



**Main Modifications
Local Plan**

Ref:

(For official use
only)

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

Representations Form

PART B - Your representation

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

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

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

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

Figure/Table _____ Policies Map change _____

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

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

a) Legally compliant

Yes

No

b) Sound Yes No

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

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

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

Continue on a separate sheet if necessary

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

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

I oppose the entire plan as proposed by Ballymore, Barnet Council, and TFL. This project is unsound and will result in the eventual decline and potential dereliction of the area.

An electric bus charging station is planned to be located beneath the towers in an underground garage. If you've been following the news, you'll know that electric buses are prone to lithium batteries exploding and creating conflagrations (see Potters Bar and Paris bus fires). Is it really safe to put so many people in giant towers on top of a potential ticking time bomb?

Please note that Ballymore keeps fudging the numbers or telling half-truths and then accusing the public of spreading misinformation. They've also been in the news for writing 5-star reviews for themselves on TrustPilot. With all the cloak-and-dagger behaviour, it's become difficult to trust anything they say. All they want is to get their build done, get their money, and leave to do the same to another poor community. They have not listened to what local residents have to say. Indeed, we have had no say whatsoever in the matter; the initial proposals were conducted in secret during the pandemic and not publicised until recently. Ballymore are not the only ones at

fault here. Barnet Council are just as much to blame for keeping residents in the dark and not publicising the plans until they were all but finalised.

They claim Sites 27 and 28 will not be the densest population in the UK, but they are taking into account the whole region to be developed, including the square footage of both the railway tracks and the Deans Brook nature reserve, and ignoring other residential buildings which already exist on the plot.

Last I checked, estimates showed the population density of the developed area (both Sites 27 and 28) will be 139,000 people per square km, far in excess of Hong Kong.

The public has been told in the past that our current bus fleet (about 200 buses) will be expanded by a large percentage to accommodate the new residents and justify the loss of parking. We now know this was a lie, as according to Ballymore representatives, the new bus garage will only hold 190 vehicles. We were lead to believe that this number would be closer to 300.

The new bus station on their supposedly "accurate" model looks like it could only support three back-to back buses in total, while our current one can easily support 5 per side with space to spare. Assuming there are 10,000 new residents reliant on public transport, making the station smaller is grossly negligent and will lead to many issues in the future.

Currently, Edgware buses fill up very fast during peak hours, particularly in the morning school/work rush. If the network isn't being expanded and improved to handle thousands more people, most of whom have no private vehicle and need to go about their day, how is the service going to cope? Since the bus station is too small, all parking space on Station Road is to become sidings for new bus stops. Will the pavement be taken up by thousands of people waiting for a bus? Station Road is already a main thoroughfare which sees a lot of traffic every day. With these changes, I can only imagine it will be at an almost permanent standstill. To top it all off, there are no plans for bus standings in the proposal.

Adding to this, a similar drop-off to the one we currently have was nowhere to be seen in the proposed model of the area, so taxis and other cars will not be able to let out passengers in front of the station. Also, the current waiting area we have is weatherproof and safe, while in the model, all I saw was an open-air area that was not covered and had no walls to speak of, which is likely to be miserable on cold and wet days. And I somehow doubt there will be weatherproof places to wait along Station Road, which there should be if the whole road is to apparently be a replacement for the bus station we already have.

Again, why are the new facilities smaller and objectively worse when thousands more people are going to be completely reliant on it?

Supposedly, no large updates are scheduled for the Northern Line until 2040. The air on this line is appalling and the tracks are deafeningly loud in places. Not only that, the trains completely fill up to the point where it can be difficult to get a seat from the entire stretch between Colindale (no thanks to the recent developments there) and Central London. It doesn't seem like the Northern Line is ready for such a massive influx of new residents.

Changing the subject to environmental concerns, there's an area immediately East and South East of the site which runs along Deans Brook. This is a wetland nature reserve that has been inaccessible to the public for 100 years. It's home to kingfishers and grey wagtails (Amber status, previously Red status; at risk). Nearby local residents on Banstock Road say other animals that live in the reserve include slow worms, bats, newts, and hedgehogs, all of which are protected under the law. Quite possibly there are many other rare animals living there that we're not aware of.

Ballymore and Barnet Council are planning to build 720 homes on this wildlife sanctuary and also carve public bicycle and foot paths through the middle of it. They're touting the site as a "brand-new park" to fulfil their quota for green space in their development. This is blatant misinformation designed to sway the uninformed public to vote for them. This kind of behaviour is immoral and disgusting. They are placing their own greed and the selfish needs of humanity over the protection of the environment.

To follow, I have done some research regarding environmental and wildlife concerns in this area. I've also provided a bibliography with direct quotes from appropriate official documents, all of which is relevant to the conversation.

If you're familiar with the topography of the land around Edgware, you'll know that the town sits at the base of a range of hills that stretch in a crescent from Harrow Weald Common in the West to Mill Hill in the East. Water that falls on those hills flows down them towards our town.



