u>2316 dwellings.</u>
	Justification:	The western parts of the site are highly accessible and provide a town centre location which is currently underused. The need to maintain the London Underground infrastructure, and the barriers imposed by this infrastructure, 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:</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. Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.</u></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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~~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

Ref:

(For official use
only)

Edgware Bus Station and Garage - MM72

(Ref:SOE-Objection02-Bus)

Save Our Edgware and Edgware Community Association's representation relating to Main Modifications 72 concerning the protection of Edgware Bus Station and Garage



Preserving Edgware
Building Tomorrow Together

**SAVE OUR
EDGWARE**

Summary - Protecting Edgware Bus Station and Garage

Main Modification:

- **Number:** MM72
- **Policy:** Chapter 11, Policy TRC02 – Transport Infrastructure

Representation Summary:

1. Concerns Over Replacement Plans:

- Current plans lack sufficient details on replacement facilities for the Edgware Bus Station, suggesting only limited bus stops on Station Road.
- Attempts to engage with TfL for discussions on equal terms as other stakeholders were refused, indicating a lack of transparency and public consultation.

2. Failure to Meet Legal and Policy Standards:

- The proposals do not comply with four of the Mayor's transport policies.
- No Equality Impact Assessment has been conducted by TfL as required under the Equality Act 2010.

3. Proposed Requirements for New Bus Station:

- New facilities must include an enclosed, weatherproof space with at least 68 seats, accessible 24/7, and adjacent to the Broadwalk Shopping Centre.
- Additional features like interactive information technology, toilets, and a space for public exhibitions should be included to bring the bus station into the 21st century.

4. Bus Garage Concerns:

- Proposals to move the bus garage underground are deemed unviable by the London Fire Brigade due to fire risks associated with lithium batteries in electric buses.
- There are no current building regulations for underground garages for electric buses, making the proposal speculative and risky.

5. Need for Above Ground Bus Garage:

- The bus garage should remain above ground and be capable of housing 20% more buses than the current capacity to accommodate future demand from population growth and reduced car parking availability.

6. Accessibility and Consultation:

- The new bus station design must ensure high standards of accessibility for people with vulnerabilities and the nine protected characteristics, necessitating thorough public consultation and compliance with the Public Sector Equality Duty.

Proposed Modification:

- Revise item g) in MM72 to ensure that bus operations and facilities are protected or enhanced, with explicit requirements for accessibility, safety, and capacity to support future growth and demand.

Conclusion: The proposed development plans need substantial revisions to ensure the continued functionality and improvement of Edgware's bus station and garage, prioritising safety, accessibility, and compliance with legal and policy standards.

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

Protecting Edgware Bus Station and Interchange

- A. We are expanding and adding to modification because the only plans presented by Ballymore showed a limited number of bus stops on Station Road and this was deemed to be the replacement of Edgware Bus Station. We 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.
- B. We have also requested a meeting with TfL Spatial Planning on the basis that Save Our Edgware should have equal treatment compared to Ballymore Ltd. This was refused.
- C. We have submitted official complaints 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.
- D. 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. (add attachments)
- E. Hence the only way to ensure that if the bus station is to be replaced there should be a completed 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, which we have specified in the modification.
- F. In addition, we have proposed at a minimum, extra facilities that will bring the Bus Station and Edgware Transport Interchange into the 21 century of which will be a proud focus of Edgware Town Centre.
- G. Save Our Edgware has written to Ballymore requesting a meeting with a consultant that is dealing with accessibility. We are most

concerned that any new bus station should be designed to the highest standards of accessibility and support for people with the 9 protected characteristics together with people that have vulnerabilities. We believe that our request is most reasonable because we are in contact with many people that have the 9 protected characteristics. We would very much like the consultant to have meaningful discussions with these people. Ballymore has not responded with this request which is most unreasonable.

- H. A more intense bus service will be needed to deal with a loss of the commuter car park, new housing units, extra visitors and population growth.
- I. The present location of the bus station and interchange has a very good layout and is optimal.
- J. Taxi rank and drop off in front of Edgware underground station, a few footsteps from the front entrance.



- K. The bus stop for alighting is covered and a few footsteps from Edgware station side entrance.

- L. 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.
- M. 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.
- N. The bus station will need to include an increase in the bus stands to accommodate extra buses.



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

Protecting Edgware Bus garage

- A. 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.
- B. The current proposal 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.
- C. 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. 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.
- D. Therefore, the bus garage will need to be above ground for the following reasons:
 - 1. The London Fire Brigade has assessed the proposal for an underground bus garage 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. ([Attached](https://saveouredgware.co.uk/edgware-under-attack/#Garage) and <https://saveouredgware.co.uk/edgware-under-attack/#Garage>)
 - 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. 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.

4. 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.
5. 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.
6. 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. Ballymore Ltd has stated that the garage facilities will not be used before 2030. 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.
7. 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.

8. 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.

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

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-notice>

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 __ Anuta Zack on behalf of Save Our Edgware _____

Date __ 14 June 2024 _____

Signature __ Tony Allan on behalf of Edgware Community Association _____

Date __ 14 June 2024 _____

Appendix: **Barnet's original MM 72 in the draft Local Plan**

MM 72 - Chapter 11 Policy TRC02 and consequential changes to supporting text

g) Interchange improvements at Edgware. Bus operations and the function of the bus station and the garage must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained

M Chapter 11
M
7 Policy TRC02
2 and
consequential
changes to
supporting text

Paras 11.10.2,
11.10.3, 11.11.1,
11.11.4, 11.11.6,
11.11.6A &
11.11.7

Policy TRC02 – Transport Infrastructure

The Council will promote delivery of new transport infrastructure to support the travel needs of a growing population. It will provide a range of alternative travel modes and facilitate growth. ~~as set out at Policy GSS09 and Policy GSS11.~~

A. ~~a)~~ The Council will in particular facilitate contributions from development to and support the delivery of key new transport infrastructure, including (but not restricted to):

- i. a) A new rail station at Brent Cross West and public transport interchange;
- ii. b) A replacement or remodelled and improved bus station at Brent Cross North Shopping Centre;
- iii. c) An upgraded and enlarged Colindale new Underground underground station and enhanced public transport interchange at Colindale.
- iv. d) A new London Overground passenger rail line - the West London Orbital Line together with upgrades to existing stations (Cricklewood and Hendon and new station at Brent Cross West) on the line;
- v. e) Crossrail 2 at New Southgate, including safeguarding for the railway and for worksites at Oakleigh Road South as shown on the Local Plan Policies Map;
- vi. f) New bus stopping and standing arrangements in North Finchley to allow for redevelopment of the bus station for commercial uses;
- vii. g) Interchange improvements at Edgware. Bus operations and the function of the bus station and the garage must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained

Delete reference to policies GSS09 and GSS11 as the transport infrastructure referred to within Policy TRC02 has wider application than for land relevant to those policies. Clarification at Part A that Council will facilitate and support contributions to delivery of the specified transport infrastructure.

Clarification at Part A that the Brent Cross North bus station may be replaced, remodelled or improved.

Update to Part A to reflect the current status of Colindale Station and the WLO. Clarification that land at Oakleigh Road South is safeguarded for Crossrail 2. Revision to be consistent with requirements of Policy GSS05.

Addition of Part C to clarify that Council will work with TfL and Network Rail to bring forward capacity improvements identified in the STA

Addition of Part D to clarify the role of IDP in relation to transport infrastructure monitoring.

Revision to para 11.11.1A to align with requirements of Policy TRC01

Explanation at para 11.11.6A on roles of and signpost to the relevant elements of the Long Term Transport Strategy 2020-2041, Strategic Transport Assessment, and IDP insofar as these relate to the requirements of Policy TRC02

~~viii Feasibility of other public transport improvement projects will be explored as appropriate, including the protection and enhancement of existing public transport operational facilities and where necessary for the provision of new facilities.~~

B. The Council's ~~has an adopted~~ Long Term Transport Strategy (BLTTS) (2020-2041) identifies additional boroughwide improvements necessary to support growth. The Council will work with National Highways England, TFL, Network Rail and others to deliver schemes and boroughwide improvements identified within the BLTTS document. In progressing schemes and improvements particular the Council will :

- ~~—— i. a) The Council will seek to work with TFL and others to increase rail capacity in Barnet and to improve all London Underground, Thameslink and Great Northern Rail stations in Barnet, especially where these have potential to deliver Step Free access for passengers;~~
- ~~—— ii. b) To work with TfL and neighbouring boroughs to review and improve the bus network and overall public transport provision, including seeking to develop proposals to improve orbital transport provision within the Borough;~~
- ~~—— iii. c) To deliver and promote infrastructure for electric or other ultra-low emission vehicles; and~~
- ~~iv. d) work with TFL to identify and protect land for enhancing rail capacity, including for the stabling of trains and sidings; and.~~
- ~~v. e) identify and deliver projects that enhance the pedestrian and cycling network in Barnet, such as the Barnet Loop.~~

Deletion of para 11.10.2 as it is inconsistent with Policy TRC01(c)(iii) as modified.

Clarifications on Building Regulations Part S requirements.

C. The Council will work with key partners to bring forward capacity improvements, identified as required in the Strategic Transport Assessment and in particular TfL and Network Rail, to address cumulative impacts of growth at underground and rail stations, TfL to secure improvements to bus services and TfL/National Highways for those to the road network:

D. Transport infrastructure improvements are included in the Infrastructure Delivery Plan (IDP). The Council will have regard to the IDP when assessing planning applications, securing planning obligations / legal agreements as necessary and taking decisions on applying CIL.

E.) The feasibility of other public transport improvement projects will be explored, and where appropriate existing public transport operational facilities protected and enhanced and provision of new facilities supported.

11.10 Ensuring Efficient Use of the Local Road Network

~~11.10.2 Construction maintenance and utility work can have a serious impact on the transport network. Therefore, the Council will require submission and approval of Construction Traffic Management Plan (CTMP) / Construction Logistics Plan (CLP) before works are carried out.~~

11.10.3 The Council will work with TfL on improving the local bus network, with the aim of more closely and efficiently matching demand and capacity and improving public transport accessibility overall. The Council will also seek a review of how the night tube and the local night time economy has impacted on the night bus network and to provide appropriate facilities for coaches, private hire vehicles and taxis. The improvement of orbital connectivity through improvement and extension of bus services within Barnet is vital to ensuring genuine and effective alternatives to private vehicle use. In instances where orbital connectivity is considered to be inadequate, the Council will support developer contributions in order to improve orbital public transport services.

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. The Council's transport objectives and requirements relating to highway and road network impacts are set out in Policy TRC01. ~~Barnet's Growth Areas are supported by a range of planning documents including area action plans, development frameworks, transport assessments/ statements, Travel Plans, negotiated planning (S106) and highway agreements (S278), planning conditions and delivery plans. These tools enable developments to be appropriately phased and aligned with investment to deliver proposed improvements to transport and the public realm. Outside these areas the Council requires Transport Assessments / Statements and Travel Plans as set out in Policy TRC01.~~

11.11.4 The Brent Cross Growth Area will benefit from new and enhanced bus services, including better bus links between Brent Cross, Colindale and neighbouring boroughs. The ~~BLLTS~~ BLTTS contains an action to link West London Orbital, both branches of the Northern Line, Great Northern, Piccadilly, Jubilee and potential Crossrail 2 lines (existing National Rail lines) with rapid and orbital bus routes. In addition there will be improvements at the existing Brent Cross and Cricklewood rail stations and a new station at Brent Cross West where many passengers are expected to reverse commute and arrive in the 'contra-peak' direction, from Central London in the morning, helping to utilise spare rail capacity. A replacement bus station has been approved as part of the 2014 Section 73 planning permission. However, if that were not to come forward as approved, a remodelled and improved bus station would otherwise be supported at Brent Cross North. ~~The new bus station at Brent Cross will replace the existing Brent Cross Shopping Centre bus station and although it is not within the Brent Cross scheme, it will provide benefits to the area and the wider bus network.~~

11.11.6 These approaches set the basis for the preparation of detailed transport mitigation and improvements likely to be required in association with future redevelopment proposals within town centres. These proposals should be informed by the outputs of an area wide transport model. These will be delivered through Community Infrastructure Levy (CIL), ~~S106~~ planning obligations and other contributions from development.

11.11.6A The Local Plan is supported by a Strategic Transport Assessment (STA). The STA assessed the cumulative impact of growth and development as set out in the Local Plan, including those impacts relating to the highway network (strategic and non-strategic) and public transport (bus and rail). The Barnet Long Term Transport Strategy (BLTTS) articulates the vision for transport in Barnet to 2041. It sets out proposals to achieve the vision supported by high level actions, with associated timescales and delivery plans. Section 3 of the BLTTS focuses on 2041 looking at predicted changes in how people use transport networks, understanding changes in journey time and journey purpose together with the mode of transport that people will have available to them in future. Policy TRC02 sets out a range of transport infrastructure that the Council has identified as required to support growth. Policy TRC02A sets out the specific large-scale interventions that are required in the Growth Areas or which are significant transport infrastructure projects in their own right and relate closely to policies GSS09 and GSS11. The items listed under TRC02B are more general improvements of boroughwide importance that have been identified as being required in the BLTTS . Items under TRC02C are capacity improvements at Underground and rail stations identified as required in the STA to support cumulative impacts of growth The Council will work with its partners to bring forward the improvements. It is likely that the items in TRC02B will be brought forward incrementally over time and will be led by the Council. Items in TRC02A are substantial transport infrastructure projects that will require significant external funding. The Council will use its powers and influence to support and bring forward these projects but their realisation will depend to a large extent on other bodies including Government. The improvements identified within the STA (pages 14 and 16) and the BLTTS (Section 3) will inform updates to the Infrastructure Delivery Plan which is a living document which the Council uses to monitor the infrastructure required to support growth and inform expenditure of Community Infrastructure Levy, planning obligations and other funding.

11.11.7 To help keep Barnet moving whilst minimising carbon emissions the Council will encourage greater numbers of electric vehicles. Charging points for electric vehicles should be provided in accordance with Policy TRC03. ~~New development is required to provide a proportion of the car parking spaces in the development with charging points for electric vehicles in accordance with London Plan Policy T6, with at least 20 per cent of spaces for new residential development having active charging facilities, and passive provision for all remaining spaces, i.e. the infrastructure should be in place to ensure they can be made into active spaces in the future. All car club parking spaces should be supplied with an active charging point for electric vehicles.~~ Charging facilities are now also available from some on street car parking spaces and car parks. For more detail on electric car charging points see <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging> or [Electric vehicles in Barnet | Barnet Council](#).

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

(Ref:SOE-Objection03-MajorCentre)

save Our Edgware and Edgware Community Association's representation relating to Main Modifications MM11, 20, 26 and 53 concerning the classification of Edgware as a Major Town Centre.



Preserving Edgware
Building Tomorrow Together

**SAVE OUR
EDGWARE**

Ref: (For official use only)
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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.

1 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 _____

2 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"/> |

3 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

3.1 Summary

3.1.1 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.

3.1.2 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.

3.1.3 Inappropriate Application of PTAL Ratings

- 1. PTAL Ratings in Outer Boroughs:**
- The London Plan's Density Matrix ties housing density to PTAL ratings, which measure public transport accessibility. However, the blanket application of PTAL ratings is unsuitable for outer borough suburban towns like Edgware.
 - **Local Context Ignored:** Barnet's Deputy Chief Executive, Cath Shaw, has expressed concerns that the London Plan fails to recognize the unique challenges of Outer London, such as reliance on cars and the different urban form compared to Inner London.
 - **Transport and Car Use:** The prescriptive PTAL thresholds and restrictive parking standards do not align with the reality of continued car use in the lower density suburbs of Outer London. This further supports the argument that the London Plan's approach is inappropriate for Edgware.

3.1.4 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

3.2 Supporting evidence

To qualify for high density house building, a town must be defined as at least a Major Town and in a Central area and have a PTAL rating of at least 6 based on the Density Matrix defined in the London Plan 2016.

This Matrix has also been included in Appendix 4 (source) in the Local Plan. Edgware was classified as Barnet's only Major Town and was classified as in the Central category and has a PTAL rating of 6.

Save Our Edgware believes that Edgware is wrongly classified as a Major Town. It is also wrongly classified as in a Central area. The blanket application of the PTAL rating in an outer borough suburban town like Edgware is also wrong.

3.2.1 The London Density Matrix

The classification of Centre, Urban and Suburban in Density Matrix of the London Plan ¹ (Johnson and Burgee)

¹ Johnson, Philip, et al. "Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)."

The [housing Density Matrix is defined in Policy 3.4 Optimising housing potential of the 2016 London Plan](#).

“Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

central – areas with very dense development, a mix of different uses, **large building footprints and typically buildings of four to six storeys**, located within 800 metres walking distance of an **International, Metropolitan or Major town centre**.

urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

suburban – areas with **predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.**”

3.2.2 Edgware’s character is clearly a suburban area rather than a central area.

Edgware does not have the characteristics of a Central area with “**large building footprints and typically buildings of four to six storeys**”. Edgware has a more Suburban characteristic “**with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.**”

Below are descriptions of Edgware from various independent sources including Barnet’s own sources.

In the wikipedia entry for Edgware ([Edgware](#))

london-plan-2016/london-plan-chapter-3/policy-34-optimising,
<https://www.london.gov.uk/programmes-strategies/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-chapter-3/policy-34-optimising>.

“**Edgware** (/ˈɛdʒwɛər/) is a suburban town in northern [Greater London](#), mostly in the [London Borough of Barnet](#) but with some parts falling in the [London Borough of Harrow](#) and in the [London Borough of Brent](#).^[2] Edgware is centred 9.5 miles (15.3 km) north-northwest of [Charing Cross](#) and has its own commercial centre. Edgware has a **generally suburban character, typical of the rural-urban fringe.** “

In the SPD Edgware Growth Area document, it also states that Edgware is a suburban town. ([Edgware SPD](#)).

Edgware is a “ a well-known suburban hub of North London”.

In Barnet Local Plan 2012, Section 4.1 Barnet’s character

“4.1.4 In the first half of the twentieth century development spread from established commuter settlements such as Chipping Barnet, New Barnet, Friern Barnet and Finchley with **suburban housing transforming the landscapes of Edgware** and Hendon as well as the south of the borough.”

In Barnet’s own Edgware Town Centre Framework 2013 report ([Barnet - Edgware Town Centre Framework](#)), Edgware is clearly described as a Suburban centre.

“The town is characterised by three to four storey interwar brick built buildings **typical of London suburbs**” and “Beyond the commercial centre of Edgware are **established, leafy and generally attractive and well maintained areas of suburban housing**. These attractive housing areas are **characterised typically by spacious Edwardian and post-war two storey detached and semi-detached housing with established gardens.**”

“**Townscape and public realm**

Edgware’s growth as a **suburban centre** was precipitated principally by the opening of the Tube station in 1924. By this time Station Road had developed into the town’s principal shopping street with a cinema facing the original train station....

The town is characterised by three to four storey interwar brick built buildings **typical of London suburbs**. This pattern of development results in well defined commercial streets with ground floor shops and frequent doors providing access to the offices and residential flats on the floors above which all have windows directly overlooking the street. This character is most

evident along the length of Station Road north of the Tube station. This type of layout works well at creating a lively, varied and durable high street that is of a **human scale**, can accommodate a wide range of activities and adapts well to change.

Beyond the commercial centre of Edgware are **established, leafy and generally attractive and well maintained areas of suburban housing**. These attractive housing areas are **characterised typically by spacious Edwardian and post-war two storey detached and semi-detached housing with established gardens.**"

3.2.3 The use of PTAL rating in outer boroughs such as Edgware is not suitable

In Barnet's response to the Draft Local Plan, Cath Shaw (Deputy Chief Executive of Barnet) stated that:

"We are also disappointed that specific policy recognition for Outer London, as set out in the existing London Plan, has been removed. London-wide policies will be unable to adequately reflect the differing character and contexts across the London boroughs. While of course boroughs face many challenges in common, there are very important differences between Inner and Outer London that necessitate different policy approaches.

The combination of the more prescriptive approach and the lack of recognition of Outer London's particular challenges means that several DLP (Draft London Plan) **policies are not suitable for Outer London Boroughs such as Barnet.**

Our concerns on this London-wide approach are set out in more detail in the attachment, but I would **draw particular attention to restrictive car parking standards and a blanket London-wide approach to PTAL thresholds which ignores the challenges of orbital transport in Outer London.**"

3.2.4 Edgware is not a Major Town Centre

3.2.4.1 Town centre classifications in the London Plan (Town Centre Network and Future Potential Network Classification)

"Table A1.1 classifies London's larger town centres into five categories: International, Metropolitan, Major and District centres, as well as CAZ retail clusters.

- International centres – ...
- Metropolitan centres – ...
- Major centres – **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**.

- **District centres** – distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions. “

Edgware was classified as Barnet’s only Major Centre, which is defined as “Major centres – **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**.”

However, Edgware does not fit this description of a Major Centre. Instead it fits the description of a District Centre very well.

Town Centres Floorspace Needs Assessment (TCFNA) was produced ([LBB Town Centres Floorspace Needs Assessment Executive Summary Peter Brett Associates](#))

which was commissioned for Barnet for National Planning Policy Framework NPPF and PPG as part of the Barnet Draft Local Plan Regulation 22 Consultation Statement ([Barnet Draft Local Plan Regulation 22 Consultation Statement in Nov 2021](#)).

Introduction

- 1.1 Peter Brett Associates LLP (PBA) was instructed by the London Borough of Barnet (LBB) in March 2017 to prepare an updated assessment of retail need for the borough addressing the requirements of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).
- 1.2 The previous full assessment was published in April 2009 and subsequently updated in July 2010; since then, national policy for retail and town centres has been amended following the publication of the NPPF in March 2012.
- 1.3 This Town Centres Floorspace Needs Assessment (TCFNA) has been commissioned as a key evidence base document to inform the review of the Barnet Local Plan ('the Local Plan'). The report will provide an updated assessment of retail need for LBB in order to inform new retail and town centre policies for the borough. The study's specific terms of reference are set out below:
 - Analyse national and regional planning policy and guidance on retail and town centres and identify existing evidence on retail needs in LBB;
 - Analyse trends affecting the retail sector which may impact and influence local retailing with the Borough and how this may change over time;
 - Identify recent planning permissions for town centre uses ('commitments') within and without the Borough which have the potential to impact on designated town centres;

- Undertake a new household survey of shopping patterns to provide an updated picture of shopping habits in the study area in order to identify the catchment area of each town centre and the occurrence of under/over trading of convenience floorspace;
- Analyse the quality of existing comparison and convenience retail provision and other town centre uses within LBB's 30 Major, District and Local / Neighbourhood town centres;
- Identify existing and projected consumer expenditure levels for the study area taking into account the latest industry standard expenditure data and the latest available GLA population projections;
- Assess future needs for comparison and convenience retail floorspace and other town centre uses to 2036 based on an existing market share and an increased market share, to take account of the effect of existing commitments;
- Review the existing hierarchy and network of centres and make recommendations including identifying any deficiencies and potential for growth to meet identified needs where appropriate;
- Assess potential site opportunities in and on the edge of existing centres;
- Allied to the above, make recommendations on the appropriateness of town centre boundaries including primary shopping areas and primary; and
- Recommend appropriate retail planning policies for the new local plan, including a local threshold for retail impact assessments.

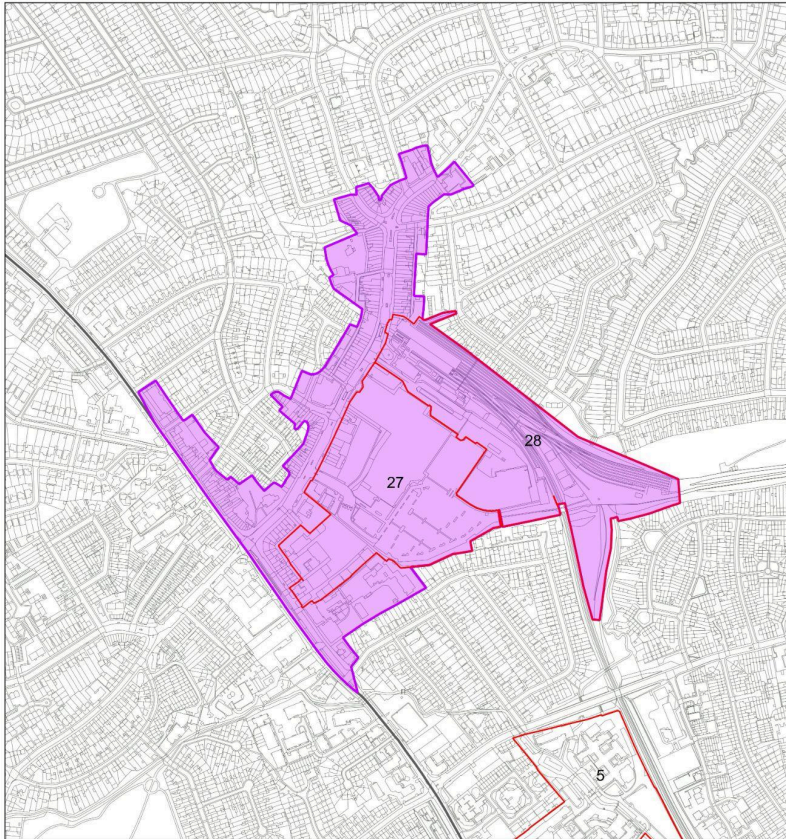
The report was also reference on Page 29 of ([Edgware SPD Town Centre Economic Strategy](#))

Town Centre Evidence Base

- 3.51 LB Barnet's latest town centre and retail evidence base document comprises the Town Centres Floorspace Needs Assessment prepared by PBA and published in December 2017.
- 3.52 The report considers the need for additional retail (comparison and convenience goods) and other town centre type uses within the borough up to 2036. The need calculations take account of existing levels of consumer spending and forecast levels of spending growth; market shares of existing town centres and other facilities in the borough and competition from outside the borough. A significant aspect to the retail need calculations is the potential increase in retailing at Brent Cross and scenarios have been considered where market share has been uplifted to reflect the increased attraction of an expanded Brent Cross.

3.2.4.2 The Study Area

Map 3C - Edgware Growth Area



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LEGEND

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

Scale 1 : 5,000

On page 23 of ([PBA Town Centres Floorspace Needs Assessment Volume 2: Appendices to Main Report](#)), it showed that Edgware study area is the same as defined in Map 3C of the Local Plan.

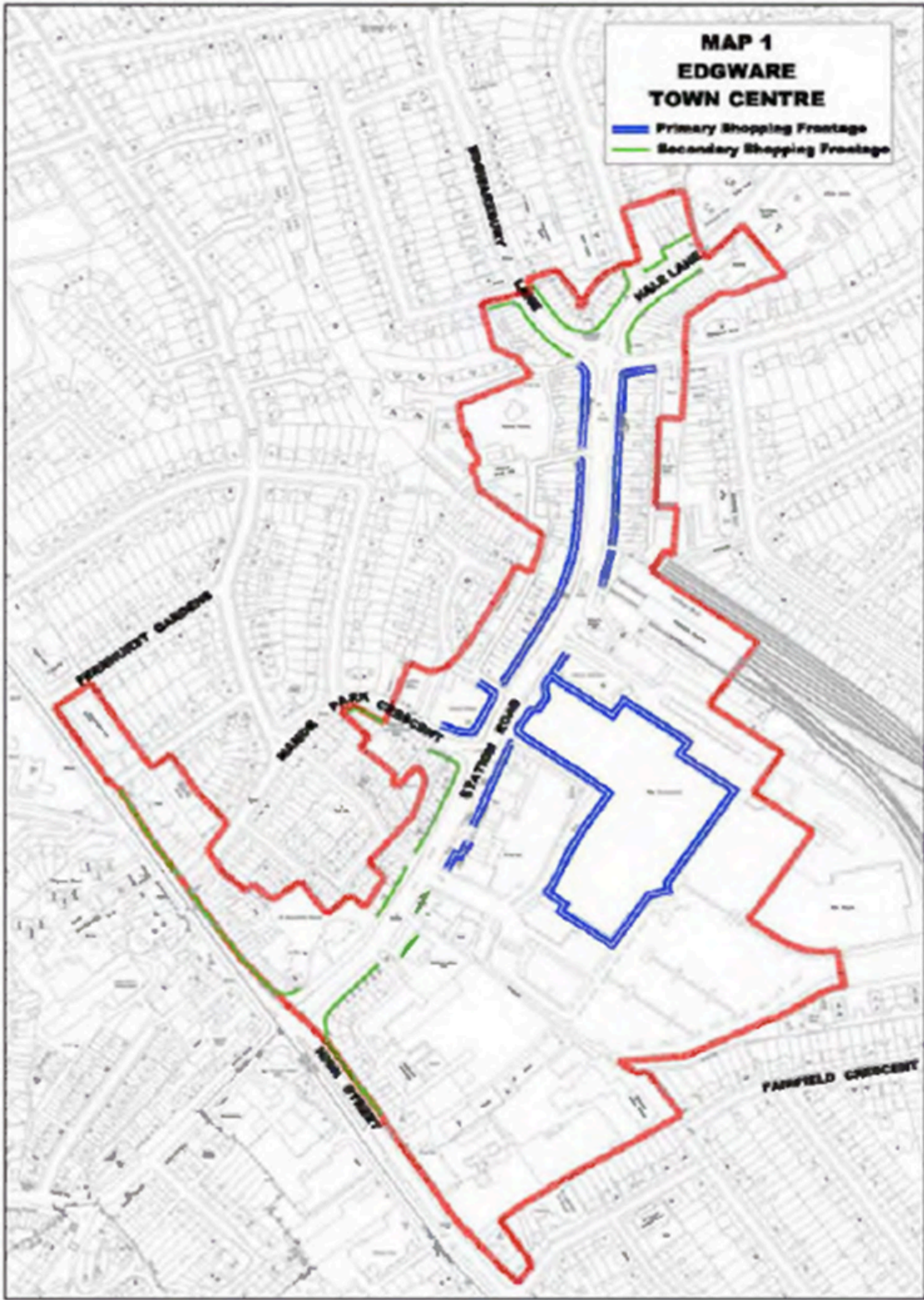
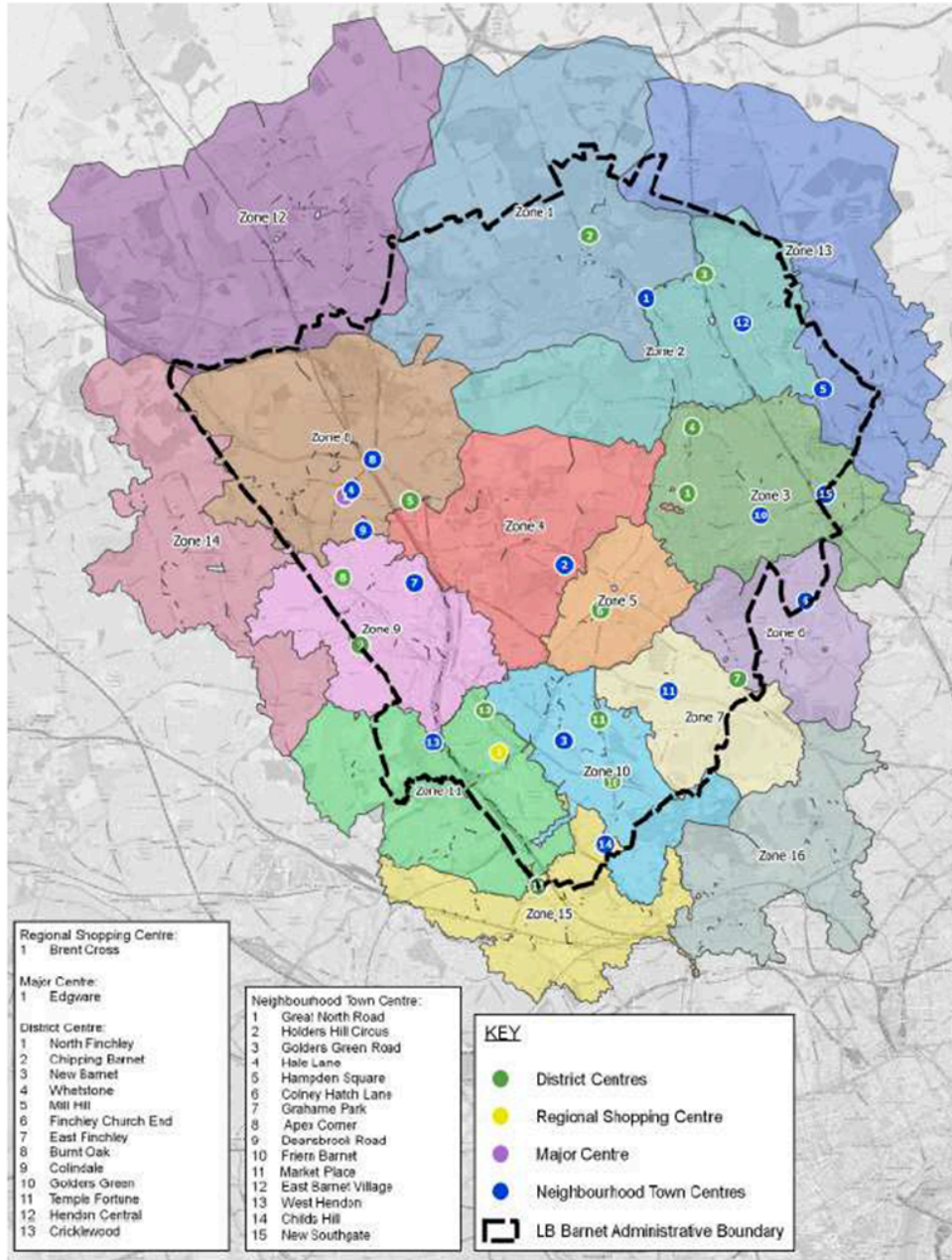


Figure A Study area and study zones



Source: PBA (2017)

3.2.4.3 Conclusion of the findings of the study, Edgware does not meet any of the Major Centre criteria

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**.

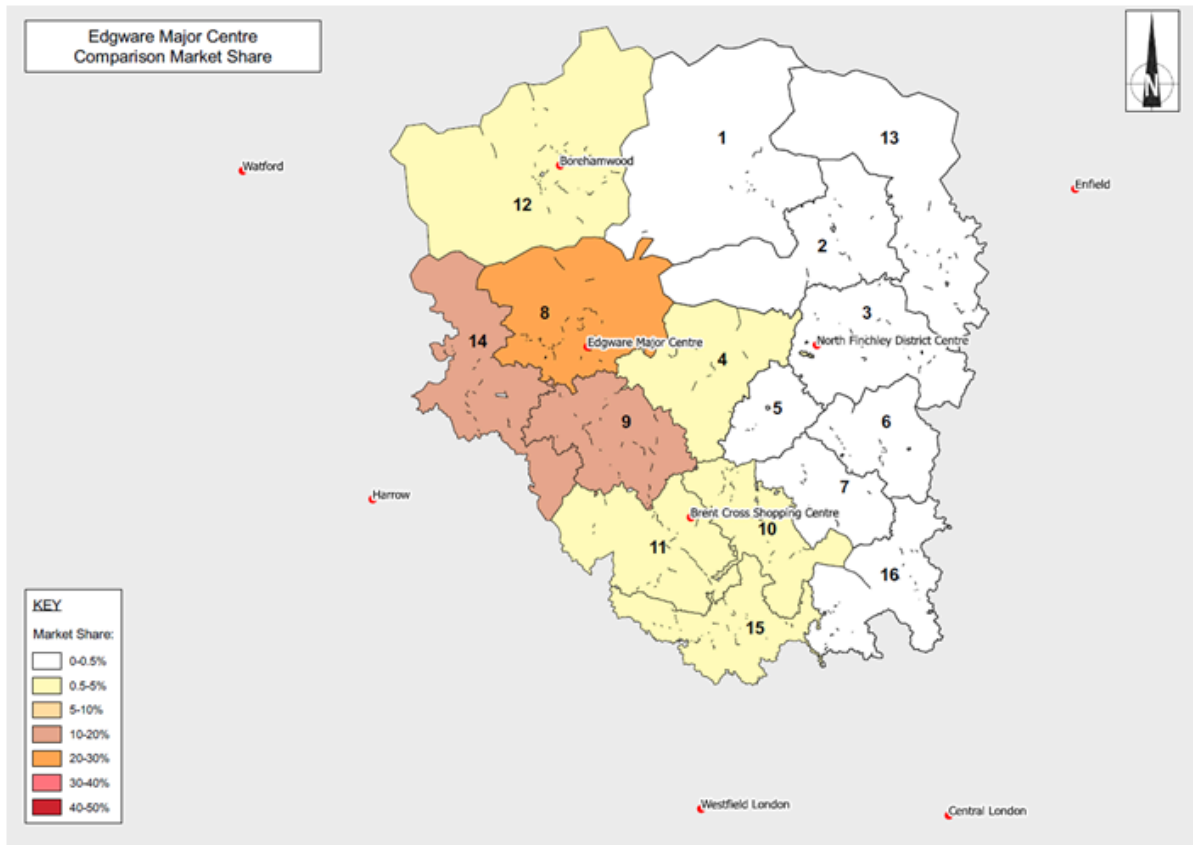
Table showing the absence of Major Centre characteristics for Edgware

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

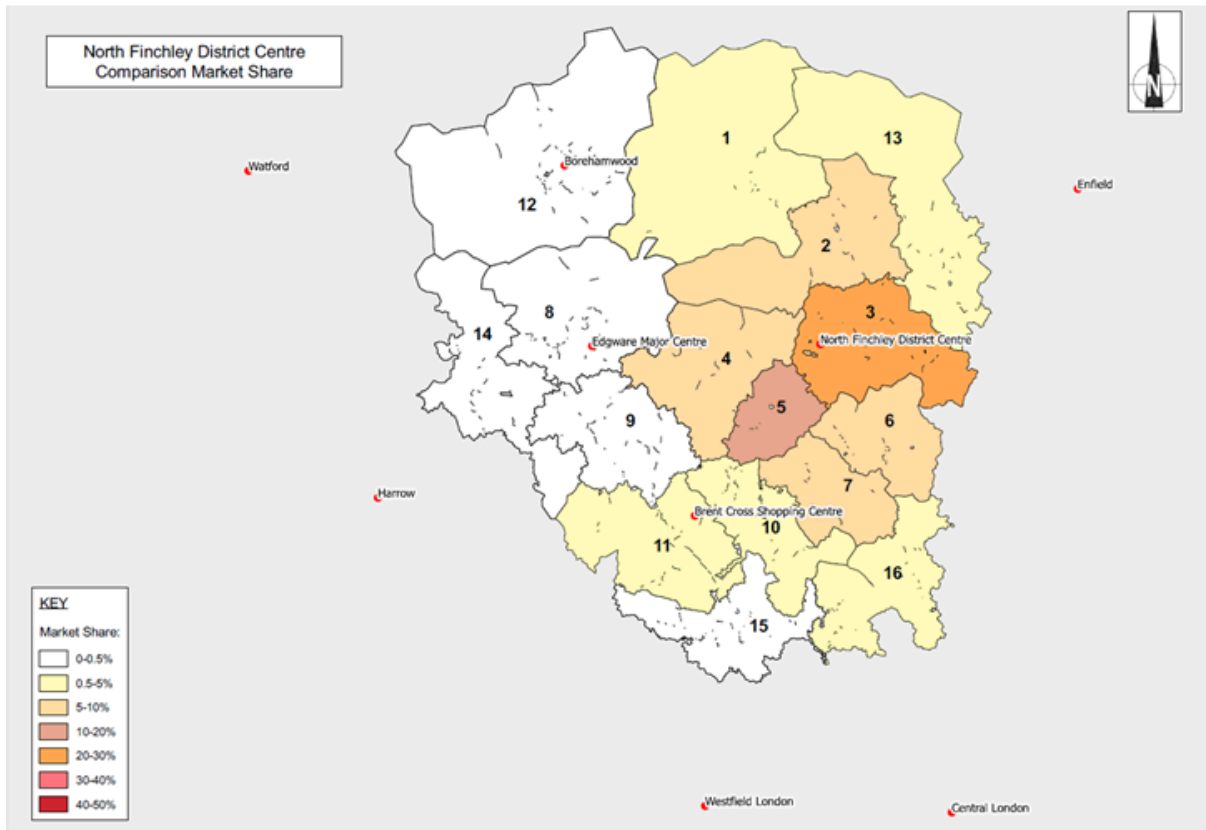
3.2.4.4 Edgware does not provide borough-wide catchment is below North Finchley and way below Brent Cross

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

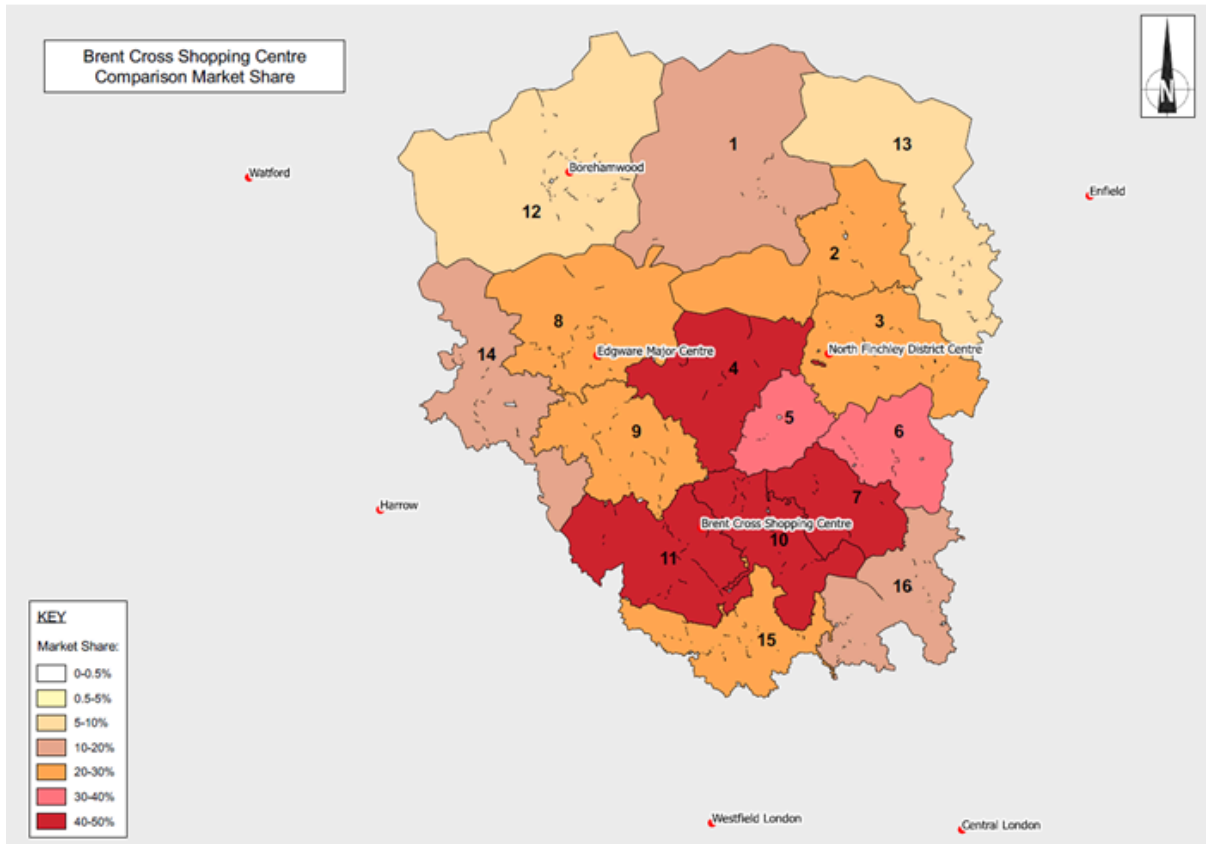
Edgware Comparison market share



North Finchley Comparison market share



Brent Cross Comparison market share



3.2.4.5 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.

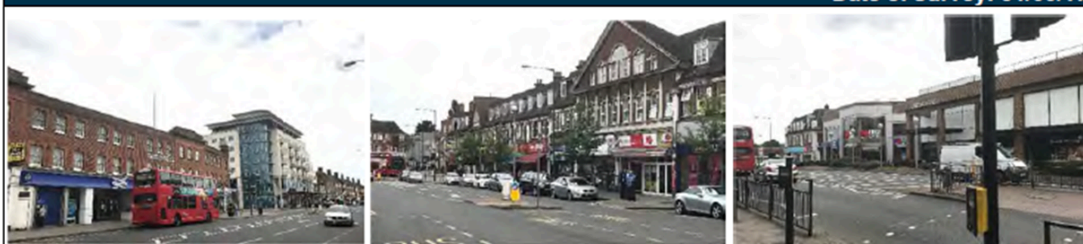
Convenience retail

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)

3.2.4.6 Edgware's comparison floorspace and turnover is lower than North Finchley's

Edgware

- 1.24 Our health check identified that the centre is vital and viable. It has good representation from national multiples, including Marks and Spencer, which attract shoppers to the centre from the north western part of the borough. While the centre's comparison turnover is lower than North Finchley's despite that centre being smaller in overall terms, its location means that it primarily serves a different catchment, and their roles should be seen as spatially complementary.
- North Finchley: is the main centre in the eastern part of the borough and it is recommended that it should be promoted to a major centre within the hierarchy. The household survey has shown the centre is a significant attractor of retail and leisure spending, with its comparison floorspace and turnover exceeding that of Edgware, and the presence of two foodstores within the centre generating significant convenience spending in the centre. The centre's food and drink offer is well established. However there has been limited recent investment in the centre, and there is potential for further improvement. The North Finchley Town Centre Framework SPD is currently being prepared and will provide further detail on how a number of the opportunity sites within the centre could be delivered to consolidate the centre's offer. This could include allowing the release of more peripheral sites for alternative uses, including residential, in order to focus offer and footfall as much as possible in what is a linear town centre.

Table 3 LBB and competing centres comparison goods trade draw £m

Destination	2008	2017	Change £m	Change %
Westfield London	-	26.9	26.9	-
Enfield Town centre	32.3	63.3	31.0	96%
Edgware major centre	48.4	76.4	28.0	58%
North Finchley district centre	66.1	103.1	37.0	56%
Borehamwood centre	44.3	65.7	21.3	48%
Wood Green centre	22.0	28.2	6.2	28%
Harrow town centre	35.3	44.5	9.2	26%
Brent Cross Shopping Centre	556.3	654.7	98.4	18%
Watford	73.2	84.5	11.3	15%
Central London/West End	294.7	63.3	-231.5	-79%

PBA based on NEMS household survey 2017 and 2008

Table 4 LBB and competing centres comparison goods trade draw %

Destination	2008	2017	Change %
Westfield London	-	1.1%	-
Enfield Town centre	1.5%	2.6%	1.0%
North Finchley district centre	3.2%	4.2%	1.0%
Edgware major centre	2.3%	3.1%	0.8%
Borehamwood centre	2.1%	2.7%	0.5%
Harrow town centre	1.7%	1.8%	0.1%
Wood Green centre	1.1%	1.1%	0.1%
Watford	3.5%	3.4%	-0.1%
Brent Cross Shopping Centre	26.7%	26.6%	-0.1%
Central London/West End	14.2%	2.6%	-11.6%

PBA based on NEMS household survey 2017 and 2008

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

In the Sales Brochure of the Broadwalk Centre ([THE BROADWALK CENTRE EDGWARE SALES BROCHURE](#)), it states clearly that Edgware is a

CONVENIENCE centre focus on value-oriented retailers.

“The property totals 190,000 sq ft of retail accommodation and is anchored by a large **Sainsbury’s foodstore** totalling 63,400 sq ft. There are a further 35 retail units let to successful **mass market and value-orientated retailers** including Boots, Poundland, WH Smith and JD Sports. Three units benefit from frontage onto the busy Station Road with Metro Bank, Superdrug and Robert Dyas all having external access. The Centre’s status as a well-let functioning, **convenience centre** is cemented by a new letting to TK Maxx who will shortly open a 26,390 sq ft unit, anchoring the internal mall and adding another high footfall-driving occupier to the tenant mix.”

3.2.4.7 Lack of Employment or Civic function in Edgware. Edgware only has Service function.

3.2.4.8 Lack of Leisure function in Edgware, No Cinema or bowling alley, a notable omission for a major centre

The report states that “The centre would benefit from redevelopment of current development opportunities to provide a greater range of leisure uses and night-time economy uses which are **currently limited for a major centre.**”

On “Leisure provision:

the centre contains a gym, operated by Pure Gym. **However, there is no cinema or bowling alley in this which is a notable omission for a major centre.**

There are currently six charity shops within the centre. These are relatively dispersed throughout the centre, though three are closer together on Station Road. While there are a number of charity shops in the centre, the relative spread is not currently a cause for concern.”

3.2.4.9 We question the accuracy of the Town Centre Network data in the London Plan regarding Edgware

We question the accuracy of the Town Centre Network data in the London Plan regarding Edgware. The data highlighted in red text contradicts the PBA Town Centre Floorspace study conducted by Barnet ([LBB Town Centres Floorspace Needs Assessment Executive Summary Peter Brett Associates](#)). The following discrepancies are of particular concern:

1. **Total Floorspace (Without Offices):** The actual occupied floorspace is 40,472 sqm, not 51,400 sqm as stated.
2. **Retail Composition in Broadwalk Centre:** Almost all Edgware's Comparison goods retail are located in Broadwalk Centre. The Total retail floorspace in Broadwalk is 17,652 sqm (190,000sqf). The Town Centre Network data from the London Plan seems to suggest that all the shops in Broadwalk are Comparison goods retails, which is wrong. Of the 17,652 sqm space in Broadwalk, Sainsburys alone occupies 5,890 sqm. This leaves the floorspace for the rest of the shops as 11,762 sqm. Most of the shops are convenience shops in Broadwalk apart from TK Maxx (2,452 sqm).

To conclude, the Comparison good retail floorspace of 4,139 sqm provided by PBA is much more credible than the 17,250 quoted in the London Plan.

In the Sales Brochure of Broadwalk, it stated that "The property totals 190,000 sq ft of retail accommodation and is anchored by a large Sainsbury's foodstore totalling 63,400 sq ft.

There are a further 35 retail units let to successful mass market and **value-orientated retailers** including **Boots, Poundland, WH Smith and JD Sports**. Three units benefit from frontage onto the busy Station Road with Metro Bank, Superdrug and Robert Dyas all having external access. The Centre's status as a well-let functioning, **convenience centre** is cemented by a new letting to TK Maxx who will shortly open a 26,390 sq ft unit, anchoring the internal mall and adding another high footfall-driving occupier to the tenant mix."

3. **Employment data:** Furthermore, we question the accuracy of the data regarding Town Centre base employee numbers of 3,100 and 6,600. Since the conversion of Premier House from office to residential use, most of the employment office space has been lost. We strongly contest the decision to mark “No data” for the office floorspace entry.

2017 Town Centre Network Review (Classification) - Barnet town centres (extracts)																			
Row Details No.	LP2016 REFERENCE	TOWN CENTRE NAME	BOROUGH	Current CLASSIFICATION	CLASSIFICATION Threshold Criteria to be used	TOTAL FLOORSPACE (Without Offices) Occupied	TOTAL RETAIL FLOORSPACE Occupied	TOTAL COMPARISON RETAIL FLOORSPACE Occupied	Comparison goods retail as a % of total retail floorspace	Convenience goods retail as a % of total retail floorspace	TOTAL LEISURE FLOORSPACE Occupied	Office floorspace (sq.m) 0 total (B1a) stock at 31.03.2016	Multiple retailers as a % of total retail floorspace (Multiple + Independent)	Town centre base employee estimates (No.)	Town centre Workplace employee estimates (No.)	Absolute 2016 Zone A Retail Rents (œ/SqM)	Zone A Retail Growth Rates % 2009 to 2016	Public Transport Accessibility Level (PTAL): Average (2011)	
Major town centre																			
2012 Experian GLA																			
2012 Experian GOAD																			
2017 Data >	17	Edgware	Barnet/Harrow	Major	Major	51,400	32,460	17,250	53	30	8,220	No data	45	3,100	6,600	915	21.5	6	
Threshold Criteria >				Major	Major	50,000 - 100,000	25,000 - 65,000	15,000 - 50,000	50-75	15-45	10,000	30,000	30-80	1,500+	4,500+	1,000+	5%+	5-6b	
Evaluation >	17	Edgware	Barnet/Harrow	Major	Major	Within Range	Within Range	Within Range	Within Range	Within Range	Below range	No Data	Within Range	Within Rang	Within Range	Below Rang	Within Ra	Within Range	
PBA data 2017						40,472	28,602	4,139	14	86									
LBB Town Centres Floorspace Needs Assessment Executive Summary Peter Brett Associates																			
Evaluation >	17	Edgware	Barnet/Harrow	Major	Major	Below range	Within Range	Below range	Below range	Below range	Below range	Below range	Within Range	Below rang	Below range	Below Rang	Within Ra	Within Range	

3.2.4.10 Conclusion

The conclusion is that Edgware is a District Centre and not a Major Town Centre. Any calculations in relation to housing capacity must be based on Edgware being a District Centre in a suburban setting. Therefore, the calculation within GSS05 which is based on the Density Matrix of London Plan 2016 and Exam 36 (insert table). Based on Edgware being a Major Town Centre with a Central definition is not valid and should be deleted. (check D3 of the London Plan)

GLA in the FOI responses () stated that “Barnet council did not respond to the invitation to review the data about Edgware being designated as a Major Centre”. It would appear that Barnet council has never checked their data (*LBB Town Centres Floorspace Needs Assessment Executive Summary Peter Brett Associates 2017*) against the data from the GLA. We have done an independent research and have found that the GLA data together with Edgware being designated a Major Centre and Barnet has wrongly applied this designation when calculating the indicative housing units for Edgware Town Centre. Therefore, now we have presented conclusively using the data produced by council that Edgware is a District Centre in a Suburban setting, any calculations of housing capacity must be based on Edgware being a District Centre.

The number of housing units within GSS05 will be based on London Plan D3. Taking into account that Edgware is a District Centre in a Suburban setting. As stated in Finchley, tall buildings are not appropriate in a suburban setting.

3.2.4.11 Appendix: Barnet's response to the consultation of the Draft Local Plan 2021, Cath Shaw (Deputy Chief Executive of Barnet) stated the following:

On the use of PTAL rating and Parking standards in outer boroughs is not suitable

"We are also disappointed that specific policy recognition for Outer London, as set out in the existing London Plan, has been removed. London-wide policies will be unable to adequately reflect the differing character and contexts across the London boroughs. While of course boroughs face many challenges in common, there are very important differences between Inner and Outer London that necessitate different policy approaches.

The combination of the more prescriptive approach and the lack of recognition of Outer London's particular challenges means that several DLP (Draft London Plan) **policies are not suitable for Outer London Boroughs such as Barnet.**

Our concerns on this London-wide approach are set out in more detail in the attachment, but I would **draw particular attention to restrictive car parking standards and a blanket London-wide approach to PTAL thresholds which ignores the challenges of orbital transport in Outer London.**"

The London Plan is not suitable for suburban areas and there should be fewer and larger houses being built.

"Furthermore, we are concerned about the **potential adverse impacts that excessive densification and intensification would have on Barnet, particularly in the more suburban and rural parts of the Borough.**

We consider there to be major flaws in the approach taken and methodology used by the GLA in producing the Greater London SHMA 2017. These flaws are explained in more detail in Appendix A but the net effect is that it is likely that fewer dwellings will be required, but **those dwellings that are provided should be larger.**"

Reliance on the car will remain important in outer London boroughs particularly in the northern part of the borough

"Transport and Car Parking

As noted above, we have serious reservations about the DLP's approach to car parking and the adverse impact of more restrictive parking standards for new development, **particularly in the northern part of the borough.** Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. The Council therefore advocates more flexibility to acknowledge local evidence led approaches to car parking that may be marginally less restrictive than the London Plan in relation to residential and commercial development. The London Plan needs to recognise that even with improvements to public transport, walking and cycling routes, **reliance on the car will remain important in outer London boroughs and therefore use of the car in these locations should not be made more difficult than it needs to be.** As stated previously we would be happy to discuss our local evidence on car parking with the London Plan team in advance of the Examination in Public."

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4 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 11 Chapter 4 – Growth and Spatial Strategy](#)

[MM 20 Chapter 4 – Growth & Spatial Strategy](#)

[MM 26 Chapter 4 – Growth & Spatial Strategy](#)

[MM 53 Chapter 7 Town Centres](#)

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), <u>Cricklewood, Mill Hill East, Brent Cross West, and Edgware</u>, and <u>Cricklewood</u> 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), <u>Cricklewood, Mill Hill East, Brent Cross West, and Edgware</u>, and <u>Cricklewood</u> 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 Growth Strategy as one of Barnet's main town centres,</u></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>4.21 Barnet's District Town Centres</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>	<p>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
	<ul 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 13. Temple Fortune 14. Whetstone 	<ul 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 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).

5 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 __Anuta Zack on behalf of Save Our Edgware_____

Date __14 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association_____

Date __14 June 2024_____

6 Appendix: Original Main Modifications

6.1 MM 11 Chapter 4 – Growth and Spatial Strategy

Paras 4.4.1 to 4.4.5A, 4.8.1A, 4.8.1, 4.8.2 to 4.8.4, 4.8.4A, 4.8.4B, 4.8.5, 4.8.6

Table 4, Table 5, Table 5A

4.3 Barnet's Growth Requirements

4.4 Housing

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 Mill Hill East Area and within the Borough's District Town Centres. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.

6.2 MM 20 Chapter 4 – Growth & Spatial Strategy

Policy GSS05

And consequential changes to supporting text

Para 4.18.1, 4.18.4 & 4.18.9A

POLICY GSS05 Edgware Growth Area

A. Level of Development

To deliver growth and regeneration at ~~Edgware Town Centre~~, the Council will seek the following from development proposals:

- a) Approximately 5,000 4,740 new homes, with provision for uplift through the design-led approach
- b) Improved leisure options such as a new cinema, swimming pool and new eating-out options;
- c) Appropriate 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. Improved public realm, including new public spaces;

4.18 Edgware Growth Area

4.18.1 Edgware has evolved from a small market town into a major town centre and has become a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and with extends into a small part extending into of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs and beyond.

4.18.4 Edgware is identified in the London Plan town centres hierarchy as Barnet's only Major Centre and is also highlighted in the Growth Strategy as ~~one of Barnet's main town centres~~, a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres. To deliver growth and regeneration in Edgware Town Centre, the Council will support proposals which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3). This should include taking account of the relationship with the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area to ensure accordance with Policy CDH08.

6.3 MM 26 Chapter 4 – Growth & Spatial Strategy

Policy GSS07

And consequential changes to supporting text

Paras 4.21.1, 4.21.4, 4.21.5, 4.21.8 & 4.21.9

POLICY GSS08 Barnet's District Town Centres

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).

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.

A. Level of Development

- a) The Council will support mixed use development within Barnet’s District Town Centres ensuring that their individual town centre offer responds to the needs of residents and workers as well as businesses and maintains their distinctiveness as places and vibrant hubs.
- b) Provision of appropriate location- based floorspace should be made for community, retail and other main town centre uses including offices and leisure. This should be provided subject to no unacceptable impact upon the vitality and viability of other town centres, with public realm and infrastructure improvements where necessary.
- c) Investment in residential led mixed use development will help to fund public realm and infrastructure improvements making District Town Centres such as North Finchley more attractive places to live, visit and enjoy.
- d) In the context of the above, Barnet’s District Town Centres (excluding Cricklewood) have capacity to deliver approximately 5,100 new homes between 2021 and 2036 with provision for uplift through the design-led approach. Capacity has been identified at the following District Centres :
 - Brent Street - 260 new homes
 - Burnt Oak - 160 new homes
 - Chipping Barnet - 530 new homes
 - East Finchley - 220 new homes

- Finchley Central Church End - 820 new homes
- Hendon Central - 120 new homes
- Mill Hill - 50 new homes
- New Barnet - 1,100 new homes
- North Finchley - 820 new homes
- Whetstone - 1,020 new homes.

Main Town Centres (Burnt Oak, Chipping Barnet, Finchley Central, Golders Green and North Finchley) will 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.

The changes to the Use Classes Order (2020) remove restrictions on changes of use and allow greater flexibility for opportunities to change between town centre uses, supporting town centre vitality and viability.

The Council will support mixed use development within Barnet's town centres ensuring that their individual town centre offer responds to the needs of residents and workers as well as businesses and maintains their distinctiveness as places and vibrant hubs.

Barnet's Town Centres (excluding Cricklewood and Edgware) have potential to deliver a minimum of 5,400 new homes.

1 4.21 Barnet's District Town Centres

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.

4.21.4 In order to be successful and thriving all of Barnet's town centres will have to adapt and take advantage of the increased flexibility provided by the 2020 radical overhaul of the Use Classes Order^[1]. The changes to the Use Classes Order (2020) remove restrictions on changes of use and allow greater flexibility for opportunities to change between town centre uses, supporting town centre vitality and viability.

4.21.5 Barnet's District town centres are important locations not only for retail, but also provide a focus for community and family friendly activities and a sense of civic pride, often containing valued heritage assets. ~~The importance of town centres as sites of employment is reflected in the Council's Article 4 Direction restricting the conversion of offices to residential.~~ The renewal of town centres must balance growth needs with sensitive and high-quality design. This is reflected in the SPD planning frameworks for Edgware and North Finchley town centres.

[1] Planning permission will no longer be required to move between retail, professional services, restaurants/cafes, offices (including research and development facilities and light industrial uses), clinics, health centres, creches, day nurseries, day centres, gyms, and most indoor recreation facilities. Previously these were all separate use classes but now all fall within the new Class E.

6.4 MM 53 Chapter 7 Town Centres

Policy TOW01, And consequential changes to supporting text

Paras 2.5.1, 7.1.1, 7.2.2, 7.2.6, 7.2.7 Table 12 (as renumbered), 7.3.5, 7.4.3, 7.6.2, 7.6.5, 7.6.6A, 7.6.7, 7.6.8, 16.7.1 & Glossary.

Policy TOW01 Vibrant Town Centres

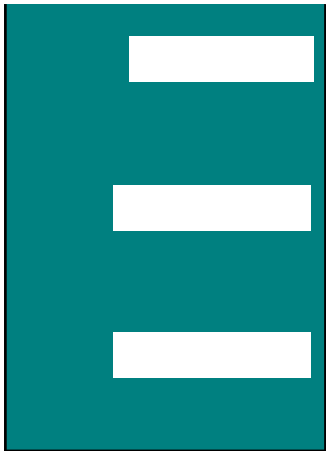
The Council will promote the vitality and viability of the Borough's town centres by managing, in accordance with the London Plan classification, a strong hierarchy of town centres (as set out in Table 12) as the priority location for commercial, business and service uses.

Investment in residential led mixed use development will help to fund public realm and infrastructure improvements **making district town centres** more attractive places to live, visit and enjoy. The Council will work with local partners to better define and enhance the distinctive character of individual town centres including improvements outlined in public realm strategies and through taking a more visible and co-ordinated approach to address a range of uses including anti-social behaviour, car parking, street cleaning and licensing.

A. The Council will support an appropriate mix of uses within designated centres:

- a) Redevelopment within the Brent Cross Growth Area (see in accordance with Policy GSS02) to will provide a strong retail offer together with as well as a wider mix of uses such as including leisure, offices and other commercial uses, community and cultural and residential uses to create a new Metropolitan Town Centre for North London.
- b) 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.
- c) Cricklewood District Town Centre (see in accordance with Policy GSS04) where regeneration will support the improvements to of the retail, community and other main town centre uses (including offices and leisure) that enhance the viability and vitality, and are proportionate to proposed housing growth of the District Town Centre offer alongside new housing, community and leisure facilities.
- d) Other District Town Centres (see in accordance with Policy GSS08) which will be promoted to provide comprising a network of centres suitable for accommodating residential development and provision of proportionate levels of floorspace for complementary retail, leisure and community and other main town centre (including offices and leisure) uses as well as new housing development.
- e) Local and Neighbourhood Centres (listed in Table 12) including new provision at Colindale Gardens) which will be promoted to provide a local level of retail and community uses (i.e. and smaller scale day to day convenience needs) and residential led mixed use development of a proportionate scale.

<p><u>Brent Cross Shopping Centre</u></p>	<p><u>Regional Shopping Centre in 2016 London Plan:</u></p> <p><u>The future potential network classification for Brent Cross is as a Metropolitan Centre in the London Plan 2021. The new town centre will be both north and south of the A406 (Brent Cross North and Brent Cross Town).</u></p>
<p><u>Major Town Centre</u></p>	<p><u>1 Edgware</u></p>
<p><u>District Town Centres</u></p>	<p><u>: Brent Street</u> _____ <u>8. Golders Green</u></p> <p><u>: Burnt Oak</u> _____ <u>9. Hendon</u></p> <p><u>: Cricklewood</u> _____ <u>10. Mill Hill</u></p> <p><u>: Chipping Barnet</u> _____ <u>11. New Barnet</u></p> <p><u>: :</u></p> <p><u>: :</u></p> <p><u>: :</u></p>



! : (: : :

Colindale - the Hyde _____ 12. North Finchley

East Finchley _____ 13. Temple Fortune

Finchley Central _____ 14. Whetstone

MM20 POLICY GSS05

Edgware Growth Area - MM 20

Chapter 4 – Growth & Spatial Strategy, Policy GSS05

(Ref:SOE-Objection04-GSS05)

save Our Edgware and Edgware Community Association's representation relating to Main Modifications MM 20 concerning Policy GSS05 Edgware Growth Area



Preserving Edgware
Building Tomorrow Together

**SAVE OUR
EDGWARE**

[1 Question 1: To which Main Modification does your representation relate?](#)

[2 Question 2: Do you consider that the Main Modification is:](#)

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

[3.1 Summary](#)

[3.1.1 Lack of employment opportunities in GSS05 incompatible with Policy BSS01 Spatial Strategy for Barnet](#)

[3.1.2 Must adopt Infrastructure first approach instead of design led approach.](#)

[3.1.3 Major concerns on Policy CDH04 Tall Buildings and Site Allocations 27 and 28](#)

[3.2 Edgware Growth Area and the excessive housing target of 4,740 should be reduced to 763 dwellings](#)

- [3.2.1 Site 28 Edgware Underground and Bus Station is unsuitable for major development. Residential capacity should be 0 dwellings.](#)
- [3.2.2 Site 28 - Edgware bus station land is unsuitable for development](#)
- [3.2.3 Site 28 - Edgware bus garage land is unsuitable for development](#)
- [3.2.4 Site 28 - Deans Brook Nature Reserve land is unsuitable for development](#)
 - [3.2.4.1 Non compliance to Policies regarding protected wildlife such as Bats](#)
- [3.2.5 Site 28's Flood risk](#)
- [3.2.6 Site 27 Edgware Town Centre's Indicative residential capacity should be reduced from 2,379 to 763 dwellings](#)
- [3.2.7 Unfair treatment of Edgware - inclusion of Edgware and removal of other towns from tall buildings list](#)
 - [3.2.7.1 In MM6, out of Barnet's 12 objectives, Edgware's GSS05 only contributes to objective 1 & 2 to meet the housing aspirations and needs](#)
- [3.2.8 Edgware was wrongly classified as a Major Town Centre in a Central setting](#)
 - [3.2.8.1 Edgware was wrongly classified as a Major Town Centre rather than a District Town Centre](#)
 - [3.2.8.2 Wrongly classification as a Central Area rather than Suburban Area](#)
 - [3.2.8.3 Inappropriate Application of PTAL \(public transport accessibility level\) Ratings](#)
 - [3.2.8.4 Conclusion](#)
- [3.2.9 Edgware's Suburban character is indisputable](#)
 - [3.2.9.1 Edgware's suburban character](#)
 - [3.2.9.2 Barnet's Characterisation Study confirms Edgware's suburban character](#)
 - [3.2.9.3 Edgware Town Centre's Character](#)
 - [3.2.9.4 The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware](#)
 - [3.2.9.5 Contradictions Between Proposed Overdevelopment and Edgware's Character](#)
- [3.2.10 Site 27 - Lost of Broadwalk Shopping Mall](#)
- [3.2.11 Broadwalk as a Social Hub stated by Barnet Council](#)
- [3.2.12 Inadequate car parking spaces impact the viability of Edgware as a Town Centre](#)
- [3.2.13 A design led approach with the community was not followed to create the Edgware policy](#)
- [3.2.14 The proposed design does not fit into the local neighbourhood](#)
 - [3.2.14.1 Contradict to the sustainability policy of the London Plan](#)
- [3.2.15 The Edgware policy of overdevelopment has not followed many of the regulations for tall buildings](#)
- [3.2.16 High-rise estates will cause loss of privacy and shadowing of](#)

neighbourhoods

3.2.17 Tall buildings are discriminatory to folks observing sabbath

3.2.18 Open space deficiency in Edgware Town Centre

3.2.18.1 Must follow Barnet's own Open Space Policies in the Local Plan

3.2.18.2 Open space deficiency in Edgware Town Centre

3.2.18.3 Inadequate Public Open Spaces For Edgware Town Centre

3.2.18.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents

3.2.18.5 Open Space must be close to Edgware Town Centre:

3.2.18.6 Open Space must be for Edgware Residents

3.2.19 Risk to Edgware's Heritage in Barnet and Harrow

3.2.20 Risk to adjacent Conservation Area

3.2.21 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas

3.2.21.1 Conserving Heritage - National Planning Policy Framework (NPPF)

3.2.21.2 Conserving Heritage - The London Plan

3.2.22 The validity of Edgware Growth Area SPD

3.2.23 Conclusion

4 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.)

5 Declaration of consent

6 Appendix: Original Main Modifications

6.1 Policy GSS05 Edgware Growth Area

7 References

Ref: (For official use only)

Representations Form

PART B - Your representation

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

1 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 ___MM20___ Policy ___Related to GSS05_Edgware Growth
Area_____ Paragraph ___All_____

Figure/Table _____ Policies Map change _____

2 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 checked="" 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"/> |

3 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

3.1 Summary

Current Housing Target in GSS05:

The Edgware Growth Area aims to deliver 4,740 homes across two primary sites:

- **Site 27: Broadwalk Shopping Centre, Car Park and Forumside** - 2,379 homes.
- **Site 28: Edgware Underground and Bus Station** - 2,316 homes.

Suggested Reduction:

The proposal recommends reducing the housing target to 763 dwellings

Policy GSS05 in the Barnet Local Plan is considered unsound due to several key issues, leading to the overdevelopment of Edgware and undermining its suburban character:

- **Misclassification of Edgware:**

Edgware is classified as Barnet's only Major Town in a Central area according to the London Plan. However, it is argued that Edgware's character should be Suburban rather than Central. Therefore, Edgware should be classified as a District Town in a Suburban area.

- **Site 28: Edgware Underground and Bus Station,**

- **Unsuitability for Major Development:**

- Edgware Bus Station and Garage - Essential infrastructure for buses.
- Edgware Underground - Critical tube station and railway tracks for the Northern Line.
- Deans Brook Nature Reserve, home to protected species such as Bats. The opening up Deans Brook to the public will not be in compliance with the decision of the SoS in 1997. [3.2.4 Site 28 - Deans Brook Nature Reserve land is unsuitable for development](#)

- **Underground bus garage not viable**

- The proposed underground bus garage poses significant fire risks, particularly with electric buses. The London Fire Brigade has deemed this proposal non-viable.
 - **Damage to Wildlife in Deans Brook:**
 - Developing the Deans Brook Nature Reserve would violate the Wildlife and Countryside Act 1981
 - **Site 28 is in high flood zone**

- **Excessive Housing Density for Site 27:**

The housing target of 2,379 for Site 27 (Edgware Town Centre) is deemed unsound. The target is based on an inappropriate Central Density of 405 units/ha. Instead, a Suburban density of 130 units/ha should be applied, reducing the housing target to 763 homes. Thus, the overall housing target for the Edgware Growth Area should be 763 homes, not 4,740.

- **Open Space Deficiency:**

Edgware has a recognised lack of open spaces, and the area has been losing open spaces over the years. The proposed development exacerbates this issue, failing to meet the open space standards required for residential developments, thereby impacting residents' wellbeing and mental health.

- **Destruction of Broadwalk Shopping Mall:**

Broadwalk Shopping Mall is a well-used, essential social hub for Edgware. Its demolition would destroy the heart of Edgware, negatively impacting local commerce and community activities.

- **Edgware's Suburban Character:**

The proposal does not align with Edgware's low-density suburban character and identity. Edgware's history and development have been characterised by low-density residential estates comprising mainly of semi-detached and detached private housing. The suburban character is further recognized in the Characterisation Study of Barnet, which identifies Edgware's primary urban typologies as "residential streets" and "suburban." The study emphasises the low density and architectural coherence of suburban streets in Edgware, which the proposed high-density development contradicts.

- **Misleading "Design-Led Approach" disregard Edgware's suburban character:**
 - The term "design-led approach" in Policy D3 is misleading, as it suggests optimising site capacity based on inappropriate area assessments. The proposed development does not enhance local

context or respect Edgware's distinctive suburban character (Policy D3; D (1)).

- **Contradiction to London Plan's Vision:**

The proposed high-density development contradicts the London Plan's vision to conserve and enhance London's distinctive character and heritage (section GG1; 1.2.7). It fails to align with Edgware's suburban character and infrastructure capacity (Policy SD1; 2.1.3). The London Plan's Policy D1 (parts A and B) about London's form, character, and capacity for growth should conclude that Edgware is not suitable for such high-density regeneration.

- **Unfair selection of Edgware as Tall Buildings site:**

Edgware is listed for potential tall buildings, raising questions about the fairness and suitability compared to similar sites.

- **Disregard of Resident/Public Opinion:**

- There has been strong opposition from residents and the public against the proposed high-density development. Ignoring this opposition contradicts Policy D1; B; 3.1.3 of the London Plan, which emphasises involving a wide range of people in area assessments.

- **Incompatibility with Car Use:**

- Edgware's low-density, suburban nature, which promotes car use, contradicts this policy. The Characterisation Study of Barnet acknowledges the importance of car use in the suburbs.

- **Parking Issues affecting viability of Edgware Town Centre:**

- The proposed reduction in parking spaces in Broadwalk will negatively impact local accessibility and footfall, harming Edgware's viability as a town centre.

- **Contradictory Policy on Office Space:**

- The policy is contradictory regarding office space, as Edgware has seen a reduction in purpose-designed office space, with most blocks converted to residential use. The correlation between new homes and office space is invalid.

- **No Transport and Connectivity improvements:**

- There are no plans for transport improvements, which could negatively impact local businesses and residents.

- **Infrastructure Requirements:**

- Development proposals should deliver or contribute to improved flood risk resilience, bus and underground station operations, and public realm improvements, which are not adequately addressed in the proposed development.

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 and low rise suburban residential houses. .

In summary, Policy GSS05 is unsound because it leads to overdevelopment by misclassifying Edgware, setting unrealistic housing targets, compromising essential

transport infrastructure, failing to provide adequate open spaces, threatening local commerce, and not sufficiently addressing environmental and public service needs. The proposal contradicts the London Plan's vision, disregards public opinion, and misrepresents Edgware's suburban character and infrastructure capacity.

We are proposing the following for the Barnet local Plan:

- A 21st century transport interchange with an improved bus station.
- No underground bus garage as a potential volcano
- A warm welcoming shopping mall to continue to be the heart of Edgware town centre
- Housing development that will fit well within the Suburban environment – no tall buildings
- Housing development that can be supported by local schools, nurseries and NHS services.
- The development should have no negative impact on conservation areas and local heritage
- Deans Brook Nature Reserve to be protected in perpetuity with no public access to protect bats and slow worms
- Open space and biodiversity to be provided in full within the Edgware Town Centre area in any development future
- A viable, sustainable and safe shopping centre which is attractive for the whole community
- Car parking that supports the whole of Edgware town centre. Many visitors, including the elderly, are unable to use public transport.

3.1.1 Lack of employment opportunities in GSS05 incompatible with Policy BSS01 Spatial Strategy for Barnet

"POLICY BSS01 Spatial Strategy for Barnet" are detailed below:

"Between ~~Up to~~ 67,000 m² and 106,000m² of ~~additional~~ new office space in the rest of the Borough (with priority given to distribution across Barnet's Major and District town centres through applying the sequential test for main town centre uses), and including the provision of affordable workspace to meet Policy ECY02;"

We would question how Edgware can deliver the intended Housing growth outlined in policy **Policy GSS05** Edgware Growth Area in excess of 4,740 plus homes and still provide meaningful contribution to office space in line with strategic policy BSS01, so as the town is simply not a dormitory town, but has a range of employment opportunities (not overly dependent on replacement retail jobs from site allocations 27 and 28 - which are the allocations for Edgware Broadwalk and Bus garage).

We would be concerned with the word "**New**" instead of additional, as this potentially enables simply old jobs and employment floorspace to be replaced as opposed to meaningful gain in jobs, that are not overly concentrated to ensure a range of employment locations for employers and employees in highly sustainable locations near transport hubs and reduced need for excessive travel.

A range of employment opportunities would be more befitting of Edgware's designation as Major Town Centre and Growth area, as opposed current plans for high dependency on replacement retail jobs translocated from the existing Broadwalk shopping centre that is to be demolished.

Scope for Edgware to provide a range of job types and a robust and varied economy is further eroded by amendments to ECY01 and which has significantly weakened language around retention of employment uses "where possible to retain existing and encourage new office space". This language severely weakens the hand of decision makers on applications and has no teeth in terms of implementation. "Where possible to" should be removed from the policy.

3.1.2 Must adopt Infrastructure first approach instead of design led approach.

Paragraph A (a) is of deep concern and objected to as the proposed changes suggests even more growth is possible for Edgware through a design led approach. Instead there is a need for an **infrastructure first approach** in addition to high quality design of any redevelopment in Edgware. The amount of growth planned for almost 12,000 new residents (based on the UK average 2.4 occupants per a dwelling) in what by necessity will be an incredibly dense arrangement whatever design and layout is settled upon, in a fringe of London suburban town seems highly inappropriate and not conducive to community cohesion or successful place making. 12,000 people is a new town within a town. Provisional plans appear to make an uncharacteristic fortress of high rise towers and bulky buildings in the centre of Edgware with a foreboding and overbearing presence and not very welcoming environment to existing residents.

The town cramming concept approach adopted by Barnet Council is not welcomed especially in areas so deficient of public open space and green infrastructure. Whilst we are sure the NHS, education authority and highway authority are working closely with the Planning team, there is concern their modelling and implementation has not proven reliable in the past to with many in the area feeling the effects of lack of critical infrastructure to meet existing needs let alone accommodate the planned levels of growth.

Before any development proceeds the main junctions within Edgware need significant improvement as the town barely copes as is, the intended level growth and construction traffic for 10-15 years on the scale proposed and these slow

moving arteries will completely seize and kill the town altogether and increase traffic emissions and reduce air quality whilst queuing traffic sits idle for hours (there's little mention of cycle or bus lane infrastructure) the end result may be a new town centre but will be sterile and soulless as the existing small town has become unviable in the interim trying to accommodate such level of growth over a generation. This phasing of critical road and transport infrastructure delivery first should be included in the policy.

Again it is noted the removal of office from the policy and no mention of light industrial/creative type uses which would diversify the economy of Edgware and reduce travel demand on the road network and public transport. **An overly dependent retail offering is not a robust enough economic model to ensure the long term vitality of Edgware** and overly susceptible to the vulnerability seen in the bricks and mortar retail industry with the rise in online shopping.

3.1.3 Major concerns on Policy CDH04 Tall Buildings and Site Allocations 27 and 28

It is a major concern and objection that there is increased flexibility for increased heights of buildings proposed for Edgware above 14 storeys, this severely weakens the negotiating hand of planners and Development Management Committee members to rebut excessively tall buildings within Edgware and leaves it very open to interpretation, we have already had sight of the developers vision for 29 storey development which seems to mistake Edgware for Canary Wharf or Manhattan.

Ballymore Edgware plan : 25 High rise Tower Blocks
3828 homes on 7.2 hectares, Denser than Hong Kong



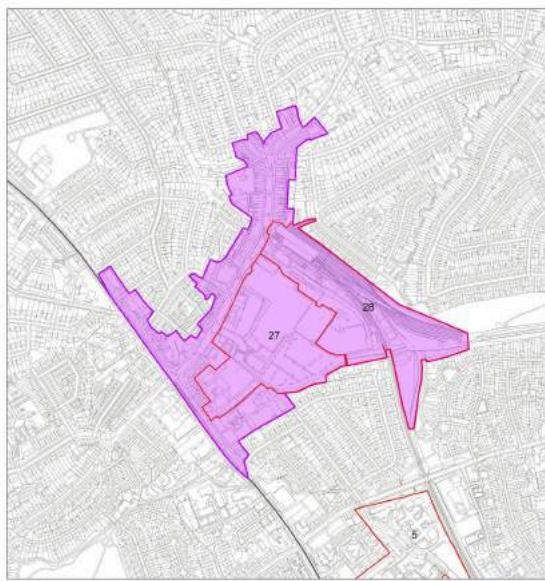
For the reasons outlined above We object to the proposed modifications to the local plan and seek amendments which prioritise fair and sound, social, economic and sustainable development, the current plan does not achieve this for Edgware or Barnet as a whole.

3.2 Edgware Growth Area and the excessive housing target of 4,740 should be reduced to 763 dwellings

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)

3.2.1 Site 28 Edgware Underground and Bus Station is unsuitable for major development. Residential capacity should be 0 dwellings.

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.](#))

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.

Further details can be found here: Read [Save Our Edgware's Representation to oppose Site 28 selection](#) (Ref:SOE-Objection01-Site28)

3.2.2 Site 28 - 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.

3.2.3 Site 28 - 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 \(Save Our Edgware & foi-response-foia79611-LFB-verdict-of-non-viable-Edgware-bus-garage, n.d.\)](#) 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.

3.2.4 Site 28 - 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.

Bats, Toads, Newts and slow worms have habitats in the Deans Brook Nature Reserve. They are all protected under the Wildlife and Countryside Act 1981. The protection includes the animals, their habitats, their roosts and breeding ponds. It is also illegal to intentionally disturb them. Hence this Nature Reserve cannot be used as a green space of humans, as is proposed by Ballymore/ TFL. Note this Nature Reserve is also home to a variety of bird species such as: Kingfishers, Grey Wagtails, Coots, Moorhens and Mallards.

Deansbrook Nature Reserve is a Site of Importance for Nature Conservation (SINC) that at present is regarded as sufficiently sensitive and important for the protection of various species such as Bats, Toads, Newts and slow worms and the environment generally that it is not open to the public. They are all protected under the Wildlife and Countryside Act 1981. The protection includes the animals, their habitats, their roosts and breeding ponds. It is also illegal to intentionally disturb them. Hence this nature reserve cannot be used as a green space for humans, as is proposed by

Barnet in the Local Plan. Note this Nature Reserve is also home to a variety of bird species such as: Kingfishers, Grey Wagtails, Coots, Moorhens and Mallards.

Also, the plans to divert flood water to Deans Brook, as outlined in the Environment Impact Assessment, will pollute the delicate eco-system of the nature reserve, endangering the protected species and their habitat.

Historically, when the Northern Line was extended to Edgware, the changes brought about involved the realignment and culverting (in part) the water course Deans Brook and also there was no longer a requirement for the railway line that went from the old Edgware Station through Mill Hill and on to Highgate. This meant that the land occupied by the old railway line and the land adjoining the new railway line were not in use and not open to the public and so were left to nature effectively to recolonise for the last hundred years. This has allowed protected species such as slow worms and bats (both of which have been registered with Green Spaces Information for Greater London as being present on this land) have been able to thrive undisturbed.

The importance of not disturbing this habitat has in fact been tested. In 1997 the Secretary of State allowed the Appeal against Barnet's deemed refusal to permit an access off Deans Lane into LULs (now TfLs) property but this was on the basis of LUL saying that they required it to access their works but there was a condition imposed in allowing this Appeal that it be used "Only for the purpose of upgrading and maintaining the Northern Line Railway". It is implicit in the Secretary of State's decision that LUL recognise the environmental sensitivity of their proposed access route within a Site of Borough Importance of Nature Conservation - with protected slow worms and other reptiles and therefore it is implicit in the decision of the Inspector and SoS that the environmental sensitivity be respected and so by extension, to allow public access to this sensitive site would clearly be against the principle which allowed them to get a planning consent (that was restricted by the above condition) in the first place. Also see attached LB Barnet's FoI response 11530928 ([FOI Response11530928-all-information-to-be-supplied-Deans-Brook-No-Public-Right-of-Way](#))

The developers of site 27 & 28 are now proposing that the Deansbrook Nature Reserve be open to the public as a walking and cycling route. We can see 3 reasons why the developers have made this proposal. Firstly, they can claim that an additional 5 hectares (approximately) of land now falls within their development site thus making their development densities drastically reduced in the number of habitable rooms per hectare proposed. Secondly they can claim that they are providing at least some of the necessary green space that a development of this size should require in a location where otherwise it would be regarded as grossly

deficient, and thirdly, they can claim strategic improvements to walking and cycling routes to support their claims for carrying out 'improvements' and 'regeneration'.

These reasons are not justified particularly as the Secretary of State has made a legal judgement that there should be no public access.

These proposals will have a highly detrimental effect to an area of very great environmental sensitivity and cause illegal disturbance to bats and slow worms. No amount of so-called mitigation will be suitable for what will be the destruction of a Nature Reserve when there is no compelling reason to do so. Barnet Council cannot include proposals that are unlawful within a local development plan

The modification MM70 to policy ECC06 Biodiversity, whilst stating developers must adequately mitigate the harm they cause, provides that where adverse impacts cannot be avoided or adequately mitigated, as a last resort, they can be compensated for.

This is permitting developers to simply buy their way out of their environmental responsibilities to the Deansbrook Nature Reserve SINC. This is unacceptable.

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.**

Also the strategic walking Network includes opening up the Deansbrook nature reserve to which there is no public access. We strongly believe that the status of the nature reserve having no public access should be maintained. Therefore the site cannot contain the Strategic Walking Network and should be deleted.

There should be no mitigation of the requirements of the biodiversity requirements which should be fully provided within the boundary of any development. The public and residents have the right to fully enjoy the benefits of biodiversity not for provision to be made elsewhere which cannot be enjoyed by the public and residents.

3.2.4.1 Non compliance to Policies regarding protected wildlife such as Bats

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.”

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.

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

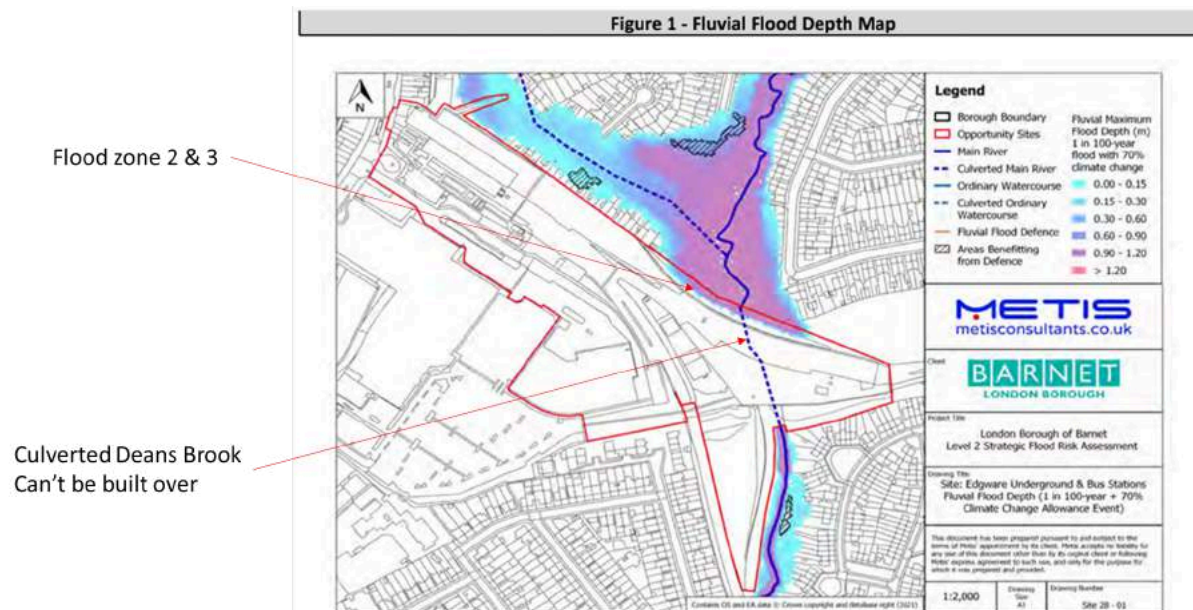
"To protect and enhance biodiversity and geodiversity, plans should... promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species..."

Building on the Deans Brook Nature Reserve and opening it up to the public 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.

3.2.5 Site 28's Flood risk

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.*)



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.

3.2.6 Site 27 Edgware Town Centre's Indicative residential capacity should be reduced from 2,379 to 763 dwellings

Site 27 includes the Broadwalk Centre and the Forumside with a total size of **7.83 ha**. ([Exam 25 - LBB Note - Development Framework](#))

The allocation of 2,378 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

2,378 units are derived from 7.83 hectares land x 405 housing units/hectare x 75% 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 indicative residential capacity in the Local Plan was calculated using the Central setting at the highest density using section 16.2 of the Local Plan below.

“16.2 Assessing Indicative Residential Capacity of Sites

16.2.1 For the purposes of the Local Plan, site capacity assessment has been based on the site size and the public transport accessibility level (PTAL), which is used to determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings.

16.2.1 16.2.2 A density matrix approach to calculate indicative residential capacity has been utilised in order to provide sufficient accuracy in terms of indicative numbers at the plan-making stage. This provides a good basis for a more detailed design led approach as proposals near the planning application stage.”

...

Figure 1: The Density Matrix

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

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- **central** – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 m walking distance of a Metropolitan or Major town centre.
- **urban** – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 m walking distance of a district centre or, along main arterial routes
 - **suburban** – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.”

We would expect that the detailed design approach will have due regard to the nature of the surrounding suburban area which would well lead to a reduced number of dwelling.

However, as we have shown in our Representation(on Edgware being wrongly classified as being Central setting and is a Major Town) that this central definition has been wrongly applied.

Edgware should be classified as a District Town in a Suburban area. The Suburban density should be applied. Using the highest Suburban density of 130 units / ha, the indicative residential capacity should be 763 dwellings with 527 in the Broadwalk area and 237 for the rest. 122 units must be deducted for Premier Place.

	Hectares	x Suburban density 70 to 130 Units/Ha for PTAL 4-6	Houses x 75% residential / commercial mix
Broadwalk (Shopping Centre + Car Park + Ex Argos)	5.40	130	527
Forumside area and land next to the Forumside	2.43	130	237
Total	7.83	130	763

The number of dwellings should be calculated taking into account that Edgware is a suburban area. There is little spare capacity for extra school and nursery places within the agreed catchment area, the requirement to provide open space and play space and biodiversity sewerage, water supply. The requirements of public safety and those relating to the 9 protected categories must be taken into account .

This 763 indicative residential capacity is in line with other District Town Centres in Barnet:
POLICY GSS08 Barnet's District Town Centres

A "d) In the context of the above, Barnet's District Town Centres (excluding Cricklewood) have capacity to deliver approximately 5,100 new homes between 2021 and 2036 with provision for uplift through the design-led approach.

Capacity has been identified at the following District Centres :

- *Brent Street - 260 new homes*
- *Burnt Oak - 160 new homes*
- *Chipping Barnet - 530 new homes*
- *East Finchley - 220 new homes*
- *Finchley Central Church End - 820 new homes*
- *Hendon Central - 120 new homes*
- *Mill Hill - 50 new homes*
- *New Barnet - 1,100 new homes*
- *North Finchley - 820 new homes*
- *Whetstone - 1,020 new homes."*

3.2.7 Unfair treatment of Edgware - inclusion of Edgware and removal of other towns from tall buildings list

The following locations are no longer earmarked as potentially being suitable for tall buildings:

- New Southgate;
- Edgware Road (A5) and Great North Road (A1000)
- Finchley Central
- North Finchley

Whereas Edgware has been left in.

Edgware is no more suitable than other town centres in the Borough for major development. In fact its time-efficient transport connectivity is poorer than many other towns in the Borough.

In short, the Local Plan earmarks Edgware for inner city style development, but with suburban style connectivity, as there are no plans for transport improvements. This is despite the plan being likely to lead to a 50% increase in the population of Edgware Ward.

In fact, if Proposals allow for a significant loss of public and commuter parking, the existing connectivity will deteriorate and become below normal suburban standards. This would be detrimental for:

- Local businesses as currently Edgware is used by people from nearby localities for shops and banking.
- Many residents, such as those with mobility impairments and people living on the outer fringes of the town.

(For further information see comments on transport, unfair treatment of Edgware and rebuttal of Edgware's status as a major town centre).

We therefore consider that Edgware Growth Area should be removed from CDH 04.

In MM 13 , POLICY GSS01 Delivering Sustainable Growth, Edgware was singled out to deliver new homes:

"New homes will be directed to the following locations:

Edgware Town Centre – 5,000 4,740 homes (Policy GSS05)"

3.2.7.1 In MM6, out of Barnet's 12 objectives, Edgware's GSS05 only contributes to objective 1 & 2 to meet the housing aspirations and needs

On GSS05, Edgware only contribute to meet housing aspirations and need wheres **not benefiting** from objectives 3 to 12 such as

- improve quality of housing,
- employment growth,
- improve orbital connectivity,
- conserve and enhance the historic environment,
- promote healthy living and wellbeing,
- meet social community infrastructure needs, support strong and cohesive family friendly communities,
- enhancing the contribution of biodiversity

- new development is high quality, sustainable, and capable of adaptation to meet the needs of residents over their lifetime

Table 2 – Relationship of Local Plan Key Objectives to Policies

1. To respond and recover from the impact of COVID19
2. To <u>help</u> deliver growth to meet housing aspirations and needs
3. To improve the quality and types of housing across the Borough in response to resident needs and demographic change
4. To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery
5. To improve orbital connectivity and sustainable travel options including cycling and walking
6. To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet’s town centres and suburbs
7. To support strong and cohesive family friendly communities
8. To promote healthy living and wellbeing
9. To meet social <u>community</u> infrastructure needs
10. To deliver an environmentally sustainable Borough and build resilience to climate change.

11. To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure.

12. To ensure well designed, beautiful and safe places where new development is high quality, sustainable, and capable of adaptation to meet the needs of residents over their lifetime.

3.2.8 Edgware was wrongly classified as a Major Town Centre in a Central setting

3.2.8.1 Edgware was wrongly classified as a Major Town Centre rather than a District Town 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.

3.2.8.2 Wrongly classification as a Central Area rather than 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.

3.2.8.3 Inappropriate Application of PTAL (public transport accessibility level) Ratings

PTAL Ratings in Outer Boroughs:

- The London Plan's Density Matrix ties housing density to PTAL ratings, which measure public transport accessibility. However, the blanket application of PTAL ratings is unsuitable for outer borough suburban towns like Edgware.
- **Local Context Ignored:** Barnet's Deputy Chief Executive, Cath Shaw, has expressed concerns that the London Plan fails to recognize the unique challenges of Outer London, such as reliance on cars and the different urban form compared to Inner London.
- **Transport and Car Use:** The prescriptive PTAL thresholds and restrictive parking standards do not align with the reality of continued car use in the lower density suburbs of Outer London. This further supports the argument that the London Plan's approach is inappropriate for Edgware.

3.2.8.4 Conclusion

The evidence clearly indicates that Edgware does not meet the criteria for a Major Town Centre or a Central setting 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.

For full detail, please check out our representation: [Save Our Edgware Representation on Edgware as Major Town Rebuttal](#)
(Ref:SOE-Objection03-MajorCentre)

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

3.2.9 Edgware’s Suburban character is indisputable

3.2.9.1 Edgware’s suburban character

Edgware is typical of much of the suburban development constructed at the early part of the last century with its characteristic low density residential estates comprising mainly of semi and detached private housing and served by local commercial high streets. The new suburbs represented a new utopian vision of urban development, offering a standard of living and level of amenity few had enjoyed before.

Indeed, the railway companies serving the new suburbs promoted the new developments as suburban idylls and rural paradises as clearly shown in London Underground posters of that era. This change in vision for urban development came about through a desire to see a better and brighter England and London after the first World War. This desire led to the creation of the Town Planning Act 1909 which wanted to end the era of “back-to-back” terraced housing and introduce legal standards for housing. This was followed by the Housing and Town Planning Act 1919 which was to prove seismic for the future of urban development. The idea of town planning grew in popularity at the start of the last century and was inspired by the Garden City concept. The above proves Edgware’s character/identity. It also demonstrates how standards of urban design and quality of living are going backwards.

3.2.9.2 Barnet's Characterisation Study confirms Edgware's suburban character

Edgware's suburban character is further recognized in the Characterisation Study of Barnet Sections 1-6. In this study, Edgware is shown as having two main primary urban typologies, "residential streets" and "box" (Section 3; page 59).

In addition to the latter, Edgware is also classed as having a secondary urban typology, "suburban" (Section 3; page 70). The study clearly recognises Edgware's suburban identity, "The defining physical characteristic of suburban streets is the low density coupled with an overall level of architectural coherence" (Section 3; page 70).

Regarding the residential streets primary typology, the suburban nature of Barnet is further reinforced, "Conventional residential streets are the predominant form of development in Barnet" (Section 3; page 56). In the same study but Sections 1&2 it states, "the council seeks to safeguard the suburban nature of the borough" (Sections 1&2; page 4). The proposal for Edgware contradicts this statement.

Character description

This character area is overwhelmingly residential in character, with most of the area made up of inter war development of semi-detached housing on linear residential streets. The area includes two linear shopping streets (core typology) at Station Road (Edgware) and Mill Hill Broadway, as well as small pockets of residential estate, big box and campus typologies.



Hazel Gardens is a typical suburban residential street type in the Edgware and Burnt Oak character area

C - SUBURBAN

Introduction

The defining physical characteristic of suburban streets is the low density coupled with an overall level of architectural coherence. The majority of suburban streets in Barnet are lined with houses built during the interwar period. This was a time of rapid growth in Barnet and it is the period of development which most strongly typifies the Borough. Many streets benefit from a strong sense of architectural consistency and coherence, as houses typically have been built to very similar specifications, often by a single developer. Additionally this secondary typology can be distinguished by its large street space widths and lack of enclosure.

Density

The density of suburban streets is a marked increase from both linear rural streets and suburban periphery streets, ranging from 20 – 30 dwellings per hectare.

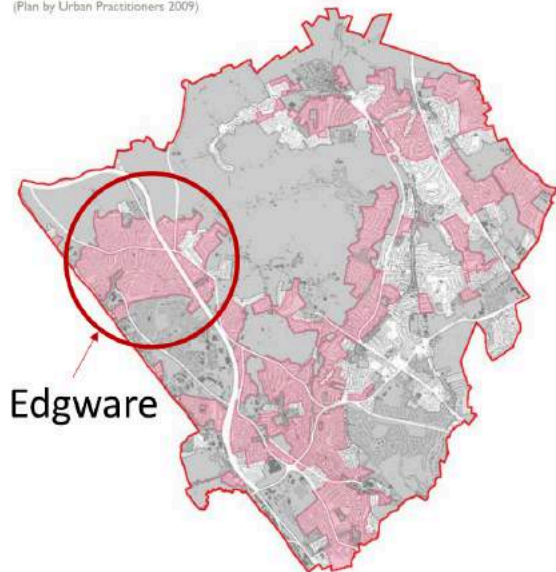
Building Types and Units

Suburban streets are lined with both detached and semi detached houses. Building heights are predominantly two storeys, with the occasional three storey house where conversions have occurred.