Fig.1: A topographical map of Edgware and the surrounding areas

Much of this water is underground or in culverts. It appears aboveground in the form of three rivers which meander through Edgware: Edgwarebury Brook, Edgware Brook, and Deans Brook. The former two are tributaries that join Deans Brook which itself in a tributary of the Silk Stream (then to the River Brent, finally the Thames). The confluence of Edgwarebury Brook and Deans Brook is slightly North of the development site, around Brook Avenue. The confluence of Edgware Brook and Deans Brook is South of the site near Edgware Community Hospital. What this ultimately means is that the area in-between (the site of the proposed “brand-new” park) is wetlands. In other words, this is a vital floodplain. Edgware has been prone to flooding in the past, and only relatively recently has been protected by a series of dams and reservoirs (at the cost of £9 million in 2008), but this doesn’t stop the problem entirely. Areas around Edgware Station still flood when it rains, so the proposed underground bus garage which is to be located next to it is surely at risk. We rely on these wetlands around the river to take the brunt of the water damage when it inevitably breaks its banks (which it can, and does). As such, we should be leaving wetlands alone to remain spaces that keep us safe and allow nature to thrive.

To carve a path through this area right next to the river on the floodplain itself is questionable at best. To build vast towers on top of it too is needlessly and mindlessly destructive. Trees, bushes, and other flora will be felled, destroying not only the habitats of the aforementioned protected animals, but also making the area even more prone to flooding. Trees provide drainage and absorb water through their roots. Even removing a few trees will only add to the issue. The new bicycle path could be at best a nightmare to maintain and at worst, a danger not only to Edgware but also to downstream areas which includes the Silk Stream near Edgware Hospital

and all areas South, and the addition of constant human traffic will drive away fauna which is already at risk. We must also consider the potentially ruinous effects of noise, air, and other pollutions from the towers' construction. What will that do to the wildlife? With an estimated construction time of 10 years, is it ethical to plan such a monstrous and lengthy build right on top of a nature reserve? How will the combined weight of so many large, heavy buildings affect such a sensitive area?

To conclude, Ballymore and Barnet Council seem to be playing in areas of expertise they either don't or can't be bothered to understand, promising a park that they absolutely should not be delivering... at least, not like this. If they were giving us truly new open parkland like nearby Chandos Rec or Canons Park, that would be wonderful, but unfortunately this is not the case; they simply want to exploit an existing sanctuary to further their agenda. Their blind ignorance of the environment will damage what little biodiversity Central Edgware has left. Barnet Council's June 2021 SPD states as a major objective: "Protect existing and create new habitats that supports diverse wildlife." This is the opposite of what they are doing here.

References and Other Sources (inc. Citations):

1. Ballymore's 17th March Proposal

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1679305303/projects/6168463831016b7957a9659b/media-upload/Edgware%20Town%20Centre%20Emerging%20Masterplan%20Proposals%20-%20March%202023.pdf/hnwxidolmxadxynruikd.pdf>