Enclosure

As opposed to linear rural and suburban periphery streets where carriageways and street space is primarily enclosed by vegetation, building fronts provide almost all enclosure on suburban streets. Street widths tend to vary between 12 – 18 metres, as pavements are often generously wide. Suburban streets contain an array of detached or semi detached houses in very close proximity to one another. Typically, building fronts remain well set back from the plot edge, as distances range from 5 – 14 metres. Consequently, suburban streets can often accommodate a significant amount of on plot parking.

Suburban Streets (Plan by Urban Practitioners 2009)



Reproduced from the Ordnance Survey digital maps with the permission of the Controller of Her Majesty's Stationary Office (C) Crown Copyright License No. London Borough of Barnet LA 100017674. Published 2005.



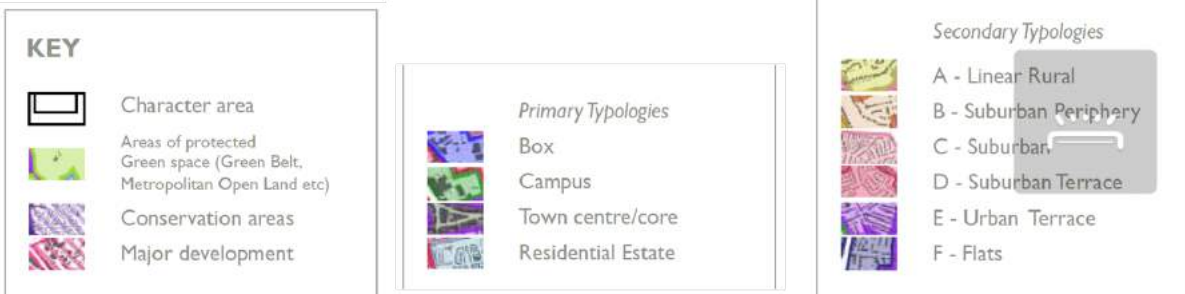
The majority of front gardens have been converted hard standing surfaces to accommodate car parking

EDGWARE AND BURNT OAK



Barnet Characterisation Study | Final Report | May 2009

125



3.2.9.3 Edgware Town Centre's Character

Regarding the primary urban typologies described for Edgware, the Primary Typologies Plan (2009) appears to identify the Broadwalk shopping centre area as conforming to “box” typology. This typology, while technically correct when set against the criteria of the Characterisation Study of Barnet, does not appear to reflect the true nature of Edgware town centre. It should correspond more with the typologies of “cores and town centres,” and “residential streets.” The addition of the Broadwalk shopping centre in the 1980’s was a drastic change to the urban morphology of the town centre which effectively killed off the traditional commercial streets.

The addition of a shopping centre to Edgware was ill conceived and is totally disproportionate to the size and population of Edgware. No other similar size town

centre in Barnet, like Finchley, has this level of retail capacity. The same can be said of towns in the neighbouring borough of Harrow such as, Pinner.

3.2.9.4 The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware

The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware and should not be used as justification for intense development. The conclusion of the Characterisation Study states, “The prevailing scale and massing should be protected in areas where there is consistent character” (Sections 4&5; paragraph 3). Over the last several decades Edgware, as well as much of the rest of Barnet borough, has seen a deliberate “denuding” of original character and heritage, to varying degrees, especially Colindale. This process must be stopped and reversed and not used as an excuse for claiming an area to be without character. This doesn’t alter the fact that the outer London suburbs are low-density areas.

3.2.9.5 Contradictions Between Proposed Overdevelopment and Edgware’s Character

The scale of the overdevelopment proposed is the complete opposite of Edgware’s identity and character. The nature and history of London’s new outer suburbs, including Edgware, shows very clearly that the suburbs were planned as low density residential urban developments and hope to demonstrate this further on.

Here are some examples of Ballymore’s proposed implementation of GSS05 policy and the detrimental impact to Edgware’s suburban streets.





The assessment metrics and criteria used for determining the kind of development in Edgware is primarily growth driven, as reflected in the “Good Growth” vision set in the London Plan. Policy D1 (parts A and B) of the London Plan regarding London’s form, character and capacity for growth should readily conclude that Edgware is not suitable for the kind of development being proposed.

The development being proposed is not regeneration, and should not be described as such, but is in fact overdevelopment dressed up as regeneration. In this respect, the London Plan is substantially flawed as can be seen from the following sections and policies: -

- *“London’s **distinctive character and heritage** is why many people want to come to the city. London’s heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced” (section GG1; 1.2.7). The proposed high-density development contradicts this statement.*
- *“The approach should include **understanding the existing character and context of an area**, in accordance with Policy D1 London’s form, character and capacity for growth” (Policy SD1; 2.1.3). The proposed high-density development contradicts this policy as Edgware’s capacity for growth must align with its low-density suburban character and current infrastructure.*
- *“**Development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings**” (Policy HC1 (C)). The proposed high-density development does not conserve the suburban heritage and character of Edgware, making it unsuitable.*
- *“urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density” (Policy D1; A; 3)). Again, the proposal does not respect the suburban heritage of Edgware.*

Perhaps the biggest concern with the proposal is the total disregard of resident/public opinion which has voiced strong opposition to the proposed high-density development. This is in contradiction to the London Plan:

“It is important to understand how places are perceived, experienced and valued. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people” (Policy D1; B; 3.1.3).

If anything, any “growth” element of future regeneration should be strictly limited as reflected in the London Plan, *“Area assessments should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements” (Policy D1; 3.1.4).*

3.2.10 Site 27 - Lost of Broadwalk Shopping Mall

Broadwalk is an enclosed shopping mall with 36 Shops of 190,000 sq feet (17,652 sq metres) which includes Sainsburys (5,890 sq metres). In addition, there are toilets, Costa coffee shop, several stalls, and seating ([“Broadwalk Centre Sales Brochure”](#)). The NHS has had a stand for health checks. Broadwalk is a well used, warm, welcoming social hub.

The retail floorspace of any new development shall be at least as big as the present Broadwalk retail floorspace of 11,761 sq metres (which excludes Sainsburys) within a covered shopping mall at least equalling the present provision.

“Footfall at the centre currently stands at **six million people per annum**” (“[Broadwalk Centre Sales Brochure](#)”). Broadwalk is the heart of Edgware and the demolition of Broadwalk will totally destroy Edgware as a centre.

3.2.11 Broadwalk as a Social Hub stated by Barnet Council

The Broadwalk is a social hub “those that use the shopping centre on the basis that this could be groups that meet there, users of the retail and other facilities or charities etc.” (source: FOI Request For Quote For Equality Impact Assessment: Edgware Broadwalk Shopping Centre Redevelopment, October 2023, Barnet Council)

If Broadwalk is to be demolished with comparable replacement, this will be to the detriment of the enjoyment of people with 9 protected characteristics and this would be a non compliance of the Public Sector Equality Duty, Equality Act 2010. Hence Barnet Council must ensure that there is no detriment.



3.2.12 Inadequate car parking spaces impact the viability of Edgware as a Town Centre

Car ownership across Barnet is high when compared to other London boroughs. This reflects the area's low density suburban and rural character. By its nature this promotes car use, with spacious streets and easy parking. At the same time the urban sprawl also requires car use..." (Characterisation Study of Barnet Sections 1&2; page 36).

Ballymore's development plan is an example of the implementation of the Edgware Policy GSS05. A total of 769 car parking spaces have been allocated in Ballymore's plan, including 425 for residents and 344 for public parking. This is much lower than current spaces of 250 long stay commuter spaces, and 900+ short stay public parking. Additionally, no parking space has been allocated to Islamic Centre on Edgware High Street, and has been allocated a large number of spaces as a condition of its planning permission.

The car park is the only car park serving Edgware town centre. It is not a car park ripe for development. In summary the allocation of 1,350 car parking is going to be reduced to 344; just a 25% allocation of current spaces. There is far from enough car parking for current visitors to Edgware, let alone attracting visitors from further afield. The developers need to be realistic. When people are doing their weekly shopping they come by car as many shoppers are unable to carry multiple heavy shopping baskets onto buses or trains. Many of the shoppers will be elderly or have vulnerabilities or are within the 9 protected characteristics covered by PSED and hence this severe reduction of the number of car parking spaces will cause detriment. And will mean that there will be no compliance with PSED. This is not acceptable.

Also, when visitors come from further away most of them will come by car! In summary this means there will be fewer people visiting Edgware, and the reduced footfall will impact the income for retails therefore impact the viability of Edgware as a Town Centre.

Reduction of parking spaces in Edgware Town will definitely cause a spillage onto neighbouring areas. This has already been noticed with residents of Premier House/ Premier Parade and Edgware Parade still owning cars and parking in neighbouring streets including those in Harrow. This problem will be exacerbated with the reduction of the visitors and commuter car parking spaces in the future.

Section 7 of SPD, on Transport and Movement Guide, indicates in para 7.8 that "The long-stay commuter off-street parking is used to capacity".

In MM109, Site 28 Edgware Underground and Bus Station section, the Local Plan states that

"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.”

This means that the commuter car park will be removed for Edgware Station. No proposals have been made about extra public transport provision.

3.2.13 A design led approach with the community was not followed to create the Edgware policy

The National Planning Policy Framework 2023: indicates that the local community should be engaged in doing design, and as early as possible.

The National Model Design Code, Part 2: indicates When preparing design codes, communities need to be involved at each stage of the process. The community involves all people living and working in and around the area for which the code is being produced together with local interest groups, stakeholders and elected representatives.

The London Plan 2021, Policy D5 Inclusive design stipulates: A Borough, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.

The London Plan 2021, Policy D9 Tall buildings, states Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

The Barnet Local Plan states that whilst tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered so as not to detract from the nature of surrounding places and the quality of life for those living and working around them. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. The Edgware Policy in the Local Plan is being imposed on the local community, without engaging with the community to define an inclusive mutually agreeable design. Leading on from the above the community has not been involved in defining any design code for the Edgware Growth Area Policy. In fact, we have had no visibility of a design code, if one exists, bar a single photo of some of the locations in Edgware.

We expect the design code should include meaningful community involvement and should take account of the surroundings of any development. Until a new design code is approved, it's is logical that no major a planning application such as Ballymore Ltd/ TFL can be properly assessed.

3.2.14 The proposed design does not fit into the local neighbourhood

The London Plan 2021, Policy D3 Optimising site capacity through the design-led approach: states that the Quality and Character of the design should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

The London Plan 2021, Policy D6 Housing quality and standards: indicates that the built form, massing and height of the development should be appropriate for the surrounding context.

The proposed design not meet the high-quality design and sensitive approach outlined in **Edgware Local Area SPD** Principle 4

Edgware is identified by **Barnet's Local Plan** as a tall buildings' location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys, subject to exceptional design quality and demonstrating that the scheme meets criteria such as integrating with the existing urban fabric, and ensuring no adverse microclimate impact relating to wind or daylight. The proposed design is not an exceptional quality design and does NOT integrate with the existing urban fabric. It is not designed sympathetically to the locale nor are they in keeping with the character of the area.

3.2.14.1 Contradict to the sustainability policy of the London Plan

The Edgware Growth Area Policy is also a contradiction to the sustainability values aspired by the Local and London Plans. The so called, "good growth" vision for London doesn't suddenly reduce the impact of development growth on the environment. Growth, whichever way it's dressed up (especially the scale being proposed for Edgware and elsewhere), is still growth and it comes with a hefty price tag to both the natural environment (pollution and scaring of the environment) and the quality of life in our towns.

Policy D3 3.3.10 of the London Plan expresses the aim to **minimise the use of new materials**. To be very clear, most construction projects require a substantial proportion of new materials. Add to this the embedded energy required for extraction and processing of the materials before it even gets to a project site. The frequent use of terms such as, sustainable, renewables, low carbon, zero carbon, low energy, etc are misleading.

3.2.15 The Edgware policy of overdevelopment has not followed many of the regulations for tall buildings

The Edgware Policy of overdevelopment is contrary to **Barnet Tall Building update 2019**, Page 31, only identifies the opportunities areas of Colindale/Burnt Oak and Cricklewood/Brent Cross as having potential for very tall buildings. This also indicated Edgware is only suitable for buildings in the range of 6-14 stories.

The Edgware Policy (GSS05) does not abide by **Barnet's Policy DM05** since

- A. There is no successful integration into existing urban fabric
- B. There is adverse impact on local viewing corridors, local views and the skyline
- C. c) It does cause harm to heritage assets and their settings
- D. d) there will be potential for adverse microclimate effects which will affect existing levels of comfort in the public realm e) the high-rise estate will NOT make a position contribution to the townscape.



Figure: GSS05 implementation will have adverse impact on local viewing corridors

The London Plan 2021, Policy D9 Tall buildings,

a) emphasises that proposals for tall buildings should address the visual, functional and environmental impacts of such structures. Regard should also be made to Historic England’s guidance on tall buildings.

b) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area. The Edgware Policy of overdevelopment does not contribute to the character of the area, alternatives have not been explored and will have an adverse visual, functional and environmental impact.

The Edgware Local Area SPD Indicates that the height and massing of buildings should be modest and not overshadow or cause loss of privacy to neighbouring residential streets, and especially Brook Avenue, Parkfield Close and Fairfield Crescent. The Edgware Policy of overdevelopment totally ignores these stipulations. See our video to visualise the impact of such a policy to Edgware <https://www.youtube.com/watch?v=thggysBG42U>.

The London Plan 2021, Policy D9 Tall buildings states - it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building. The area does not have the capacity to accommodate such a large influx of new residents and new visitors. After repeated requests, we have not received any modelling analysis done to estimate the expected additional load on public transport. There are no plans to increase the capacity of Edgware TFL Station until 2040. The removal of the bus terminal will cause chaos and congestion as bus stops all along Station Road. The reduced number of car parking spaces will mean that neighbouring streets will get congested, with new residents, commuters, shoppers and visitors from far afield parking here. This will also place extra strain on bus services and taxis.

3.2.16 High-rise estates will cause loss of privacy and shadowing of neighbourhoods

The **Edgware Local Area SPD** paragraph 5.20 Indicates that the height and massing of buildings should be modest and not overshadow or cause loss of privacy to neighbouring residential streets, and especially Brook Avenue, Parkfield Close and Fairfield Crescent. The Edgware Policy of overdevelopment totally ignores these stipulations. The tall buildings will cast long shadows over neighbouring areas, leading to significant reduction of natural light for both residents within the towers and those in surrounding properties. These will be particularly worse in the winter months. Additionally, the new development will obstruct views that existing residents once enjoyed, leading to dissatisfaction and potential conflicts.

3.2.17 Tall buildings are discriminatory to folks observing sabbath

Jewish & Christian citizens practising Sabbath will not be able to use lifts or are able to take the stairs, given the height of buildings. Since around 30% of the local population is Jewish, a fair proportion of the population is indirectly being discriminated against by the high-rise development.

3.2.18 Open space deficiency in Edgware Town Centre

3.2.18.1 Must follow Barnet's own Open Space Policies in the Local Plan

Barnet has an Open Space standard in the London Plan. Edgware development area must follow this standard.

"Policy ECC04 –Barnet's Parks and Open Spaces

A. ...

B. b): The Council will meet increased demand for access to open space and opportunities for physical activity, by protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:

i. a) development proposals should make provision for securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:

- **Parks: 1.63ha per 1000 residents**
- **Natural Green Spaces¹: 2.05ha per 1000 residents**
- **Playing pitches: 0.75ha per 1000 residents.**
- **Play and informal recreation: as set out by London Plan Policy S4**

~~provision for children's play, sports facilities and better access arrangement"~~

Also in Barnet council responded to an FOI request on what open space standards would be required for residential development by providing the following policy statement:

"The Council's expectation is that development proposals should make provision for open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards: ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

"

- *Parks: 1.63ha per 1000 residents*
- *Natural Green Spaces: 2.05ha per 1000 residents*

¹ Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

- *Playing pitches: 0.75ha per 1000 residents.*
- *Play and informal recreation: as set out by London Plan Policy S4 Play and informal recreation which requires at least 10m2 per child of good quality accessible play provision. “*

- We have the standard
- Two paragraphs in our explanation.
- It is essential that any development in Edgware fulfils ECC04.
- Since the wellbeing of the residents need space within 400meter
- Attachment on FOI
- Blog as pdf
- National Institute of Health - wellbeing of residents

3.2.18.2 Open space deficiency in Edgware Town Centre

The 2021 Edgware Growth Area SPD accepts Edgware has a lack of open spaces. Over the last few years the area has lost many open spaces. In 2009 a report showed Edgware had a deficit of open space (shaded pink). Since then this has diminished further.

“The provision of parks in the following Wards falls below the current borough average in terms of parks provision per 1,000 head of population:

... Edgware, ...” ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

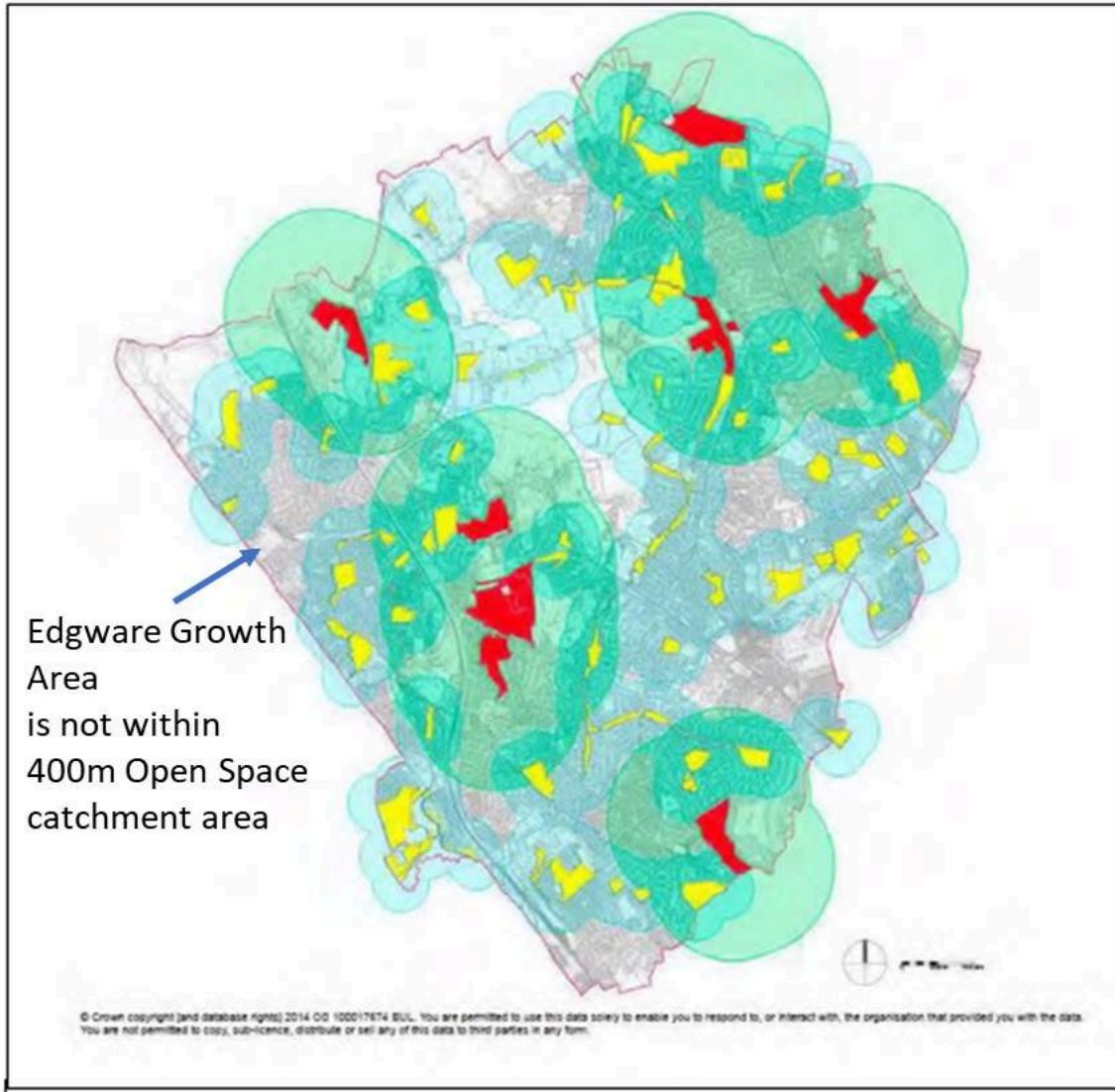
Open Space and Parks Deficiency (Shaded pink)



- Borough Boundary
- District Parks
- Local Parks
- 400 m Catchment Area
- 1.2 km Catchment Area

Open Space and Parks

Blue: 400m Catchment Area



UK Health Security Agency in its blog ([Green space, mental wellbeing and sustainable communities – UK Health Security Agency](#)) states “So there is a wealth of evidence of how the public’s health can be improved by increasing access to green and blue space and improving the quality of our natural environment.” (UKHSA blog is the official blog of UK Health Security Agency).

3.2.18.3 Inadequate Public Open Spaces For Edgware Town Centre

An area of 5.95 hectares of quality green space is needed, based upon requirements stipulated in the emerging **Barnet Local Area Plan** and **London Plan 2021**.

- 2.41 hectares of amenity space for residents
- 1.54 hectares of play space for children
- 2 hectares of green space within 400 meters

There are no Open Space of the above size within 400 meters of the Edgware Growth Area and the Deansbrook Nature Reserve, 1.9 hectares, cannot be used as there is no public access in order to preserve the habitat of protected species including the Bats and Slow Worms that have been found. These details have been registered. (Quote Green Space...)

3.2.18.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents

The NPPF emphasises the importance of access to high-quality open spaces and opportunities for sport and recreation, which can make an important contribution to the health and well-being of communities.

"Access to high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities" (NPPF, paragraph 96).

The "Improving access to greenspace: A new review for 2020" by Public Health England highlights significant health benefits of access to greenspace, including improved mental health, reduced stress, and increased physical activity. Ensuring new residents in Edgware have access to greenspace can contribute to the overall health and well-being of the community.

- "Evidence shows that access to greenspace is associated with better health outcomes, including lower rates of mortality and morbidity" (p. 5).

The document emphasises the importance of equitable access to greenspace, noting that areas with lower socioeconomic status often have less access. Given that Edgware is already in deficit, adding new open spaces in Edgware is critical to addressing this inequity.

- "Ensuring equitable access to greenspace is vital for addressing health inequalities" (p. 7).

The Edgware Policy of overdevelopment will fail to meet Objective 15 in **Edgware Local Area SPD: Support health and wellbeing**.

Most studies have found clear correlations between high-rise living and childhood behavioural problems. No study has found high-rise living beneficial to children.

Nicolas Boys Smith, founder of Create Streets, in his 2016 report on design of cities shows there is evidence that residents (and especially children) of high-rise blocks tend to suffer from more stress, mental health issues and neurosis than gentler developments. The high-rise development has limited open spaces for recreation and relaxation. The lack of accessible green areas or parks within close proximity will affect the well-being and mental health of residents, especially families with children. Limited outdoor play spaces will make

it challenging for children to engage in outdoor activities and play with other children. With limited outdoor spaces and play areas, children will resort to spending more time indoors with electronic devices, leading to potential health and developmental issues. Also, the increased reliance on elevators will discourage physical activity, impacting the health and well-being of elderly residents. Residents will experience further anxiety due to reduced privacy, especially in units facing each other at close distances.

3.2.18.5 Open Space must be close to Edgware Town Centre:

The review (UKHSA blog is the official blog of UK Health Security Agency) underlines that greenspace should be within walking distance to maximise its usage and benefits. This aligns with your findings that new open spaces must be within walking distance for Edgware residents.

- "Access to greenspace should ideally be within a 5-10 minute walk (about 300-600 meters) from people's homes" (p. 9).

Best practices in urban planning advocate for the integration of greenspaces within walking distance of residents. This ensures the spaces are used and contribute to the quality of life and health of the community.

- "Urban planning should prioritise the creation of greenspaces within close proximity to residents to maximise their accessibility and use" (Improving access to greenspace: A new review for 2020, p. 9).

3.2.18.6 Open Space must be for Edgware Residents

Therefore it is very important that Barnet Policy regarding ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#)) is fully compliant within any residential development and not dealt with by financial mitigation or locating the open spaces in another district outside the 400m boundary. Edgware is deficient in open space so mitigation cannot be claimed to be suitable in any way.

3.2.19 Risk to Edgware's Heritage in Barnet and Harrow

Edgware consists of 5 wards, 2 of which are in Harrow so whilst a small part of the borough of Harrow the portion of Edgware in Harrow is a very significant part of Edgware. The Borough boundary actually dissects Edgware's High Street and historic center.

The London Plan wrongly classifies Edgware as a Major Center. However in no way could the town be classified by anyone's metrics as even close to Major if not including the Harrow portion of Edgware. It is inequitable to take a pick and mix approach to Edgware's Harrow assets. The Harrow side of Edgware has 2 conservation areas yards from the borough boundary that are afforded no protection

despite being integral parts of Edgware and containing some of Edgware's oldest surviving buildings and covered by an archaeological priority designation. It contains Edgware's war memorial to its dead.

Location of this list entry and nearby places that are also listed. Use our [map search](#) to find more listed places.



The Canons Park Estate conservation area is deemed an outstanding area. The Key View down the Canons Drive which is home to one of the finest tree collections in the country would be decimated by tall buildings. The below picture illustrates how the clusters of tall buildings, proposed by Ballymore who follows Barnet's Edgware Policy GSS05, can have a significant detrimental impact to Canons Park Estate conservation area.

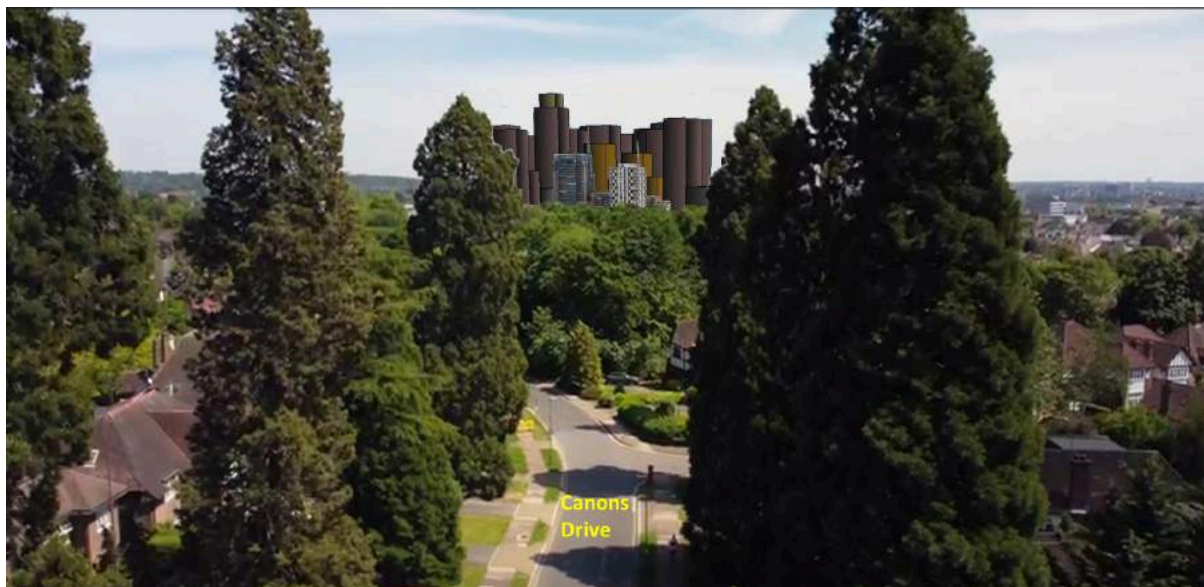


Figure: view of the Edgware Tall Builds by Ballymore from Canons Drive



Yet is excluded from any consideration. Harrow has not agreed on the tall building strategy for Edgware which is a joint town.

Barnet and Harrow created a joint SPD historically, in no way should any development strategy of a town artificially divided by a borough line not be a jointly agreed strategy. Barnet's local plan in respect of Edgware must be agreed fully and

jointly with Harrow. There must be an inclusive vision that ensures balanced growth throughout the town whilst preserving the unique character and historical significance of the town much of which is situated on the Harrow side of the boundary. CDH08 must take into account all neighbouring designated heritage assets with equal care and consideration.

Causing divisions in community identity and preventing the integration of heritage conservation can not be justified on the grounds of artificial borough boundaries that show no respect to the history and heritage of a town.

The NPPF emphasises the enhancing and conserving of the historic environment, it also charges that “any” heritage that may be affected by a proposal be identified and assessed, not simply those limited to borough lines. The London Plan 2021 stipulates that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to form, scale, materials and architectural detail policy HC1. Historic England guidance stipulates this as part of planning.

3.2.20 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.

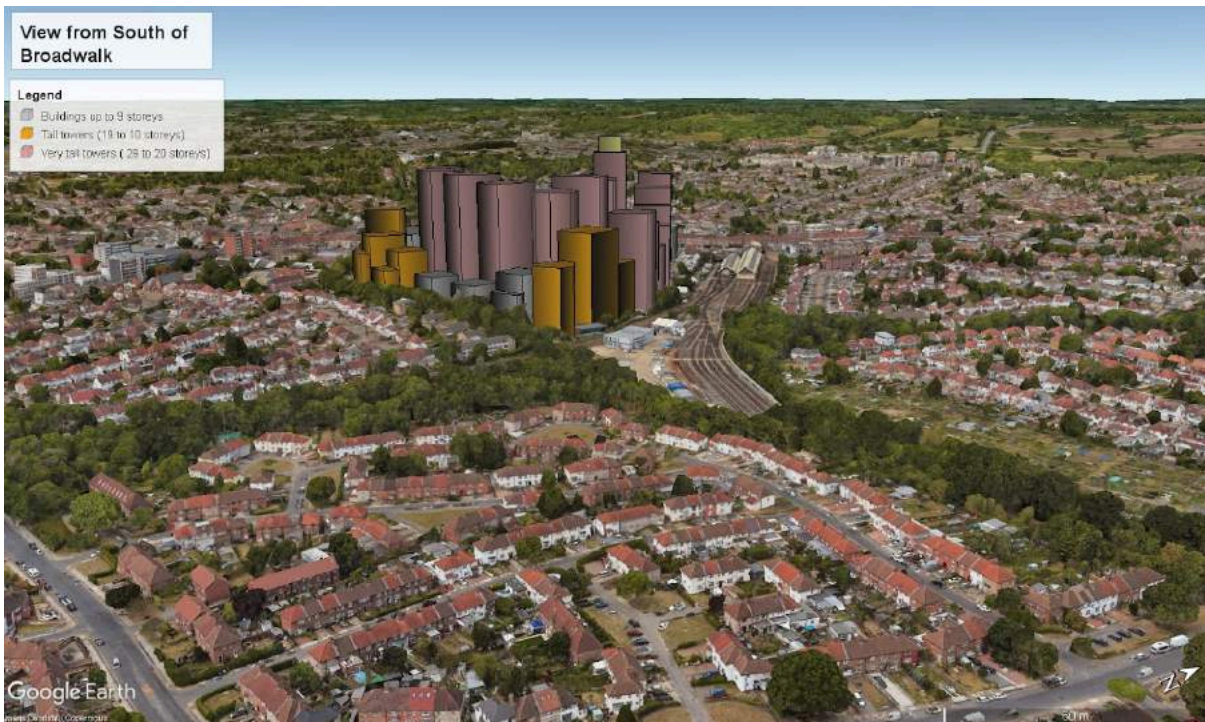
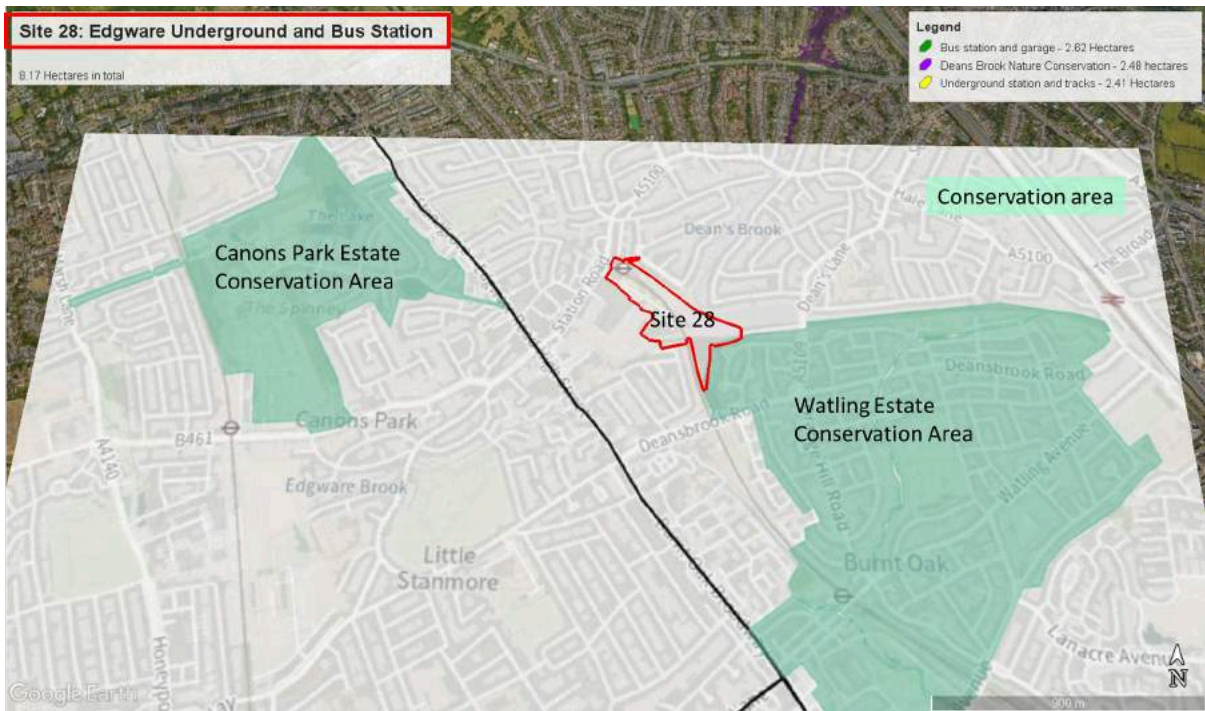


Figure: view of the GSS05 implementation by Ballymore from Watling Estate Conservation Area

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>

3.2.21 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas

Edgware is in Archaeological Priority Areas. It should be protected from overdevelopment.

In Barnet Policy CDH08, it states that

"There are also two Scheduled Monuments, at Brockley Hill in Edgwarebury and at the Manor House in Finchley, five prehistoric, four Roman and thirty mediaeval sites containing archaeological remains of more than local importance. These have been grouped into nineteen 'Local Archaeological Priority Areas' (APAs) as listed in Table 11 and shown on the Policies Map. "

Table 11 - Barnet's Designated and Non-designated Heritage Assets

Listed Buildings	<u>Over 670</u> 651 entries
Battlefield Site	Battle of Barnet 1471
Registered Parks and Gardens	5 registered historic parks and gardens; St Marylebone Cemetery, Stephens House and Gardens, Avenue House Garden , Golders Green Crematorium, St Pancras Cemetery and Hoop Lane Jewish Cemetery.
Scheduled Monuments	Brockley Hill Romano – British Pottery, Edgware Manor House Moated Site, East End Road, Finchley
Archaeological Priority Areas	<ol style="list-style-type: none"> 1. Barnet Gate and Totteridge Fields 2. Burnt Oak 3. Child's Hill 4. Chipping Barnet 5. Copthall 6. Cricklewood 7. East Barnet 8. East Finchley 9. Edgware 10. Edgwarebury and Scratchwood 11. Finchley 12. Friern Barnet 13. Galley Lane 14. Halliwick Manor House 15. Hendon 16. Mill Hill 17. Monken Hadley Common 18. Totteridge and Whetstone 19. Watling Street.
Conservation Areas	<ol style="list-style-type: none"> 1. The Burroughs, Hendon, 1983 2. Church End, Finchley, 1979 3. Church End, Hendon, 1983 4. College Farm, Finchley, 1989 5. Cricklewood Railway Terraces, 1998 6. Finchley Garden Village, 1978 7. Golders Green Town Centre, 1998 8. Hampstead Garden Suburb, 1968 9. Hampstead Village (Heath Passage), 1994 10. Mill Hill, 1968 11. Monken Hadley, 1968 12. Moss Hall Crescent, 1974 13. Totteridge, 1968 14. Watling Estate, Burnt Oak, 1998 15. Wood Street, Barnet, 1969 16. Glenhill Close, Finchley, 2001
Locally Listed Buildings	<u>Over 1,250</u> 1,221

The National Planning Policy Framework (NPPF) and the London Plan both include policies and regulations to protect Archaeological Priority Areas (APAs) from overdevelopment, particularly with tall buildings.

3.2.21.1 Conserving Heritage - National Planning Policy Framework (NPPF)

The NPPF provides a comprehensive framework for conserving and enhancing the historic environment. Key sections relevant to protecting Archaeological Priority Areas include:

- **Section 16: Conserving and Enhancing the Historic Environment**
 - **Paragraph 189:** This paragraph emphasises the need to identify and assess the significance of any heritage assets that might be affected by a development. It specifically mentions the importance of desk-based assessments and field evaluations for archaeological sites.
 - **Paragraph 194:** It states that any harm to, or loss of, the significance of a designated heritage asset (including archaeological sites) should require clear and convincing justification.
 - **Paragraph 195:** When a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

3.2.21.2 Conserving Heritage - The London Plan

The London Plan includes specific policies aimed at protecting heritage assets, including Archaeological Priority Areas, from inappropriate development. Relevant policies include:

- **Policy HC1: Heritage conservation and growth**
 - **Policy HC1(A):** It requires boroughs to develop and implement local policies that conserve the significance of heritage assets and their settings. This includes identifying and protecting APAs.
 - **Policy HC1(C):** Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- **Policy D9: Tall buildings**
 - **Policy D9(C):** This policy states that proposals for tall buildings should address their visual, functional, environmental, and cumulative impacts, including the potential effect on the significance of heritage assets. It specifically requires an assessment of the impact of tall buildings on the character and heritage significance of areas.
 - **Policy D9(D):** It ensures that tall building locations are carefully managed and that their height, scale, massing, and footprint are appropriate to their context, particularly concerning heritage assets.

3.2.22 The validity of Edgware Growth Area SPD

The Edgware Growth Area SPD 2021 is an expansion of the Barnet local plan 2012. This will be replaced by the new Draft Plan making the SPD document invalid. If the SPD is to provide further guidance, then relevant parts should be included within the development.

3.2.23 Conclusion

We are disappointed that the emphasis is on building dwellings to densities that will be the highest in the UK and exceeds Hong Kong without any thought for the provision of a good environment and public services for residents and the public and excludes any recognition that the existence of Edgware as a town centre is based on the shops and public transport. The existence of Edgware as a shopping centre cannot be relegated to a poor second or not at all.

In conclusion, the proposed Edgware Growth Area policy GSS05 is contentious and raises significant concerns across various dimensions. Key issues include the potential loss of a central community hub with essential services, inadequate provisions for car parking leading to potential accessibility issues, and the fundamental misclassification of Edgware as a Major Town Centre rather than a District Centre. These factors not only threaten the social fabric and convenience of Edgware but also challenge the sustainability and character of the area, contrary to local planning guidelines and community interests. A more inclusive and design-led approach, engaging with the local community, is essential to address these concerns and ensure any future developments align with the true suburban identity and needs of Edgware.

4 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.

MM20 POLICY GSS05 Edgware Growth Area - MM 20

Our proposed modifications are highlighted in red

MM	Original	Proposed modifications	Notes
MM20 Intro	<p>POLICY GSS05 Edgware Growth Area Edgware Town Centre is identified as an opportunity for regeneration and intensification, supported by high existing PTALs reflecting its potential to become an Integrated Transport Hub. The Town Centre can be used far more effectively to support growth and enable the recovery from the Covid-19 pandemic. The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area. <u>To deliver growth and regeneration at Edgware Growth Area, the Council will support proposals which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3), provide infrastructure and jobs, while improving the amenity of the area and the overall offer of the town centre.</u></p>	<p>POLICY GSS05 Edgware Growth Area Edgware Town Centre is identified as an opportunity for regeneration, supported by high existing PTALs reflecting its potential to become an Integrated Transport Hub. The Town Centre can be used far more effectively to support growth and enable the recovery from the Covid-19 pandemic. The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area. <u>To deliver growth and regeneration at Edgware Growth Area, the Council will support proposals through an infrastructure-led approach design-led approach (London Plan Policy D3), provide infrastructure and jobs, while improving the amenity of the area and the overall offer of the town centre.</u></p>	<p>3.1.2 Must adopt Infrastructure first approach instead of design led approach.</p>

<p>MM20</p> <p>A.</p>	<p>A. Level of Development</p> <p>To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:</p> <ul style="list-style-type: none"> a) Approximately 5,000 4,740 new homes, with provision for uplift through the design-led approach b) Improved leisure options such as a new cinema, swimming pool and new eating-out options; c) Appropriate 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. Improved public realm, including new public spaces; d) Transformation of the relationship between the rail and bus stations and the wider town centre to improve the pedestrian experience for <u>pedestrians and cyclists</u> and reduce congestion; 	<p>A. Level of Development</p> <p>To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:</p> <ul style="list-style-type: none"> a) Approximately <u>a maximum 4,740</u> 763 new homes <u>(with a further 122 units deduction for Premier Place)</u> with provision for uplift through the design led approach b) Improved leisure options such as a new cinema, swimming pool and new eating-out options; c) Appropriate location- based floorspace for community, <u>light industrial/creative industries</u> retail and <u>office use and</u> other main town centre uses including office to support the vitality and viability of Edgware Town Centre. <u>Improved public realm, including new public spaces;</u> d) Transformation of the relationship between the rail and bus stations and the wider town centre to improve the experience for pedestrians and cyclists and reduce congestion; 	<p>3.2 Edgware Growth Area and the excessive housing target of 4,740 should be reduced to 763 dwellings</p> <p>with a further 122 units deduction for Premier Place</p> <p>3.1.1 Lack of employment opportunities in GSS05 incompatible with Policy BSS01 Spatial Strategy for Barnet</p> <p>3.2.12 Inadequate car parking spaces impact the viability of Edgware as a Town Centre</p> <p>3.2.10 Site 27 - Lost of Broadwalk Shopping Mall</p>
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<p>e) Retain existing levels of employment and pursue opportunities for new jobs.</p>	<p>e) Retain existing levels of employment and <u>actively pursue and develop</u> opportunities for <u>new additional</u> jobs.</p> <p>f) <u>a enclosed shopping mall at least to the equivalent of Broadwalk shopping centre (11761 sq meters which excludes Sainsburys) and to ensure continuity of trading throughout any construction</u></p> <p>g) <u>car parking provision that will support an increased number of shoppers and visitors as well as making provision for residents of housing development.</u></p> <p>h) <u>any development must comply with the Equality Act 2010 to the satisfaction of organisations representing the 9 protected characteristics.</u></p> <p>i) <u>Excludes Deans Brook Nature Reserve so that it continue its is present state with no public access</u></p> <p>j) <u>The first priority before any development starts will be to improve the main road junctions within Edgware to provide significant improvement.</u></p>	<p>3.2.11 Broadwalk as a Social Hub stated by Barnet Council</p> <p>3.2.12 Inadequate car parking spaces impact the viability of Edgware as a Town Centre</p> <p>3.2.4 Site 28 - Deans Brook Nature Reserve land is unsuitable for development</p> <p>3.1.2 Must adopt Infrastructure first approach instead of design led approach.</p>
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<p>MM20</p> <p>B.</p>	<p>B. Development Proposals and Infrastructure Requirements</p> <p>Development proposals (in accordance with NPPF and CIL Regulations and/or any equivalent relevant legislation or regulations) will be required through detailed design, planning conditions and/or contributions secured through planning obligations / legal agreements to deliver or contribute to the following infrastructure :</p> <ul style="list-style-type: none"> a) Improved flood risk resilience for the Growth Area and surrounding communities with provision of flood risk infrastructure and restored rivers; b) Interchange improvements. 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, and 	<p>B. Development Proposals and Infrastructure Requirements</p> <p>Development proposals (in accordance with NPPF and CIL Regulations and/or any equivalent relevant legislation or regulations) will be required through detailed design, planning conditions and/or contributions secured through planning obligations / legal agreements to deliver or contribute to the following infrastructure :</p> <ul style="list-style-type: none"> a) Improved flood risk resilience for the Growth Area and surrounding communities with provision of flood risk infrastructure and restored rivers; b) Interchange improvements. Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. A new bus station must have facilities that exceed those provided at present. London Underground infrastructure and operations must also be maintained at all times. 	<p>3.2.2 Site 28 - Edgware bus station land is unsuitable for development</p> <p>3.2.18 Open space deficiency in Edgware Town Centre</p>
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MM	Original	Proposed modifications	Notes
	<p>c) <u>Deliver improvements to streets and the public realm, including new public spaces, additional town centre cycle parking and station cycle parking, in line with the Healthy Streets Approach.</u></p>	<p>c) Deliver improvements to streets and the public realm, including new public spaces, additional town centre cycle parking and station cycle parking, in line with the Healthy Streets Approach.</p> <p>d) <u>Public service provision such as school place, nursery places and NHS and social care provision. This should be within 400 meters of the development. Staffing costs for an agreed period should be included.</u></p>	
MM20 C.	<p><u>C. Planning Framework</u> The Council has prepared a more detailed planning framework Supplementary Planning Document for this area, working in conjunction with LB Harrow. <u>This planning framework will help to provide more detailed guidance for the Edgware Growth Area and the development sites within.</u></p>	<p><u>C. Planning Framework</u> The Council has prepared a more detailed planning framework Supplementary Planning Document for this area, working in conjunction with LB Harrow. This planning framework will help to provide more detailed guidance for the Edgware Growth Area and the development sites within.</p>	

MM	Original	Proposed modifications	Notes
MM20 4.18	<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> a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and <u>with extends into</u> a small part <u>extending into</u> of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs and beyond.</p>	<p>4.18 Edgware Growth Area</p> <p>4.18.1 Edgware has evolved from a small market town into a thriving major town centre and has become a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and with a small part extending into of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs and beyond.</p>	<p>The Map 3C did not include Harrow therefore, can't have Harrow included here.</p>

MM	Original	Proposed modifications	Notes
MM20 4.18.4	<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 Growth Strategy</u> as one of Barnet's main town centres; a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres. <u>To deliver growth and regeneration in Edgware Town Centre, the Council will support proposals which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3). This should include taking account of the relationship with the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area to ensure accordance with Policy CDH08.</u></p>	<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 Growth Strategy</u> as a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres. To deliver growth and regeneration <u>of</u> Edgware Town Centre, the Council will support proposals <u>which optimise the use of land and site capacity</u> through a design-led approach (London Plan Policy D3). <u>This should include taking account of the relationship with the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area and Canons Park Estate Conservation Area, Edgware to ensure accordance with Policy CDH08.</u></p>	<p>3.2.8 Edgware was wrongly classified as a Major Town Centre in a Central setting</p> <p>3.2.19 Risk to Edgware's Heritage in Barnet and Harrow</p> <p>3.2.20 Risk to adjacent Conservation Area</p>

MM	Original	Proposed modifications	Notes
MM20 4.18.9A	<p>4.18.9A <u>Edgware Town Centre is in effect surrounded by floodplains particularly on the eastern and southern boundaries by the Edgwarebury Brook, Deans Brook and Edgware Brook flowing into the Silk Stream. There are also two confluences with the Edgwarebury Brook and Deans Brook joining south of Brook Avenue and the Edgware Brook meeting the Deans Brook south of Deansbrook Road. Given these key features development proposals should aim to achieve a reduction in flood risk from all sources, river restoration and enhancement and the improvement of or planning contributions towards strategic flood infrastructure where necessary.</u></p>	<p>4.18.9A <u>Edgware Town Centre is in effect surrounded by floodplains particularly on the eastern and southern boundaries by the Edgwarebury Brook, Deans Brook and Edgware Brook flowing into the Silk Stream. There are also two confluences with the Edgwarebury Brook and Deans Brook joining south of Brook Avenue and the Edgware Brook meeting the Deans Brook south of Deansbrook Road. Given these key features development proposals must achieve a reduction in flood risk from all sources, river restoration and enhancement and the improvement of or planning contributions towards strategic flood infrastructure where necessary.</u></p>	<p>3.2.5 Site 28's Flood risk</p>

MM	Original	Proposed modifications	Notes
MM20 4.18.12	<p>4.18.12 <u>In order for Edgware to become an integrated transport hub, bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment.</u> London Underground infrastructure and operations must also be maintained. While the public transport linkages are good, the bus and rail stations integration with the town centre and surrounding areas could be improved. The bus access in particular conflicts with pedestrians. The public realm is generally poor, being crowded, clustered and noisy. There is very limited public outdoor space for sitting or socialising. <u>There is a need to transform the relationship between the rail and bus stations and the wider town centre to improve the experience for pedestrians and cyclists and reduce congestion in line with the Healthy Streets Approach.</u></p>	<p>4.18.12 In order for Edgware to continue as an integrated transport hub, 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 at all times. While the public transport linkages are good, the bus and rail stations integration with the town centre and surrounding areas could be improved. The bus access in particular conflicts with pedestrians. The public realm is generally poor, being crowded, clustered and noisy. There is very limited public outdoor space for sitting or socialising. There is a need to transform the relationship between the rail and bus stations and the wider town centre to improve the experience for pedestrians and cyclists and reduce congestion in line with the Healthy Streets Approach.</p>	<p>3.2.2 Site 28 - Edgware bus station land is unsuitable for development</p> <p>3.1.2 Must adopt Infrastructure first approach instead of design led approach.</p>

MM	Original	Proposed modifications	Notes
MM20 4.18.13		<p><u>Statement of common understanding April 2023 Between Barnet council and Ballymore Ltd and TFL includes indicative dwellings of 2,379 for site 27 and 2,316 for site 28. The submission of Save our Edgware is that there is a wrong application of the Central setting using the Density Matrix of the London Plan 2016. We have submitted our reasons why Site 28 should have zero housing and site 27 to have a reduced number of 763. Therefore we submit that the Statement of common standing is no longer valid and should be withdrawn.</u></p>	<p><u>Statement of common understanding April 2023 Between Barnet council and Ballymore Ltd and TFL</u> should be withdrawn.</p>

5 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 Anuta Zack on behalf of Save Our Edgware Date 18 June 2024

Signature Tony Allan on behalf of Edgware Community Association
Date 18 June 2024

6 Appendix: Original Main Modifications

6.1 Policy GSS05 Edgware Growth Area

<p>M M 20</p>	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSS05 And consequential changes to supporting text</p> <p>Para 4.18.1, 4.18.4 & 4.18.9A</p>		<p>Clarification that Council supports proposals that optimise residential density on suitable sites in accordance with design-led approach,</p> <p>Clarification that Council is seeking approximately '4,740 new homes with any uplifts as part of design-led approach. This includes removal of windfall expectations given constrained capacity beyond planning permissions and proposed allocations.</p> <p>Clarification of support for proposals that address location-based requirements for appropriate floorspace for community, retail, other main town centre uses, including offices, that are proportionate to supporting the proposed housing growth and the viability and vitality of the Town Centre.</p> <p>Clarification that development ensures improved flood risk resilience for Growth Areas and surrounding communities with</p>
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POLICY GSS05 Edgware Growth Area

Edgware Town Centre is identified as an opportunity for regeneration and intensification, supported by high existing PTALs reflecting its potential to become an Integrated Transport Hub. ~~The Town Centre can be used far more effectively to support growth and enable the recovery from the Covid-19 pandemic. The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area.~~ To deliver growth and regeneration at Edgware Growth Area, the Council will support proposals which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3), provide infrastructure and jobs, while improving the amenity of the area and the overall offer of the town centre.

A. Level of Development

To deliver growth and regeneration ~~at Edgware Town Centre~~, the Council will seek the following from development proposals:

- k) Approximately 5,000 4,740 new homes, with provision for uplift through the design-led approach
- l) Improved leisure options such as a new cinema, swimming pool and new eating-out options;
- m) Appropriate 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. ~~Improved public realm, including new public spaces;~~
- n) Transformation of the relationship between the rail and bus stations and the wider town centre to improve the pedestrian experience for pedestrians and cyclists and reduce congestion;
- o) Retain existing levels of employment and pursue opportunities for new jobs.

B. Development Proposals and Infrastructure Requirements

provision of flood risk infrastructure and restored rivers.

Clarification on requirements of Strategic Transport Plan relating to maintaining operations associated with rail and bus stations.

Clarification of requirement to improve experience of and linkages for pedestrians and cyclists, together with new requirement to deliver improvements to the streets and public realm in line with Healthy Streets Approach.

Clarification on relationship with Policy CDH08

Development proposals (in accordance with NPPF and CIL Regulations and/or any equivalent relevant legislation or regulations) will be required through detailed design, planning conditions and/ or contributions secured through planning obligations / legal agreements to deliver or contribute to the following infrastructure :

- e) Improved flood risk resilience for the Growth Area and surrounding communities with provision of flood risk infrastructure and restored rivers;
- f) Interchange improvements. 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, and
- g) Deliver improvements to streets and the public realm, including new public spaces, additional town centre cycle parking and station cycle parking, in line with the Healthy Streets Approach.

C. Planning Framework

The Council has prepared a more detailed planning framework Supplementary Planning Document for this area, working in conjunction with LB Harrow. This planning framework will help to provide more detailed guidance for the Edgware Growth Area and the development sites within.

4.18 Edgware Growth Area

4.18.1 Edgware has evolved from a small market town into a **major town centre** and has become a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and with extends into a small part extending into of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs and beyond.

4.18.4 Edgware is identified in the **London Plan town centres hierarchy as Barnet's only Major Centre and is also highlighted in the Growth Strategy** as ~~one of Barnet's main town centres~~, a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres. To deliver growth and regeneration in Edgware Town Centre, the Council will support proposals which optimise the use of land and site capacity through a design-led approach (London Plan Policy D3). This should include taking account of the relationship with the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area to ensure accordance with Policy CDH08.

4.18.9A **Edgware Town Centre is in effect surrounded by floodplains particularly on the eastern and southern boundaries by the Edgwarebury Brook,** Deans Brook and Edgware Brook flowing into the Silk Stream. There are also two confluences with the Edgwarebury Brook and Deans Brook joining south of Brook Avenue and the Edgware Brook meeting the Deans Brook south of Deansbrook Road. Given these key features development proposals should aim to achieve a reduction in flood risk from all sources, river restoration and enhancement and the improvement of or planning contributions towards strategic flood infrastructure where necessary.

4.18.12 In order for Edgware to become an integrated transport hub, 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. While the public transport linkages are good, the bus and rail stations integration with the town centre and surrounding areas could be improved. The bus access in particular conflicts with pedestrians. The public realm is generally poor, being crowded, clustered and noisy. There is very limited public outdoor space for sitting or socialising. There is a need to transform the relationship between the rail and bus stations and the wider town centre to improve the experience for pedestrians and cyclists and reduce congestion in line with the Healthy Streets Approach.

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(For official use only)

Site 27 Edgware Town Centre - MM108

Save Our Edgware and Edgware Community Association’s representation relating to Main Modifications 108 concerning the selection of Site 27 Edgware Town Centre



Preserving Edgware
Building Tomorrow Together



1 Question 1: To which Main Modification does your representation relate?.....4

2 Question 2: Do you consider that the Main Modification is:.....4

3 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.).....5

 3.1 Summary: Site 27 housing target should be reduced from 2,379 to an indicative 763 homes.....5

 3.1.1 Lost of Broadwalk Shopping Mall..... 8

 3.1.2 Broadwalk as a Social Hub stated by Barnet Council..... 8

 3.1.3 Inadequate car parking spaces impact the viability of Edgware as a Town

Centre.....	9
3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting..	10
3.1.4.1 Edgware was wrongly classified as a Major Town Centre rather than a District Town Centre.....	10
3.1.4.2 Classification as a Central Area vs. Suburban Area.....	11
3.1.5 Indicative residential capacity should be reduced to 763.....	13
3.1.6 Edgware’s Suburban character is indisputable.....	17
3.1.6.1 Edgware’s suburban character.....	17
3.1.6.2 Barnet’s Characterisation Study confirms Edgware’s suburban character... 18	
3.1.6.3 Edgware Town Centre’s Character.....	20
3.1.6.4 The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware.....	21
3.1.6.5 Contradictions Between Proposed Overdevelopment and Edgware’s Character.....	21
3.1.7 A design led approach with the community was not followed to create the Edgware policy.....	22
3.1.8 The proposed design does not fit into the local neighbourhood.....	23
3.1.8.1 Contradict to the sustainability policy of the London Plan.....	24
3.1.9 The Edgware policy of overdevelopment has not followed many of the regulations for tall buildings.....	24
3.1.10 High-rise estates will cause loss of privacy and shadowing of neighbourhoods. 25	
3.1.11 Tall buildings are discriminatory to folks observing sabbath.....	25
3.1.12 Open space deficiency in Edgware Town Centre.....	26
3.1.12.1 Must follow Barnet’s own Open Space Policies in the Local Plan.....	26
3.1.12.2 Open space deficiency in Edgware Town Centre.....	27
3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre.....	30
3.1.12.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents.....	30
3.1.12.5 Open Space must be close to Edgware Town Centre:.....	31
3.1.12.6 Open Space must be for Edgware Residents.....	31
3.1.13 Reduced Biodiversity - real threat to protected species living in the Deansbrook Nature Reserve.....	31
3.1.13.1 Non compliance to Policies regarding protected wildlife such as Bats... 33	
3.1.14 Risk to Edgware’s Heritage in Barnet and Harrow.....	38
3.1.15 Risk to adjacent Conservation Area.....	41
3.1.16 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas.....	42
3.1.16.1 National Planning Policy Framework (NPPF).....	44
3.1.16.2 The London Plan.....	44
3.1.17 The validity of Edgware Growth Area SPD.....	44
3.1.18 Must adopt Infrastructure first approach instead of design led approach.....	45
3.1.19 Conclusion.....	46
3.2 References.....	46

4 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.)	50
4.1 Proposed Modification table.....	51
5 Declaration of consent	61
6 Appendix: Original Main Modification 108 - Site 27 - Edgware Town Centre	62
6.1 Map 3C Edgware Growth Area.....	68

Representations Form

PART B - Your representation

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

1 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 ___108 Edgware Town Centre_ ([to read MM108 click here](#)) _____

Policy ___Related to GSS05_____ Paragraph ___All_____

Figure/Table _____ Policies Map change _____

2 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"/> |

3 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.

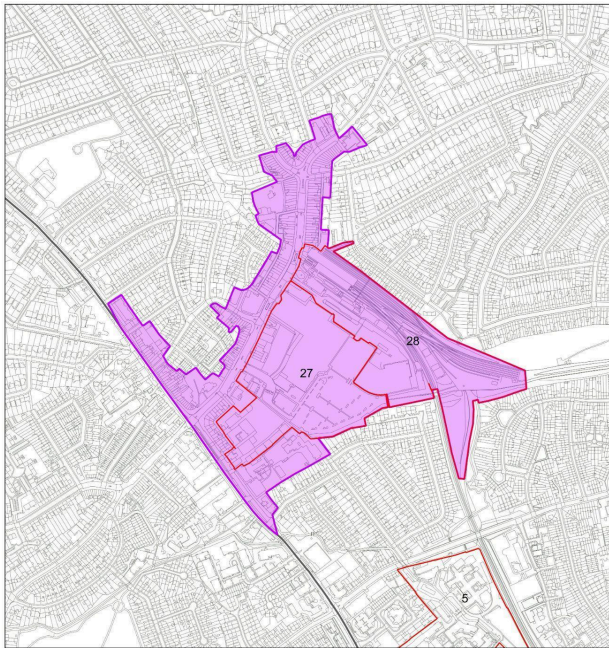
Continue on a separate sheet if necessary

3.1 Summary: Site 27 housing target should be reduced from 2,379 to an indicative 763 homes

In the Local Plan, Edgware Growth Area (GSS05), 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)

We feel that it should be reduced to an indicative 763 dwellings.

The allocation of 2,379 dwellings for site 27 is unsound for the following reasons:

1. Misclassification of Edgware:

- Edgware is classified as Barnet's only Major Town in a Central area according to the London Plan. However, it is argued that Edgware's character should be Suburban rather than Central. Therefore, Edgware should be classified as a District Town in a Suburban area.

2. Excessive Housing Density for Site 27:

- The housing target of 2,379 for Site 27 (Edgware Town Centre) is deemed unsound. The target is based on an inappropriate Central Density of 405 units/ha. Instead, a Suburban density of 130 units/ha should be applied, reducing the housing target to 763 homes. Thus, the overall housing target for the Edgware Growth Area should be 763 homes, not 4,740.

3. Open Space Deficiency:

- Edgware has a recognized lack of open spaces, and the area has been losing open spaces over the years. The proposed development

exacerbates this issue, failing to meet the open space standards required for residential developments, thereby impacting residents' wellbeing and mental health.

4. Destruction of Broadwalk Shopping Mall:

- Broadwalk Shopping Mall is a well-used, essential social hub for Edgware. Its demolition would destroy the heart of Edgware, negatively impacting local commerce and community activities.

5. Invalidation of the SPD:

- The Edgware Growth Area SPD 2021 expands on the Barnet Local Plan 2012, which is set to be replaced by the new draft plan. More over Harrow part of the SPD has been removed as described in MM21. This renders the SPD potentially invalid.

6. Edgware's Suburban Character:

- The proposal does not align with Edgware's low-density suburban character and identity. Edgware's history and development have been characterised by low-density residential estates comprising mainly of semi-detached and detached private housing. The suburban character is further recognized in the Characterisation Study of Barnet, which identifies Edgware's primary urban typologies as "residential streets" and "suburban." The study emphasises the low density and architectural coherence of suburban streets in Edgware, which the proposed high-density development contradicts.

7. Contradiction to London Plan's Vision:

- The proposed high-density development contradicts the London Plan's vision to conserve and enhance London's distinctive character and heritage (section GG1; 1.2.7). It fails to align with Edgware's suburban character and infrastructure capacity (Policy SD1; 2.1.3). The London Plan's Policy D1 (parts A and B) about London's form, character, and capacity for growth should conclude that Edgware is not suitable for such high-density regeneration.

8. Disregard of Resident/Public Opinion:

- There has been strong opposition from residents and the public against the proposed high-density development. Ignoring this opposition contradicts Policy D1; B; 3.1.3 of the London Plan, which emphasises involving a wide range of people in area assessments.

9. Incompatibility with Car Use:

- The design and layout of the proposed development aim to reduce the dominance of cars (Policy D3; 3.3.16). However, Edgware's low-density, suburban nature, which promotes car use, contradicts this policy. The Characterisation Study of Barnet acknowledges the importance of car use in the suburbs.

10. Misleading "Design-Led Approach":

- The term "design-led approach" in Policy D3 is misleading, as it suggests optimising site capacity based on inappropriate area assessments. The proposed development does not enhance local context or respect Edgware's distinctive suburban character (Policy D3; D (1)).

11. Contradictory Policy on Office Space:

- The policy is contradictory regarding office space, as Edgware has seen a reduction in purpose-designed office space, with most blocks

converted to residential use. The correlation between new homes and office space is invalid.

12. Infrastructure Requirements:

- Development proposals should deliver or contribute to improved flood risk resilience, bus and underground station operations, and public realm improvements, which are not adequately addressed in the proposed development.

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>

3.1.1 Lost of Broadwalk Shopping Mall

Broadwalk is an enclosed shopping mall with 36 Shops of 190,000 sq feet (17,652 sq metres) which includes Sainsburys (5,890 sq metres). In addition, there are toilets, Costa coffee shop, several stalls, and seating ("[Broadwalk Centre Sales Brochure](#)"). The NHS has had a stand for health checks. Broadwalk is a well used, warm, welcoming social hub.

The retail floorspace of any new development shall be at least as big as the present Broadwalk retail floorspace of 11,761 sq metres (which excludes Sainsburys) within a covered shopping mall at least equalling the present provision.

"Footfall at the centre currently stands at **six million people per annum**" ("[Broadwalk Centre Sales Brochure](#)"). Broadwalk is the heart of Edgware and the demolition of Broadwalk will totally destroy Edgware as a centre.

3.1.2 Broadwalk as a Social Hub stated by Barnet Council

The Broadwalk is a social hub "those that use the shopping centre on the basis that this could be groups that meet there, users of the retail and other facilities or charities etc." (source: FOI Request For Quote For Equality Impact Assessment: Edgware Broadwalk Shopping Centre Redevelopment, October 2023, Barnet Council)

If Broadwalk is to be demolished with comparable replacement, this will be to the detriment of the enjoyment of people with 9 protected characteristics and this would be a non compliance of the Public Sector Equality Duty, Equality Act 2010. Hence Barnet Council must ensure that there is no detriment.



3.1.3 Inadequate car parking spaces impact the viability of Edgware as a Town Centre

Car ownership across Barnet is high when compared to other London boroughs. This reflects the area's low density suburban and rural character. By its nature this promotes car use, with spacious streets and easy parking. At the same time the urban sprawl also requires car use... (Characterisation Study of Barnet Sections 1&2; page 36).

Ballymore's development plan is an example of the implementation of the Edgware Policy GSS05. A total of 769 car parking spaces have been allocated in Ballymore's plan, including 425 for residents and 344 for public parking. This is much lower than current spaces of 250 long stay commuter spaces, and 900+ short stay public parking. Additionally, no parking space has been allocated to Islamic Centre on Edgware High Street, and has been allocated a large number of spaces as a condition of its planning permission.

The car park is the only car park serving Edgware town centre. It is not a car park ripe for development. In summary the allocation of 1,350 car parking is

going to be reduced to 344; just a 25% allocation of current spaces. There is far from enough car parking for current visitors to Edgware, let alone attracting visitors from further afield. The developers need to be realistic. When people are doing their weekly shopping they come by car as many shoppers are unable to carry multiple heavy shopping baskets onto buses or trains. Many of the shoppers will be elderly or have vulnerabilities or are within the 9 protected characteristics covered by PSED and hence this severe reduction of the number of car parking spaces will cause detriment. And will mean that there will be no compliance with PSED. This is not acceptable.

Also, when visitors come from further away most of them will come by car! In summary this means there will be fewer people visiting Edgware, and the reduced footfall will impact the income for retails therefore impact the viability of Edgware as a Town Centre.

Reduction of parking spaces in Edgware Town will definitely cause a spillage onto neighbouring areas. This has already been noticed with residents of Premier House/ Premier Parade and Edgware Parade still owning cars and parking in neighbouring streets including those in Harrow. This problem will be exacerbated with the reduction of the visitors and commuter car parking spaces in the future.

Section 7 of SPD, on Transport and Movement Guide, indicates in para 7.8 that "The long-stay commuter off-street parking is used to capacity".

In MM109, Site 28 Edgware Underground and Bus Station section, the Local Plan states that "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."

This means that the commuter car park will be removed for Edgware Station. No proposals have been made about extra public transport provision.

3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting

3.1.4.1 Edgware was wrongly classified as a Major Town Centre rather than a District Town 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.

3.1.4.2 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 setting 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.

For full detail, please check out our representation: [Save Our Edgware Representation on Edgware as Major Town Rebuttal](#)
(Ref:SOE-Objection03-MajorCentre)

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

3.1.5 Indicative residential capacity should be reduced to 763

Site 27 includes the Broadwalk Centre and the Forumside with a total size of **7.83 ha**. ([Exam 25 - LBB Note - Development Framework](#))

The allocation of 2,378 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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2,378 units are derived from 7.83 hectares land x 405 housing units/hectare x 75% 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 indicative residential capacity in the Local Plan was calculated using the Central setting at the highest density using section 16.2 of the Local Plan below.

“16.2 Assessing Indicative Residential Capacity of Sites

16.2.1 For the purposes of the Local Plan, site capacity assessment has been based on the site size and the public transport accessibility level (PTAL), which is used to determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings.

16.2.2 A density matrix approach to calculate indicative residential capacity has been utilised in order to provide sufficient accuracy in terms of indicative numbers at the plan-making stage. This provides a good basis for a more detailed design led approach as proposals near the planning application stage.”

...
Figure 1: The Density Matrix

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

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- **central** – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 m walking distance of a Metropolitan or Major town centre.
- **urban** – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 m walking distance of a district centre or, along main arterial routes
 - **suburban** – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.”

We would expect that the detailed design approach will have due regard to the nature of the surrounding suburban area which would well lead to a reduced number of dwelling

However, as we have shown in our Representation(on Edgware being wrongly classified as being Central setting and is a Major Town) that this central definition has been wrongly applied.

Edgware should be classified as a District Town in a Suburban area. The Suburban density should be applied. Using the highest Suburban density of 130 units / ha, the indicative residential capacity should be 763 dwellings with 527 in the Broadwalk area and 237 for the rest. 122 units must be deducted for Premier Place.

	Hectares	x Suburban density 70 to 130 Units/Ha for PTAL 4-6	Houses x 75% residential / commercial mix
Broadwalk (Shopping Centre + Car Park + Ex Argos)	5.40	130	527
Forumside area and land next to the Forumside	2.43	130	237
Total	7.83	130	763

The number of dwellings should be calculated taking into account that Edgware is a suburban area. There is little spare capacity for extra school and nursery places within the agreed catchment area, the requirement to provide open space and play space and biodiversity sewerage, water supply. The requirements of public safety and those relating to the 9 protected categories must be taken into account .

This 763 indicative residential capacity is in line with other District Town Centres in Barnet:

POLICY GSS08 Barnet's District Town Centres

A “d) In the context of the above, Barnet's District Town Centres (excluding Cricklewood) have capacity to deliver approximately 5,100 new homes between 2021 and 2036 with provision for uplift through the design-led approach. Capacity has been identified at the following District Centres :

- Brent Street - 260 new homes
- Burnt Oak - 160 new homes
- Chipping Barnet - 530 new homes
- East Finchley - 220 new homes
- Finchley Central Church End - 820 new homes
- Hendon Central - 120 new homes
- Mill Hill - 50 new homes
- New Barnet - 1,100 new homes
- North Finchley - 820 new homes
- Whetstone - 1,020 new homes.”

3.1.6 Edgware’s Suburban character is indisputable

3.1.6.1 Edgware’s suburban character

Edgware is typical of much of the suburban development constructed at the early part of the last century with its characteristic low density residential estates comprising mainly of semi and detached private housing and served by local commercial high streets. The new suburbs represented a new utopian vision of urban development, offering a standard of living and level of amenity few had enjoyed before.

Indeed, the railway companies serving the new suburbs promoted the new developments as suburban idylls and rural paradises as clearly shown in London Underground posters of that era. This change in vision for urban development came about through a desire to see a better and brighter England and London after the first World War. This desire led to the creation of the Town Planning Act 1909 which wanted to end the era of “back-to-back” terraced housing and introduce legal standards for housing. This was followed by the Housing and Town Planning Act 1919 which was to prove seismic for the future of urban development. The idea of town planning grew in popularity at the start of the last century and was inspired by the Garden City concept. The above proves Edgware’s character/identity. It also demonstrates how standards of urban design and quality of living are going backwards.

3.1.6.2 Barnet's Characterisation Study confirms Edgware's suburban character

Edgware's suburban character is further recognized in the Characterisation Study of Barnet Sections 1-6. In this study, Edgware is shown as having two main primary urban typologies, "residential streets" and "box" (Section 3; page 59).

In addition to the latter, Edgware is also classed as having a secondary urban typology, "suburban" (Section 3; page 70). The study clearly recognises Edgware's suburban identity, "The defining physical characteristic of suburban streets is the low density coupled with an overall level of architectural coherence" (Section 3; page 70).

Regarding the residential streets primary typology, the suburban nature of Barnet is further reinforced, "Conventional residential streets are the predominant form of development in Barnet" (Section 3; page 56). In the same study but Sections 1&2 it states, "the council seeks to safeguard the suburban nature of the borough" (Sections 1&2; page 4). The proposal for Edgware contradicts this statement.

Character description

This character area is overwhelmingly residential in character, with most of the area made up of inter war development of semi-detached housing on linear residential streets. The area includes two linear shopping streets (core typology) at Station Road (Edgware) and Mill Hill Broadway, as well as small pockets of residential estate, big box and campus typologies.



Hazel Gardens is a typical suburban residential street type in the Edgware and Burnt Oak character area

C - SUBURBAN

Introduction

The defining physical characteristic of suburban streets is the low density coupled with an overall level of architectural coherence. The majority of suburban streets in Barnet are lined with houses built during the interwar period. This was a time of rapid growth in Barnet and it is the period of development which most strongly typifies the Borough. Many streets benefit from a strong sense of architectural consistency and coherence, as houses typically have been built to very similar specifications, often by a single developer. Additionally this secondary typology can be distinguished by its large street space widths and lack of enclosure.

Density

The density of suburban streets is a marked increase from both linear rural streets and suburban periphery streets, ranging from 20 – 30 dwellings per hectare.

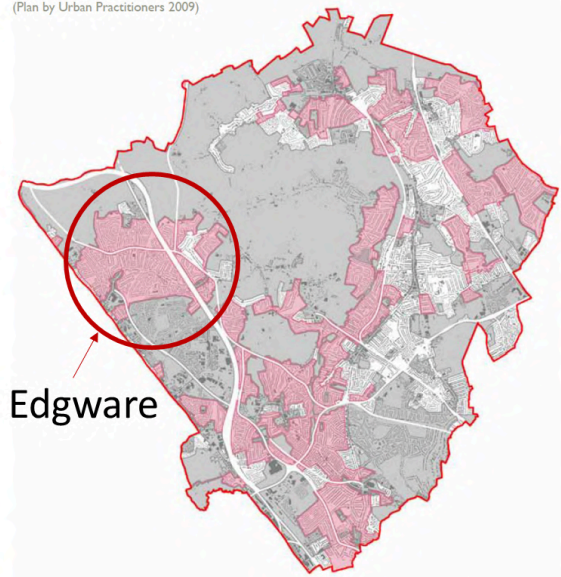
Building Types and Units

Suburban streets are lined with both detached and semi detached houses. Building heights are predominantly two storeys, with the occasional three storey house where conversions have occurred.

Enclosure

As oppose to linear rural and suburban periphery streets where carriageways and street space is primarily enclosed by vegetation, building fronts provide almost all enclosure on suburban streets. Street widths tend to vary between 12 – 18 metres, as pavements are often generously wide. Suburban streets contain an array of detached or semi detached houses in very close proximity to one another. Typically, building fronts remain well set back from the plot edge, as distances range from 5 – 14 metres. Consequently, suburban streets can often accommodate a significant amount of on plot parking.

Suburban Streets (Plan by Urban Practitioners 2009)



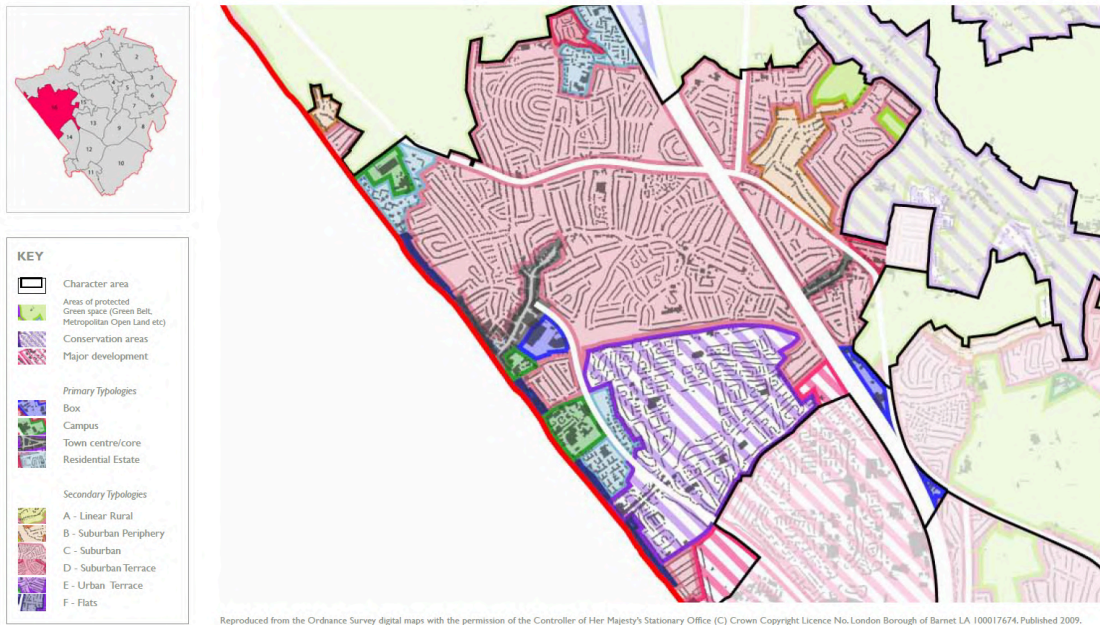
Edgware

Reproduced from the Ordnance Survey digital maps with the permission of the Controller of Her Majesty's Stationary Office (C) Crown Copyright Licence No. London Borough of Barnet LA 100017674. Published 2009.



The majority of front gardens have been converted hard standing surfaces to accommodate car parking

EDGWARE AND BURNT OAK



Barnet Characterisation Study | Final Report | May 2010

125



3.1.6.3 Edgware Town Centre's Character

Regarding the primary urban typologies described for Edgware, the Primary Typologies Plan (2009) appears to identify the Broadwalk shopping centre area as conforming to “box” typology. This typology, while technically correct when set against the criteria of the Characterisation Study of Barnet, does not appear to reflect the true nature of Edgware town centre. It should correspond more with the typologies of “cores and town centres,” and “residential streets.” The addition of the Broadwalk shopping centre in the 1980’s was a drastic change to the urban morphology of the town centre which effectively killed off the traditional commercial streets.

The addition of a shopping centre to Edgware was ill conceived and is totally disproportionate to the size and population of Edgware. No other similar size town

centre in Barnet, like Finchley, has this level of retail capacity. The same can be said of towns in the neighbouring borough of Harrow such as, Pinner.

3.1.6.4 The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware

The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware and should not be used as justification for intense development. The conclusion of the Characterisation Study states, “The prevailing scale and massing should be protected in areas where there is consistent character” (Sections 4&5; paragraph 3). Over the last several decades Edgware, as well as much of the rest of Barnet borough, has seen a deliberate “denuding” of original character and heritage, to varying degrees, especially Colindale. This process must be stopped and reversed and not used as an excuse for claiming an area to be without character. This doesn’t alter the fact that the outer London suburbs are low-density areas.

3.1.6.5 Contradictions Between Proposed Overdevelopment and Edgware’s Character

The scale of the overdevelopment proposed is the complete opposite of Edgware’s identity and character. The nature and history of London’s new outer suburbs, including Edgware, shows very clearly that the suburbs were planned as low density residential urban developments and hope to demonstrate this further on.

The assessment metrics and criteria used for determining the kind of development in Edgware is primarily growth driven, as reflected in the “Good Growth” vision set in the London Plan. Policy D1 (parts A and B) of the London Plan regarding London’s form, character and capacity for growth should readily conclude that Edgware is not suitable for the kind of development being proposed.

The development being proposed is not regeneration, and should not be described as such, but is in fact overdevelopment dressed up as regeneration. In this respect, the London Plan is substantially flawed as can be seen from the following sections and policies: -

- *“London’s **distinctive character and heritage** is why many people want to come to the city. London’s heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced” (section GG1; 1.2.7). The proposed high-density development contradicts this statement.*

- *“The approach should include **understanding the existing character and context of an area**, in accordance with Policy D1 London’s form, character and capacity for growth” (Policy SD1; 2.1.3). The proposed high-density development contradicts this policy as Edgware’s capacity for growth must align with its low-density suburban character and current infrastructure.*
- *“**Development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings**” (Policy HC1 (C)). The proposed high-density development does not conserve the suburban heritage and character of Edgware, making it unsuitable.*
- *“urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density” (Policy D1; A; 3)). Again, the proposal does not respect the suburban heritage of Edgware.*

Perhaps the biggest concern with the proposal is the total disregard of resident/public opinion which has voiced strong opposition to the proposed high-density development. This is in contradiction to the London Plan:

“It is important to understand how places are perceived, experienced and valued. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people” (Policy D1; B; 3.1.3).

If anything, any “growth” element of future regeneration should be strictly limited as reflected in the London Plan, *“Area assessments should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements” (Policy D1; 3.1.4).*

3.1.7 A design led approach with the community was not followed to create the Edgware policy

The National Planning Policy Framework 2023: indicates that the local community should be engaged in doing design, and as early as possible.

The National Model Design Code, Part 2: indicates When preparing design codes, communities need to be involved at each stage of the process. The community involves all people living and working in and around the area for which the code is being produced together with local interest groups, stakeholders and elected representatives.

The London Plan 2021, Policy D5 Inclusive design stipulates: A Borough, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.

The London Plan 2021, Policy D9 Tall buildings, states Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

The Barnet Local Plan states that whilst tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered so as not to detract from the nature of surrounding places and the quality of life for those living and working around them. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure.

The Edgware Policy in the Local Plan is being imposed on the local community, without engaging with the community to define an inclusive mutually agreeable design. Leading on from the above the community has not been involved in defining any design code for the Edgware Growth Area Policy. In fact, we have had no visibility of a design code, if one exists, bar a single photo of some of the locations in Edgware.

We expect the design code should include meaningful community involvement and should take account of the surroundings of any development. Until a new design code is approved, it's is logical that no major a planning application such as Ballymore Ltd/ TFL can be properly assessed.

3.1.8 The proposed design does not fit into the local neighbourhood

The London Plan 2021, Policy D3 Optimising site capacity through the design-led approach: states that the Quality and Character of the design should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

The London Plan 2021, Policy D6 Housing quality and standards: indicates that the built form, massing and height of the development should be appropriate for the surrounding context.

The proposed design not meet the high-quality design and sensitive approach outlined in **Edgware Local Area SPD** Principle 4

Edgware is identified by **Barnet's Local Plan** as a tall buildings' location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys, subject to exceptional design quality and demonstrating that the scheme meets criteria such as integrating with the existing urban fabric, and ensuring no adverse microclimate impact relating to wind or daylight. The proposed

design is not an exceptional quality design and does NOT integrate with the existing urban fabric. It is not designed sympathetically to the locale nor are they in keeping with the character of the area.

3.1.8.1 Contradict to the sustainability policy of the London Plan

The Edgware Growth Area Policy is also a contradiction to the sustainability values aspired by the Local and London Plans. The so called, “good growth” vision for London doesn’t suddenly reduce the impact of development growth on the environment. Growth, whichever way it’s dressed up (especially the scale being proposed for Edgware and elsewhere), is still growth and it comes with a hefty price tag to both the natural environment (pollution and scarring of the environment) and the quality of life in our towns.

Policy D3 3.3.10 of the London Plan expresses the aim to **minimise the use of new materials**. To be very clear, most construction projects require a substantial proportion of new materials. Add to this the embedded energy required for extraction and processing of the materials before it even gets to a project site. The frequent use of terms such as, sustainable, renewables, low carbon, zero carbon, low energy, etc are misleading.

3.1.9 The Edgware policy of overdevelopment has not followed many of the regulations for tall buildings

The Edgware Policy of overdevelopment is contrary to **Barnet Tall Building update 2019**, Page 31, only identifies the opportunities areas of Colindale/Burnt Oak and Cricklewood/Brent Cross as having potential for very tall buildings. This also indicated Edgware is only suitable for buildings in the range of 6-14 stories.

The Edgware Policy (GSS05) does not abide by **Barnet’s Policy DM05** since

- A. There is no successful integration into existing urban fabric
- B. There is adverse impact on local viewing corridors, local views and the skyline
- C. c) It does cause harm to heritage assets and their settings
- D. d) there will be potential for adverse microclimate effects which will affect existing levels of comfort in the public realm e) the high-rise estate will NOT make a positive contribution to the townscape.

The London Plan 2021, Policy D9 Tall buildings,

a) emphasises that proposals for tall buildings should address the visual, functional and environmental impacts of such structures. Regard should also be made to Historic England’s guidance on tall buildings.

b) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that

there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area. The Edgware Policy of overdevelopment does not contribute to the character of the area, alternatives have not been explored and will have an adverse visual, functional and environmental impact.

The Edgware Local Area SPD Indicates that the height and massing of buildings should be modest and not overshadow or cause loss of privacy to neighbouring residential streets, and especially Brook Avenue, Parkfield Close and Fairfield Crescent. The Edgware Policy of overdevelopment totally ignores these stipulations. See our video to visualise the impact of such as policy for Edgware <https://www.youtube.com/watch?v=thqgysBG42U>.

The London Plan 2021, Policy D9 Tall buildings states - it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building. The area does not have the capacity to accommodate such a large influx of new residents and new visitors. After repeated requests, we have not received any modelling analysis done to estimate the expected additional load on public transport. There are no plans to increase the capacity of Edgware TFL Station until 2040. The removal of the bus terminal will cause chaos and congestion as bus stops all along Station Road. The reduced number of car parking spaces will mean that neighbouring streets will get congested, with new residents, commuters, shoppers and visitors from far afield parking here. This will also place extra strain on bus services and taxis.

3.1.10 High-rise estates will cause loss of privacy and shadowing of neighbourhoods

The **Edgware Local Area SPD** paragraph 5.20 Indicates that the height and massing of buildings should be modest and not overshadow or cause loss of privacy to neighbouring residential streets, and especially Brook Avenue, Parkfield Close and Fairfield Crescent. The Edgware Policy of overdevelopment totally ignores these stipulations. The tall buildings will cast long shadows over neighbouring areas, leading to significant reduction of natural light for both residents within the towers and those in surrounding properties. These will be particularly worse in the winter months. Additionally, the new development will obstruct views that existing residents once enjoyed, leading to dissatisfaction and potential conflicts.

3.1.11 Tall buildings are discriminatory to folks observing sabbath

Jewish & Christian citizens practising Sabbath will not be able to use lifts or are able to take the stairs, given the height of buildings. Since around 30% of the local population is Jewish, a fair proportion of the population is indirectly being discriminated against by the high-rise development.

3.1.12 Open space deficiency in Edgware Town Centre

3.1.12.1 Must follow Barnet's own Open Space Policies in the Local Plan

Barnet has an Open Space standard in the London Plan. Edgware development area must follow this standard.

“Policy ECC04 –Barnet’s Parks and Open Spaces

A. ...

B. b)- The Council will meet increased demand for access to open space and opportunities for physical activity, by protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:

i: a) development proposals should make provision for securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:

- **Parks: 1.63ha per 1000 residents**
- **Natural Green Spaces¹: 2.05ha per 1000 residents**
- **Playing pitches: 0.75ha per 1000 residents.**
- **Play and informal recreation: as set out by London Plan Policy S4**
~~provision for children’s play, sports facilities and better access arrangement”~~

Also in Barnet council responded to an FOI request on what open space standards would be required for residential development by providing the following policy statement:

“The Council's expectation is that development proposals should make provision for open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards: ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

“

- *Parks: 1.63ha per 1000 residents*
- *Natural Green Spaces: 2.05ha per 1000 residents*
- *Playing pitches: 0.75ha per 1000 residents.*

¹ Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

- *Play and informal recreation: as set out by London Plan Policy S4 Play and informal recreation which requires at least 10m2 per child of good quality accessible play provision. “*

- We have the standard
- Two paragraphs in our explanation.
- It is essential that any development in Edgware fulfils ECC04.
- Since the wellbeing of the residents need space within 400meter
- Attachment on FOI
- Blog as pdf
- National Institute of Health - wellbeing of residents

3.1.12.2 Open space deficiency in Edgware Town Centre

The 2021 Edgware Growth Area SPD accepts Edgware has a lack of open spaces. Over the last few years the area has lost many open spaces. In 2009 a report showed Edgware had a deficit of open space (shaded pink). Since then this has diminished further.

“The provision of parks in the following Wards falls below the current borough average in terms of parks provision per 1,000 head of population:

... Edgware, ...” ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

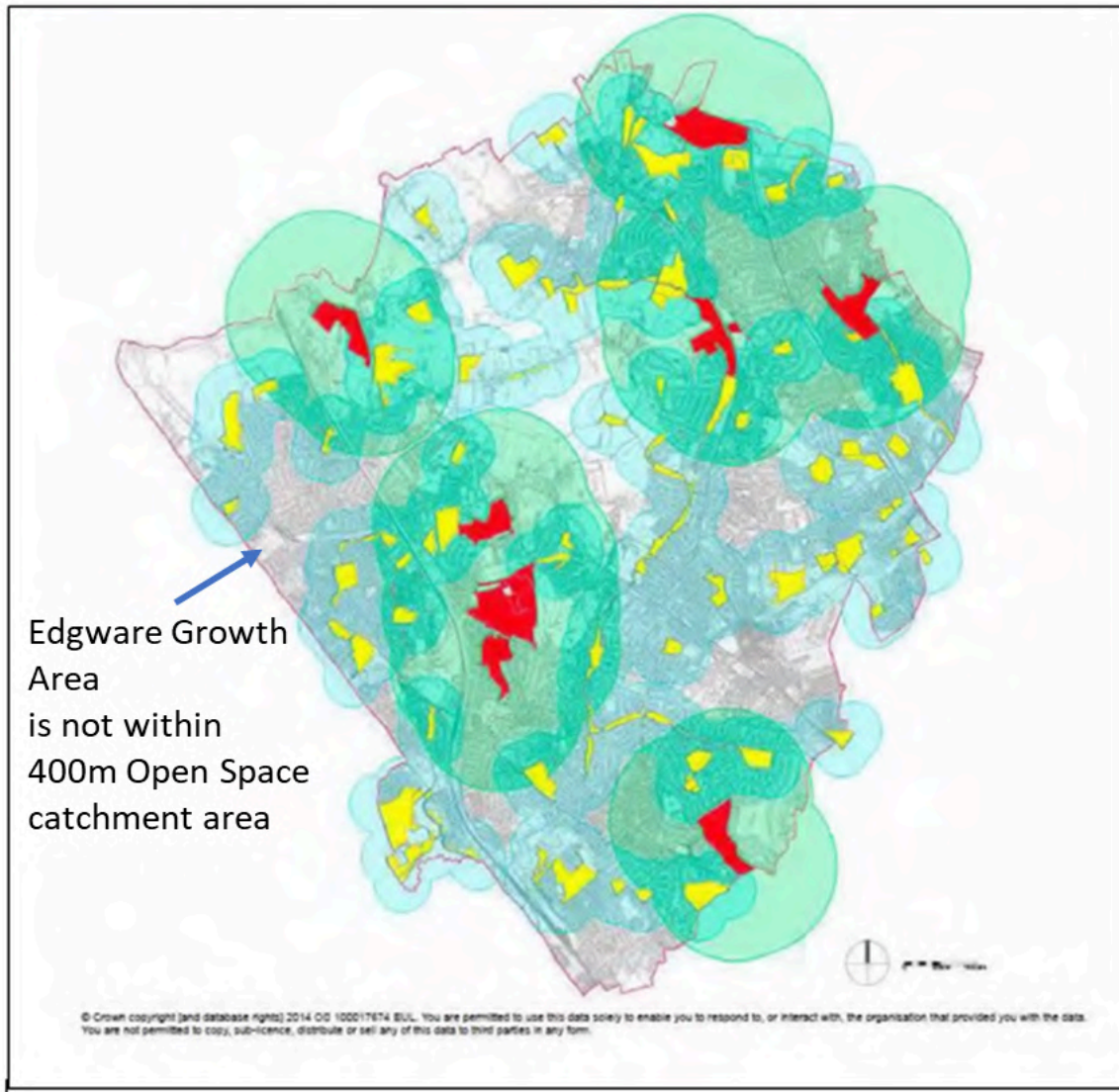
Open Space and Parks Deficiency (Shaded pink)



Open Space and Parks



Blue: 400m Catchment Area



UK Health Security Agency in its blog ([Green space, mental wellbeing and sustainable communities – UK Health Security Agency](#)) states “So there is a wealth of evidence of how the public’s health can be improved by increasing access to green and blue space and improving the quality of our natural environment.” (UKHSA blog is the official blog of UK Health Security Agency).

3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre

An area of 5.95 hectares of quality green space is needed, based upon requirements stipulated in the emerging **Barnet Local Area Plan** and **London Plan 2021**.

- 2.41 hectares of amenity space for residents
- 1.54 hectares of play space for children
- 2 hectares of green space within 400 meters

There are no Open Space of the above size within 400 meters of the Edgware Growth Area and the Deansbrook Nature Reserve, 1.9 hectares, cannot be used as there is no public access in order to preserve the habitat of protected species including the Bats and Slow Worms that have been found. These details have been registered. (Quote Green Space...)

3.1.12.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents

The NPPF emphasises the importance of access to high-quality open spaces and opportunities for sport and recreation, which can make an important contribution to the health and well-being of communities.

"Access to high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities" (NPPF, paragraph 96).

The "Improving access to greenspace: A new review for 2020" by Public Health England highlights significant health benefits of access to greenspace, including improved mental health, reduced stress, and increased physical activity. Ensuring new residents in Edgware have access to greenspace can contribute to the overall health and well-being of the community.

- "Evidence shows that access to greenspace is associated with better health outcomes, including lower rates of mortality and morbidity" (p. 5).

The document emphasises the importance of equitable access to greenspace, noting that areas with lower socioeconomic status often have less access. Given that Edgware is already in deficit, adding new open spaces in Edgware is critical to addressing this inequity.

- "Ensuring equitable access to greenspace is vital for addressing health inequalities" (p. 7).

The Edgware Policy of overdevelopment will fail to meet Objective 15 in **Edgware Local Area SPD**: Support health and wellbeing.

Most studies have found clear correlations between high-rise living and childhood behavioural problems. No study has found high-rise living beneficial to children.

Nicolas Boys Smith, founder of Create Streets, in his 2016 report on design of cities shows there is evidence that residents (and especially children) of high-rise blocks tend to suffer

from more stress, mental health issues and neurosis than gentler developments. The high-rise development has limited open spaces for recreation and relaxation. The lack of accessible green areas or parks within close proximity will affect the well-being and mental health of residents, especially families with children. Limited outdoor play spaces will make it challenging for children to engage in outdoor activities and play with other children. With limited outdoor spaces and play areas, children will resort to spending more time indoors with electronic devices, leading to potential health and developmental issues. Also, the increased reliance on elevators will discourage physical activity, impacting the health and well-being of elderly residents. Residents will experience further anxiety due to reduced privacy, especially in units facing each other at close distances.

3.1.12.5 Open Space must be close to Edgware Town Centre:

The review (UKHSA blog is the official blog of UK Health Security Agency) underlines that greenspace should be within walking distance to maximise its usage and benefits. This aligns with your findings that new open spaces must be within walking distance for Edgware residents.

- "Access to greenspace should ideally be within a 5-10 minute walk (about 300-600 meters) from people's homes" (p. 9).

Best practices in urban planning advocate for the integration of greenspaces within walking distance of residents. This ensures the spaces are used and contribute to the quality of life and health of the community.

- "Urban planning should prioritise the creation of greenspaces within close proximity to residents to maximise their accessibility and use" (Improving access to greenspace: A new review for 2020, p. 9).

3.1.12.6 Open Space must be for Edgware Residents

Therefore it is very important that Barnet Policy regarding ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#)) is fully compliant within any residential development and not dealt with by financial mitigation or locating the open spaces in another district outside the 400m boundary. Edgware is deficient in open space so mitigation cannot be claimed to be suitable in any way.

3.1.13 Reduced Biodiversity - real threat to protected species living in the Deansbrook Nature Reserve

Bats, Toads, Newts and slow worms have habitats in the Deans Brook Nature Reserve. They are all protected under the Wildlife and Countryside Act 1981. The protection includes the animals, their habitats, their roosts and breeding ponds. It is also illegal to intentionally disturb them. Hence this Nature Reserve cannot be used as a green space of humans, as is proposed by Ballymore/ TFL. Note this Nature Reserve is also home to a variety of bird species such as: Kingfishers, Grey Wagtails, Coots, Moorhens and Mallards.

Deansbrook Nature Reserve is a Site of Importance for Nature Conservation (SINC) that at present is regarded as sufficiently sensitive and important for the protection of various species such as Bats, Toads, Newts and slow worms and the environment generally that it is not open to the public. They are all protected under the Wildlife and Countryside Act 1981. The protection includes the animals, their habitats, their roosts and breeding ponds. It is also illegal to intentionally disturb them. Hence this nature reserve cannot be used as a green space for humans, as is proposed by Barnet in the Local Plan. Note this Nature Reserve is also home to a variety of bird species such as: Kingfishers, Grey Wagtails, Coots, Moorhens and Mallards.

Also, the plans to divert flood water to Deans Brook, as outlined in the Environment Impact Assessment, will pollute the delicate eco-system of the nature reserve, endangering the protected species and their habitat.

Historically, when the Northern Line was extended to Edgware, the changes brought about involved the realignment and culverting (in part) the water course Deans Brook and also there was no longer a requirement for the railway line that went from the old Edgware Station through Mill Hill and on to Highgate. This meant that the land occupied by the old railway line and the land adjoining the new railway line were not in use and not open to the public and so were left to nature effectively to recolonise for the last hundred years. This has allowed protected species such as slow worms and bats (both of which have been registered with Green Spaces Information for Greater London as being present on this land) have been able to thrive undisturbed.

The importance of not disturbing this habitat has in fact been tested. In 1997 the Secretary of State allowed the Appeal against Barnet's deemed refusal to permit an access off Deans Lane into LULs (now TfLs) property but this was on the basis of LUL saying that they required it to access their works but there was a condition imposed in allowing this Appeal that it be used "Only for the purpose of upgrading and maintaining the Northern Line Railway". It is implicit in the Secretary of State's decision that LUL recognise the environmental sensitivity of their proposed access route within a Site of Borough Importance of Nature Conservation - with protected slow worms and other reptiles and therefore it is implicit in the decision of the Inspector and SoS that the environmental sensitivity be respected and so by extension, to allow public access to this sensitive site would clearly be against the principle which allowed them to get a planning consent (that was restricted by the above condition) in the first place. Also see attached LB Barnet's FoI response 11530928 ([FOI Response11530928-all-information-to-be-supplied-Deans-Brook-No-Public-Right-of-Way](#))

The developers of site 27 & 28 are now proposing that the Deansbrook Nature Reserve be open to the public as a walking and cycling route. We can see 3 reasons why the developers have made this proposal. Firstly, they can claim that

an additional 5 hectares (approximately) of land now falls within their development site thus making their development densities drastically reduced in the number of habitable rooms per hectare proposed. Secondly they can claim that they are providing at least some of the necessary green space that a development of this size should require in a location where otherwise it would be regarded as grossly deficient, and thirdly, they can claim strategic improvements to walking and cycling routes to support their claims for carrying out 'improvements' and 'regeneration'.

These reasons are not justified particularly as the Secretary of State has made a legal judgement that there should be no public access.

These proposals will have a highly detrimental effect to an area of very great environmental sensitivity and cause illegal disturbance to bats and slow worms. No amount of so-called mitigation will be suitable for what will be the destruction of a Nature Reserve when there is no compelling reason to do so. Barnet Council cannot include proposals that are unlawful within a local development plan

The modification MM70 to policy ECC06 Biodiversity, whilst stating developers must adequately mitigate the harm they cause, provides that where adverse impacts cannot be avoided or adequately mitigated, as a last resort, they can be compensated for.

This is permitting developers to simply buy their way out of their environmental responsibilities to the Deansbrook Nature Reserve SINC. This is unacceptable.

The strategic walking Network includes opening up the Deansbrook nature reserve to which there is no public access. We strongly believe that the status of the nature reserve having no public access should be maintained. Therefore the site cannot contain the Strategic Walking Network and should be deleted.

There should be no mitigation of the requirements of the biodiversity requirements which should be fully provided within the boundary of any development. The public and residents have the right to fully enjoy the benefits of biodiversity not for provision to be made elsewhere which cannot be enjoyed by the public and residents.

3.1.13.1 Non compliance to Policies regarding protected wildlife such as Bats

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.”

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..."

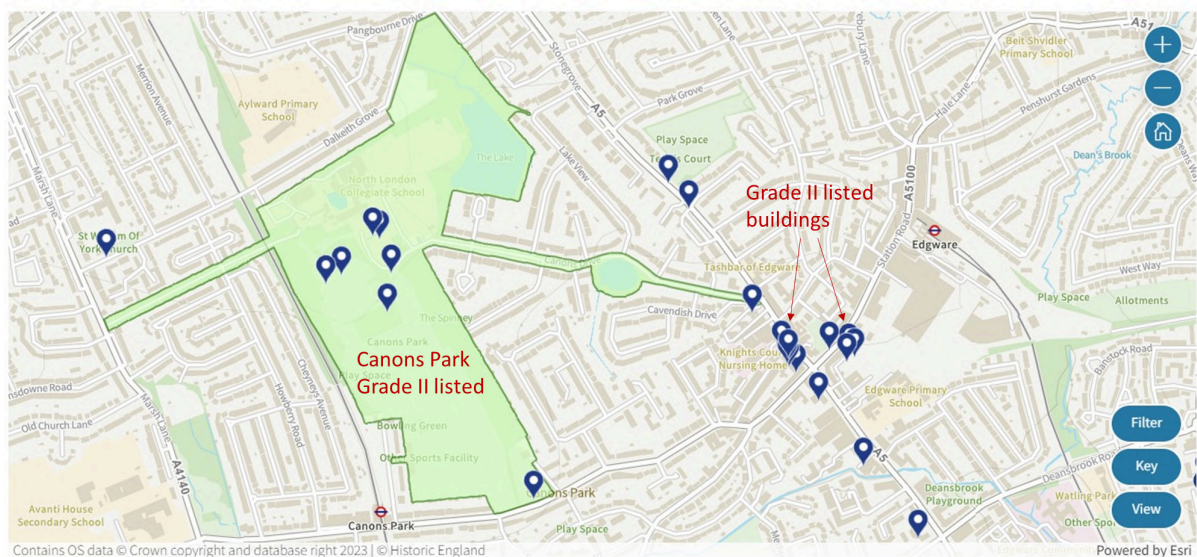
Building on the Deans Brook Nature Reserve and opening it up to the public contradicts this principle. The presence of protected species necessitates strict adherence to conservation laws, and the goal of a 10% net biodiversity gain further supports the case against development on this site.

3.1.14 Risk to Edgware's Heritage in Barnet and Harrow

Edgware consists of 5 wards, 2 of which are in Harrow so whilst a small part of the borough of Harrow the portion of Edgware in Harrow is a very significant part of Edgware. The Borough boundary actually dissects Edgware's High Street and historic center.

The London Plan wrongly classifies Edgware as a Major Center. However in no way could the town be classified by anyone's metrics as even close to Major if not including the Harrow portion of Edgware. It is inequitable to take a pick and mix approach to Edgware's Harrow assets. The Harrow side of Edgware has 2 conservation areas yards from the borough boundary that are afforded no protection despite being integral parts of Edgware and containing some of Edgware's oldest surviving buildings and covered by an archaeological priority designation. It contains Edgware's war memorial to its dead.

Location of this list entry and nearby places that are also listed. Use our [map search](#) to find more listed places.



The Canons Park Estate conservation area is deemed an outstanding area. The Key View down the Canons Drive which is home to one of the finest tree collections in the country would be decimated by tall buildings. The below picture illustrates how the clusters of tall buildings, proposed by Ballymore who follows Barnet's Edgware Policy GSS05, can have a significant detrimental impact to Canons Park Estate conservation area.



Figure: view of the Edgware Tall Builds by Ballymore from Canons Drive

Yet is excluded from any consideration. Harrow has not agreed on the tall building strategy for Edgware which is a joint town.

Barnet and Harrow created a joint SPD historically, in no way should any development strategy of a town artificially divided by a borough line not be a jointly agreed strategy. Barnet's local plan in respect of Edgware must be agreed fully and jointly with Harrow. There must be an inclusive vision that ensures balanced growth throughout the town whilst preserving the unique character and historical significance of the town much of which is situated on the Harrow side of the boundary. CDH08 must take into account all neighbouring designated heritage assets with equal care and consideration.

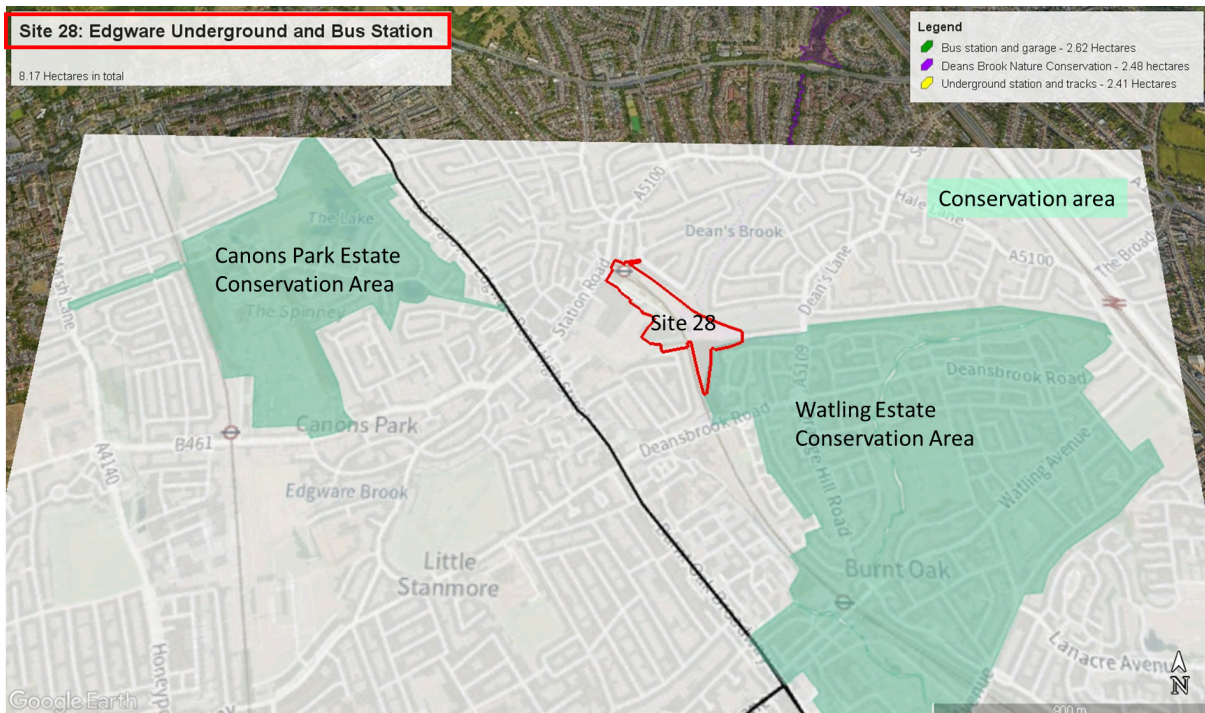
Causing divisions in community identity and preventing the integration of heritage conservation can not be justified on the grounds of artificial borough boundaries that show no respect to the history and heritage of a town.

The NPPF emphasises the enhancing and conserving of the historic environment, it also charges that "any" heritage that may be affected by a proposal be identified and assessed, not simply those limited to borough lines. The London Plan 2021 stipulates that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to form, scale, materials and architectural detail policy HC1. Historic England guidance stipulates this as part of planning.

3.1.15 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>

3.1.16 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas

Edgware is in Archaeological Priority Areas. It should be protected from overdevelopment.

In Barnet Policy CDH08, it states that

"There are also two Scheduled Monuments, at Brockley Hill in Edgwarebury and at the Manor House in Finchley, five prehistoric, four Roman and thirty mediaeval sites containing archaeological remains of more than local importance. These have been grouped into nineteen 'Local Archaeological Priority Areas' (APAs) as listed in Table 11 and shown on the Policies Map. "

Table 11 - Barnet's Designated and Non-designated Heritage Assets

Listed Buildings	<u>Over 670</u> 654 entries
Battlefield Site	Battle of Barnet 1471
Registered Parks and Gardens	5 registered historic parks and gardens; St Marylebone Cemetery, <u>Stephens House and Gardens</u> , Avenue House Garden , Golders Green Crematorium, St Pancras Cemetery and Hoop Lane Jewish Cemetery.
Scheduled Monuments	Brockley Hill Romano – British Pottery, Edgware Manor House Moated Site, East End Road, Finchley
Archaeological Priority Areas	<ol style="list-style-type: none"> 1. Barnet Gate and Totteridge Fields 2. Burnt Oak 3. Child's Hill 4. Chipping Barnet 5. Copthall 6. Cricklewood 7. East Barnet 8. East Finchley 9. Edgware 10. Edgwarebury and Scratchwood 11. Finchley 12. Friern Barnet 13. Galley Lane 14. Halliwick Manor House 15. Hendon 16. Mill Hill 17. Monken Hadley Common 18. Totteridge and Whetstone 19. Watling Street.
Conservation Areas	<ol style="list-style-type: none"> 1. The Burroughs, Hendon, 1983 2. Church End, Finchley, 1979 3. Church End, Hendon, 1983 4. College Farm, Finchley, 1989 5. Cricklewood Railway Terraces, 1998 6. Finchley Garden Village, 1978 7. Golders Green Town Centre, 1998 8. Hampstead Garden Suburb, 1968 9. Hampstead Village (Heath Passage), 1994 10. Mill Hill, 1968 11. Monken Hadley, 1968 12. Moss Hall Crescent, 1974 13. Totteridge, 1968 14. Watling Estate, Burnt Oak, 1998 15. Wood Street, Barnet, 1969 16. Glenhill Close, Finchley, 2001
Locally Listed Buildings	<u>Over 1,250</u> 1,224

The National Planning Policy Framework (NPPF) and the London Plan both include policies and regulations to protect Archaeological Priority Areas (APAs) from overdevelopment, particularly with tall buildings.

3.1.16.1 National Planning Policy Framework (NPPF)

The NPPF provides a comprehensive framework for conserving and enhancing the historic environment. Key sections relevant to protecting Archaeological Priority Areas include:

- **Section 16: Conserving and Enhancing the Historic Environment**
 - **Paragraph 189:** This paragraph emphasises the need to identify and assess the significance of any heritage assets that might be affected by a development. It specifically mentions the importance of desk-based assessments and field evaluations for archaeological sites.
 - **Paragraph 194:** It states that any harm to, or loss of, the significance of a designated heritage asset (including archaeological sites) should require clear and convincing justification.
 - **Paragraph 195:** When a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

3.1.16.2 The London Plan

The London Plan includes specific policies aimed at protecting heritage assets, including Archaeological Priority Areas, from inappropriate development. Relevant policies include:

- **Policy HC1: Heritage conservation and growth**
 - **Policy HC1(A):** It requires boroughs to develop and implement local policies that conserve the significance of heritage assets and their settings. This includes identifying and protecting APAs.
 - **Policy HC1(C):** Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- **Policy D9: Tall buildings**
 - **Policy D9(C):** This policy states that proposals for tall buildings should address their visual, functional, environmental, and cumulative impacts, including the potential effect on the significance of heritage assets. It specifically requires an assessment of the impact of tall buildings on the character and heritage significance of areas.
 - **Policy D9(D):** It ensures that tall building locations are carefully managed and that their height, scale, massing, and footprint are appropriate to their context, particularly concerning heritage assets.

3.1.17 The validity of Edgware Growth Area SPD

The Edgware Growth Area SPD 2021 is an expansion of the Barnet local plan 2012. This will be replaced by the new Draft Plan making the SPD document invalid. If the SPD is to provide further guidance, then relevant parts should be included within the development.

3.1.18 Must adopt Infrastructure first approach instead of design led approach.

Paragraph A (a) is of deep concern and objected to as the proposed changes suggests even more growth is possible for Edgware through a design led approach. Instead there is a need for an **infrastructure first approach** in addition to high quality design of any redevelopment in Edgware. The amount of growth planned for almost 12,000 new residents (based on the UK average 2.4 occupants per a dwelling) in what by necessity will be an incredibly dense arrangement whatever design and layout is settled upon, in a fringe of London suburban town seems highly inappropriate and not conducive to community cohesion or successful place making. 12,000 people is a new town within a town. Provisional plans appear to make an uncharacteristic fortress of high rise towers and bulky buildings in the centre of Edgware with a foreboding and overbearing presence and not very welcoming environment to existing residents.

The town cramming concept approach adopted by Barnet Council is not welcomed especially in areas so deficient of public open space and green infrastructure. Whilst we are sure the NHS, education authority and highway authority are working closely with the Planning team, there is concern their modelling and implementation has not proven reliable in the past to with many in the area feeling the effects of lack of critical infrastructure to meet existing needs let alone accommodate the planned levels of growth.

Before any development proceeds the main junctions within Edgware need significant improvement as the town barely copes as is, the intended level growth and construction traffic for 10-15 years on the scale proposed and these slow moving arteries will completely seize and kill the town altogether and increase traffic emissions and reduce air quality whilst queuing traffic sits idle for hours (there's little mention of cycle or bus lane infrastructure) the end result may be a new town centre but will be sterile and soulless as the existing small town has become unviable in the interim trying to accommodate such level of growth over a generation. This phasing of critical road and transport infrastructure delivery first should be included in the policy.

Again it is noted the removal of office from the policy and no mention of light industrial/creative type uses which would diversify the economy of Edgware and reduce travel demand on the road network and public transport. **An overly dependent retail offering is not a robust enough economic model to ensure the long term vitality of Edgware** and overly susceptible to the vulnerability seen in the bricks and mortar retail industry with the rise in online shopping.

3.1.19 Conclusion

We are disappointed that the emphasis is on building dwellings to densities that will be the highest in the UK and exceeds Hong Kong without any thought for the provision of a good environment and public services for residents and the public and excludes any recognition that the existence of Edgware as a town centre is based on the shops and public transport. The existence of Edgware as a shopping centre cannot be relegated to a poor second or not at all.

In conclusion, the proposed Edgware Growth Area policy GSS05 is contentious and raises significant concerns across various dimensions. Key issues include the potential loss of a central community hub with essential services, inadequate provisions for car parking leading to potential accessibility issues, and the fundamental misclassification of Edgware as a Major Town Centre rather than a District Centre. These factors not only threaten the social fabric and convenience of Edgware but also challenge the sustainability and character of the area, contrary to local planning guidelines and community interests. A more inclusive and design-led approach, engaging with the local community, is essential to address these concerns and ensure any future developments align with the true suburban identity and needs of Edgware.

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4 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.

4.1 Proposed Modification table

MM	Original	Proposed modifications	Notes
MM108	Context type: Central	Context type: Central <u>Suburban</u>	3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting
MM108	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.	In Site Description section: Edgware is identified as a location where tall buildings of 8 storeys or more may be appropriate within the boundaries of the Town Centre. <u>Edgware is identified as a District Town Centre in a Suburban setting. Tall buildings of 8 storeys or more are not appropriate within the boundaries of the Town Centre. Development must take account of the surrounding suburban areas, local heritage, listed buildings and conservation areas.</u> <u>Development must adopt an Infrastructure led approach rather than design led approach.</u>	Edgware is a District Town Centre in a Suburban setting. Barnet council has wrongly assigned Edgware Town centre to be central 3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting 3.1.19 Must adopt Infrastructure first

			approach instead of design led approach.
MM108	Indicative residential capacity: 2,379 dwellings.	Indicative residential capacity: 2379 <u>763</u> <u>122 dwellings must be deducted for Premier Place</u>	Edgware should be classified as a District Town in a Suburban area. The Suburban density should be applied. Using the highest Suburban density of 130 units / ha, the indicative residential capacity should be 763 dwellings with 527 in the Broadwalk area and 237 for the rest. 3.1.5 Indicative residential capacity should be reduced to 763

<p>MM108</p> <p>Justification:</p>	<p>The site is highly accessible by public transport and includes large areas of brownfield land, surface car parking and low-density buildings. Intensification is an opportunity to improve the quality of the build environment and deliver benefits for the local area while providing new housing and town centre uses.</p>	<p>The site is highly accessible by public transport and includes large areas of brownfield land, surface car parking and low density buildings. <u>Intensification is an opportunity to improve the quality of the build environment and deliver benefits for the local area while providing new housing and town centre uses. a significant enclosed shopping mall, surface car park, and some low density buildings. Any development must demonstrate to the community that the environment is improved and that there are benefits for the local area and residents and people with the 9 protected characteristics covered by the Equality Act 2010.</u></p> <p><u>Development must be shabbat compliant to serve the Jewish community in Edgware.</u></p>	<p>Broadwalk has a significant indoor shopping mall.</p> <p>3.1.1 Lost of Broadwalk Shopping Mall</p> <p>3.1.2 Broadwalk as a Social Hub stated by Barnet Council</p> <p>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</p> <p>3.1.6 Edgware's Suburban character is indisputable</p>
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<p>MM108</p> <p><i>In Proposed uses/ allocation:</i></p>	<p>75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community, and car parking</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), leisure, community and car parking.</u></p>	<p>75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community, and car parking.</p> <p><u>the retail floorspace shall be at least as big as the present Broadwalk retail floorspace of 11,761 sq metres (which excludes Sainsburys) within a covered shopping mall at least equalling the present provision.</u></p> <p>Residential led mixed use development with town centre uses, commercial (retail and office), leisure, community and car parking.</p>	<p>Lost of Broadwalk Shopping Mall</p> <p>The replacement of the Broadwalk Shopping centre needs to be at least as big as the present one.</p>
<p>MM108</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>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>3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting</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.</p>	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment.</p>	<p>Edgware is not a Major Town Centre therefore unsuitable for high density housing.</p> <p>3.1.4 Edgware was wrongly classified as a Major Town Centre in a Central setting</p>
<p>Site requirements and development guidelines:</p>	<p>Car parking requirements must be assessed and re-provided as needed</p>	<p>Car parking requirements must be assessed and re-provided as needed <u>taking into account the requirements of disabled, people 9 protected characteristics and the extra traffic generated by the expected economic activity and additional dwellings.</u></p>	<p>Reinstate car park requirements.</p> <p>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</p>

<p>Site requirements and development guidelines:</p>	<p><u>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02. Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</u></p>	<p>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02. Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</p>	<p>This makes it too flexible for developers to do whatever they want.</p> <p>Note: Policy GSS12 Redevelopment of Car Parks</p> <p>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</p>
<p>Site requirements and development guidelines:</p>	<p><u>Consistent with Policy CDH04, all tall building proposals 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.</u></p>	<p>Consistent with Policy CDH04, all tall building proposals will be subject to a detailed assessment of how the proposed buildings relates to its surroundings, responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity-, open space and play areas, biodiversity, sustainability into the future, maintenance of the development, net- zero carbon, public safety. Tall building proposals will be subject to microclimate model testing.</p>	<p>3.1.6 Edgware's Suburban character is indisputable</p> <p>3.1.6.2 Barnet's Characterisation Study confirms Edgware's suburban character</p> <p>3.1.6.4 The box typology of the Broadwalk does not alter the low-density suburban nature of Edgware</p>

		<p><u>Further guidance will be provided by the Designing for Density SPD-</u></p> <p><u>All development proposals must be assessed using the Designing for Density SPD.</u></p>	<p><u>3.1.12.2 Open space deficiency in Edgware Town Centre</u></p> <p><u>3.1.12.1 Must follow Barnet's own Open Space Policies in the Local Plan</u></p> <p><u>3.1.12.2 Open space deficiency in Edgware Town Centre</u></p> <p><u>3.1.12.5 Open Space must be close to Edgware Town Centre:</u></p> <p><u>3.1.13 Reduced Biodiversity - real threat to protected species living in the Deansbrook Nature Reserve</u></p>
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<p>Site requirements and development guidelines:</p>		<p><u>the provision of water supply must be assessed with Affinity Water</u></p>	
<p>Site requirements and development guidelines:</p>	<p>The emerging Edgware Growth Area SPD (2021) provides further guidance.</p>	<p>Site requirements and development guidelines: The emerging Edgware Growth Area SPD (2021) provides further guidance. <u>Statement of common understanding April 2023 Between Barnet council and Ballymore Ltd and TFL includes indicative dwellings of 2,379 for site 27 and 2,316 for site 28. The submission of Save our Edgware is that there is a wrong application of the Central setting using the Density Matrix of the London Plan 2016. We have submitted our reasons why Site 28 should have zero housing and site 27 to have a reduced number of 763. Therefore we submit that the Statement of common standing is no longer valid and should be withdrawn.</u></p>	<p>3.1.17 The validity of Edgware Growth Area SPD Statement of common understanding April 2023 Between Barnet council and Ballymore Ltd and TFL should be withdrawn.</p>

<p>Site requirements and development guidelines:</p>		<p><u>Residential development should comply with Policy ECC04 – Barnet’s Parks and Open Spaces on open spaces within the boundary of development particularly since Edgware has a deficiency for open space.</u></p> <p><u>Biodiversity requirements must be met within the boundary of development for the enjoyment of residents and visitors:</u></p>	<p><u>3.1.12.1 Must follow Barnet’s own Open Space Policies in the Local Plan</u></p> <p><u>3.1.12.2 Open space deficiency in Edgware Town Centre</u></p> <p><u>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</u></p> <p><u>3.1.12.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents</u></p> <p><u>3.1.12.5 Open Space must be close to Edgware Town Centre:</u></p>
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			3.1.12.6 Open Space must be for Edgware Residents
Site requirements and development guidelines:		The functioning of Broadwalk mall must continue throughout the construction so that Edgware continues to be a thriving shopping centre.	3.1.1 Lost of Broadwalk Shopping Mall
Site requirements and development guidelines:	<u>This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network.</u>	This site lies on the Strategic Walking Network and development proposals should therefore take the opportunity to ensure effective connectivity to this network.	The opening up of Deans Brook will damage protected Bats habitat. 3.1.14 Reduced Biodiversity - real threat to protected species living in the Deansbrook Nature Reserve

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).*

5 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 __Anuta Zack on behalf of Save Our Edgware_____ Date __18 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association_____
Date __18 June 2024_____

6 Appendix: Original Main Modification 108 - Site 27 - Edgware Town Centre

("Barnet Local Plan Main Modifications May 2024" page 486)

MM108	Site 27	Edgware Town Centre
<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. Remove percentages for proposed uses to provide flexibility for a design-led approach and to 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 the approach to tall buildings in a manner consistent with Policy CDH04, and changes to the approach to heritage assets to ensure consistency with national policy. Reflect development of Premier Place – 122 dwellings as part of Site 27. Provide certainty that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto. 		<p>Edgware Town Centre (Edgware Growth Area)</p>
Site No. 27		
Site Address:	Station Rd, Edgware, HA8	

Map and Image retained as submitted	Ward:	Edgware	Image retained as submitted
	PTAL 2019:	6A	
	PTAL 2031:	6A	
	Site Size:	7.83 ha	
	Ownership:	Private,Council and TfL	
	Site source:	Edgware Town Centre Framework (2013)	
	Context type:	Central	
	Existing or most recent site use/s:	Retail, office, residential and car parking.	
	Development timeframe:	6-10 years. <u>Development of Premier Place within 1 – 5 years</u>	
	Planning designations:	Town Centre; Archaeological Priority Area	

	Relevant planning applications:	16/0112/FUL (approved) at 120-124 Station Road for 122 flats and retail (Premier Place); 19/6697/FUL (approved) at 30 High Street offices and 14 residential units; 17/4335/FUL (approved) at 1-2 Church Way 9 flats; 19/6776/FUL (refused) land to rear of Railway Hotel to be used as a car park.	
	Site description:	<p>The site is within Edgware Town Centre and includes Primary Retail Frontages. It encompasses the Broadwalk Shopping Centre (with roof car parking), a supermarket and associated car parking. To the north and west the sites faces onto Station Road and A5 Edgware Road with retail frontages in mid-20th Century buildings. The site also includes some office and residential uses. To the south is a mosque and a primary school, along with low-rise housing. To the east are the bus and railway stations. The Grade II listed Railway Hotel – a local landmark building - is close to the north western part of the site. Public transport accessibility is high. 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>	
	Applicable Draft Local Plan policies:	GSS01, GSS05, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, EGY01, EGY02, EGY03, ECC02, TRC01, TRC03	

	Proposed uses/ allocation (as a proportion of floorspace):	<p>75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community, and car parking</p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), leisure, community and car parking.</u></p>
	Indicative residential capacity:	<p><u>2379 dwellings</u></p>
	Justification:	<p>The site is highly accessible by public transport and includes <u>large areas of brownfield land</u>, surface car parking and low-density buildings. <u>Intensification is an opportunity</u> to improve the quality of the build environment and deliver benefits for the local area while <u>providing new housing and town centre uses</u>.</p>

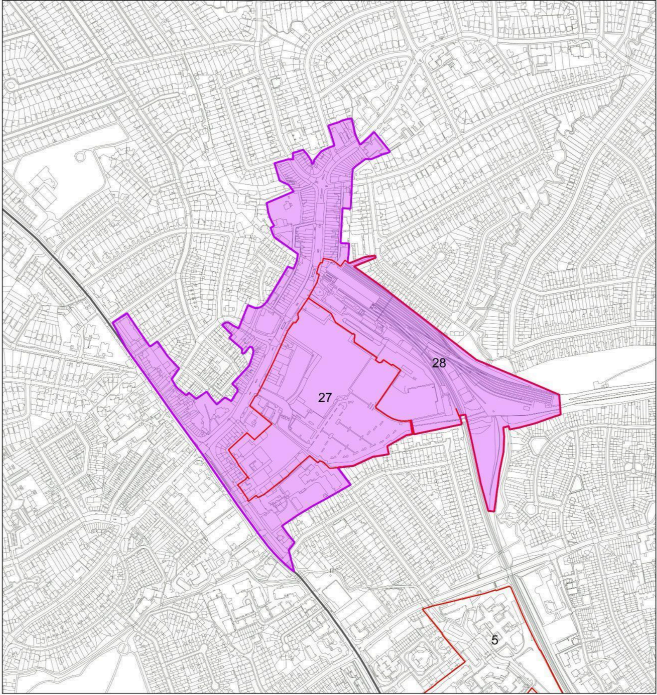
<p>Site requirements and development guidelines:</p>	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment. Proposals must consider existing site uses, including retail, offices and residents. Car parking requirements must be assessed and re-provided as needed</p> <p><u>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02. Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</u></p> <p>Proposals must consider the site context which includes the Grade II listed Railway Hotel <u>to ensure that the significance of heritage assets are conserved or enhanced, together with the existing character of Station Road and the High Street, Edgware Primary School to the south, and the relationship with adjacent low-rise suburban housing.</u></p> <p><u>Consistent with Policy CDH04, all tall building proposals 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.</u></p> <p>Proposals must be subject to an archaeological assessment.</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>The potential risk of surface water flooding must be considered.</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.</u></p> <p>The emerging Edgware Growth Area SPD (2021) provides further guidance.</p>
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“Barnet Local Plan Main Modifications May 2024.” *Barnet*, May 2024,

https://www.barnet.gov.uk/sites/default/files/schedule_of_main_modifications_-_may_2024_0.pdf. Accessed 15 May 2024.

6.1 Map 3C Edgware Growth Area

Map 3C - Edgware Growth Area



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

Scale 1 : 5,000

Ref:

(For official use
only)

Tall buildings

(Ref:SOE-Objection06-TallBuildings)

Save Our Edgware and Edgware Community Association's representation relating to Main Modifications MM 46, Chapter 6 Character, Design & Heritage, Policy CDH04 concerning Tall Buildings Policy



Preserving Edgware
Building Tomorrow Together

**SAVE OUR
EDGWARE**

Summary

This document sets out the highlights from our review of CDH04 in the draft Local Plan. The following is a brief summary of key issues that we have identified:

- 1.1 The removal of the classification of Very Tall Buildings lowers the bar for approval of buildings which can create challenges in terms of fire safety, especially for disabled people and present environmental issues as well as changing the character of an area.
- 1.2 The need for buildings over 18 metres as opposed to 30 metres, to have 2 staircases.
- 1.3 The lack of a determination of a maximum height for key buildings.
- 2 Inclusion of Edgware and removal of other towns in the Borough as being suitable for tall buildings. Apart from being inconsistent treatment, the earmarking of Edgware as being suitable for tall buildings would potentially leave it with inner city style development but with worse than suburban transport connectivity. This would be detrimental to both businesses and many residents.
- 3 The need to add the view from Stanmore Country Park towards Central London into the Locally Important Views in **Map 4**, together with a need to reinstate wording which lowers the bar for considering the impact of Proposals on Locally Important Views
- 4 Several instances of watering down criteria for assessing Tall Buildings proposals. In 6.18.15 there is reference to sensitive townscapes, which include North Finchley and Finchley Central. It appears that Edgware is being earmarked for high density, potentially lower grade development, when other areas which are similar in character aren't. This is neither fair or acceptable.
- 5 Reference to a Designing for Density SPD, which is yet to be produced. We cannot see how the Local Plan could become effective without this being in place.

1 BUILDING HEIGHT AND SAFETY

1.1 Removal of the classification of Very Tall Buildings.

The previous draft of the Local Plan defined Tall Buildings as being 8 to 14 storeys and Very Tall Buildings as being 15 storeys or more.

The previous draft said that Very Tall Buildings would not be permitted unless exceptional circumstances can be demonstrated. It also said that a 'Very Tall' building must have "a legible and coherent role, integrating effectively to its location".

The removal of this lowers the bar for acceptance of tall and very tall buildings as they could be approved in unexceptional circumstances and without integrating effectively with their location. This is inappropriate for suburban areas where areas could have inner city type developments imposed which could completely change their character.

Drawbacks associated with very tall buildings, include:

- Difficulty for people with mobility impairments evacuating in an emergencies
- Potential challenges for London Fire Brigade due the need for suitable equipment that can reach great heights

- Environmental issues:
 - A [study featured](#) in the highly respected publication Nature concluded that a chain of skyscrapers generates 140% more greenhouse gas emissions during its life cycle compared with a broader area with lower buildings and the same number of inhabitants.
 - Tall buildings clustered together create heat islands where the heat becomes trapped at street level between the buildings and does not naturally dissipate
 - Clusters of tall buildings prevent toxic particles in the air from dissipating, reducing air quality.

It is therefore essential that very tall buildings are only permitted in very exceptional circumstances and so the category of Very Tall buildings should be reinstated together with the associated criteria.

1.2 Requirement for 2 staircases in tall buildings and compliance with legislation

The amended CDH04E includes a requirement for residential buildings over 30 metres to have two staircases. [Government guidance](#) which is expected to become law, requires all residential buildings over 18 metres to have two staircases.

CDH04 refers to the Building Safety Act 2022 but does not refer to equalities legislation.

The Local Plan should ensure best practice and not apply the minimum technically acceptable standards, given the challenges that mobility impaired people may face in an emergency.

We therefore consider that CDH04 should require 2 staircases for buildings over 18 meters and that it should also refer to the Equality Act 2010.

1.3 Lack of a maximum height for buildings

The London Plan requires Boroughs to determine a maximum height for tall buildings, which does not appear to have been done.

We request that a maximum height for tall buildings is included.

2 INCLUSION OF EDWARE AND REMOVAL OF OTHER TOWNS IN THE BOROUGH

The following locations are no longer earmarked as potentially being suitable for tall buildings:

- New Southgate;
- Edware Road (A5) and Great North Road (A1000)
- Finchley Central
- North Finchley

Whereas Edware has been left in.

Edware is no more suitable than other town centres in the Borough for major development. In fact its time-efficient transport connectivity is poorer than many other towns in the Borough.

In short, the Local Plan earmarks Edware for inner city style development, but with suburban style connectivity, as there are no plans for transport improvements. This is despite the plan being likely to lead to a 50% increase in the population of Edware Ward.

In fact, if Proposals allow for a significant loss of public and commuter parking, the existing connectivity will deteriorate and become below normal suburban standards. This would be detrimental for:

- Local businesses as currently Edware is used by people from nearby localities for shops and banking.

- Many residents, such as those with mobility impairments and people living on the outer fringes of the town.

(For further information see comments on transport, unfair treatment of Edgware and rebuttal of Edgware's status as a major town centre).

We therefore consider that Edgware Growth Area should be removed from CDH 04.

3 LOCAL VIEWS

CDH04C has added in a reference for Proposals to have regard to the Locally Important views depicted on [Map 4](#). [Map 4](#) includes 4 views from locations in Barnet. While it is in Harrow, there is a popular [viewpoint from Stanmore Country Park](#) towards Central London which would be marred by a large number of high rise blocks in Edgware.

This appears to replace a deleted paragraph in CDH04B, which required particular attention in assessment to there being "no adverse impact on longer range Locally Important Views as well as mid-range and intermediate views"

The Local Plan should ensure that all locally important views are taken into account whether or not they are from within the Borough.

We also consider that 'having regard to' is a very low bar which without clarification could be open to a whole range of interpretations and therefore inconsistencies between assessments.

We therefore would like [Map 4](#) to be amended to include the view from Stanmore Country Park towards Central London and for the original wording in CDH04C to be reinstated.

4 GENERAL WATERING DOWN OF CRITERIA FOR APPROVAL.

4.1 In CDH 04

There have been a number of instances where the criteria for assessment of a Proposal for Tall Buildings have been watered down. These include:

- In CDH04B. Removal of particular attention being given to the following aspects during assessment:
 - The building's contribution to the character of the area
 - Heritage assets in neighbouring boroughs
 - impact on green/blue spaces and wildlife.
 - impact on solar energy generation and pollution
- In CDH04D the removal of the requirement to prove compliance with "Historic England guidance on tall buildings".
- In CDH 04E The removal of the requirements for:
 - The redevelopment or refurbishment of existing tall buildings to make a positive contribution to the townscape
 - Proposals to be an exemplary standard in architectural quality and materials
 - The promotion of High Quality Design, to ensure that tall buildings are appropriate for their location and do not lead to unacceptable impacts.

It is essential that all proposals for Tall Buildings are assessed as thoroughly as possible and as sensitively as possible. Removal of these requirements implies that low quality proposals for tall buildings could be passed, which would be detrimental for both new and existing residents and could create environments where crime and anti-social behaviour are rife.

Edgware is a suburb on the very outer fringe of London, which has not previously experienced inner city scale development. Watering these sections down could invite a transformation of its character and not for the better.

We have suggested revisions which substantially involve the reinstatement of these deleted phrases.

4.2 Other

4.2.1 There has been further watering down of the text in the explanatory paragraphs. Most notably in 6.18.3:

- Deletion of the suggestion that the siting of tall buildings should “not to detract from the nature of surrounding places and the quality of life for those living and working around them”.
- And instead that they should “make optimal use of the capacity of sites, which are well-connected by public transport”.

This is unacceptable for both new and existing residents. Combining the lower quality of life with new residents in high density accommodation could well increase the likelihood of crime and anti-social behaviour, with adverse outcomes for both new and existing residents. Potentially, the creation of sink estates.

If anything the Local Plan should be promoting a better quality of life – the proposed amendments convey a tone that the lowering of standards is acceptable, which is totally inappropriate.

We have therefore suggested revisions, which substantially revert to the original wording

4.2.2 Furthermore, 6,18.5 now refers to “sensitive townscapes such as Finchley Central, North Finchley”, but does not regard Edgware in the same vein.

Edgware should not be treated differently to Finchley Central and North Finchley, (see 2 above for further details)

Edgware should therefore be included in section 6.18.5.

4.2.3 Taking 4.2.1 and 4.2.2 together it appears that Edgware is being earmarked for high density, potentially lower grade development, when other areas which are similar in character aren't. This is neither fair or acceptable.

5 ABSENCE OF DESIGNING FOR DENSITY SPD

CDH04E refers to a Designing for Density Supplementary Planning Document which is yet to be produced.

We are unclear whether the Local Plan could become effective without this SPD being in place. In our view it would be inappropriate for it to become effective, without all relevant documents being in place. Indeed it is not possible for us to fully assess the Draft Local Plan, without this SPD being available.

We therefore request that the Local Plan is not approved without the Designing for Density SPD being in place.

1 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 46 Policy Related to Policy CDH04 Tall Buildings -
MM46 Paragraph All

Figure/Table Policies Map change

2 Detailed Representation - answering Question 2,3,4 per modification in MM 46

2.0.1 TALL BUILDINGS 1 MM46, A - Policy CDH04 Tall Buildings

(8 to 14 storeys ~~and above~~ or 26 to 46 metres ~~above~~ ~~and above~~ ground level) may be appropriate

~~b) Tall buildings of 15 storeys or more ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area or Growth Area.~~

~~c) Any proposal for a 'Very Tall' building must have a legible and coherent role, integrating effectively to its location in compliance with part d)~~

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

2.0.1.1 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.

Sustainability

From a general perspective, removing the storey/height limit creates challenges in terms of the National Planning Policy Framework in terms of sustainability. An example of this is people with mobility impairments who have to evacuate in an emergency -the more floors, the more difficult it will be for them to evacuate. By placing no upper limit it also will create challenges for London Fire Brigade due to a lack of suitable equipment that can reach great heights. In the case of Edgware, where there could potentially be a large number of very tall buildings in close proximity, this will increase the risk of spread of fire and accessibility issues for the Fire Brigade.

A study featured in the highly respected publication Nature concluded that a chain of skyscrapers generates 140% more greenhouse gas emissions during its life cycle compared with a broader area with lower buildings and the same number of inhabitants. This is due to the need to use heavier structures that are more robust, using more materials with a higher carbon footprint.

Tall buildings clustered together also:

- create heat islands where the heat becomes trapped at street level between the buildings and which does not naturally dissipate after sunset.

- prevent toxic particles in the air from dissipating, reducing air quality

Very tall buildings in Edgware Growth Area

The deletion of these clauses changes the context for the inclusion of Edgware Growth Area as an appropriate location as it lowers the bar for the approval of buildings with 15 storeys and above.

- The London Plan requires in relation to “mid-range views from the surrounding neighbourhood” – “particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality”. We therefore consider that all new buildings should have a legible and coherent role and integrate effectively into their location and this should be emphasised in the local plan.
- The London Plan also requires Boroughs to “identify locations where tall buildings may be an appropriate form of development “ and determine maximum height that could be acceptable”
- Edgware is a suburban area with largely low rise 1930s housing. While there are two existing tall buildings in the town centre further high rise development would not make a positive contribution to the townscape as they would be disproportionate to the surrounding neighbourhood. This would be especially so if a development was to create a mass of high rise buildings.
- Furthermore a large number of high rise buildings, close together in Edgware, would significantly increase the population in an area which is served by a single tube line:
 - There would naturally be greater usage of the Northern Line which already has the worst air quality on London Underground.
 - There are no current plans to increase the capacity of the Northern Line or bus services. A large number of new residents, together with general population growth means that the transport infrastructure could become inadequate. Due to the developments in Colindale, the Northern Line is already under strain from Colindale southwards on the Edgware branch during peak periods.

Summary

The amendments render the inclusion of Edgware Growth Area in paragraph A as being inappropriate, both on the general inappropriateness having regard to the area’s location and sustainability, infrastructure issues.

More generally, the removal of the Very Tall Buildings definition lowers the bar for assessment for buildings that would create environmental safety issues and they may not integrate effectively with their location.

2.0.1.2 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.)

Edgware should be removed from CDH04

We also suggest that paragraph c) is reinstated.

MM	Original Text	Proposed Modifications	Notes
46 A	b. — c) Any proposal for a 'Very Tall' building must have a legible and coherent role, integrating effectively to its location in compliance with part d)	c) Any proposal for a 'Very Tall' building must have a legible and coherent role, integrating effectively to its location in compliance with part d)	Paragraph c) is reinstated.

2.0.2 TALL BUILDINGS 2 MM46, A - Policy CDH04 Tall Buildings

- ~~• New Southgate Opportunity Area²² (Policy G5509);~~
- ~~• Major Thoroughfares – Edgware Road (A5) and Great North Road (A1000) (Policy G5511); and the~~
- ~~• Town Centres of Finchley Central and North Finchley (Policy G5508)~~

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

2.0.2.1 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.

It is illogical that areas that are closer to Central London than Edgware are removed from the list, with Edgware being left in. The designation of Edgware as a Major Town Centre has been refuted elsewhere and we contend that Edgware should be treated in a similar way to other local centres with a suburban character.

Edgware is on the outer fringes of London and while there is a good southbound tube link, connections going in other directions are slow. While Edgware is served by a large number of bus routes, bus travel is sub optimal, when comparing the time for say a 5 mile tube journey south on the Northern Line, with a 5 mile bus journey to access areas in suburbs in the north east or west. Development in areas closer to London would involve shorter distances to travel to central London and tube connectivity in more than one direction. There are no current plans to increase tube capacity on the Northern Line and large scale development in Edgware would increase demand on a tube line which has the worst air quality on London Underground.

2.0.2.2 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.)

We suggest that:

- **Edgware Growth Area is also deleted from CDH04A.**

Check background: This directly contradictory to site 28 biodiversity.

MM	Original Text	Proposed Modifications	Notes
46 A	<p>Policy CDH04 Tall Buildings</p> <p>A. Tall buildings (8 to 14 storeys <u>and above or (26 to 46 metres above and above ground level))</u> may be appropriate in the following <u>locations</u> strategie locations:</p> <ul style="list-style-type: none"> • Brent Cross Growth (Opportunity) Area (Policy GSS02); • Brent Cross West Growth (Opportunity) Area (Policy GSS03); • Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06); • Cricklewood Growth (Opportunity) Area (Policy GSS04); • Edgware Growth Area (Policy GSS05); • West Hendon Estate (Policy GSS10); <u>and</u> • <u>Locations specified on Map 4</u> • New Southgate Opportunity Area²⁷ (Policy GSS09); • Major Thoroughfares – Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the • Town Centres of Finchley Central and North Finchley (Policy GSS08) 	<p>Policy CDH04 Tall Buildings</p> <p>A. Tall buildings (8 to 14 storeys <u>and above or (26 to 46 metres above and above ground level))</u> may be appropriate in the following <u>locations</u> strategie locations:</p> <ul style="list-style-type: none"> • Brent Cross Growth (Opportunity) Area (Policy GSS02); • Brent Cross West Growth (Opportunity) Area (Policy GSS03); • Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06); • Cricklewood Growth (Opportunity) Area (Policy GSS04); • Edgware Growth Area (Policy GSS05); • West Hendon Estate (Policy GSS10); <u>and</u> • <u>Locations specified on Map 4</u> • New Southgate Opportunity Area²⁷ (Policy GSS09); • Major Thoroughfares – Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the • Town Centres of Finchley Central and North Finchley (Policy GSS08) 	<p>Edgware Growth Area is also deleted from CDH04A.</p>

2.0.3 TALL BUILDINGS 3 - MM46, B - Policy CDH04 Tall Buildings

~~B. Proposals for Tall and Very Buildings must adequately address all the criteria in London Plan Policy D9C, including in terms of acceptable cumulative visual, environmental and functional impacts including siting, microclimate, wind turbulence, noise, daylight and sunlight, reflective glare, aviation, navigation and electronic communication or broadcast interference; will be assessed in accordance with the visual, functional, environmental and cumulative impacts set out in London Plan Policy D9 Tall Buildings. Particular attention will be given to assessing the following:~~

~~i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate;~~

~~ii. how the building responds to topography, with no adverse impact on longer range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views~~

~~iii. the buildings contribution to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.~~

~~iv. the relationship between the building and the surrounding public realm;~~

~~v. the relationship between the building and the natural environment, including public open spaces and river corridors~~

~~Taller elements should be set back from any rivers and water courses and designed so as not to cause harm to the wildlife, including directing artificial light away from the river corridor.~~

~~vi. buildings should not interfere with digital connectivity in compliance with Policy TRC04 nor have a possible negative impact on solar energy generation on adjoining buildings ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution~~

C. Proposals are required to have regard to the Locally Important Views depicted on Map 4

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

Topic	Original	Proposed Modifications	Comments
Green and blue spaces	<ul style="list-style-type: none"> The relationship between the building and the natural environment, including public open spaces and river corridors Taller elements should be set back from any rivers and water courses and designed so as not to cause harm to the wildlife, including directing artificial light away from the river corridor. 	<ul style="list-style-type: none"> 	The revised text does not consider the impact on green/blue spaces, including impact to wildlife.
Thermal, noise and light	<ul style="list-style-type: none"> Nor have a possible negative impact on solar energy generation on adjoining buildings ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution 	<ul style="list-style-type: none"> Microclimate Wind turbulence Noise Daylight and sunlight Reflective glare 	<p>The new text does not specifically mention levels of comfort or pollution.</p> <p>The new text has additional reference to sunlight and reflective glare which should be retained.</p>
Aviation	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Aviation 	The new text has additional reference to aviation which should be retained.
Electronics	<ul style="list-style-type: none"> Buildings should not interfere with digital connectivity in compliance with Policy TRC04 	<ul style="list-style-type: none"> Navigation Electronic communication Broadcast interference 	The revised text removes reference to specifics of types of digital connectivity which tall buildings could impact.

Due regard needs to be made to an area's character. Edgware is a suburb, on the very outer fringe of London, which has not previously experienced inner city scale development. It is therefore essential that all proposals for Tall Buildings are assessed as thoroughly as possible and as sensitively as possible. Watering this section down is inappropriate for an area like Edgware.

2.0.3.2 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.)

We suggest that:

- The original draft is reinstated, with the additional text proposed regarding sunlight, reflective glare and aviation.

B. Proposals for Tall and Very Buildings will be assessed in accordance with the visual, functional, environmental and cumulative impacts set out in London Plan Policy D9 Tall Buildings. Particular attention will be given to assessing the following:

- i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate,*
- ii. how the building responds to topography, with no adverse impact on longer range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views*
- iii. the buildings contribution to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.*
- iv. the relationship between the building and the surrounding public realm,*
- v. the relationship between the building and the natural environment, including public open spaces and river corridors*
- Taller elements should be set back from any rivers and water courses and designed so as not to cause harm to the wildlife, including directing artificial light away from the river corridor.*
- vi. buildings should not interfere with digital connectivity in compliance with Policy TRC04 nor have a possible negative impact on solar energy generation on adjoining buildings ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution*
- vii. daylight and sunlight and reflective glare*
- viii. aviation and navigation*

2.0.4 TALL BUILDINGS 4 - MM46, D - Policy CDH04 Tall Buildings

D. Proposals for tall and very tall buildings will need to provide evidence of how they have complied with the criteria in this policy as well as and the London Plan Policy D9 and as well as related policies (in particular CDH01, CDH08, ECC01, ECC02 and TRC04) contained within the Local Plan. Historic England guidance on tall buildings.

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

2.0.4.1 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.

By removing the phrase “Historic England Guidance on Tall Buildings” it implies a lower level of attention and due diligence than had previously been envisaged.

If Edgware was to be included in CDH 04A, due regard needs to be made to its character as a suburb, on the very outer fringe of London, which has not previously experienced inner city scale development. It is therefore essential that all proposals for Tall/ Very Tall Buildings are assessed as thoroughly as possible and as sensitively as possible. Edgware’s historic buildings include the Railway Hotel, St Margaret’s Church and Handel’s Smithy, all of which are close to Site 27, watering this section down is inappropriate for Edgware.

To be consistent with other comments, reference to Very Tall buildings should be reinstated.

PROPOSED REVISION

We suggest that this paragraph reads:

“D. Proposals for Tall and Very tall buildings will need to provide evidence of how they have complied with the criteria in this policy, as well as and the London Plan Policy D9 and as well as and related policies (in particular CDH01, CDH08, ECC01, ECC02 and TRC04) contained within the Local Plan, and Historic England guidance on tall buildings.”

B. SOE Representation 5 (SPD)

2.0.5 TALL BUILDINGS 5 - MM 46, D (missing SPD) - Policy CDH04 Tall Buildings

~~Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape.~~

~~Proposals should be of an exemplary standard in architectural quality and materials to ensure the appearance and architectural integrity of the building is maintained.~~

~~Barnet’s definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.~~

The Council will produce a Designing for Density Supplementary Planning Document. This will provide guidance on how the appropriateness of Tall Building proposals will be assessed relative to the impacts detailed in London Plan Policy D9C. It will also set out good practice design guidance on site-specific and character considerations including typologies related to uses, views, form, public realm, safety, amenity and microclimates.

f. _____

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

2.0.5.1 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.

By removing the phrases:

“Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape. “

“Proposals should be of an exemplary standard in architectural quality and materials to ensure the appearance and architectural integrity of the building is maintained.”

“ Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area”.

it implies a lower level of attention and due diligence than had previously been envisaged.

It is essential that all proposals for Tall/ Very Tall Buildings are assessed as thoroughly as possible and as sensitively as possible.

While a Designing for Density Supplementary Planning Document may compensate for the effects of the deletions, it is not acceptable that the Local Plan could become effective without the SPD being in place. Therefore such guidance needs to be an integral part of the Local Plan or should be prepared and finalised prior to the approval of the Local Plan.

2.0.5.2 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.)

We suggest that:

- **The following phrases are reinstated:**

“Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape. “

“Proposals should be of an exemplary standard in architectural quality and materials to ensure the appearance and architectural integrity of the building is maintained.”

- **That paragraph D includes the substance of the phrase “to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area” so that it reads:**

“D. Proposals for Tall and Very tall buildings will need to provide evidence of how they have complied with the criteria in this policy, as well as and the London Plan Policy D9 as well as related policies (in particular CDH01, CDH08, ECC01, ECC02 and TRC04) contained within the Local Plan together with Historic England guidance on tall buildings, to ensure that proposals are appropriate for their location and do not lead to unacceptable impacts on the local area”.

- **The Designing for Density Supplementary Planning Document needs to be finalised before the Local Plan is approved.**

2.0.6 TALL BUILDINGS 6 MM46, D - Policy CDH04 Tall Buildings

E. All new Tall Buildings must meet the requirements of the Building Safety Act 2022 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Proposals that involve residential buildings over 30 metres in height will need to provide two staircases to meet Building Regulations standards on Fire Safety.

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

2.0.6.1 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.

This clause is not in line with [March 2024 amendments to Approved Document B, volume 1 and volume 2, which in clause, 3.30b](#) of which states that buildings with a top storey of 18 metres or more in height should be “served by more than one common stair” or [Government guidance](#) which is expected to become law. Having regard to the fact that this has not been reflected in the Draft, we consider that CDH04 should also require the assessment of

proposals to take account the latest building and fire safety laws and regulations, together with duties under Equality laws and regulations, regarding the evacuation of people who have difficulty or unable to access stairs or by other means.

2.0.6.2 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.)

We suggest that the text reads as follows:

- E. All new Tall Buildings must meet the requirements of the Building Safety Act 2022 and the Equality Act 2010 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Proposals that involve residential buildings over 18 metres in height will need to provide two staircases to meet Building Regulations standards on Fire Safety. The assessment of Proposals should have due regard to the building safety, fire safety and equalities laws and regulations extant at the time of the assessment.

2.0.7 TALL BUILDINGS 7, MM46, 6.18.2 - Policy CDH04 Tall Buildings

6.18.2 Tall buildings can form part of a strategic design-led approach to optimising the capacity of sites through comprehensive redevelopment. Taller buildings are not the only way to deliver higher densities and optimise the potential of brownfield sites. As referenced in the London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for a site. Therefore, the Council will carefully assess the design and townscape qualities of proposals to ensure that the Borough's predominant suburban and historic character is maintained. ~~Such~~ Sites in locations where tall buildings may be appropriate ~~must~~ should be well-connected by public transport and have good access to services and amenities. As part of a placemaking strategy they can help to emphasise the character of a place as a centre of activity. Tall buildings that are of exemplary architectural quality can make a positive contribution to Barnet and become a valued part of the identity of places such as Brent Cross and Colindale ~~as well as Growth Areas and Town Centres such as Cricklewood, and Edgware~~ which are designated as Growth Areas in this Plan. Within more sensitive townscapes as well as Growth Areas and Town Centres such as Finchley Central, and North Finchley, and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000) this form of development presents greater challenges in addressing more constrained site locations. Reflecting these constraints, the Council has identified specific site opportunities for higher density development within town centres, where tall buildings may be appropriate. These are included in Annex 1 – Schedule of Proposals and shown on Map 4 as well as the Policies Map.

2.0.7.1 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.

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

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

2.0.7.2 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.)

The phrase “the Borough’s predominant suburban and historic character is maintained” suggests

that this will not apply to certain areas. It seems illogical that Edgware, which is on the very outer fringe of London, is deemed less sensitive than Finchley Central and North Finchley, with no explanation given as to why more centrally located centres should be considered to have a suburban character that is more sensitive, when intuitively one would expect the opposite.

It would be inappropriate for Tall and especially Very Tall buildings to not be well served by public transport as this could make them less suitable for mobility impaired people. Edgware is on the very outer fringes of London and while there is a good southbound tube link, connections going in other directions are slow. While Edgware is served by a large number of bus routes, bus travel is sub optimal, for example, when comparing the time for say a 5 mile tube journey south on the Northern Line, with a 5 mile bus journey to access areas in suburbs in the north east or west. Development in areas closer to London would involve shorter distances to travel to central London and tube connectivity in more than one direction. There are no current plans to increase tube capacity on the Northern Line and large scale development in Edgware would increase demand on a tube line which has the worst air quality on London Underground.

From a practical perspective, major development in Edgware resulting in a loss of public parking could adversely impact on journey times for local businesses where easy access to and from the town will be diminished people living in the outer reaches of the locality, who rely on cars to access the town centre or public transport. This would be especially bad for the mobility impaired. We also would like to see a clear definition of “well served by public transport”. The definition needs to take account of travel times as well as the number of connections and also accessibility of fast forms of transport (such as the Tube), for all people in the locality.

PROPOSED REVISION

The 4th sentence onwards should read

- Therefore, the Council will carefully assess the design and townscape qualities of proposals to ensure that **a townscape's** predominant suburban and historic character is maintained. Sites in locations where tall buildings may be appropriate **must** be well-connected by public transport and

have good access to services and amenities. As part of a placemaking strategy they can help to emphasise the character of a place as a centre of activity. Tall buildings that are of exemplary architectural quality can make a positive contribution to Barnet and become a valued part of the identity of places such as Brent Cross, Colindale as well as Growth Areas and Town Centres such as Cricklewood, Edgware, Finchley Central, and North Finchley, and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000).

Please include a definition of 'well served by public transport'.

2.0.8 TALL BUILDINGS 8, MM46, 6.18.3 - Policy CDH04 Tall Buildings

6.18.3 ~~While tall buildings offer the opportunity for intensive use, their~~ The siting and design of tall buildings should be carefully considered so not to detract from the nature of surrounding places and the quality of life for those living and working around them to make optimal use of the capacity of sites, which are well-connected by public transport and have good access to services and amenities. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. Tall buildings of a high quality design in the right location can make a positive contribution to the townscape; however they can also have detrimental visual, functional and environmental impacts. The Council will also assess applications for tall buildings proposed on sites outside of the locations specified in CDH04A as potentially suitable for tall buildings; all applications needing to be determined against relevant development management policy criteria. Due to their potential impact, development proposals that include tall buildings will need to must demonstrate compliance with address all relevant parts of Policy CDH04 as well as the requirements listed in the London Plan (Tall Buildings Policy D9) which ~~emphasises that~~ outlines the issues that proposals for tall buildings should address to minimise the visual, functional and environmental impacts of such structures. Proposals are therefore, as a minimum, required to address site specific and character considerations including typologies related to proposed uses, views, form, public realm, safety, amenity and microclimate. Regard should also be ~~had~~ made to Historic England's Advice Note 4 guidance on tall buildings. Proposals for tall buildings of more than 30 metres in height (~~equivalent to 9 storeys~~) are will be referred referrable to the Mayor of London).

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

2.0.8.1 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.

The deletion of the phrase “so not to detract from the nature of surrounding places and the quality of life for those living and working around them” **is totally unacceptable - the inference is that certain areas will be condemned to a lower quality life. This is unacceptable for both new and existing residents. Combining the lower quality of life with new residents who could be living in high density accommodation -it is likely to increase the likelihood of crime and anti-social behaviour.**

The insertion of the phrase: “to make optimal use of the capacity of sites, which are well-connected by public transport and have good access to services and amenities”, further suggests a quantity over quality of life approach which is also unacceptable.

The removal of the phrase “will need to demonstrate compliance” **implies a lower level of attention and due diligence than had previously been envisaged. This is inappropriate, given the potential impact of tall buildings on people’s lives.**

The amendment “which emphasises that outlines the issues that proposals for tall buildings should address to minimise the visual, functional and environmental impacts of such structures” **implies that visual, functional and environmental impacts are not as important as previously envisaged.**

The insertion “Proposals are therefore, as a minimum, required to address site specific and character considerations including typologies related to proposed uses, views, form, public realm, safety, amenity and microclimate.” implies a lowering of the bar where other matters previously mentioned are not so important.

2.0.8.2 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.)

6.18.3 ~~While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered so not to detract from the nature of surrounding places and the quality of life for those living and working around them. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. Tall buildings of a high quality design in the right location can make a positive contribution to the townscape; however they can also have detrimental visual, functional and environmental impacts. The Council will also assess applications for tall buildings proposed on sites outside of the locations specified in CDH04A as potentially suitable for tall buildings; all applications needing to be determined against relevant development management policy criteria. Due to their potential impact, development proposals that include tall buildings must demonstrate compliance with Policy CDH04 as well as the requirements listed in the London Plan (Tall Buildings Policy D9) which emphasises that proposals for tall buildings should address the visual, functional and environmental impacts of such structures. Regard should also be had made to Historic England’s Advice Note 4 guidance on tall buildings. Proposals for tall buildings of more~~

than 30 metres in height (equivalent to 9 storeys) are will be referred referrable to the Mayor of London.

2.0.9 TALL BUILDINGS 9, MM46, 6.18.5 - Policy CDH04 Tall Buildings

6.18.5 Barnet's Tall Buildings Study Update informs Barnet's Local Plan, providing guidance regarding the potential heights and locations of tall buildings and a detailed contextual and spatial analysis to establish a design-led approach to future development of Tall Buildings in the Borough. The Study Update ~~It investigated~~ where this form of development may be appropriately sited ~~the potential opportunity for development of tall buildings,~~ and considers ~~ing~~ existing and approved development to help identify and establish the suitable locations for tall buildings and heights outlined in Policy CDH04. ~~these areas. The Update provides the basis for identifying strategic locations where proposals for tall buildings may be appropriate.~~ These locations include Opportunity Growth Areas such as Brent Cross, ~~Cricklewood~~ Brent Cross West (Staples Corner) and Colindale as well as town centres such as Edgware. ~~The Update also highlighted the long established association of the~~ and A5 and A1000 major thoroughfares, which have a long established association with buildings of 8 storeys or more. The Update provides a contextual and spatial analysis of the A5 and A1000 corridors as well as Finchley Central Town Centre covering ~~all (with the exception of New Southgate Opportunity Area)~~ the identified strategic locations. It therefore helps ~~and~~ sets the basis for guidance on a design led approach covering parameters, scale and height that will be established through a Supplementary Planning Document (SPD) on Building Heights Designing for Density. The SPD will provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use and development capacity. The SPD will further articulate, as guidance, the implementation of Policy CDH04 and distinguish between the character and context of each of the identified 'appropriate' locations to provide further clarity around heights in sensitive townscapes such as Finchley Central, North Finchley, and along the Major Thoroughfares. ~~The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD and the North Finchley Town Centre Framework SPD. Within the New Southgate Opportunity Area the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. Consideration of the parameters for tall buildings in New Southgate will be a key feature of the area planning framework.~~

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

2.0.9.1 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.

It is not acceptable that the Local Plan could become effective without the Designing for Density Supplementary Planning Document being in place. Therefore such guidance needs to be an integral part of the Local Plan or should be prepared and finalised prior to the approval of the Local Plan.

Edgware has been treated differently to North Finchley & Finchley Central - we have pointed out elsewhere why a large number of Tall and Very Tall Buildings are not appropriate for Edgware and why it should be considered sensitively. (eg: transport inefficiency, location on the outer fringe of London).

2.0.9.2 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.)

The phrase “such as Edgware” should be removed.

The phrase: “around heights in sensitive townscapes such as Finchley Central, North Finchley, and along the Major Thoroughfares”. Should become “around heights in sensitive townscapes such as Finchley Central, North Finchley, **Edgware**, and along the Major Thoroughfares”.

The Designing for Density Supplementary Planning Document needs to be finalised before the Local Plan is approved.

MM	Original Text	Proposed Modifications	Notes
46 6.18 .5	6.18.5 Barnet’s Tall Buildings Study Update informs Barnet’s Local Plan, providing <u>guidance regarding the potential heights and locations of tall buildings and a detailed contextual and spatial analysis to establish a design-led approach to future development of Tall Buildings in the Borough. The Study Update # investigateds where this form of development may be appropriately sited the potential opportunity for development of tall buildings, and considers ing-existing and</u>	6.18.5 Barnet’s Tall Buildings Study Update informs Barnet’s Local Plan, providing <u>guidance regarding the potential heights and locations of tall buildings and a detailed contextual and spatial analysis to establish a design-led approach to future development of Tall Buildings in the Borough. The Study Update # investigateds where this form of development may be appropriately sited the potential opportunity for development of tall buildings,</u>	The phrase “such as Edgware” should be removed. The phrase: “around heights in sensitive townscapes such as Finchley Central, North Finchley, and along the Major Thoroughfares”. Should become “around heights in

MM	Original Text	Proposed Modifications	Notes
	<p>approved development to <u>help identify and establish the suitable locations for tall buildings and heights outlined in Policy CDH04.</u> these areas. The Update provides the basis for identifying strategic locations where proposals for tall buildings may be appropriate. These locations include Opportunity Growth Areas such as Brent Cross, Cricklewood Brent Cross West (Staples Corner) and Colindale <u>as well as town centres such as Edgware.</u> The Update also <u>highlighted the long established association of the and A5 and A1000 major thoroughfares which have a long established association with buildings of 8 storeys or more.</u> The Update provides a contextual and spatial analysis of the A5 and A1000 corridors as well as Finchley Central Town Centre covering all (with the exception of New Southgate Opportunity Area) the identified strategic locations. <u>It therefore helps and sets the basis for guidance on a design led approach covering parameters, scale and height that will be established through a Supplementary Planning Document (SPD) on Building Heights Designing for Density.</u> The SPD will provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use and development capacity. The SPD will further articulate, as guidance, the implementation of Policy CDH04 and distinguish between the character and</p>	<p>and considers ing-existing and approved development to <u>help identify and establish the suitable locations for tall buildings and heights outlined in Policy CDH04.</u> these areas. The Update provides the basis for identifying strategic locations where proposals for tall buildings may be appropriate. These locations include Opportunity Growth Areas such as Brent Cross, Cricklewood Brent Cross West (Staples Corner) and Colindale as well as town centres such as Edgware. The Update also <u>highlighted the long established association of the and A5 and A1000 major thoroughfares which have a long established association with buildings of 8 storeys or more.</u> The Update provides a contextual and spatial analysis of the A5 and A1000 corridors as well as Finchley Central Town Centre covering all (with the exception of New Southgate Opportunity Area) the identified strategic locations. <u>It therefore helps and sets the basis for guidance on a design led approach covering parameters, scale and height that will be established through a Supplementary Planning Document (SPD) on Building Heights Designing for Density.</u> The SPD will provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use</p>	<p><i>sensitive townscapes such as Finchley Central, North Finchley, Edgware, and along the Major Thoroughfares".</i></p> <p>The Designing for Density Supplementary Planning Document needs to be finalised before the Local Plan is approved.</p>

MM	Original Text	Proposed Modifications	Notes
	<p><u>context of each of the identified ‘appropriate’ locations to provide further clarity around heights in sensitive townscapes such as Finchley Central, North Finchley, and along the Major Thoroughfares.</u> The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD and the North Finchley Town Centre Framework SPD. Within the New Southgate Opportunity Area the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. Consideration of the parameters for tall buildings in New Southgate will be a key feature of the area planning framework.</p>	<p><u>and development capacity. The SPD will further articulate, as guidance, the implementation of Policy CDH04 and distinguish between the character and context of each of the identified ‘appropriate’ locations to provide further clarity around heights in sensitive townscapes such as Finchley Central, North Finchley, Edgware, and along the Major Thoroughfares.</u> The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD and the North Finchley Town Centre Framework SPD. Within the New Southgate Opportunity Area the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. Consideration of the parameters for tall buildings in New Southgate will be a key feature of the area planning framework.</p>	

2.0.10 TALL BUILDINGS 10, MM46 6.18.6 - Policy CDH04 Tall Buildings

6.18.6 Since the definition of a tall building was established in the 2012 Local Plan new buildings of height have been developed within the Borough’s identified strategic locations. This reflects a rising trend in Outer London with tall building development a consequence of estate regeneration programmes, increasing housing targets and comparatively lower land values in the suburbs. Reflecting the increase in the development of tall buildings within Barnet, notably around Colindale and West Hendon, since 2012 there is a need to recognise local variation and application so as to manage

~~positively assist delivering proposals for Tall Buildings ensuring that they are in the right place and at an appropriate height. In addition, the London Plan expects boroughs as part of a plan led approach to determine the maximum acceptable height of Tall Buildings (London Plan para 3.9.2). An additional definition of a Very Tall Building set at 15 storeys or more (45 metres or more above ground level) has been introduced.~~

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

2.0.10.1 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.

The deletion of the final sentence represents a watering down, which will make it easier for Very Tall buildings which may be inappropriate for an area to be approved. As mentioned in previous representations this is inappropriate for an area like Edgware.

Furthermore the London Plan requires Boroughs to “identify locations where tall buildings may be an appropriate form of development” and “in these locations, determine the maximum height that could be acceptable” - this does not appear to have taken place

2.0.10.2 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.)

The final sentence should be reinstated.

The Local Plan should include a maximum height for Tall Buildings or Very Tall Buildings

2.0.11 TALL BUILDINGS 11, MM46, 6.18.7 - Policy CDH04 Tall Buildings

~~6.18.7 Very Tall Buildings will not be permitted in the strategic locations identified in Policy CDH04 unless exceptional circumstances can be demonstrated. Such circumstances can include appropriate siting within an Opportunity Area or Growth Area. Opportunity~~

~~Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development on the basis of Area Frameworks that set parameters for development proposals in the area. Opportunity Areas are areas of extensive change while Growth Areas are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment. Growth Areas, together with the District Town Centres, provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. Each~~ Many of the strategic locations identified in Policy CDH04 is ~~are~~ subject to more detailed policy in the Chapter on Growth and Spatial Strategy. The Growth Areas (Policies GSS02 to GSS06) through good public transport accessibility and a supply of brownfield and underused land provide the best opportunities offered for development. Table 5 – New Homes Delivery shows that the Growth Areas are expected to deliver over 21,000 new homes within the lifetime of the Local Plan. Through identified developable and deliverable sites substantial capacity to accommodate new homes, jobs and infrastructure will be realised in Barnet's Growth Areas.

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

2.0.11.1 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.

If the insertion at the end is considered to be appropriate, then this suggests that Edgware is not suitable for large numbers of tall or very tall buildings:

- Regarding the phrase “good public transport accessibility”. It is something that should be defined and the definition should extend beyond PTAL. As previously mentioned, while Edgware has Tube access going south it has no tube or rail access in other directions and is well served by different bus routes, bus travel is not an efficient form of transport for travelling more than a short distance. Given the poor air quality on the Northern Line and plans for more developments on the Edgware Branch, without increasing capacity. In our view Edgware does not have “good public transport accessibility” and large numbers of new residents without cars, would put strain on a network that is presently only adequate.
- The phrase “underused land” does not apply to site 27, which is a shopping centre and well used car park which is valued by people in Edgware and beyond.

- Much of site 28 is indispensably used as transport undertakings (Northern Line tracks/sidings and station, plus a bus garage and bus station with associated infrastructure) plus a Site of Borough Importance for Nature Conservation

2.0.11.2 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.)

The reference to Very Tall buildings should be reinstated. If the inserted paragraph remains then Edgware would need to be removed from CDH04A

2.0.12 TALL BUILDINGS 13, MM46, 6.18.8 - Policy CDH04 Tall Buildings

6.18.8 Detailed urban design analysis and evidence will be required for tall buildings to establish if they are appropriate in principle and meet all the policy tests. Proposals for tall buildings should use the Barnet Characterisation Study as a starting point for a 360° appraisal of the impact of the design of all buildings of height on their surrounding area. The Council will work with the Mayor to utilise 3D virtual reality digital modelling to help assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can be used to help assess cumulative impacts of developments, particularly those permitted but not yet completed. Proposals should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Varying heights, proportion, silhouette and facing materials at the design stage will help assess how to lessen any negative impacts including light pollution; and reflected glare. Architectural quality and materials of an exemplary standard should ensure that the appearance and architectural integrity of the building is maintained through its lifespan. London Plan policy D9 – Tall Buildings sets out further considerations on the functional impact including ensuring the safety of occupants and surrounding areas through internal and external design as well as servicing, maintenance and building management arrangements which should be considered at the start of the design process. In terms of environmental impacts wind, daylight, sunlight penetration and temperature conditions must be carefully considered, and air movement affected by the building(s) should support the effective dispersion of pollutants and ~~not detract from~~ help enhance the comfort and enjoyment of open spaces around the building. All new tall buildings must meet the requirements of the Building Safety Act 2022 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

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

2.0.12.1 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.

Given the potential safety implications of tall buildings for mobility impaired people there needs to be a reference to Equalities legislation. The reference to Very Tall buildings should be reinstated.

2.0.12.2 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.)

The inserted word towards the end of the paragraph should become "All new Tall and Very Tall buildings must meet the requirements of the Building Safety Act 2022 and the Equalities Act 2010 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings"

2.0.13 TALL BUILDINGS 14, MM46, 6.18.10 - Policy CDH04 Tall Buildings

6.18.10 High density development can be delivered through well designed compact development that does not necessarily have to be a tall building. Tall buildings generally cost more to construct per unit of floor area than low or medium rise buildings, have longer build out times and are also considered less sustainable overall due to environmental effects and higher energy requirements. While tall buildings may offer the opportunity for more intensive use, it is essential that proposals occur in the most suitable and sustainable locations as outlined in Policy CDH04. This will help ensure that ~~can protect and enhance~~ the existing character and townscape of the Borough is protected and where possible enhanced.

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

2.0.13.1 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.

The insertion of the phrase “as outlined in Policy CDH04”, implies that the inclusion of an area in CDH04A defines it as being suitable and sustainable. For reasons stated elsewhere sites 27 & 28 in Edgware are not suitable and sustainable locations.

2.0.13.2 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.)

Edgware should be removed from CDH 04.

2.0.14 TALL BUILDINGS 15, MM46, 6.18.12 - Policy CDH04 Tall Buildings

6.18.12 The Council requires that visual impact is addressed in terms of long-range views ~~from of~~ the top of the building, mid-range views from the surrounding neighbourhood and intermediate views from the surrounding streets. The Council has identified on Map 4 and the Policies Map four long established important local views within the Borough. These are:

1. from Mill Field towards Harrow-on-the-Hill;
 2. from Golders Hill Park towards Harrow-on-the-Hill;
 3. from Hampstead Heath Extension towards Hampstead Garden Suburb; and
 4. from King George Fields, Hadley Green across Central London including Canary Wharf.
- ~~Map 4 shows these locally important views, conservation areas in the Borough, Green Belt / MOL and the location of existing tall buildings together with the strategic locations (including Opportunity Areas) identified for tall buildings. The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing. Proposals for buildings of height that the Council considers cause harm to these views will be resisted.~~

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

2.0.14.1 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.

There is a popular [viewpoint from Stanmore Country Park](#) in Harrow towards Central London which would be marred by a large number of high rise blocks in Edgware. This needs to be added to the list of locally important views. It is not sufficient to only include views from locations in Barnet.

Locally important views are on map 7 not map 4.

2.0.14.2 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.)

The words “in the Borough” should be removed and “from the viewpoint, Stanmore Country Park across Central London f”, needs to be added. The important views map needs to be amended accordingly and numbered appropriately.

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-notice>

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 __Anuta Zack on behalf of Save Our Edgware_____

Date __14 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association_____

Date __14 June 2024_____

3 Appendix: Original MM46 Policy CDH04 Tall Buildings

Policy CDH04 Tall Buildings

A. Tall buildings (8 to 14 storeys and above or (26 to 46 metres above and above ground level)) may be appropriate in the following locations strategic locations:

- Brent Cross Growth (Opportunity) Area (Policy GSS02);
- Brent Cross West Growth (Opportunity) Area (Policy GSS03);
- Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);
- Cricklewood Growth (Opportunity) Area (Policy GSS04);
- Edgware Growth Area (Policy GSS05);
- West Hendon Estate (Policy GSS10); and
- Locations specified on Map 4
- New Southgate Opportunity Area²⁷ (Policy GSS09);
- Major Thoroughfares – Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the
- Town Centres of Finchley Central and North Finchley (Policy GSS08)

Annex 1 - Schedule of Proposals also includes sites that may be appropriate for tall buildings.

b. b) Tall buildings of 15 storeys or more ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area or Growth Area.

e. c) Any proposal for a 'Very Tall' building must have a legible and coherent role, integrating effectively to its location in compliance with part d)

b. d) The Council will produce SPD on Building Heights Supplementary Planning Document, which will set out within the identified strategic locations, the parameters for tall and very tall buildings within the areas and site locations identified as being potentially appropriate for tall buildings.

e) B. Proposals for Tall and Very Buildings must adequately address all the criteria in London Plan Policy D9C, including in terms of acceptable cumulative visual, environmental and functional impacts including siting, microclimate, wind turbulence, noise, daylight and sunlight, reflective glare, aviation, navigation and electronic communication or broadcast interference; will be assessed in accordance with the visual, functional, environmental and cumulative impacts set out in London Plan Policy D9 Tall Buildings. Particular attention will be given to assessing the following:

i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate;

ii. how the building responds to topography, with no adverse impact on longer-range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views

iii. the buildings contribution to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.

iv. the relationship between the building and the surrounding public realm,

v. the relationship between the building and the natural environment, including public open spaces and river corridors

Taller elements should be set back from any rivers and water courses and designed so as not to cause harm to the wildlife, including directing artificial light away from the river corridor.

vi. buildings should not interfere with digital connectivity in compliance with Policy TRC04 nor have a possible negative impact on solar energy generation on adjoining buildings

~~e. ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution~~

~~C. Proposals are required to have regard to the Locally Important Views depicted on Map 4~~

~~D. Proposals for tall and very tall buildings will need to provide evidence of how they have complied with the criteria in this policy as well as and the London Plan Policy D9 and as well as related policies (in particular CDH01, CDH08, ECC01, ECC02 and TRC04) contained within the Local Plan. Historic England guidance on tall buildings.~~

~~E. All new Tall Buildings must meet the requirements of the Building Safety Act 2022 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Proposals that involve residential buildings over 30 metres in height will need to provide two staircases to meet Building Regulations standards on Fire Safety.~~

~~Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape.~~

~~Proposals should be of an exemplary standard in architectural quality and materials to ensure the appearance and architectural integrity of the building is maintained.~~

~~Barnet's definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.~~

The Council will produce a Designing for Density Supplementary Planning Document. This will provide guidance on how the appropriateness of Tall Building proposals will be assessed relative to the impacts detailed in London Plan Policy D9C. It will also set out good practice design guidance on site-specific and character considerations including typologies related to uses, views, form, public realm, safety, amenity and microclimates.

6.18 Tall Buildings

6.18.1 The predominant and largely residential suburban character of Barnet is two or three storeys. Reflecting this character, the potential for tall buildings within Barnet may be constrained in some locations. However, as the Borough changes over the lifetime of this Plan next fifteen years certain locations will evolve a different local character as tall and medium rise buildings are expected to play a greater part in new development.

6.18.2 Tall buildings can form part of a strategic design-led approach to optimising the capacity of sites through comprehensive redevelopment. Taller buildings are not the only way to deliver higher densities and optimise the potential of brownfield sites. As referenced in the London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for a site. Therefore, the Council will carefully assess the design and townscape qualities of proposals to ensure that the Borough's predominant suburban and historic character is maintained. Such sites in locations where tall buildings may be appropriate must should be well-connected by public transport and have good access to services and amenities. As part of a placemaking strategy they can help to emphasise the character of a place as a centre of activity. Tall buildings that are of exemplary architectural quality can make a positive contribution to Barnet and become a valued part of the identity of places such as Brent Cross and Colindale as well as Growth Areas and Town Centres such as Cricklewood, and Edgware which are designated as Growth Areas in this Plan. Within more sensitive townscapes as well as Growth Areas and Town Centres such as Finchley Central, and North Finchley, and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000) this form of development presents greater challenges in addressing more constrained site locations. Reflecting these constraints, the Council has identified specific site opportunities for higher density development within town centres, where tall buildings may be appropriate. These are included in Annex 1 – Schedule of Proposals and shown on Map 4 as well as the Policies Map.

6.18.3 ~~While tall buildings offer the opportunity for intensive use, their siting and design of tall buildings should be carefully considered so not to detract from the nature of surrounding places and the quality of life for those living and working around them~~ to make optimal use of the capacity of sites, which are well-connected by public transport and have good access to services and amenities. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. Tall buildings of a high quality design in the right location can make a positive contribution to the townscape; however they can also have detrimental visual, functional and environmental impacts. The Council will also assess applications for tall buildings proposed on sites outside of the locations specified in CDH04A as potentially suitable for tall buildings; all applications needing to be determined against relevant development management policy criteria. Due to their potential impact, development proposals that include tall buildings will need to ~~must demonstrate compliance with~~ address all relevant parts of Policy CDH04 as well as the requirements listed in the London Plan (Tall Buildings Policy D9) which emphasises that outlines the issues that proposals for tall buildings should address to minimise the visual, functional and environmental impacts of such structures. Proposals are therefore, as a minimum, required to address site specific and character considerations including typologies related to proposed uses, views, form, public realm, safety, amenity and microclimate. Regard should also be ~~had made~~ to Historic England's Advice Note 4 ~~guidance~~ on tall buildings. Proposals for tall buildings of more than 30 metres in height (~~equivalent to 9 storeys~~) ~~are~~ will be referred ~~referrable~~ to the Mayor of London).

6.18.4 The London Plan requires Development Plans to define, based on local context, what is considered a tall building for specific localities. Barnet through the 2012 Local Plan established ~~its~~ its definition of a tall building as a structure having a height of 8 storeys or more (equivalent to 26 metres or more above ground level). This is on the basis that a storey is generally 3 to 3.25 metres in height. The 2012 Local Plan also identified ~~strategic locations were~~ where tall buildings may be appropriate.

6.18.5 Barnet's Tall Buildings Study Update informs Barnet's Local Plan, providing guidance regarding the potential heights and locations of tall buildings and a detailed contextual and spatial analysis to establish a design-led approach to future development of Tall Buildings in the Borough. The Study Update # investigateds where this form of development may be appropriately sited the potential opportunity for development of tall buildings; and considers ing-existing and approved development to help identify and establish the suitable-locations for tall buildings and heights outlined in Policy CDH04. these areas. The Update provides the basis for identifying strategic locations where proposals for tall buildings may be appropriate. These locations include ~~Opportunity Growth Areas such as Brent Cross, -Cricklewood Brent Cross West (Staples Corner) and Colindale~~ as well as town centres such as Edgware. The Update also highlighted the long ~~established association of the and A5 and A1000 major thoroughfares which have a long established association~~ with buildings of 8 storeys or more. The Update provides a contextual and spatial analysis of the A5 and A1000 corridors as well as Finchley Central Town Centre covering ~~all~~ (with the exception of New Southgate Opportunity Area) the identified strategic locations. It therefore helps and sets the basis for guidance on a design led approach covering parameters; scale and height that will be established through a Supplementary Planning Document (SPD) on Building Heights Designing for Density. The SPD will provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use and development capacity. The SPD will further articulate, as guidance, the implementation of Policy CDH04 and distinguish between the character and context of each of the identified 'appropriate' locations to provide further clarity around heights in sensitive townscapes such as Finchley Central, North Finchley, and along the Major Thoroughfares. The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD and the North Finchley Town Centre Framework SPD. Within the New Southgate Opportunity Area the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. Consideration of the parameters for tall buildings in New Southgate will be a key feature of the area planning framework.

6.18.5A The Council has signalled its intention to facilitate an early review of the Local Plan through formal publication of a new Local Development Scheme. It is anticipated that a strategic policy and joint area planning framework will be established with LB Enfield and LB Haringey for the New Southgate Opportunity Area (NSOA). This will enable consideration of the potential for tall buildings within the NSOA to be taken into account when this Local Plan is reviewed.

6.18.6 Since the definition of a Tall Building was established in the 2012 Local Plan new buildings of height have been developed within the Borough's identified strategic locations. This reflects a rising trend in Outer London with tall building development a consequence of estate regeneration programmes, increasing housing targets and comparatively lower land values in the suburbs. Reflecting the increase in the development of tall buildings within Barnet, notably around Colindale and West Hendon, since 2012 there is a need to recognise local variation and application so as to ~~manage positively assist delivering proposals for Tall Buildings ensuring that they are~~ in the right place and at an appropriate height. ~~In addition, the London Plan expects boroughs as part of a plan-led approach to determine the maximum acceptable height of Tall Buildings (London Plan para 3.9.2). An additional definition of a Very Tall Building set at 15 storeys or more (45 metres or more above ground level) has been introduced.~~

6.18.7 ~~Very Tall Buildings will not be permitted in the strategic locations identified in Policy CDH04 unless exceptional circumstances can be demonstrated. Such circumstances can include appropriate siting within an Opportunity Area or Growth Area. Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development on the basis of Area Frameworks that set parameters for development proposals in the area. Opportunity Areas are areas of extensive change while Growth Areas are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment. Growth Areas, together with the District Town Centres, provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. Each Many of the strategic locations identified in Policy CDH04 is are subject to more detailed policy in the Chapter on Growth and Spatial Strategy. The Growth Areas (Policies GSS02 to GSS06) through good public transport accessibility and a supply of brownfield and underused land provide the best opportunities offered for development. Table 5 – New Homes Delivery shows that the Growth Areas are expected to deliver over 21,000 new homes within the lifetime of the Local Plan. Through identified developable and deliverable sites substantial capacity to accommodate new homes, jobs and infrastructure will be realised in Barnet's Growth Areas.~~

6.18.8 Detailed urban design analysis and evidence will be required for tall buildings to establish if they are appropriate in principle and meet all the policy tests. Proposals for tall buildings should use the Barnet Characterisation Study as a starting point for a 360° appraisal of the impact of the design of all buildings of height on their surrounding area. The Council will work with the Mayor to utilise 3D virtual reality digital modelling to help assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can be used to help assess cumulative impacts of developments, particularly those permitted but not yet completed. Proposals should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Varying heights, proportion, silhouette and facing materials at the design stage will help assess how to lessen any negative impacts including light pollution, and reflected glare. Architectural quality and materials of an exemplary standard should ensure that the appearance and architectural integrity of the building is maintained through its lifespan. London Plan policy D9 – Tall Buildings sets out further considerations on the functional impact including ensuring the safety of occupants and surrounding areas through internal and external design as well as servicing, maintenance and building management arrangements which should be considered at the start of the design process. In terms of environmental impacts wind, daylight, sunlight penetration and temperature conditions must be carefully considered, and air movement affected by the building(s) should support the effective dispersion of pollutants and ~~not detract from~~ help enhance the comfort and enjoyment of open spaces around the building. All new tall buildings must meet the requirements of the Building Safety Act 2022 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

6.18.9 Policy GSS09 highlights residential led mixed-use opportunities for design-led infill development on the major thoroughfares of Barnet as shown on the Key Diagram. ~~Although Recognising that~~ there has been a loss of original residential character along these routes, ~~which are characterised by good public transport accessibility~~, there is an opportunity for ~~higher density~~ infill development including ~~Tall Buildings~~ (where appropriately located on Edgware Road (A5) and Great North Road (A1000)) to have a positive impact on the environment of the thoroughfare. It is imperative that such design-led proposals should ~~sensitively~~ relate to the original character of the suburban streets behind the thoroughfare. ~~The loss of original character together with good public transport accessibility has contributed to the promotion of such thoroughfares for higher density development.~~ There is also a desire to better manage the development proposals that are coming forward in such locations.

6.18.10 High density development can be delivered through well designed compact development that does not necessarily have to be a tall building. Tall buildings generally cost more to construct per unit of floor area than low or medium rise buildings, have longer build out times and are also considered less sustainable overall due to environmental effects and higher energy requirements. While tall buildings ~~may~~ offer the opportunity for more intensive use, it is essential that proposals occur in the most suitable and sustainable locations ~~as outlined in Policy CDH04. This will help ensure that can protect and enhance~~ the existing character and townscape of the Borough ~~is protected and where possible enhanced.~~

6.18.11 ~~The Council expects N~~new tall buildings ~~to should~~ positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are tangible public benefits derived that outweigh that harm. ~~Riverside Watercourse~~ locations are often an attractive choice for developments ~~with tall buildings offering views over the landscape and river.~~ However, if tall buildings are located too close to a watercourse they can cause overshadowing, create wind corridors and introduce artificial light spill which can disrupt vegetation growth and the attractiveness of the river corridor area as habitat or migratory/foraging routes for wildlife, such as bats, insects and birds. In order to avoid such impacts taller buildings should be to be set back further, more than 10 metres, to provide a substantial buffer zone adjacent to the river, and to preserve and enhance the river corridor area.

6.18.12 The Council requires that visual impact is addressed in terms of long-range views ~~from of~~ the top of the building, mid-range views from the surrounding neighbourhood and intermediate views from the surrounding streets. ~~The Council has identified on Map 4 and the Policies Map four long established important local views within the Borough. These are:~~

- ~~1. from Mill Field towards Harrow-on-the-Hill;~~
- ~~2. from Golders Hill Park towards Harrow-on-the-Hill;~~
- ~~3. from Hampstead Heath Extension towards Hampstead Garden Suburb; and~~
- ~~4. from King George Fields, Hadley Green across Central London including Canary Wharf. Map 4 shows these locally important views, conservation areas in the Borough, Green Belt / MOL and the location of existing tall buildings together with the strategic locations (including Opportunity Areas) identified for tall buildings. The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing. Proposals for buildings of height that the Council considers cause harm to these views will be resisted.~~

15. Tall Building can't be too close to river which will affect wildlife such as bats.

6.18.11 ~~The Council expects N~~new tall buildings ~~to should~~ positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are tangible public benefits derived that outweigh that harm. ~~Riverside Watercourse~~ locations are often an attractive choice for developments ~~with tall buildings offering views over the landscape~~

and river. However, if tall buildings are located too close to a watercourse they can cause overshadowing, create wind corridors and introduce artificial light spill which can disrupt vegetation growth and the attractiveness of the river corridor area as habitat or migratory/foraging routes for wildlife, such as bats, insects and birds. In order to avoid such impacts taller buildings should be to be set back further, more than 10 metres, to provide a substantial buffer zone adjacent to the river, and to preserve and enhance the river corridor area.

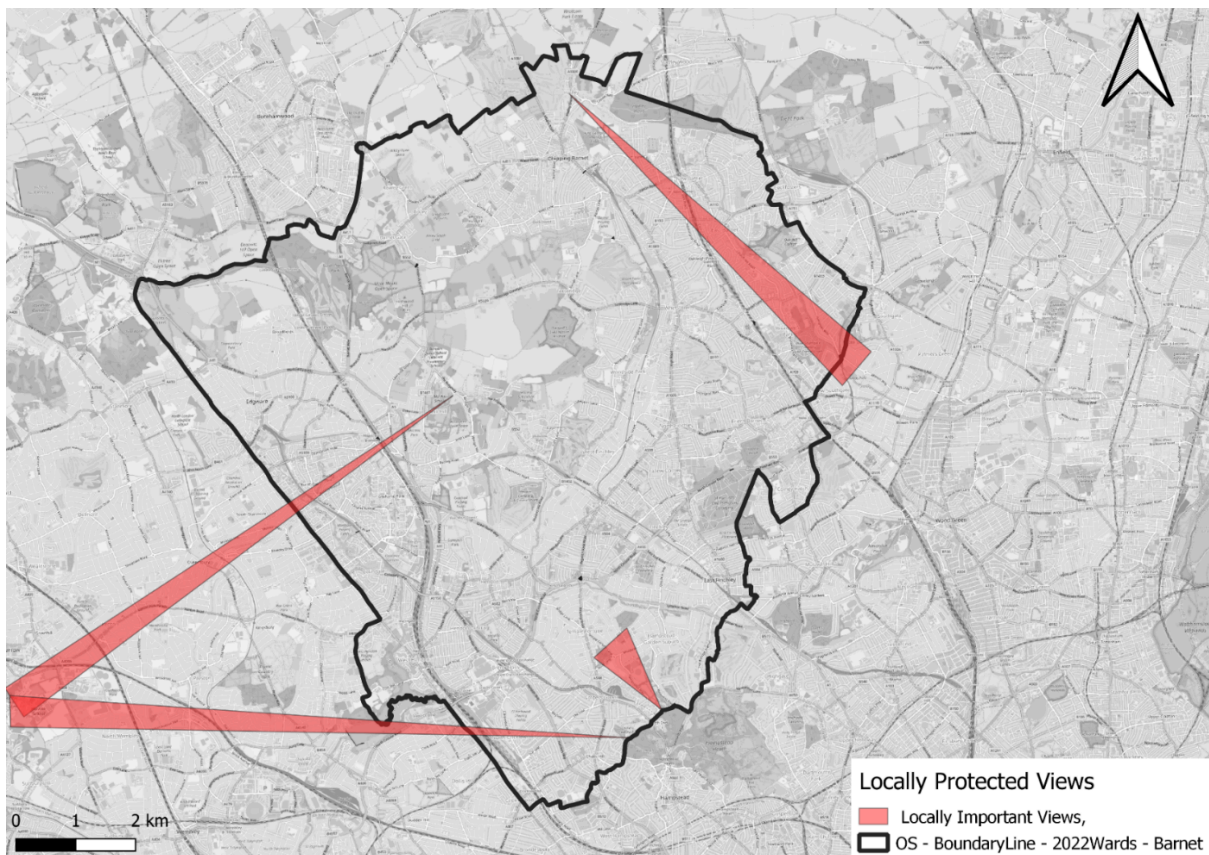
3.0.1 Tall building should not affect neighbouring boroughs heritage assets and their settings

6.18.11 The Council expects Nnew tall buildings to ~~should~~ positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are tangible public benefits derived that outweigh that harm.

3.0.2 Edgware nearly blocks the Locally important views

Locally Important Views

1. Map 7 sets out the 4 locally important views from points within the Borough. These views are shown in Local Plan Map 4 in support of Policy CDH04 – Tall Buildings and on the Policies Map. T



Ref:
(For official use only)

Preserve Edgware's

Heritage - MM51 (Policy

CDH08 Barnet's Heritage)

Save Our Edgware and Edgware Community Association's representation relating to Main Modifications 51 concerning the preservation of Edgware's Heritage



Preserving Edgware
Building Tomorrow Together



1 Question 1: To which Main Modification does your representation relate?.....3
2 Question 2: Do you consider that the Main Modification is:.....3
3 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.).....4

3.1 Risk to Edgware’s Heritage in Barnet and Harrow.....	4
3.2 Risk to adjacent Conservation Area.....	7
3.3 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas	9
3.3.1 Conserving Heritage - National Planning Policy Framework (NPPF).....	10
3.3.2 Conserving Heritage - The London Plan.....	11
4 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.).....	12
4.1 Proposed Modification table.....	13
4.2 The 2021 version of the CDH08 Barnet Heritage can better protect Barnet’s heritage.	40
5 Appendix: M 51 Policy CDH08 Barnet’s Heritage and MM46 Policy CDH04 Tall Buildings.....	44
5.1 MM 51 Policy CDH08 Barnet’s Heritage.....	44
5.2 Previous Policy CDH08 Barnet’s Heritage.....	60

Representations Form

PART B - Your representation

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

1 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 ___ MM51 (Policy CDH08 Barnet's Heritage) _____ Policy
___ Related to CDH08 _____ Paragraph ___ All _____

Figure/Table _____ Policies Map change _____

2 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"/> |

3 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

3.1 Risk to Edgware's Heritage in Barnet and Harrow

Edgware consists of 5 wards, 2 of which are in Harrow so whilst a small part of the borough of Harrow the portion of Edgware in Harrow is a very significant part of Edgware. The Borough boundary actually dissects Edgware's High Street and historic center.

The London Plan wrongly classifies Edgware as a Major Center. However in no way could the town be classified by anyone's metrics as even close to Major if not including the Harrow portion of Edgware. It is inequitable to take a pick and mix approach to Edgware's Harrow assets. The Harrow side of Edgware has 2 conservation areas yards from the borough boundary that are afforded no protection despite being integral parts of Edgware and containing some of Edgware's oldest surviving buildings and covered by an archaeological priority designation. It contains Edgware's war memorial to its dead.

Location of this list entry and nearby places that are also listed. Use our [map search](#) to find more listed places.



The Canons Park Estate conservation area is deemed an outstanding area. The Key View down the Canons Drive which is home to one of the finest tree collections in the country would be decimated by tall buildings. The below picture illustrates how the clusters of tall buildings, proposed by Ballymore who follows Barnet's Edgware Policy GSS05, can have a significant detrimental impact to Canons Park Estate conservation area.

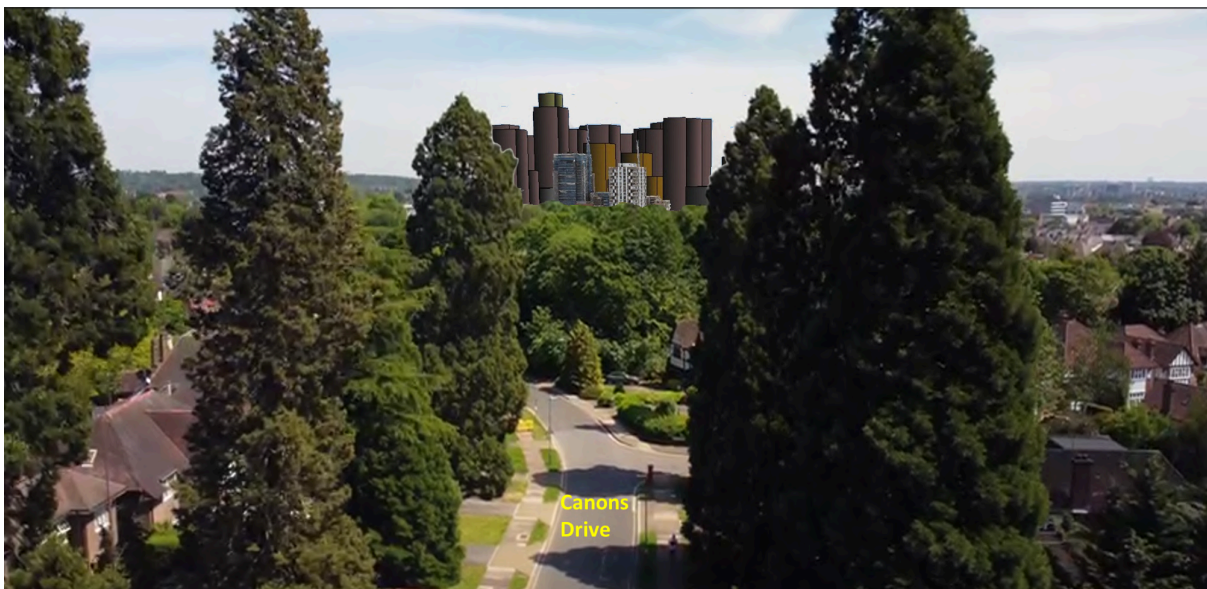


Figure: view of the Edgware Tall Builds by Ballymore from Canons Drive



Yet is excluded from any consideration. Harrow has not agreed on the tall building strategy for Edgware which is a joint town.

Barnet and Harrow created a joint SPD historically, in no way should any development strategy of a town artificially divided by a borough line not be a jointly agreed strategy. Barnet's local plan in respect of Edgware must be agreed fully and jointly with Harrow. There must be an inclusive vision that ensures balanced growth throughout the town whilst preserving the unique character and historical significance of the town much of which is situated on the Harrow side of the boundary. CDH08 must take into account all neighbouring designated heritage assets with equal care and consideration.

Causing divisions in community identity and preventing the integration of heritage conservation can not be justified on the grounds of artificial borough boundaries that show no respect to the history and heritage of a town.

The NPPF emphasises the enhancing and conserving of the historic environment, it also charges that "any" heritage that may be affected by a proposal be identified and assessed, not simply those limited to borough lines. The London Plan 2021 stipulates that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to form, scale, materials

and architectural detail policy HC1. Historic England guidance stipulates this as part of planning.

3.2 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 Conservation Areas.

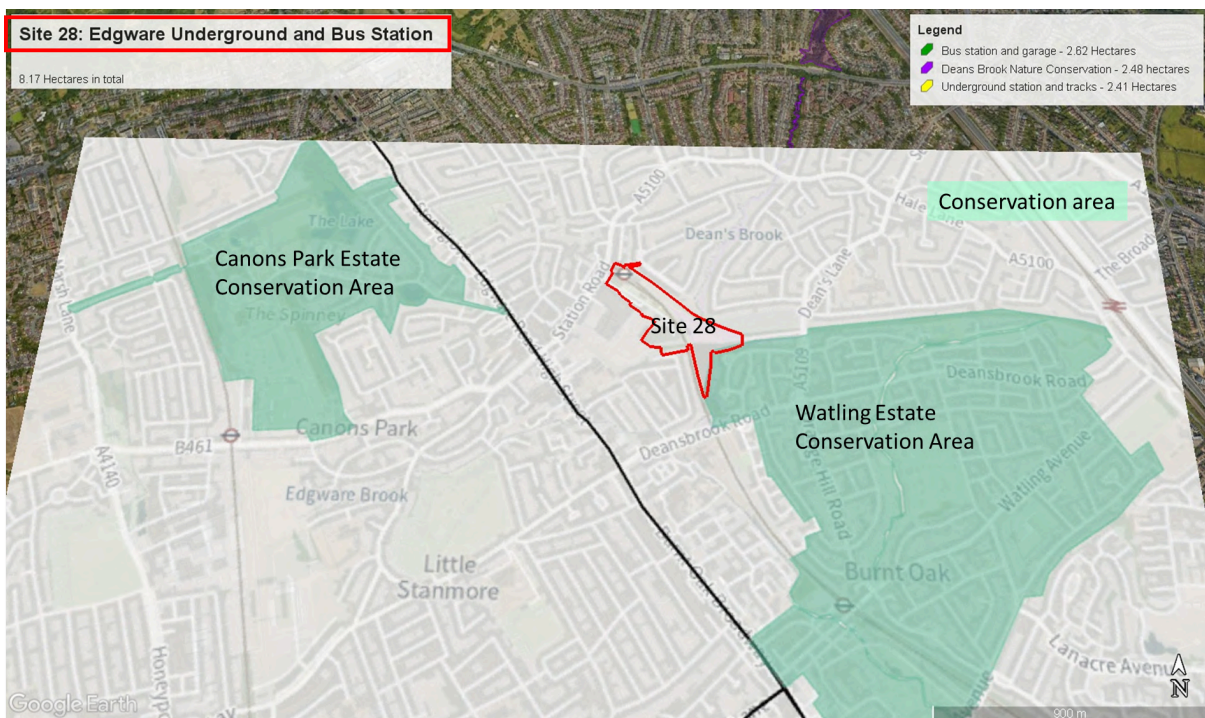




Figure: view of the GSS05 Edgware Growth Area Policy implementation by Ballymore from Watling Estate Conservation Area

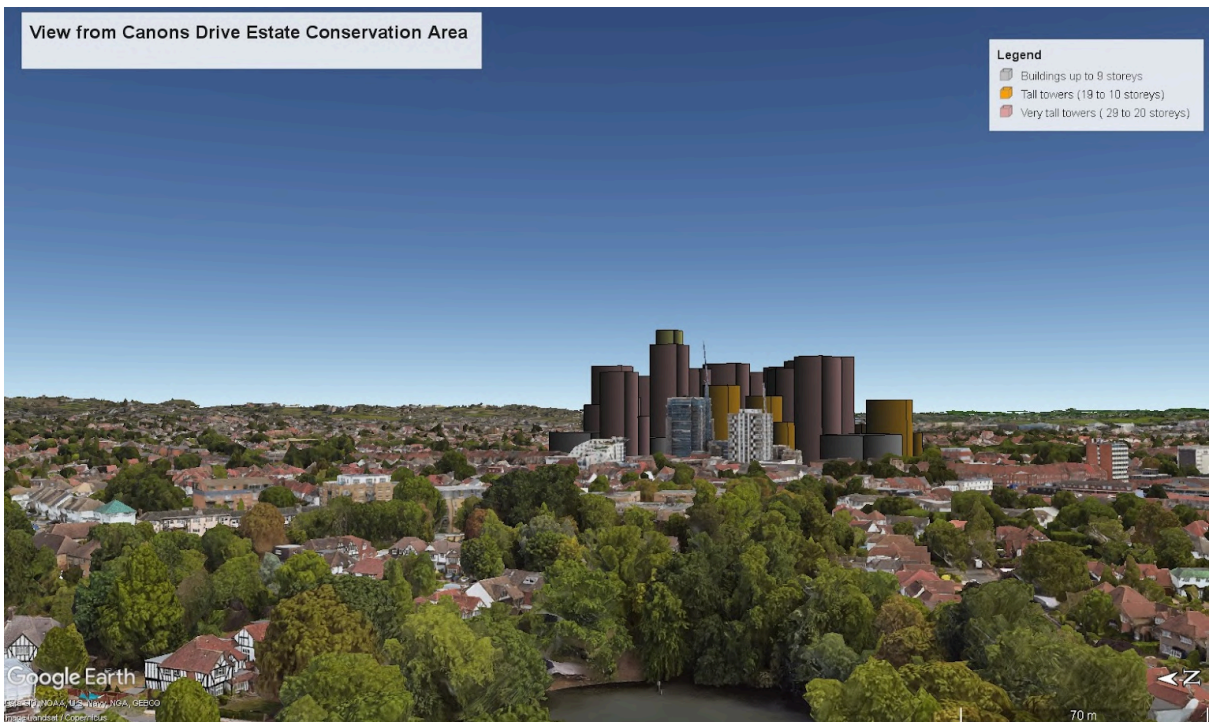


Figure: View of the GSS05 Edgware Growth Area Policy implementation by Ballymore from Canons Drive Estate Conservation Area

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=thggysBG42U>

3.3 Heritage - Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas

Edgware is in Archaeological Priority Areas. It should be protected from overdevelopment.

In Barnet Policy CDH08, it states that

"There are also two Scheduled Monuments, at Brockley Hill in Edgwarebury and at the Manor House in Finchley, five prehistoric, four Roman and thirty mediaeval sites containing archaeological remains of more than local importance. These have been grouped into nineteen 'Local Archaeological Priority Areas' (APAs) as listed in Table 11 and shown on the Policies Map. "

Table 12 11 - Barnet's Designated and Non-designated Heritage Assets

Listed Buildings	<u>Over 670</u> 651 entries
Battlefield Site	Battle of Barnet 1471
Registered Parks and Gardens	5 registered historic parks and gardens; St Marylebone Cemetery, Stephens House and Gardens Avenue House Garden , Golders Green Crematorium, St Pancras Cemetery and Hoop Lane Jewish Cemetery.
Scheduled Monuments	Brockley Hill Romano – British Pottery, Edgware Manor House Moated Site, East End Road, Finchley
Archaeological Priority Areas	Burnt Oak Edgware Edgwarebury and Scratchwood Watling Street
Conservation Areas	14. Watling Estate, Burnt Oak, 1998
Locally Listed Buildings	<u>Over 1,250</u> 1,221

The National Planning Policy Framework (NPPF) and the London Plan both include policies and regulations to protect Archaeological Priority Areas (APAs) from overdevelopment, particularly with tall buildings.

3.3.1 Conserving Heritage - National Planning Policy Framework (NPPF)

The NPPF provides a comprehensive framework for conserving and enhancing the historic environment. Key sections relevant to protecting Archaeological Priority Areas include:

- **Section 16: Conserving and Enhancing the Historic Environment**
 - **Paragraph 189:** This paragraph emphasises the need to identify and assess the significance of any heritage assets that might be affected by a development. It specifically mentions the importance of desk-based assessments and field evaluations for archaeological sites.
 - **Paragraph 194:** It states that any harm to, or loss of, the significance of a designated heritage asset (including archaeological sites) should require clear and convincing justification.
 - **Paragraph 195:** When a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

3.3.2 Conserving Heritage - The London Plan

The London Plan includes specific policies aimed at protecting heritage assets, including Archaeological Priority Areas, from inappropriate development. Relevant policies include:

- **Policy HC1: Heritage conservation and growth**
 - **Policy HC1(A):** It requires boroughs to develop and implement local policies that conserve the significance of heritage assets and their settings. This includes identifying and protecting APAs.
 - **Policy HC1(C):** Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- **Policy D9: Tall buildings**
 - **Policy D9(C):** This policy states that proposals for tall buildings should address their visual, functional, environmental, and cumulative impacts, including the potential effect on the significance of heritage assets. It specifically requires an assessment of the impact of tall buildings on the character and heritage significance of areas.
 - **Policy D9(D):** It ensures that tall building locations are carefully managed and that their height, scale, massing, and footprint are appropriate to their context, particularly concerning heritage assets.

4 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.

4.1 Proposed Modification table

MM	Original	Proposed modifications	Notes
MM 51 Introduction	<p>Designated Heritage Assets Great weight will be placed on the conservation of the Borough's designated heritage assets, including listed buildings and conservation areas, when considering the impact of development proposals. Any harm to, or loss of, the designated heritage asset will require clear and convincing justification. Substantial harm to, or loss of, designated heritage assets will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that outweigh such harm or loss.</p> <p>Where less than substantial harm will result from a development proposal, this harm will need to be balanced against any public benefits that emanate from the proposal.</p>	<p>Designated Heritage Assets Great weight will be placed on the conservation of the Borough's designated heritage assets, including listed buildings and conservation areas, when considering the impact of development proposals. Any harm to, or loss of, the designated heritage asset will require clear and convincing justification. Substantial harm to, or loss of, designated heritage assets will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that outweigh such harm or loss.</p> <p>Where less than substantial harm will result from a development proposal, this harm will need to be balanced against any public benefits that emanate from the proposal.</p>	reinstated

MM51 A	<p>A. Conservation Areas</p> <p>The Council will seek to preserve or enhance <u>In exercising the Council's duties set out in section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special attention will be paid to the desirability of preserving or enhancing the character and appearance of conservation areas when assessing development proposals. Great weight will be given to the asset's conservation.</u> Conservation area character appraisals and, where applicable, conservation area-based design guidance will be used in the assessment of planning applications.</p> <p>The following criteria will be applied to <u>development in conservation areas:</u></p> <p>i) the loss or substantial demolition of, a building that makes a positive contribution to the character or appearance of a conservation area, including a locally listed building</p> <p>a) <u>development resulting in substantial harm to or loss of the significance of the designated heritage asset will be resisted,</u></p>	<p>Should reinstate the previous version</p> <p>A. Conservation Areas</p> <p><u>Conservation Areas The Council will seek to preserve or enhance the character and appearance of its conservation areas when assessing development proposals. Conservation area character appraisals and where applicable, conservation area-based design guidance will be used in the assessment of planning applications. The following criteria will be applied:</u></p> <p><u>i) the loss or substantial demolition of, a building that makes a positive contribution to the character or appearance of a conservation area, including a locally listed building, will be resisted.</u></p> <p><u>ii) the impact of development outside a conservation area, but which has a harmful impact on its character or appearance, including its setting, will be resisted.</u></p> <p><u>iii) the impact of development on trees, landscaping and open space, including gardens, that contributes to the character or</u></p>	<p>Should reinstate the previous version</p> <p>The modifications water down the commitment to protect heritage assets. MM should be reverted to the previous version.</p>
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unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the relevant criteria within the NPPF apply.

b) where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

c) ~~ii) the above criteria a) and b), will also be applied where impact of development either inside or outside a conservation area (within its setting), but which has a harmful impact on its character, or appearance or significance, including its setting, will be resisted where there would be adverse effects to buildings. iii) the impact of development on trees, landscaping and or open space, including gardens, that contributes positively to its significance. to the character or appearance of a conservation area will be opposed.~~

appearance of a conservation area will be opposed

iv) proposals should have regard to the local historic context and character

v)

vi) proposals should retain architectural detailing, traditional features, including shopfronts, which contribute positively to the appearance of a building or an area

vii) in exceptional circumstances, where the loss of any heritage asset is permitted, the Council will require the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred

d) ~~v)~~ proposals should have regard to the local historic context and character, including the appearance, scale, mass and height of buildings, use of materials, patterns of development and the layout of buildings and spaces. ~~v)~~ vi)

e) proposals should retain architectural detailing, traditional features, including shopfronts, which contribute positively to the character, appearance and significance of a building or an area conservation area.

~~vii) in exceptional circumstances, where the loss of any heritage asset is permitted, the Council will require the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred~~

<p>MM51</p> <p>B</p>	<p>B.</p> <p>Statutory Listed Buildings</p> <p><u>In exercising the Council’s duties as set out in sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the conservation of Barnet’s statutory listed buildings will be given a high priority of importance great weight (the more important the asset, the greater the weight should be). when assessing applications. Special regard will be given to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In accordance with national policy, Any harm to, or loss of, the significance of listed buildings will require clear and convincing justification.</u></p> <p>The following <u>criteria approach</u> will be applied:</p> <p>i) Resist any where there is harm to, or loss of significance of a listed building, including from its whole or partial demolition, extensions or alterations that are inappropriate in design, scale or material, ii) Resist harmful alterations to the interior or exterior, or changes to curtilage features iii) Resist extensions or additions that are inappropriate in design, scale or material or any other iii) Resist any</p>	<p>a.</p> <p>where resulting in substantial harm to the significance of the designated heritage asset the proposal will be resisted, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (or all of the relevant criteria within the NPPF apply);</p> <p>b.</p> <p>where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p>	<p>b) should not be added.</p>
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harm to, or loss of, its significance, from development within ~~its~~ the setting of a listed building, including tall buildings³⁰;

- a. where resulting in substantial harm to the significance of the designated heritage asset the proposal will be resisted, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (or all of the relevant criteria within the NPPF apply).
- b. where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

<p>MM51</p> <p>E</p>	<p>E. Locally Listed Buildings and Other Non-Designated Local Heritage Assets</p> <p>The Council will protect <u>conserve</u> Locally Listed Buildings <u>local non-designated heritage assets</u> and their settings in accordance with a <u>a manner appropriate to their significance.</u> Therefore, and in accordance with <u>national policy,</u> the <u>effect on the significance of a non-designated heritage asset will be taken into account in determining an application.</u> There is a presumption in favour of their retention and their loss will be normally be resisted. <u>When considering applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss, taking into account any public benefits that might result.</u> Development proposals, including external alterations and extensions, <u>are encouraged to take opportunities to</u> should conserve, <u>better</u> reveal and enhance the significance of these non-designated heritage assets and their settings.</p>	<p>When considering applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss, taking into account any public benefits that might result.</p> <p>There is a presumption in favour of their retention and their loss will be normally be resisted</p>	<p>Reject</p> <p>There is no definition of the metrics of judgement.</p> <p>Reinstate previous version</p>
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MM51	<p>F. Archaeology</p>	<p>Archaeology</p>	
F	<p>Archaeological remains will be protected, conserved <u>in a manner appropriate to their significance. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation will be required. particularly in the identified Areas of Special Significance, by requiring that This should include acceptable measures are to be taken proportionate to the significance of the heritage asset to preserve conserve them and their setting, including physical preservation, where considered appropriate. Where dDevelopment which impacts substantially on archaeological assets of national importance, which are of demonstrably equivalent significance to scheduled monuments, will be resisted it will be subject of consideration relative to the approach to heritage assets in the NPPF.</u></p> <p>Scheduled monuments and other undesignated assets which are demonstrably</p>	<p><u>Archaeological remains will be protected, particularly in the identified Local Areas of Special Significance, by requiring that acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where considered appropriate. Development which impacts substantially on archaeological assets of national importance will be resisted. Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance, which hold, or potentially hold, evidence of past human activity, should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment together with, where necessary, a field evaluation.</u></p>	<p>Reinstate the previous version. Do not make changes.</p> <p>Edgware, Edgwarebury and Burnt Oak are in Archaeological Priority Areas</p>

~~of national archaeological importance, which hold, or potentially hold, evidence of past human activity, should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest,~~ The Council will require developers to consult with GLAAS and if appropriate HADAS the Greater London Archaeological Advisory Service (GLAAS) and, where relevant, the Hendon and District Archaeological Society (HADAS)¹, including and submit submission of an appropriate desk-based assessment together with, where necessary, a field evaluation. Archaeological Priority Areas (APAs) are identified in Table 11. As part of any application, development proposals within these areas will need to provide detail in consultation with GLAAS of how they will investigate, catalogue and where possible preserve the remains in situ or in a museum.

<p>Non-Designated Heritage Assets When assessing the impact of a proposal on a non-designated heritage asset, the effect on its significance will be taken into account when determining the application. A balanced judgement will be required, having regard to the scale of any harm or loss and any public benefits that might result.</p> <p>The Council may identify any potential non-designated heritage asset as a consideration of development proposals:</p> <p>Heritage at Risk The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register.</p> <p>Archaeological Interest The Council will protect remains of archaeological importance in accordance with their significance. Assets of national archaeological importance should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with</p>	<p><u>Non-Designated Heritage Assets</u> <u>When assessing the impact of a proposal on a non-designated heritage asset, the effect on its significance will be taken into account when determining the application. A balanced judgement will be required, having regard to the scale of any harm or loss and any public benefits that might result.</u></p> <p><u>The Council may identify any potential non-designated heritage asset as a consideration of development proposals.</u></p> <p><u>Heritage at Risk</u> <u>The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register.</u></p> <p><u>Archaeological Interest</u> <u>The Council will protect remains of archaeological importance in accordance with their significance. Assets of national archaeological importance should be preserved in-situ. Where a site on which development is proposed includes, or has</u></p>	<p>reinstate</p>
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~~archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment and, where necessary, a field evaluation.~~

the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment and, where necessary, a field evaluation.

<p>MM 51 6.23.2</p>	<p>6.23.2 National planning policy distinguishes between designated and non-designated heritage assets. Table 42 <u>11</u> lists Barnet's heritage assets (including Statutory Listed Buildings, Battlefield Sites, Registered Parks and Gardens, Scheduled Monuments, Local Areas of Special Archaeological Significance and Conservation Areas) and non-designated heritage assets (local heritage assets locally listed buildings)²⁹ <u>including APAs and locally listed buildings</u>). These assets are an irreplaceable resource and the Council will therefore assess proposals based on a presumption that the heritage asset should be conserved while looking for opportunities to enhance a heritage asset's significance. The Council recognises that well-designed development can make a positive contribution to and better reveal the significance of heritage assets. The Council takes a proactive approach to conserving its heritage assets in a number of ways. These include: the publication of Conservation Area Character Appraisals; working with Conservation Area Advisory Committees; working with Historic England to remove heritage at risk assets from the register; the <u>maintenance</u></p>	<p><u>Local Areas of Special Archaeological Significance</u></p>	<p>reinstate</p>
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	<p>establishment of a Local Heritage List; and the production of Design Guidance and Codes creation of Design Guidance.</p>		
MM51 6.23.3	<p><u>6.23.3 In determining applications for planning permission that affect heritage assets or their settings, the NPPF requires, amongst other things, that local planning authorities take into account the desirability of sustaining and enhancing the significance of such heritage assets, and of putting them to viable uses consistent with their conservation; and consider the positive contribution that conserving such heritage assets can make to sustainable communities including their economic vitality.</u></p>	<p>6.23.3 In determining applications for planning permission that affect heritage assets or their settings, the NPPF requires, amongst other things, that local planning authorities take into account the desirability of sustaining and enhancing the significance of such heritage assets, and of putting them to viable uses consistent with their conservation; and consider the positive contribution that conserving such heritage assets can make to sustainable communities including their economic vitality.</p>	<p>Reject</p> <p>There is an inherent potential conflict of interest and no details of how that can be arbitrated. Many heritage assets have been lost due to short term objectives and vision throughout the country. The presumption must be to retain. Long term benefits must be given weight.</p>

<p>MM51</p> <p>6.14</p>	<p>6.24 Designated Heritage Assets</p> <p>6.24.1 In accordance with the NPPF great weight will be placed on the conservation of the Borough's designated heritage assets when considering the impact of development proposals. The Council will not permit harm to a designated heritage asset unless the public benefits, which can include heritage benefits, of the proposal outweigh the harm; <u>or, in the case that development would result in substantial harm to or total loss of the significance of the asset, it is demonstrated that the nature of the asset prevents all reasonable uses of the site; no viable use of the asset itself can be found in the medium term through appropriate marketing that will enable its conservation; conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.</u> More detailed guidance on public benefits is set out in National Planning Practice Guidance (NPPG). Harm to, or loss of, a designated heritage asset requires clear and convincing</p>	<p>;; or, in the case that development would result in substantial harm to or total loss of the significance of the asset, it is demonstrated that the nature of the asset prevents all reasonable uses of the site; no viable use of the asset itself can be found in the medium term through appropriate marketing that will enable its conservation; conservation by grant funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.</p>	<p>Reject.</p> <p>Lack of viability is often argued by developers who then make above industry standard profits in the long run. Independent assessment must be provided.</p>
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<p>justification. In determining applications affecting heritage assets the Council will take into consideration the scale of the harm and the significance of the asset.</p>		
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MM 51	<p>6.25 Conservation Areas</p>	<p>The Council will manage changes in a way that ensures the distinctive characters of conservation areas is retained and all new development makes a positive contribution to the conservation areas in particular that it preserves or enhances the special character or appearance of that area. The character of each a-conservation areas derives from a combination of factors, which include the such as built form and scale of its historic buildings and density, the pattern of development, the overall landscape including the topography, trees and open space.</p>	Reinstate
6.25.1	<p>6.25.1 The Council has adopted a series of conservation area character appraisals which serve as a material consideration when assessing planning applications for development in conservation areas. <u>Design guidance has also been produced for some conservation areas and provides advice on repairs, alterations, extensions, outbuildings, landscaping, works to trees and gardens. Applications are determined in the light of the guidance provided.</u> The Council will manage changes in a way that ensures the distinctive characters of conservation areas is retained and all new development makes a positive contribution to the conservation areas in particular that it preserves or enhances the special character or appearance of that area. The character of each a-conservation areas derives from a combination of factors, which include the such as built form and scale of its historic buildings and density, the pattern of development, the overall landscape including the topography, trees and open space. In addition, characteristic materials, architectural detail and historic uses are</p>		Do not agree the water down of commitment

<p>significant. The design of new development should identify and respond to such elements. Design and Access Statements must include an assessment of the historic local context and character and clarify how new proposals have been informed by it and respond to it.</p>		
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<p>MM51 6.25.2</p>	<p>6.25.2 Barnet's conservation areas can also be impacted by development which takes place outside of the conservation area but may be visible from within it as part of its setting. This can include high or bulky buildings, which can have a detrimental impact on areas that may be some distance away, as well as development that may be-sit alongside a conservation area. The Council will oppose <u>critically appraise development which outside conservation areas, including in neighbouring boroughs, that it considers could cause harms the significance of to the character, appearance or setting of any a conservation area in accordance with the NPPF and any other relevant guidance produced by the Council (including Conservation Area Design Guidance).</u></p>	<p>6.25.2 Barnet's conservation areas can also be impacted by development <u>which takes place</u> outside of the conservation area but may be visible from within it <u>as part of its setting.</u> This can include high or bulky buildings, which can have a detrimental impact on areas that may be some distance away, as well as development that may be-sit alongside a conservation area. The Council will oppose critically appraise development which outside conservation areas, including in neighbouring boroughs, that it considers could cause harms the significance of to the character, appearance or setting of any a conservation area <u>in accordance with the NPPF and any other relevant guidance produced by the Council (including Conservation Area Design Guidance).</u></p>	<p>Reinstate the original text</p> <p>The borough should look to work in collaboration with neighbouring boroughs. No community or town should be divided by arbitrary borough lines. Councils and planning should lead the way in showing collaboration. Neighbour relationships are important in all contexts.</p>
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<p>MM46</p> <p>B, iii</p>	<p><u>B. Proposals for Tall and Very Buildings must adequately address all the criteria in London Plan Policy D9C, including in terms of acceptable cumulative visual, environmental and functional impacts including siting, microclimate, wind turbulence, noise, daylight and sunlight, reflective glare, aviation, navigation and electronic communication or broadcast interference; will be assessed in accordance with the visual, functional, environmental and cumulative impacts set out in London Plan Policy D9 Tall Buildings. Particular attention will be given to assessing the following:</u></p> <p><u>i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate;</u></p> <p><u>ii. how the building responds to topography, with no adverse impact on longer range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views</u></p> <p><u>iii. the buildings contribution to the character of the area. Proposals should</u></p>	<p>In Site Description section:</p> <p>Edgware is identified as a location where tall buildings of 8 storeys or more may be appropriate within the boundaries of the Town Centre.</p> <p>Edgware is identified as a District Town Centre in a Suburban setting. Tall buildings of 8 storeys or more are not appropriate within the boundaries of the Town Centre. Development must take account of the surrounding suburban areas, local heritage, listed buildings and conservation areas.</p> <p>Particular attention will be given to assessing the following:</p> <p>i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to</p>	<p>REdware is a District Town Centre in a Suburban setting. Barnet council has wrongly assigned Edgware Town centre to be central</p> <p>.</p> <p>Reinstate</p> <p>Good practice and all development should meld well into their environment.</p>
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take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.

pedestrian permeability and providing an active street frontage where appropriate;
ii. how the building responds to topography, with no adverse impact on longer range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views
iii. the buildings contribution to the character of the area

. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings

Reinstate

The concept that neighbouring boroughs' heritage assets should not be given equal respect is unacceptable.

R	<p>6.25.6 The use of Article 4 Directions to remove permitted development rights will be considered where the character and appearance of a conservation area is <u>believed considered</u> to be under threat by the loss or alteration of traditional architectural details. <u>gradual erosion of its character and appearance through inappropriate development.</u></p>		
	<p>6.26.3 The setting of a listed building is not fixed and may change as the asset and its surroundings evolve. The setting itself is not designated and its importance depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. New development can impact on the setting of listed buildings and any adverse impact should be avoided <u>will require clear and convincing justification</u>. Historic England has produced guidance on managing change within the setting of heritage assets and proposals will <u>be</u> expected to be in line with this guidance.</p>	<p><u>will require clear and convincing justification</u></p>	<p>Remove</p> <p>Heritage assets should be protected providing a gateway to justifying their diminution is not appropriate.</p>

<p>6.32 6.31 Heritage at Risk</p> <p>6.32.1 6.31.1 Barnet's Heritage at Risk Register is updated <u>annually by Historic England and reported</u> through the Authorities Monitoring Report. The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register. Developers considering the redevelopment of sites containing buildings on the Register must work with the Council and Historic England to determine the best course of action to retain and restore the historic asset.</p>	<p>Developers considering the redevelopment of sites containing buildings on the Register must work with the Council and Historic England to determine the best course of action to retain and restore the historic asset.</p>	<p>Retain Seems best practice and optimal.</p>
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~~6.33.1~~ 6.32.1 Barnet has many historic, locally significant buildings and other assets which make a positive contribution to the distinctiveness of local areas, including conservation areas. The NPPF identifies such buildings and structures as non-designated heritage assets. Barnet has a Local Heritage List which identifies buildings of historic or architectural interest. The Council may identify any ~~potential~~ non-designated heritage asset ~~when considering development proposals as part of the decision-making process on planning applications (see NPPG para: 039 Reference ID: 18a-040-20190723).~~ The non-designated heritage asset will be identified by applying the adopted criteria for the selection of local heritage assets as found on the Council's website. The effect of an application on the significance of a non-designated heritage asset will be taken into account in determining the application, in accordance with the NPPF. These NPPF requirements mean that the conservation of a building or site on a local heritage list as a heritage asset is a material consideration when determining the outcome of a planning application. Planning applications can be

<p><u>refused on the grounds of harm to a local heritage asset. The legitimacy and weight within the planning system of local heritage lists is increased when the list has been prepared in accordance with defined selection criteria and has been subject to public consultation. In considering applications that affect these non-designated heritage assets, the Council will have regard to the significance of the asset and the scale of any harm or loss.</u></p> <p><u>There is a presumption in favour of retaining all Locally Listed Buildings as well as any building which makes a positive contribution to the character or appearance of a Conservation Area.</u></p>	<p><u>There is a presumption in favour of retaining all Locally Listed Buildings as well as any building which makes a positive contribution to the character or appearance of a Conservation Area.</u></p>	<p>Retain</p> <p>There should always be a presumption to retain heritage assets.</p>
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~~6.32.2 The Council will need to be satisfied that all efforts have been made to continue the present use or to find the compatible alternative uses before considering demolition as a viable option, including marketing the property for the sole purpose of its ongoing use. Prior to considering the demolition of a non-designated heritage asset, it is expected that efforts are made to continue its use or find alternative uses that are consistent with its conservation. In line with the NPPF a deteriorated condition as a result of deliberate neglect of or damage to a heritage asset will not be a factor considered in any decision. The Council EPA will assess proposals for demolition by taking into consideration both the condition of the existing building (particularly if it is beyond repair and its continued use is unviable), the harm to its significance, balanced against and the merits of the alternative proposals for the site including public benefits, which could include heritage benefits.~~

~~2_ The Council will need to be satisfied that all efforts have been made to continue the present use or to find the compatible alternative uses before considering demolition as a viable option, including marketing the property for the sole purpose of its ongoing use~~

Retain

Why would it not be all efforts

<p><u>6.28-6.33 Archaeological Priority Areas and Scheduled Monuments</u></p> <p>6.28-1 <u>6.33.1</u> Archaeological remains, above and below ground level, and Scheduled Monuments, are important surviving evidence of Barnet's past and once removed are lost forever. Due to the long history of human habitation across Barnet there are archaeological sites and areas, that are designated, undesignated and yet to be discovered; therefore, all applications that have the potential to impact upon archaeological heritage assets should be supported by an archaeological desk-based assessment. The aim of the assessment is to identify the scale and significance of the archaeological impact. An archaeological field evaluation may also be necessary. The Council will consult with Historic England and the Greater London Archaeology Advisory Service (GLAAS) on the implications of development proposals in <u>APAs</u> Archaeological Priority Areas. GLAAS holds further information on archaeological sites in Barnet. When considering proposals which have the potential to impact on archaeological</p>	<p>It may also be appropriate for Hendon and District Archaeology Society (HADAS) to be consulted.</p>	<p>Retain</p> <p>Provides clarity as to who should be consulted.</p>
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remains, the Council will have regard to the NPPF. It may also be appropriate for Hendon and District Archaeology Society (HADAS) to be consulted.		
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4.2 The 2021 version of the CDH08 Barnet Heritage can better protect Barnet's heritag

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 __Anuta Zack on behalf of Save Our Edgware_____ Date __18 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association_____ Date __18 June 2024_____

5 Appendix: M 51 Policy CDH08 Barnet's Heritage and MM46 Policy CDH04 Tall Buildings

5.1 MM 51 Policy CDH08 Barnet's Heritage

<p>MM 51 Chapter 6 Character, Design & Heritage</p> <p>Policy CDH08 And consequential changes to supporting text</p> <p>Paras 6.23.1 to 6.23.3, Section 6.24, Paras 6.24.1, 6.25.1 to 6.25.6, 6.26.1, 6.26.3, 6.28.1, 6.28.2, 6.32.1, 6.32.2, Section 6.33, Para 6.33.1 & Table 11 as renumbered</p>	<p>Policy CDH08 Barnet's Heritage</p> <p>In accordance with national policy, The Council will ensure that Barnet's <u>designated</u> heritage assets (designated and non-designated), including its conservation areas, statutory listed buildings, scheduled monuments, registered historic parks and gardens, archaeological remains, locally listed buildings registered historic battlefield, and its <u>non-designated heritage assets</u> (referred to in Barnet as local heritage assets) are conserved and enhanced in a manner appropriate to their significance. These assets are an irreplaceable resource which greatly contribute to the Borough's distinctive character and should continue to be enjoyed by present and future generations.</p> <p>Designated Heritage Assets</p> <p>Great weight will be placed on the conservation of the Borough's designated heritage assets, including listed buildings and conservation areas, when considering the impact of development proposals. Any harm to, or loss of, the designated heritage asset will require clear and convincing justification. Substantial harm to, or loss of, designated heritage assets will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that outweigh such harm or loss.</p> <p>Where less than substantial harm will result from a development proposal, this harm will need to be balanced against any public benefits that emanate from the proposal.</p>	<p>Comprehensive redraft to ensure CDH08 aligns with NPPF approaches to the historic environment.</p> <p>setting out clear procedures for designated and non-designated heritage assets, including consideration of the potential impact of a proposed development on the significance of designated heritage assets and the approaches where a proposal would result in substantial or less than substantial harm.</p> <p>ensuring that CDH08 is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan revisions relating to:</p> <p>Consistency in terminology for archaeological assets of heritage interest, and clarification in respect of decision making for Barnet's Archaeological Priority Areas (APAs) and the roles of 'GLAAS' and 'HADAS' as potential consultees for applications.</p>
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A. Conservation Areas

~~The Council will seek to preserve or enhance~~ In exercising the Council's duties set out in section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special attention will be paid to the desirability of preserving or enhancing the character and appearance of conservation areas when assessing development proposals. Great weight will be given to the asset's conservation. Conservation area character appraisals and, where applicable, conservation area-based design guidance will be used in the assessment of planning applications.

The following criteria will be applied to development in conservation areas:

~~i) the loss or substantial demolition of, a building that makes a positive contribution to the character or appearance of a conservation area, including a locally listed building~~

a) development resulting in substantial harm to or loss of the significance of the designated heritage asset will be resisted, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the relevant criteria within the NPPF apply.

b) where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

~~c) ii) the above criteria a) and b), will also be applied where impact of development either inside or outside a conservation area (within its setting), but which has a harmful impact on its character, or appearance or significance, including its setting, will be resisted where there would be adverse effects to buildings, iii) the impact of development on trees, landscaping and or open space, including gardens, that contributes positively to its significance. to the character or appearance of a conservation area will be opposed.~~

Accordance with the Council's duties at sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Deletion of requirement for contracts of works to be secured so development proceeds within specific timescales as there is insufficient justification for this.

d) ~~iv)~~ proposals should have regard to the local historic context and character, including the appearance, scale, mass and height of buildings, use of materials, patterns of development and the layout of buildings and spaces. ~~v) vi)~~

e) proposals should retain architectural detailing, traditional features, including shopfronts, which contribute positively to the character, appearance and significance of a building or an area conservation area.

~~vii) in exceptional circumstances, where the loss of any heritage asset is permitted, the Council will require the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred~~

B. Statutory Listed Buildings

In exercising the Council's duties as set out in sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, ~~the~~ conservation of Barnet's statutory listed buildings will be given a high priority of importance great weight (the more important the asset, the greater the weight should be), ~~when assessing applications. Special regard will be given to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In accordance with national policy, Any~~ harm to, or loss of, the significance of listed buildings will require clear and convincing justification.

The following ~~criteria~~ approach will be applied: ~~i) Resist any where there is harm to, or loss of significance of a listed building, including from its whole or partial demolition, extensions or alterations that are inappropriate in design, scale or material. ii) Resist harmful alterations to the interior or exterior, or changes to curtilage features iii) Resist extensions or additions that are inappropriate in design, scale or material or any other iii) Resist any harm to, or loss of, its significance; from development within its the setting of a listed building, including tall buildings³⁰:~~

a) ~~where resulting in substantial harm to the significance of the designated heritage asset the proposal will be resisted, unless it can be demonstrated that the substantial harm or total loss is~~

necessary to achieve substantial public benefits that outweigh that harm or loss (or all of the relevant criteria within the NPPF apply).

- b) where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

C. Registered Parks and Gardens

Development proposals within Registered Parks and Gardens should respect their special historic character and aesthetic qualities, whilst avoiding any adverse impact on their setting or on key views within or outside the designated sites. In accordance with national policy, Any harm to, or loss of, their significance, from alterations, destruction, or from development within ~~its~~ their setting, ~~should~~ will require clear and convincing justification. Substantial harm to Grade II Registered Parks or Gardens should be exceptional, and wholly exceptional for Grade II* Registered Parks or Gardens, and the respective approaches to heritage assets in the NPPF will be followed in circumstances where a proposed development would lead to substantial harm to (or total loss of significance), or would lead to less than substantial harm to its significance.

D. Registered Historic Battlefield

The site of the Battle of Barnet (1471) is of great historical importance and will be protected from development, both above and below ground. If a proposal, that would result in harm to its significance it will be considered relative to the approach to heritage assets in the NPPF.

E. ~~Locally Listed Buildings and Other Non-Designated~~ Local Heritage Assets

The Council will ~~protect~~ conserve ~~Locally Listed Buildings~~ local non-designated heritage assets and their settings in ~~accordance with~~ a manner appropriate to their significance. Therefore, and in accordance with national policy, the effect on the significance of a non-designated heritage asset will

be taken into account in determining an application. There is a presumption in favour of their retention and their loss will be normally be resisted. When considering applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss, taking into account any public benefits that might result. Development proposals, including external alterations and extensions, are encouraged to take opportunities to ~~should conserve~~; better reveal and enhance the significance of these non-designated heritage assets and their settings.

F. Archaeology

Archaeological remains will be ~~protected~~, conserved in a manner appropriate to their significance. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation will be required. ~~particularly in the identified Areas of Special Significance, by requiring that~~ This should include acceptable measures are to be taken proportionate to the significance of the heritage asset to ~~preserve~~ conserve them and their setting, including physical preservation, where considered appropriate. ~~Where dDevelopment which impacts substantially on archaeological assets of national importance, which are of demonstrably equivalent significance to scheduled monuments, will be resisted~~ it will be subject of consideration relative to the approach to heritage assets in the NPPF.

Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance, which hold, or potentially hold, evidence of past human activity, should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, ~~t~~The Council will require developers to consult with GLAAS and if appropriate HADAS the Greater London Archaeological Advisory Service (GLAAS) and, where relevant, the Hendon and District Archaeological Society (HADAS)¹.

¹ HADAS (Hendon and District Archaeological Society) was founded in 1961 with one aim: to find and prove, on the ground, the Saxon origins of Hendon. Since that time the Society has expanded in area, today encompassing the whole of the London Borough of Barnet and excavation and research now covers all archaeological periods

~~including and submit submission of an~~ appropriate desk-based assessment together with, where necessary, a field evaluation. Archaeological Priority Areas (APAs) are identified in Table 11. As part of any application, development proposals within these areas will need to provide detail in consultation with GLAAS of how they will investigate, catalogue and where possible preserve the remains in situ or in a museum.

Non-Designated Heritage Assets

~~When assessing the impact of a proposal on a non-designated heritage asset, the effect on its significance will be taken into account when determining the application. A balanced judgement will be required, having regard to the scale of any harm or loss and any public benefits that might result.~~

~~The Council may identify any potential non-designated heritage asset as a consideration of development proposals.~~

Heritage at Risk

~~The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register.~~

Archaeological Interest

~~The Council will protect remains of archaeological importance in accordance with their significance. Assets of national archaeological importance should be preserved in-situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment and, where necessary, a field evaluation.~~

6.23 Barnet's Heritage

6.23.1 The Council takes a positive approach to the conservation and enhancement of the historic environment and recognises the wide benefits it can bring to the local economy, character, and distinctiveness of the Borough. Barnet's historic environment significantly contributes to the Borough and its sense of place and therefore all new development should respect its ~~the~~ character and distinctiveness.

~~of Barnet's historic environment.~~ The historic environment is reflected in the designation of 16 conservation areas, the majority of which are supported by conservation area character appraisals. Barnet has over 650 statutory listed building entries on the National Heritage List. The Borough has 5 Registered Parks and Gardens on Historic England's Register of Parks and Gardens. The Borough also has London's only Registered Historic Battlefield, the site of the Battle of Barnet (1471), which is of national significance and lies to the north of Chipping Barnet. There are also two Scheduled Monuments, at **Brockley Hill in Edgwarebury** and at the Manor House in Finchley, five prehistoric, **four Roman and thirty medieval sites containing archaeological remains of more than local importance**. These have been grouped into nineteen 'Local Archaeological Priority Areas' (APAs) as listed in Table 11 and shown on the Policies Map. In addition ~~to these heritage assets~~ the Council maintains a Local Heritage List consisting of over ~~4200~~ 1250 non-designated heritage assets.

6.23.2 National planning policy distinguishes between designated and non-designated heritage assets. Table ~~42~~ 11 lists Barnet's heritage assets (including Statutory Listed Buildings, Battlefield Sites, Registered Parks and Gardens, Scheduled Monuments, ~~Local Areas of Special Archaeological Significance~~ and Conservation Areas) and non-designated heritage assets (local heritage assets ~~locally listed buildings~~)²⁹ including APAs and locally listed buildings). These assets are an irreplaceable resource and the Council will therefore assess proposals based on a presumption that the heritage asset should be conserved while looking for opportunities to enhance a heritage asset's significance. The Council recognises that well-designed development can make a positive contribution to and better reveal the significance of heritage assets. The Council takes a proactive approach to conserving its heritage assets in a number of ways. These include: the publication of Conservation Area Character Appraisals; working with Conservation Area Advisory Committees; working with Historic England to remove heritage at risk assets from the register; the maintenance establishment of a Local Heritage List; and the ~~production of Design Guidance and Codes~~ creation of Design Guidance.

6.23.3 In determining applications for planning permission that affect heritage assets or their settings, the NPPF requires, amongst other things, that local planning authorities take into account the desirability of sustaining and enhancing the significance of such heritage assets, and of putting them to viable uses

consistent with their conservation; and consider the positive contribution that conserving such heritage assets can make to sustainable communities including their economic vitality.

6.24 Designated Heritage Assets

6.24.1 In accordance with the NPPF great weight will be placed on the conservation of the Borough's designated heritage assets when considering the impact of development proposals. The Council will not permit harm to a designated heritage asset unless the public benefits, which can include heritage benefits, of the proposal outweigh the harm; **or, in the case that development would result in substantial harm to or total loss of the significance of the asset, it is demonstrated that the nature of the asset prevents all reasonable uses of the site; no viable use of the asset itself can be found in the medium term through appropriate marketing that will enable its conservation; conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.** More detailed guidance on public benefits is set out in National Planning Practice Guidance (NPPG). Harm to, or loss of, a designated heritage asset requires clear and convincing justification. ~~In determining applications affecting heritage assets the Council will take into consideration the scale of the harm and the significance of the asset.~~

6.25 Conservation Areas

6.25.1 The Council has adopted a series of conservation area character appraisals which serve as a material consideration when assessing planning applications for development in conservation areas. Design guidance has also been produced for some conservation areas and provides advice on repairs, alterations, extensions, outbuildings, landscaping, works to trees and gardens. Applications are determined in the light of the guidance provided. The Council will manage changes in a way that ensures the **distinctive characters of conservation areas is retained** and **all new development makes a positive contribution to the conservation areas in particular that it preserves or enhances the special character or appearance of that area.** The character of each a conservation areas derives from a

combination of factors, ~~which include the such as~~ built form and scale of its historic buildings ~~and density~~, the pattern of development, the overall landscape including the topography, trees and open space. In addition, characteristic materials, architectural detail and historic uses are significant. The design of new development should identify and respond to such elements. Design and Access Statements must include an assessment of the historic local context and character and clarify how new proposals have been informed by it and respond to it.

6.25.2 Barnet's conservation areas can also be impacted by development which takes place outside of the conservation area but may be visible from within it as part of its setting. This can include high or bulky buildings, which can have a detrimental impact on areas that may be some distance away, as well as development that may be sit alongside a conservation area. The Council will ~~oppose~~ critically appraise development which outside conservation areas, including in neighbouring boroughs, that it considers could cause ~~harms the significance of to the character, appearance or setting of any a~~ conservation area in accordance with the NPPF and any other relevant guidance produced by the Council (including Conservation Area Design Guidance).

6.25.3 ~~The loss of traditional uses can erode the character of an area. It is essential therefore that traditional uses are not displaced by redevelopment proposals for change of use. A change in traditional patterns of use can erode the character of an area. It is essential therefore that uses contributing to the character of a conservation area are not displaced by redevelopment proposals, including changes of use.~~ Public houses and local shops are of particular importance to the character of conservation areas, especially when they are located in historic buildings. The Council will seek to protect ~~traditional uses of buildings these, and other uses where viable,~~ under policies GSS08, TOW01, TOW02, TOW03 and CHW04.

6.25.4 When considering applications for the demolition of buildings that are locally listed or are considered to make a positive contribution to the area, the Council will consider ~~take into account~~ the

significance of the building and its contribution to the conservation area. Proposals for the demolition of buildings and facadism will often have a harmful effect on the significance of a conservation area. The Council will resist the total or substantial demolition of such buildings, including proposals for facadism, unless significant public benefits, which should include heritage benefits, are shown that outweigh the ease for retention. Applicants will be required to have regard to national and local plan policies and any other relevant ~~supplementary~~ guidance produced by the Council in order to justify the demolition of a building that is considered to make a positive contribution to a conservation area. All planning applications proposing ~~total or~~ substantial demolition within conservation areas must clearly demonstrate that effective measures will be taken to ensure the structural stability of all retained fabric during demolition and re-building. The Council must be satisfied that any approved development, following the loss of a heritage asset, will proceed within an agreed timespan. Where the loss of any heritage asset is permitted, the Council may seek the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred.

6.25.5 The loss of historic architectural details can erode the character and appearance of a conservation area. Proposals for alterations should normally be undertaken in materials matching that of the original. Where traditional architectural features have been lost, re-instatement of such elements will be considered provided sufficient evidence exists for an accurate replacement.

6.25.6 The use of Article 4 Directions to remove permitted development rights will be considered where ~~the character and appearance of a conservation area is~~ believed considered to be under threat by the loss or alteration of traditional architectural details. gradual erosion of its character and appearance through inappropriate development.

6.26 Statutory Listed Buildings

6.26.1 Barnet's statutory listed buildings and structures make a significant contribution to the Borough's architectural legacy. They provide places for people to live and work in, are often cherished local landmarks, some of which contribute to their local areas as visitor attractions and make important and valued contributions to the character and appearance of the Borough. The ~~Borough Council~~ has a duty to ~~preserve~~ conserve such assets for both present and future generations and such buildings will be protected under ~~such~~ relevant policies as set out in the NPPF.

6.26.3 The setting of a listed building is not fixed and may change as the asset and its surroundings evolve. The setting itself is not designated and its importance depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. New development can impact on the setting of listed buildings and any adverse impact ~~should be avoided~~ will require clear and convincing justification. Historic England has produced guidance on managing change within the setting of heritage assets and proposals will be expected to be in line with this guidance.

~~6.29~~ 6.28 Registered Parks and Gardens

~~6.29.1~~ 6.28.1 Barnet has five Registered Parks and Gardens

- Golders Green Crematorium (Ggrade I);
- East Finchley Cemetery (Ggrade II*);
- St Pancras and Islington Cemetery (Ggrade II*);
- Stephens House and Gardens ~~Avenue House Grounds~~ (Ggrade II); and
- Hoop Lane Jewish Cemetery (Ggrade II).

~~6.29.2~~ 6.28.2 These sites are considered to have historical significance as they have been skilfully planned with surroundings reflecting the landscaping fashions of their day. The emphasis for their recognition is on 'designed' landscapes, rather than on planting or botanical importance. Development in the immediate surrounds of these Registered Parks and Gardens should be designed in a manner that does not detract or harm their significance ~~or~~ which includes their setting.

~~6.32~~ 6.31 Heritage at Risk

~~6.32.1~~ 6.31.1 Barnet's Heritage at Risk Register is updated annually by Historic England and reported through the Authorities Monitoring Report. The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register. ~~Developers considering the redevelopment of sites containing buildings on the Register must work with the Council and Historic England to determine the best course of action to retain and restore the historic asset.~~

Non designated heritage assets

~~6.33~~ 6.32 Local Heritage List

~~6.33.1~~ 6.32.1 Barnet has many historic, locally significant buildings and other assets which make a positive contribution to the distinctiveness of local areas, including conservation areas. The NPPF identifies such buildings and structures as non-designated heritage assets. Barnet has a Local Heritage List which identifies buildings of historic or architectural interest. The Council may identify any ~~potential~~ non-designated heritage asset ~~when considering development proposals as part of the decision-making process on planning applications (see NPPG para: 039 Reference ID: 18a-040-20190723).~~ The non-designated heritage asset will be identified by applying the adopted criteria for the selection of local heritage assets as found on the Council's website. The effect of an application on the significance of a non-designated heritage asset will be taken into account in determining the application, in accordance with the NPPF. These NPPF requirements mean that the conservation of a building or site on a local heritage list as a heritage asset is a material consideration when determining the outcome of a planning application. Planning applications can be refused on the grounds of harm to a local heritage asset. The legitimacy and weight within the planning system of local heritage lists is increased when the list has

been prepared in accordance with defined selection criteria and has been subject to public consultation. ~~In considering applications that affect these non-designated heritage assets, the Council will have regard to the significance of the asset and the scale of any harm or loss. There is a presumption in favour of retaining all Locally Listed Buildings as well as any building which makes a positive contribution to the character or appearance of a Conservation Area.~~

~~6.32.2 The Council will need to be satisfied that all efforts have been made to continue the present use or to find the compatible alternative uses before considering demolition as a viable option, including marketing the property for the sole purpose of its ongoing use.~~ Prior to considering the demolition of a non-designated heritage asset, it is expected that efforts are made to continue its use or find alternative uses that are consistent with its conservation. In line with the NPPF a deteriorated condition as a result of deliberate neglect of or damage to a heritage asset will not be a factor considered in any decision. The Council LPA will assess proposals for demolition by taking into consideration both the condition of the existing building (particularly if it is beyond repair and its continued use is unviable), the harm to its significance, balanced against ~~and~~ the merits of the alternative proposals for the site including public benefits, which could include heritage benefits.

~~6.28~~ 6.33 Archaeological Priority Areas and Scheduled Monuments

~~6.28.1~~ 6.33.1 Archaeological remains, above and below ground level, and Scheduled Monuments, are important surviving evidence of Barnet's past and once removed are lost forever. Due to the long history of human habitation across Barnet there are archaeological sites and areas, that are designated, undesignated and yet to be discovered; therefore, all applications that have the potential to impact upon archaeological heritage assets should be supported by an archaeological desk-based assessment. The aim of the assessment is to identify the scale and significance of the archaeological impact. An archaeological field evaluation may also be necessary. The Council will consult with Historic England and the ~~Greater London Archaeology Advisory Service (GLAAS)~~ on the implications of development proposals in APAs ~~Archaeological Priority Areas~~. GLAAS holds further information on archaeological sites in Barnet. When considering proposals which have the potential to impact on archaeological remains, the

Council will have regard to the NPPF. It may also be appropriate for ~~Hendon and District Archaeology Society (HADAS)~~ to be consulted.

Table 42 11 - Barnet's Designated and Non-designated Heritage Assets

Listed Buildings	Over 670 654 entries
Battlefield Site	Battle of Barnet 1471
Registered Parks and Gardens	5 registered historic parks and gardens; St Marylebone Cemetery, <u>Stephens House and Gardens</u> , Avenue House Garden , Golders Green Crematorium, St Pancras Cemetery and Hoop Lane Jewish Cemetery.
Scheduled Monuments	Brockley Hill Romano – British Pottery, Edgware Manor House Moated Site, East End Road, Finchley
Archaeological Priority Areas	<ol style="list-style-type: none"> 1. Barnet Gate and Totteridge Fields 2. Burnt Oak 3. Child's Hill 4. Chipping Barnet 5. Copthall 6. Cricklewood 7. East Barnet 8. East Finchley 9. Edgware 10. Edgwarebury and Scratchwood 11. Finchley 12. Friern Barnet 13. Galley Lane 14. Halliwick Manor House 15. Hendon 16. Mill Hill 17. Monken Hadley Common 18. Totteridge and Whetstone 19. Watling Street.

Conservation Areas

1. The Burroughs, Hendon, 1983
2. Church End, Finchley, 1979
3. Church End, Hendon, 1983
4. College Farm, Finchley, 1989
5. Cricklewood Railway Terraces, 1998
6. Finchley Garden Village, 1978
7. Golders Green Town Centre, 1998
8. Hampstead Garden Suburb, 1968
9. Hampstead Village (Heath Passage), 1994
10. Mill Hill, 1968
11. Monken Hadley, 1968
12. Moss Hall Crescent, 1974
13. Totteridge, 1968
14. **Watling Estate, Burnt Oak, 1998**
15. Wood Street, Barnet, 1969
16. Glenhill Close, Finchley, 2001

Locally Listed Buildings

Over 1,250 ~~1,221~~

5.2 Previous Policy CDH08 Barnet's Heritage

Policy CDH08 Barnet's Heritage

The Council will ensure that Barnet's heritage assets (designated and non-designated), including its conservation areas, statutory listed buildings, scheduled monuments, registered historic parks and gardens, archaeological remains, locally listed buildings and registered historic battlefield are conserved and enhanced in a manner appropriate to their significance. These assets are an irreplaceable resource which greatly contribute to the Borough's distinctive character and should continue to be enjoyed by present and future generations.

Designated Heritage Assets

Great weight will be placed on the conservation of the Borough's designated heritage assets, including listed buildings and conservation areas, when considering the impact of development proposals. Any harm to, or loss of, the designated heritage asset will require clear and convincing justification. Substantial harm to, or loss of, designated heritage assets will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that outweigh such harm or loss.

Where less than substantial harm will result from a development proposal, this harm will need to be balanced against any public benefits that emanate from the proposal.

Conservation Areas

The Council will seek to preserve or enhance the character and appearance of its conservation areas when assessing development proposals. Conservation area character appraisals and where applicable, conservation area-based design guidance will be used in the assessment of planning applications.

The following criteria will be applied:

- i) the loss or substantial demolition of, a building that makes a positive contribution to the character or appearance of a conservation area, including a locally listed building, will be resisted.
- ii) the impact of development outside a conservation area, but which has a harmful impact on its character or appearance, including its setting, will be resisted.
- iii) the impact of development on trees, landscaping and open space, including gardens, that contributes to the character or appearance of a conservation area will be opposed
- iv) proposals should have regard to the local historic context and character
- v)
- vi) proposals should retain architectural detailing, traditional features, including shopfronts, which contribute positively to the appearance of a building or an area
- vii) in exceptional circumstances, where the loss of any heritage asset is permitted, the Council will require the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred

Statutory Listed Buildings

The conservation of Barnet's statutory listed buildings will be given a high priority of importance when assessing applications. Any harm to, or loss of, the significance of listed buildings will require clear and convincing justification.

The following criteria will be applied:

- i) Resist any harm to, or loss of significance, from whole or partial demolition, extension or alteration
- ii) Resist harmful alterations to the interior or exterior, or changes to curtilage features
- iii) Resist extensions or additions that are inappropriate in design, scale or material
- iii) Resist any harm to, or loss of, its significance, from development within its setting, including tall buildings³⁰

Registered Parks and Gardens

Development proposals within Registered Parks and Gardens should respect their special historic character and aesthetic qualities, whilst avoiding any adverse impact on their setting or on key views within or outside the designated sites. Any harm to, or loss of, their significance, from alterations, destruction, or from development within its setting, should require clear and convincing justification. Substantial harm to Grade II Registered Parks or Gardens should be exceptional, and wholly exceptional for grade II* Registered Parks or Gardens.

Registered Historic Battlefield

The site of the Battle of Barnet (1471) is of great historical importance and will be protected from development, both above and below ground, that would result in harm to its significance.

Archaeology

Archaeological remains will be protected, particularly in the identified Local Areas of Special Significance, by requiring that acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where considered appropriate. Development which impacts substantially on archaeological assets of national importance will be resisted.

Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance, which hold, or potentially hold, evidence of past human activity, should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment together with, where necessary, a field evaluation.

Locally Listed Buildings and Other Non-Designated Heritage Assets

The Council will protect Locally Listed Buildings and their settings in accordance with their significance. There is a presumption in favour of their

retention and their loss will be normally be resisted. Development proposals, including external alterations and extensions should conserve, reveal and enhance the significance of these non-designated heritage assets and their settings.

Non-Designated Heritage Assets

When assessing the impact of a proposal on a non-designated heritage asset, the effect on its significance will be taken into account when determining the application. A balanced judgement will be required, having regard to the scale of any harm or loss and any public benefits that might result.

The Council may identify any potential non-designated heritage asset as a consideration of development proposals.

Heritage at Risk

The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register.

Archaeological Interest

The Council will protect remains of archaeological importance in accordance with their significance. Assets of national archaeological importance should be preserved in-situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Ref:

(For official use only)

Edgware Town Centre Open Space Deficiency - MM68 - Policy ECC04 –Barnet’s Parks and Open Spaces

Save Our Edgware and Edgware Community Association’s representation relating to Main Modifications 68 concerning Barnet’s Parks and Open Spaces policy affecting Edgware



Preserving Edgware
Building Tomorrow Together



1 Question 1: To which Main Modification does your representation relate?..... 3

2 Question 2: Do you consider that the Main Modification is:..... 3

3 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.)..... 4

 3.1.12 Open space deficiency in Edgware Town Centre..... 4

3.1.12.1 Must follow Barnet’s own Open Space Policies in the Local Plan.....	4
3.1.12.2 Open space deficiency in Edgware Town Centre.....	5
3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre.....	8
3.1.12.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents.....	8
3.1.12.5 Open Space must be close to Edgware Town Centre:.....	9
3.1.12.6 Open Space must be for Edgware Residents.....	9
3.2 References.....	9
4 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.).....	9
4.1 Proposed Modification table.....	11
5 Declaration of consent.....	21
6. Appendix: Original Main Modification 68 - Policy ECC04 –Barnet’s Parks and Open Spaces.....	22

Representations Form

PART B - Your representation

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

1 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 ___ MM 68 Open Space affecting Edgware _(to read MM68 [click here](#)) _____ Policy ___ Related to ECC04 _____ Paragraph
___ All _____

Figure/Table _____ Policies Map change _____

2 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"/> |

3 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

3.1.12 Open space deficiency in Edgware Town Centre

3.1.12.1 Must follow Barnet's own Open Space Policies in the Local Plan

Barnet has an Open Space standard in the London Plan. Edgware development area must follow this standard.

“Policy ECC04 –Barnet’s Parks and Open Spaces

A. ...

B. b): The Council will meet increased demand for access to open space and opportunities for physical activity, by protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:

i. a) development proposals should make provision for securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:

- **Parks: 1.63ha per 1000 residents**
- **Natural Green Spaces¹: 2.05ha per 1000 residents**
- **Playing pitches: 0.75ha per 1000 residents.**

¹ Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

- **Play and informal recreation: as set out by London Plan Policy S4 provision for children's play, sports facilities and better access arrangement**

Also in Barnet council responded to an FOI request on what open space standards would be required for residential development by providing the following policy statement:

“The Council's expectation is that development proposals should make provision for open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards: ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

“

- *Parks: 1.63ha per 1000 residents*
- *Natural Green Spaces: 2.05ha per 1000 residents*
- *Playing pitches: 0.75ha per 1000 residents.*
- *Play and informal recreation: as set out by London Plan Policy S4 Play and informal recreation which requires at least 10m2 per child of good quality accessible play provision. “*

- We have the standard
- Two paragraphs in our explanation.
- It is essential that any development in Edgware fulfils ECC04.
- Since the wellbeing of the residents need space within 400meter
- Attachment on FOI
- Blog as pdf
- National Institute of Health - wellbeing of residents

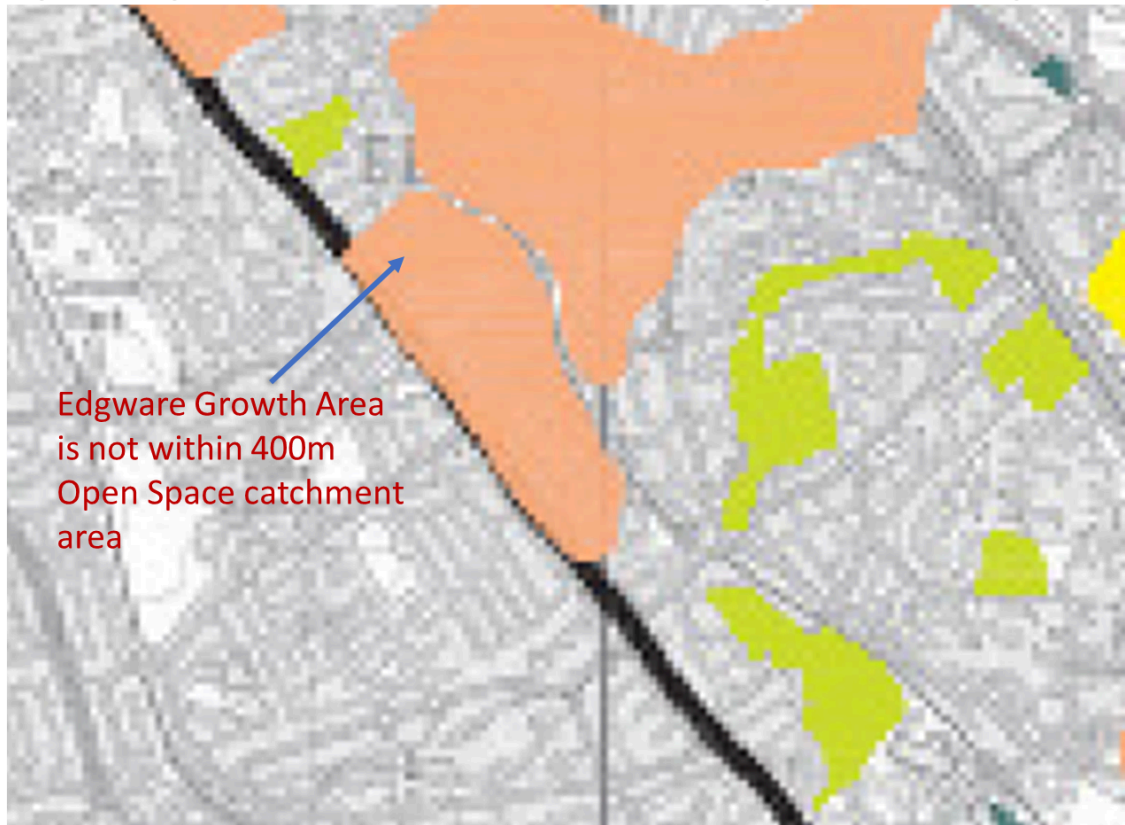
3.1.12.2 Open space deficiency in Edgware Town Centre

The 2021 Edgware Growth Area SPD accepts Edgware has a lack of open spaces. Over the last few years the area has lost many open spaces. In 2009 a report showed Edgware had a deficit of open space (shaded pink). Since then this has diminished further.

“The provision of parks in the following Wards falls below the current borough average in terms of parks provision per 1,000 head of population:

... Edgware, ...” ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#))

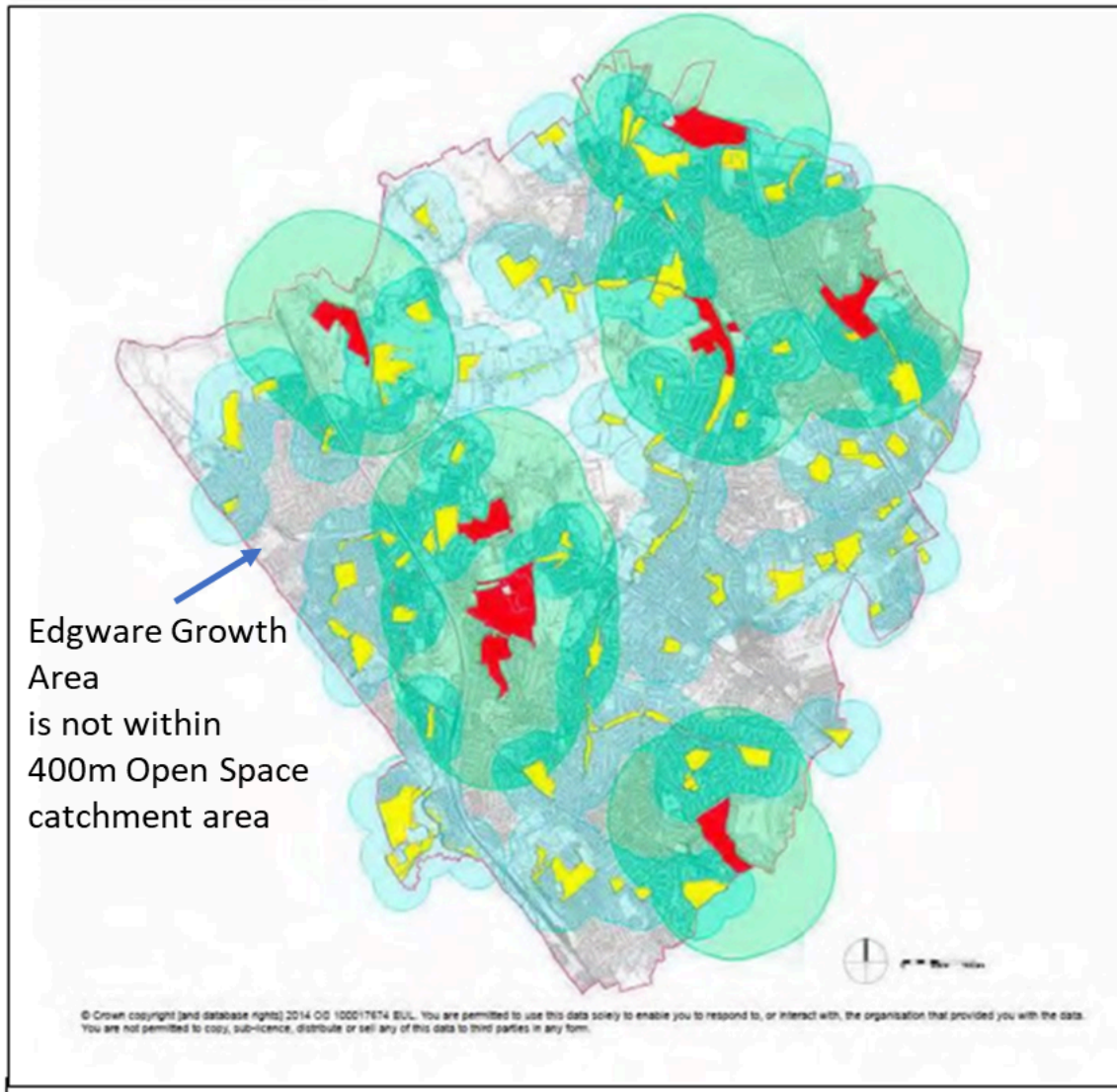
Open Space and Parks Deficiency (Shaded pink)



Open Space and Parks



Blue: 400m Catchment Area



UK Health Security Agency in its blog ([Green space, mental wellbeing and sustainable communities – UK Health Security Agency](#)) states “So there is a wealth of evidence of how the public’s health can be improved by increasing access to green and blue space and improving the quality of our natural environment.” (UKHSA blog is the official blog of UK Health Security Agency).

3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre

An area of 5.95 hectares of quality green space is needed, based upon requirements stipulated in the emerging **Barnet Local Area Plan** and **London Plan 2021**.

- 2.41 hectares of amenity space for residents
- 1.54 hectares of play space for children
- 2 hectares of green space within 400 meters

There are no Open Space of the above size within 400 meters of the Edgware Growth Area and the Deansbrook Nature Reserve, 1.9 hectares, cannot be used as there is no public access in order to preserve the habitat of protected species including the Bats and Slow Worms that have been found. These details have been registered. (Quote Green Space...)

3.1.12.4 Must follow NPPF and Public Health England policy to ensure the well-being of residents - lack of amenity space is detrimental to the health & wellbeing of residents

The NPPF emphasises the importance of access to high-quality open spaces and opportunities for sport and recreation, which can make an important contribution to the health and well-being of communities.

"Access to high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities" (NPPF, paragraph 96).

The "Improving access to greenspace: A new review for 2020" by Public Health England highlights significant health benefits of access to greenspace, including improved mental health, reduced stress, and increased physical activity. Ensuring new residents in Edgware have access to greenspace can contribute to the overall health and well-being of the community.

- "Evidence shows that access to greenspace is associated with better health outcomes, including lower rates of mortality and morbidity" (p. 5).

The document emphasises the importance of equitable access to greenspace, noting that areas with lower socioeconomic status often have less access. Given that Edgware is already in deficit, adding new open spaces in Edgware is critical to addressing this inequity.

- "Ensuring equitable access to greenspace is vital for addressing health inequalities" (p. 7).

The Edgware Policy of overdevelopment will fail to meet Objective 15 in **Edgware Local Area SPD**: Support health and wellbeing.

Most studies have found clear correlations between high-rise living and childhood behavioural problems. No study has found high-rise living beneficial to children.

Nicolas Boys Smith, founder of Create Streets, in his 2016 report on design of cities shows there is evidence that residents (and especially children) of high-rise blocks tend to suffer from more stress, mental health issues and neurosis than gentler developments. The

high-rise development has limited open spaces for recreation and relaxation. The lack of accessible green areas or parks within close proximity will affect the well-being and mental health of residents, especially families with children. Limited outdoor play spaces will make it challenging for children to engage in outdoor activities and play with other children. With limited outdoor spaces and play areas, children will resort to spending more time indoors with electronic devices, leading to potential health and developmental issues. Also, the increased reliance on elevators will discourage physical activity, impacting the health and well-being of elderly residents. Residents will experience further anxiety due to reduced privacy, especially in units facing each other at close distances.

3.1.12.5 Open Space must be close to Edgware Town Centre:

The review (UKHSA blog is the official blog of UK Health Security Agency) underlines that greenspace should be within walking distance to maximise its usage and benefits. This aligns with your findings that new open spaces must be within walking distance for Edgware residents.

- "Access to greenspace should ideally be within a 5-10 minute walk (about 300-600 meters) from people's homes" (p. 9).

Best practices in urban planning advocate for the integration of greenspaces within walking distance of residents. This ensures the spaces are used and contribute to the quality of life and health of the community.

- "Urban planning should prioritise the creation of greenspaces within close proximity to residents to maximise their accessibility and use" (Improving access to greenspace: A new review for 2020, p. 9).

3.1.12.6 Open Space must be for Edgware Residents

Therefore it is very important that Barnet Policy regarding ([Parks and Open Spaces Our Strategy for Barnet 2016-26](#)) is fully compliant within any residential development and not dealt with by financial mitigation or locating the open spaces in another district outside the 400m boundary. Edgware is deficient in open space so mitigation cannot be claimed to be suitable in any way.

3.2 References

Barnet - Chapter 5 Open Environment. (n.d.). *Chapter 5 Open Environment*.

Barnet Council. Retrieved May 14, 2024, from

<https://www.barnet.gov.uk/sites/default/files/assets/citizenportal/documents/planningconservationandbuildingcontrol/chapter5barnetudpversion2.pdf>

4 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.

4.1 Proposed Modification table

MM	Original	Proposed modifications	Notes
	<p>Policy ECC04 –Barnet’s Parks and Open Spaces</p> <p>A. a) As Barnet grows there is a need to optimise the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet.; †The Council will work with its partners to improve Barnet’s Green Infrastructure by:</p> <p>i-a) managing and enhancing open spaces, including Green Belt and Metropolitan Open Land to provide improved accessibility;</p> <p>ii-b) promoting a new Regional Park within the Brent Valley and Barnet Plateau Green Grid Area; and</p> <p>iii-c) ensuring positive management of Green Belt, Metropolitan Open Land and open spaces to provide improvements in overall quality and protection of character and historic significance.; <u>and</u></p>	<p>Policy ECC04 –Barnet’s Parks and Open Spaces</p> <p>A. a) As Barnet grows there is a need to optimise the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet.; †The Council will work with its partners to improve Barnet’s Green Infrastructure by:</p> <p>i-a) managing and enhancing open spaces, including Green Belt and Metropolitan Open Land to provide improved accessibility;</p> <p>ii-b) promoting a new Regional Park within the Brent Valley and Barnet Plateau Green Grid Area; and</p> <p>iii-c) ensuring positive management of Green Belt, Metropolitan Open Land and open spaces to provide improvements in overall quality and protection of character and historic significance.; <u>and</u></p>	<p>3.1.12 Open space deficiency in Edgware Town Centre</p> <p>3.1.12.1 Must follow Barnet’s own Open Space Policies in the Local Plan</p> <p>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</p> <p>3.1.12.5 Open Space must be close to Edgware Town Centre:</p> <p>3.1.12.6 Open Space must be for Edgware Residents</p>

<p>d) <u>promoting the delivery and use of the sports hubs identified in Policy GSS13.</u></p> <p><u>B. b):</u> The Council will meet increased demand for access to open space and opportunities for physical activity, by <u>protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:</u></p> <p>i- a) <u>development proposals should make provision for securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:</u></p> <ul style="list-style-type: none"> ● <u>Parks: 1.63ha per 1000 residents</u> ● <u>Natural Green Spaces²: 2.05ha per 1000 residents</u> 	<p>d) <u>promoting the delivery and use of the sports hubs identified in Policy GSS13.</u></p> <p><u>B. b):</u> The Council will meet increased demand for access to open space and opportunities for physical activity, by <u>protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:</u></p> <p>i- a) <u>development proposals should make provision for securing improvements securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:</u></p> <ul style="list-style-type: none"> ● <u>Parks: 1.63ha per 1000 residents</u> ● <u>Natural Green Spaces³: 2.05ha per 1000 residents</u> 	
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² Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

³ Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

- Playing pitches: 0.75ha per 1000 residents.
- Play and informal recreation: as set out by London Plan Policy S4

~~provision for children's play, sports facilities and better access arrangements (both into parks and between them), where opportunities arise, from all developments that create an additional demand for open space. Where this is not viable, a cash in lieu payment will be required for off-site provision or enhancement to parks and open spaces that are nearby;~~

~~ii. b) Contributions to improvements to existing open spaces will be secured by planning obligations where necessary, including where it would be unsuitable for specific forms of open spaces to be provided directly on site. improving~~

~~access to open spaces particularly in areas of public open space deficiency identified by Map 7. The Council will seek to improve provision in these areas of deficiency in accordance with the following standards:~~

- ~~Parks (1.63 hectares per 1,000 residents)~~

- Playing pitches: 0.75ha per 1000 residents.
- Play and informal recreation: as set out by London Plan Policy S4

provision for children's play, sports facilities and better access arrangements (both into parks and between them), where opportunities arise, should be provided from all developments that create an additional demand for open space. Where this is not viable, a cash in lieu payment will be required for off-site provision or enhancement to parks and open spaces that are nearby;

ii. b) Contributions to improvements to existing open spaces will be secured by planning obligations where necessary, including where it would be unsuitable for specific forms of open spaces to be provided directly on site. This includes

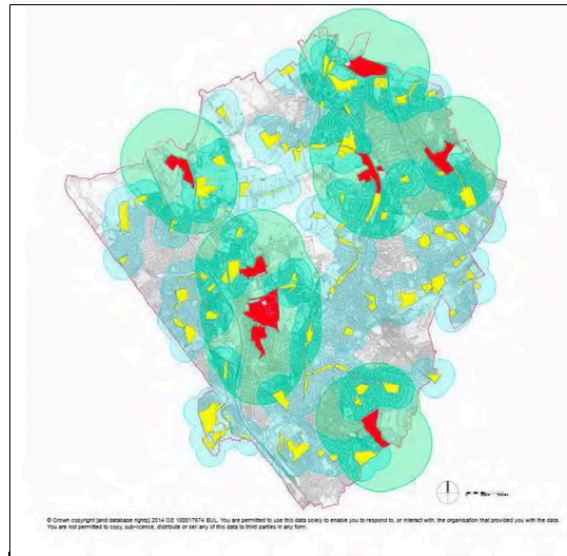
improving access to open spaces particularly in areas of public open space deficiency identified by Map 7: The Council will seek to improve provision in these areas of deficiency in accordance with the following standards:

- Parks (1.63 hectares per 1,000 residents)

	<ul style="list-style-type: none"> • — Natural green spaces (2.05 hectares per 1,000 residents) <p>iii. <u>c) Arrangements relating to the long-term maintenance and management of open spaces will be secured by planning obligations where necessary. This will include maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses, especially where this enables green corridors to link Barnet's rural, urban fringe and urban green spaces.</u></p>	<ul style="list-style-type: none"> • Natural green spaces (2.05 hectares per 1,000 residents) <p>iii. <u>c) Arrangements relating to the long-term maintenance and management of open spaces will be secured by planning obligations where necessary. This will include maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses, especially where this enables green corridors to link Barnet's rural, urban fringe and urban green spaces.</u></p>	
	<p>e). In areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of low quality and low value open space to robustly demonstrate that the following criteria can be satisfied:</p> <ul style="list-style-type: none"> i. — the development proposal is a small scale ancillary use which 	<p>e). In areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of low quality and low value open space to robustly demonstrate that the following criteria can be satisfied:</p> <ul style="list-style-type: none"> i. the development proposal is a small scale ancillary use which 	<p>3.1.12 Open space deficiency in Edgware Town Centre</p> <p>3.1.12.1 Must follow Barnet's own Open Space Policies in the Local Plan</p> <p>3.1.12.3 Inadequate Public Open Spaces</p>

	<p>supports the improved use of the open space; and</p> <p>II. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or</p> <p>Equivalent or better quality open space provision will be delivered. Any permissible exception will also need to ensure that it does not create or exacerbate any existing public open space deficiency and has no significant impact on biodiversity.</p>	<p>supports the improved use of the open space; and</p> <p>II. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or</p> <p>Equivalent or better quality open space provision will be delivered. Any permissible exception will also need to ensure that it does not create or exacerbate any existing public open space deficiency and has no significant impact on biodiversity.</p>	<p>For Edgware Town Centre</p> <p>3.1.12.5 Open Space must be close to Edgware Town Centre:</p> <p>3.1.12.6 Open Space must be for Edgware Residents</p>
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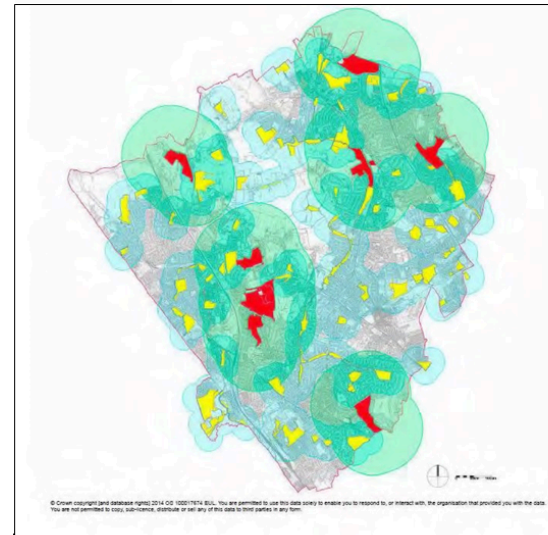
Map 7 – Public open space provision and deficiencies



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10.189.8 Map 7 identifies those areas of the Borough that are deficient in public open space being outside the

Map 7 – Public open space provision and deficiencies



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The Council will ensure

(radii of 1.2km (district parks) and 0.4km (local parks). ~~have a deficiency in both district and local parks).~~ Whilst Map 7 shows areas of deficiency wherein open space provision is needed, the Council may require open space provision or improvements elsewhere in the Borough. Areas of Map 7 that are not covered by a park or a catchment area are considered to be areas of open space deprivation. This type of deprivation is of particular concern in areas of dense urban development as these are areas where residents do not have easy access to open space. Where development is proposed in areas of open space deprivation the developer should work with the Council to ensure the residents will have access to open space whether that is through assisting in new provision, or through improving access to and quality of existing open space. New open space and /or financial contributions towards improvements of existing open space will be secured through planning obligations / legal agreements or utilising the Community Infrastructure Levy Infrastructure Payments Policy.

Where

Where development is proposed in areas of open space deprivation ~~the developer should work with the Council to~~ will ensure the residents will have access to open space whether that is through assisting in new provision, or through improving access to and quality of existing open space. This provision must be within easy access of the residents. This will ensure that residents are able to easily enjoy the facilities.

10.19

Residential development will normally be expected to make provision on site for play space. ~~However, there may be occasions where it is demonstrated that it is not feasible to provide play space as part of the development. In these instances, contributions to the provision of new play space, or the improvement to existing play space~~

10.1920 Children's Play Facilities

10.1920.1 There are 50 public parks in Barnet that provide formal play space for children, this equates to 0.5m² of space per child under 15 years. Children should also have access to stimulating play space in private residential developments. As detailed in para 6.21.5 and Policy CDH07, Children's play spaces should therefore be provided in all new residential development containing flatted schemes with the potential occupancy of 10 or more child bed spaces as set out in the Mayor's SPG Shaping Neighbourhoods – Play and Informal Recreation. Residential development will normally be expected to make provision on site for play space. However, there may be occasions where it is demonstrated that it is not feasible to provide play space as part of the development. In these instances, contributions to the provision of new play space, or the improvement to existing play space provision in a

~~provision in a near-by public open space, might be more appropriate.~~
The housing density and design must allow for the provision of play space. ~~overdevelopment will not be approved if this means that play space can not be provided within the development.~~

	<p><u>near-by public open space, might be more appropriate.</u></p>		
	<p>10.2122 Natural and Semi Natural Space</p> <p>10.212.1 The Borough contains one Site of Special Scientific Interest (SSSI) – the Welsh Harp (Brent Reservoir) - into which the River Brent and Silk Stream flow. The Reservoir was created in 1835 as a water supply for the canal network and is jointly managed by Barnet and Brent Councils with the Canal and River Trust. As the largest expanse of water in Barnet, it provides an important recreational resource as well as a valuable wildlife habitat. Access to the Welsh Harp (Brent Reservoir) is being improved as part of the regeneration proposals for the West Hendon Estate. <u>Any increased access to the Welsh Harp will be managed appropriately in partnership with the community's Vision for the Harp' and in consultation with Natural England to ensure its integrity as a SSSI is maintained.</u></p>	<p><u>10.21.1</u></p> <p><u>Locally registered Nature Reserves shall continue in their present status, which means there should be no development that will destroy or fundamentally alter the habitat and wildlife within the Nature Reserve. Where there is no public access, such as Deans Brook Nature Reserve, this prohibition of public access must continue in perpetuity.</u></p> <p><u>Developments must be designed to ensure that the Biodiversity Net Gain is delivered with the development.</u></p> <p><u>Overdevelopment will not be approved.</u></p>	<p><u>3.1.12 Open space deficiency in Edgware Town Centre</u></p> <p><u>3.1.12.1 Must follow Barnet's own Open Space Policies in the Local Plan</u></p> <p><u>3.1.12.3 Inadequate Public Open Spaces For Edgware Town Centre</u></p> <p><u>3.1.12.5 Open Space must be close to Edgware Town Centre:</u></p> <p><u>3.1.12.6 Open Space must be for Edgware Residents</u></p>

<p>10.212.2 The Council seeks to maintain networks of natural habitats by avoiding their fragmentation and isolation and will therefore identify 'missing links' where enhanced or new measures to support biodiversity and nature conservation may be supported as part of proposals. Where no additional open space is being created, the Council will ensure that the development is designed in a way to enable it to replace and enhance biodiversity, ensuring Biodiversity Net Gain. Barnet's suite of design guidance SPDs Sustainable Design and Development Guidance SPD together with the Green Infrastructure SPD will provide further guidance on making provision for biodiversity.</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).

5 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 __Anuta Zack on behalf of Save Our Edgware_____ Date __18 June 2024_____

Signature __Tony Allan on behalf of Edgware Community Association____ Date __18 June 2024_____

6. Appendix: Original Main Modification 68 - Policy ECC04 –Barnet’s Parks and Open Spaces

<p>M M 68</p>	<p>Chapter 10</p> <p>Environment and Climate Change</p> <p>Policy ECC04 and consequential changes to supporting text</p> <p>Paras 10.17.1, 10.17.4, 10.17.5, 10.18.1, 10.19.3 to 10.19.8, 10.20.1, 10.21.1, 10.21.2, 10.23.1 & Map 7</p>	<p>Policy ECC04 –Barnet’s Parks and Open Spaces</p> <p>A. a)- As Barnet grows there is a need to optimise the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet.; †The Council will work with its partners to improve Barnet’s Green Infrastructure by:</p> <p>i.-a) managing and enhancing open spaces, including Green Belt and Metropolitan Open Land to provide improved accessibility;</p> <p>ii.-b) promoting a new Regional Park within the Brent Valley and Barnet Plateau Green Grid Area; and</p> <p>iii.-c) ensuring positive management of Green Belt, Metropolitan Open Land and open spaces to provide improvements in overall quality and protection of character and historic significance.; and</p> <p>d) <u>promoting the delivery and use of the sports hubs identified in Policy GSS13.</u></p> <p>B. b)- The Council will meet increased demand for access to open space and opportunities for physical activity, by <u>protecting and enhancing existing open spaces and tackling deficiencies and under provision through: securing new open space provision and improvements to existing open spaces:</u></p> <p>i.-a) <u>development proposals should make provision for securing improvements to open spaces, including parks and playing fields, where additional demand is created and new or improved open space is necessary, in accordance with the following standards:</u></p> <ul style="list-style-type: none"> <u>Parks: 1.63ha per 1000 residents</u> 	<p>Restructuring to make clear that the Council intends to protect and enhance existing open spaces; clarify where developers will be expected to make provision for new and/or improvements to the quality and accessibility of parks and open spaces. This includes the circumstances where contributions towards offsite provision rather than direct provision may be appropriate and sets out management and maintenance expectations. In addition, it also includes the standards for sports pitches identified in the Barnet Open Space, Sports and Recreational Facilities Assessment; and refers to London Plan Policy S4 in respect of the approach to play provision; clarifies what is meant by ‘natural green spaces’; and refers to playing fields as a form of open space.</p> <p>Former part e deleted to reconcile with Council’s strategy to address deficiencies in and improve access to parks and open spaces, and to reflect that the evidence does not justify a policy approach that</p>
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- Natural Green Spaces⁴: 2.05ha per 1000 residents
- Playing pitches: 0.75ha per 1000 residents.
- Play and informal recreation: as set out by London Plan Policy S4

~~provision for children's play, sports facilities and better access arrangements (both into parks and between them), where opportunities arise, from all developments that create an additional demand for open space. Where this is not viable, a cash in lieu payment will be required for off-site provision or enhancement to parks and open spaces that are nearby;~~

~~ii. b) Contributions to improvements to existing open spaces will be secured by planning obligations where necessary, including where it would be unsuitable for specific forms of open spaces to be provided directly on site. improving access to open spaces particularly in areas of public open space deficiency identified by Map 7. The Council will seek to improve provision in these areas of deficiency in accordance with the following standards:~~

- ~~● Parks (1.63 hectares per 1,000 residents)~~
- ~~● Natural green spaces (2.05 hectares per 1,000 residents)~~

~~iii. c) Arrangements relating to the long-term maintenance and management of open spaces will be secured by planning obligations where necessary. This will include maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses, especially where this enables green corridors to link Barnet's rural, urban fringe and urban green spaces.~~

~~iv. d) enhancing local food production through support for community food growing, the protection of allotments, and the provision of opportunities for growing food in new developments.~~

permits release of existing open space for development.

Clarification on standards in that the Open Space, Sports and Recreational Facilities Assessment figure is used (0.75ha per 1000 residents) as the alternative approach of requiring the majority of residents to be within 1.2km of a pitch has not been justified and would not enable an objective assessment to be undertaken in respect of calculating contributions.

Additionally, the 0.5sqm play space figure has not been sufficiently justified. Whilst there is a standard of 0.09ha per 1000 residents identified in the evidence base, applying such a standard would overlap with the requirement for play space to be provided in accordance with London Plan Policy S4 (and Policy CDH07 of this Plan).

Consequential changes to the supporting text to ensure a

⁴ Natural green spaces are defined as land, water and geological features with nature conservation value having been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents. These less managed spaces areas might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland and include nature reserves and green corridors.

~~C. e)-~~ In supporting provision of new Green Infrastructure the Council will work with neighbouring authorities as part of the All London Green Grid to establish Area Frameworks as the basis for identification, creation and management of new green spaces as part of:

~~i.a)~~ Lea Valley and Finchley Ridge Green Grid Area; and

~~ii.b)~~ Brent Valley and Barnet Plateau Green Grid Area.

~~D. d)-~~ The Watling Chase Forest Plan will be taken into account when assessing development proposals in the area covered by Watling Chase Community Forest helping it become a readily accessible 'green lung' for Barnet's residents.

~~e)- In areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of low quality and low value open space to robustly demonstrate that the following criteria can be satisfied:~~

~~I. the development proposal is a small scale ancillary use which supports the improved use of the open space; and~~

~~II. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or~~

~~Equivalent or better quality open space provision will be delivered. Any permissible exception will also need to ensure that it does not create or exacerbate any existing public open space deficiency and has no significant impact on biodiversity.~~

consistent approach includes changes to:

para 10.17.4 to refer to the NPPF;

para 10.18.1 to accurately reflect the size of the proposed adjustments to the Green Belt and Metropolitan Open Land;

para 10.19.1 to clarify that the intention is for publicly accessible open space to be provided at Site No. 45 and not Local Green Space (as defined in national policy);

para 10.19.7 to set out the Council's aspirations for improvements more widely than just for the regional park, which is addressed principally by Policy GSS13;

para 10.22.1 to highlight that accessibility improvements to the Welsh Harp Reservoir will need appropriate management arrangements to ensure its integrity as an SSSI is maintained;

10.17 Green Infrastructure

10.17.1 As well as new housing, leisure centres, schools and community buildings, the Council is investing in improvements to open spaces and routes connecting them. Green Infrastructure can be defined as a strategic network of green spaces places and features that thread through and surround urban areas and connect town to country. It comprises ~~of~~ a wide range of valued public and private green spaces ~~assets~~ including parks, woodland, trees, residential gardens, allotments and waterways. Green Infrastructure provides a range of environmental benefits including flood water storage, sustainable drainage, urban cooling and access to shady outdoor space while assisting in mitigating and adapting to climate change; and can facilitate a natural and healthy environment vital to Barnet's success as a place to live. **It also provides habitats for wildlife and, through the creation and enhancement of 'green corridors',** should aid the natural migration of species responding to the changing climate.

10.17.4 To determine the open space, sport and recreation provision needed and in ensuring the best use of parks and open spaces the Council has produced the following documents:

- Green Belt and Metropolitan Open Land Study 2018;
- Playing Pitch Strategy 2017;
- Tree Policy ~~2023-28~~ 2017;
- Green Infrastructure SPD 2017;
- Fit and Active Barnet 2016-2020;
- Barnet Parks and Open Spaces Strategy 2016 (BPOSS);
- Health and Wellbeing Strategy ~~2015-20~~ 2021-2025 ; and
- Open Space, Sport and Recreational Facilities Needs Assessment 2009

para 10.22.2 to clarify the roles and status of the current and proposed future SPDs;

revisions to para 10.18.9 to explain the Council's approach in targeting areas of open space deficiency and clarify the role of Map 7 in that regard.

clarification at para 10.17.5, reference to preparation of up-to-date evidence relating to park and open space requirements to inform an early review of the Plan.

10.17.5 ~~The NPPF (para 96)~~ states that planning policies should be based on an assessment of the need for open space, sports and recreational facilities and opportunities for new provision. BPOSS provides the Council with a review of the quality of its parks and suggests a range of opportunities that green spaces offer to enhance the quality of life and economic success of the Borough. However, the Council recognises the need to now prepare more up to date evidence relating to park and open space requirements across the Borough. Work is already underway on a new Barnet Parks and Open Spaces Strategy. This refresh of evidence will be used to inform the early review of Barnet's Local Plan and deliver the Council's commitment as set out at Section 1.7.

~~10.18 Barnet's Green Belt and Metropolitan Open Land~~

~~10.18.1 Barnet is one of the greenest boroughs in London. Green Belt and MOL covers a third of the Borough. MOL is strategic open land within the urban area. The principles of natural national Green Belt policy also apply to MOL. In total there are 2,466 ~~2,471~~ hectares of Green Belt and 690 ~~688~~ hectares of MOL. This designated land makes a major contribution to quality of life in the Borough. This is reflected in the findings of Barnet Green Belt Study.~~

~~10.4918~~ Barnet's Parks and Open Spaces

~~10.189.1~~ Barnet has 10 district parks and 77 local parks ranging in size from Hamilton Road Playground (0.04 ha) to Monken Hadley Common (41 ha). These are categorised according to the London Plan public open space hierarchy. ~~Changes to~~ The the Policies Map shows Barnet's parks and public open spaces. The Schedule of Proposals in Annex 1 highlights the provision of new publicly accessible ~~Local~~ Open Space open space at Whalebones (Site 45) Park which will be designated in accordance with NPPF para 99 to help address an existing local deficiency in open space.

10.189.3 The success and value of an open space network is dependent on three principal factors: the quantity, quality and accessibility of open spaces. Barnet's Open Space, Sports and Recreational Facilities Needs Assessment 2009 applied these factors to the existing open spaces in the Borough to create a standard for Barnet. As highlighted in Chapter 4 Barnet's Growth Areas as Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040. To achieve this new developments will be expected to deliver adequate levels of open space in accordance with the standards below. Where a development is in an area of deficiency for publicly accessible open space New open space and improvements to existing open spaces should be provided in line with these standards:

- Children's play (0.09 hectares per 1,000 residents); Play and informal recreation: as set out by London Plan Policy S4.
Parks (1.63 hectares per 1,000 residents); and
Natural green spaces (2.05 hectares per 1,000 residents); and
Playing pitches (0.75ha per 1000 residents).

~~10.19.4 BPOSS, in a follow up to the 2009 Assessment, has assessed open spaces around the Borough and identified a number of low quality / low value sites where alternative uses may be a more optimal use of the land and allow investment in other parks.~~

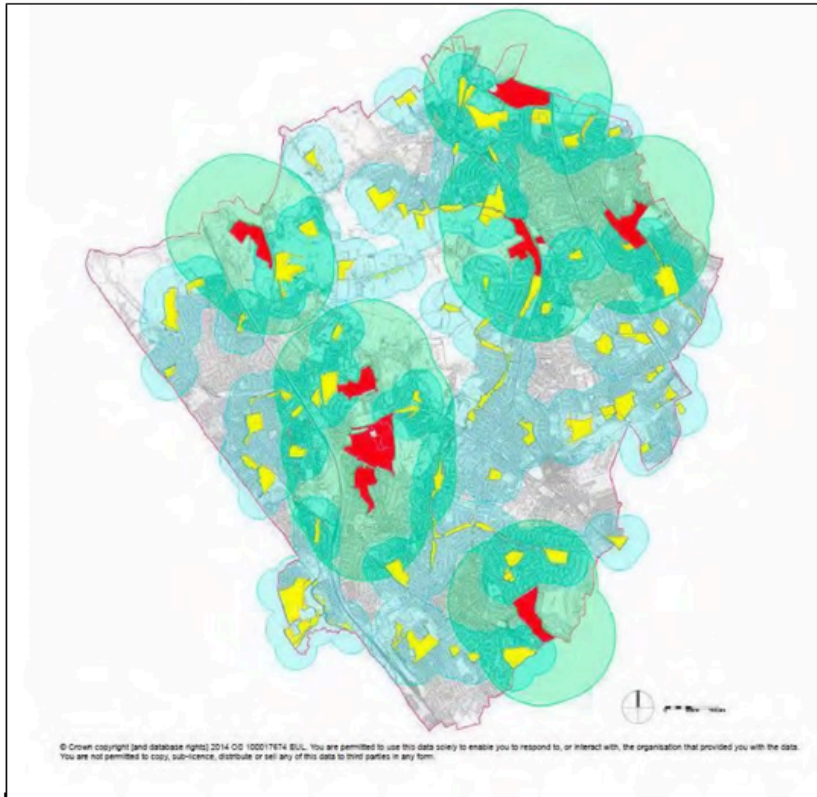
~~10.19.5 Development on open space will only be permitted where it results in no net loss of equivalent open space or a better quality of provision. Small scale development on open space identified in BPOSS as being of low quality and low value may sometimes be acceptable.~~

~~10.19.6 The release of low quality, low value open space for development must robustly demonstrate that the criteria set out in Policy ECG04(e) is satisfied and the requirements of Policy ECG06 – Biodiversity are met. Replacement open space should be the same or better quality than that which is proposed to be lost and be provided in the local catchment area to ensure that it does not create further deficiency in public access to open space.~~

10.189.7 The All London Green Grid Strategy identifies the potential for a Regional Park within the Brent Valley and Barnet Plateau Green Grid Area. The open spaces that can most effectively support a new Regional Park lie within designated Green Belt or Metropolitan Open Land, therefore maximising the long-term benefit of such areas for residents will be the key test for any proposals. Such locations may need accessibility enhancements to unlock their full potential. The Council will seek improvements to individual parks and open spaces; enhancement of footpath, cycling and bridleway networks; improved green corridors and nature conservation areas will be supported. Improvements to signage, surfaces, lighting and surveillance should all assist in encouraging existing and new residents to make greater use of the local spaces in close proximity to where they live. For any new green infrastructure secured proposals must also include information detailing proposed future management and maintenance arrangements, including a payment programme. This management plan will be secured through planning obligation or planning condition as part of any permission.

10.198.7A All developments should also consider how accessibility to open space can be improved through pedestrian and cycle links as well as bus routes where practicable. The Dollis Valley Green Walk and the Capital Ring are strategic walking routes that cross Barnet. To support health and wellbeing aspirations ~~it is an ambition of the borough~~ and ensure everyone has access to green space, the Council will seek to increase the number of local and strategic walking routes as well as continuing to protect and enhance the existing public rights of way across the Borough. ~~This is demonstrated reflected in the Barnet~~ Long Term Transport Strategy which ~~introduces the aspiration~~ aims to create a walking and cycling route referred to as the Barnet Loop.

Map 7 – Public open space provision and deficiencies



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10.189.8 Map 7 identifies those areas of the Borough that are deficient in public open space being outside the (radii of 1.2km (district parks) and 0.4km (local parks). have a deficiency in both district and local parks). Whilst Map 7 shows areas of deficiency wherein open space provision is needed, the Council may require open space provision or improvements elsewhere in the Borough. Areas of Map 7 that are not covered by a park or a catchment area are considered to be areas of open space deprivation. This type of deprivation is of particular concern in areas of dense urban development as these are areas where residents do not have easy access to open space. Where development is proposed in areas of open space deprivation the developer should work with the Council to ensure the residents will have access to open space whether that is through assisting in new provision, or through improving access to and quality of existing open space. New open space and /or financial contributions towards improvements of existing open space will be secured through planning obligations / legal agreements or utilising the Community Infrastructure Levy Infrastructure Payments Policy.

10.1920 Children's Play Facilities

10.1920.1 There are 50 public parks in Barnet that provide formal play space for children, this equates to 0.5m² of space per child under 15 years. Children should also have access to stimulating play space in private residential developments. As detailed in para 6.21.5 and Policy CDH07, cChildren's play spaces should therefore be provided in all new residential development containing flatted schemes with the potential occupancy of 10 or more child bed spaces as set out in the Mayor's SPG Shaping Neighbourhoods – Play and Informal Recreation. Residential development will normally be expected to make provision on site for play space. However, there may be occasions where it is demonstrated that it is not feasible to provide play space as part of the development. In these instances, contributions to the provision of new play space, or the improvement to existing play space provision in a near-by public open space, might be more appropriate.

10.2122 Natural and Semi Natural Space

10.212.1 The Borough contains one Site of Special Scientific Interest (SSSI) – the Welsh Harp (Brent Reservoir) - into which the River Brent and Silk Stream flow. The Reservoir was created in 1835 as a water supply for the canal network and is jointly managed by Barnet and Brent Councils with the Canal and River Trust. As the largest expanse of water in Barnet, it provides an important recreational resource as well as a valuable wildlife habitat. Access to the Welsh Harp (Brent Reservoir) is being improved as part of the regeneration proposals for the West Hendon Estate. Any increased access to the Welsh Harp will be managed appropriately in partnership with the community's Vision for the Harp' and in consultation with Natural England to ensure its integrity as a SSSI is maintained.

10.212.2 The Council seeks to maintain networks of natural habitats by avoiding their fragmentation and isolation and will therefore identify 'missing links' where enhanced or new measures to support biodiversity and nature conservation may be supported as part of proposals. Where no additional open space is being created, the Council **will ensure that the development is designed in a way to enable it to replace and enhance biodiversity, ensuring Biodiversity Net Gain**. ~~Barnet's suite of design guidance SPDs~~ Sustainable Design and Development Guidance SPD together with the Green Infrastructure SPD will provide further guidance on making provision for biodiversity.

10.23 Trees

10.23.1 Barnet has around 36,000 street trees, the second highest number in London. These trees make an important contribution to the character of the Borough and the quality of life of residents as well as mitigating climate change. The Mayor of London seeks to utilise Borough Tree Strategies to increase tree cover in London, with 2 million additional trees sought by 2025. ~~Barnet's Tree Policy 2023-28 sets out ambitious targets to plant 900 trees annually focussing primarily on improving air quality, reducing the urban heat island effect and enhancing Barnet's parks~~ highlights that since 2017 the Council has planted more than 4,500 trees across the Borough. Planting locations have focused on targeting areas of poor air quality, urban heat island temperatures, avenue and landscape trees within parks, replacing

		<p><u>street trees and green infrastructure planting. The Council aims to plant 5,000 new trees over the 5 year life of the Tree Policy.</u></p>	
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