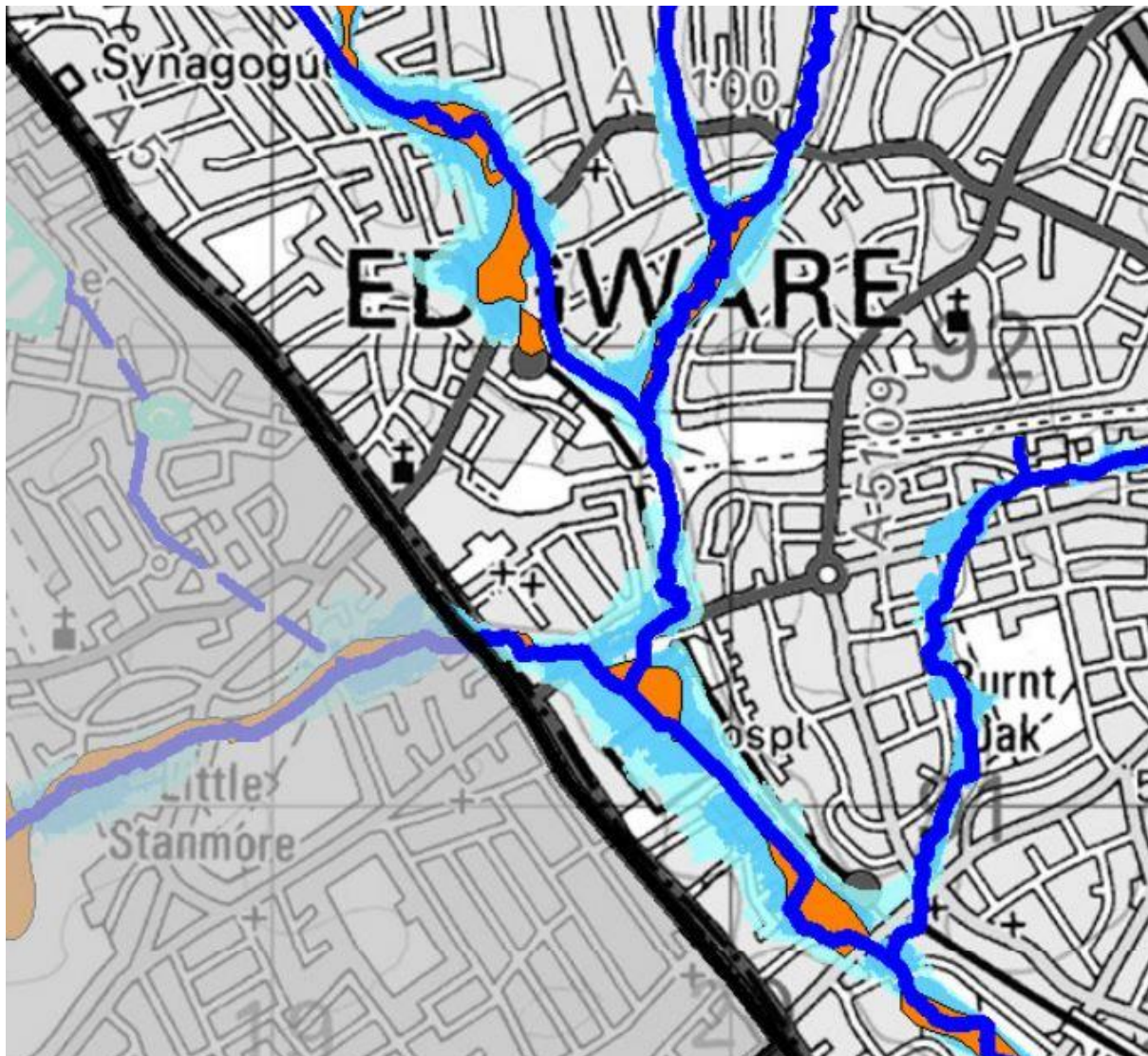
2. Ballymore's 29th June Proposal

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1688483927/projects/6168463831016b7957a9659b/media-upload/Board%20ALL%20-%2029%20June%20FINAL1%20%282%29.pdf/vu97yqpz87w9mzgn8uej.pdf>

3. Edgware (and surrounding areas) Topographical Map (Fig.1)

<https://en-gb.topographic-map.com/map-z22zs/Edgware/?center=51.62601%2C-0.28582&zoom=13>

4. Barnet Flood Map and Fluvial Flood Incidents



Author's note: Please click through the link for the full map:

<https://www.barnet.gov.uk/sites/default/files/assets/citizenportal/documents/planningconservationandbuildingcontrol/floodmaps/FigureD4EAFloodMapandFluvialFloodIncidents.pdf>

5. Statement of Common Ground between London Borough of Barnet and Environment Agency September 2022

https://www.barnet.gov.uk/sites/default/files/EB_SoCG_07%20Environment%20Agency.pdf

Paragraph 2.5

Policy GSS05 - Edgware Growth Area – EA have highlighted that GSS05 is not meeting the area's objectively assessed needs and achieving sustainable development. It is also not consistent with the aims of paras 20 (b), 20 (d) or 149 of the NPPF. The 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 Policy GSS05 should include strategic principles aiming 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. The preamble supporting text should explain the context for this.

6. Barnet Draft Local Plan (Reg 19) 2021 to 2036 (November 2021)

https://www.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission.pdf

Please see Section 10.13 Flood and Water Management

Paragraph 10.13.1: Deans Brook mentioned as a tributary of the River Brent and that the area is at risk from flooding.

Paragraph 10.13.8: Silk Stream and its tributaries mentioned as being "Fluvial flood extents" (i.e. flood plains)

"To ensure these risks of flooding are managed appropriately, the requirements of the NPPF and PPG are met in regards to steering development away from flood prone land, and the predicted impact of climate change is properly acknowledged in the management of flooding across the Borough, an additional layer of flood risk has been introduced to assist developers and planners in assessing the flood risk for sites. The extent of the additional layer of flood risk has been identified using 1% AEP51 plus 70% climate change fluvial flood extent and the 0.1% AEP RoFSW52 flood extent.

Fluvial flood extents include the River Brent, Silk Stream, River Lee and their tributaries. If a proposed site is within these flood extents, then a site-specific Sequential Test and a site-specific Flood Risk Assessment will be required"

Table 22 (p238): Deans Brook listed as Site of Importance for Nature Conservation in Barnet (Grade II listing)

7. Edgware Growth Area Supplementary Planning Document (SPD) (June 2021)

<https://moderngov.harrow.gov.uk/documents/s171597/Appendix%20C%20-%20Edgware%20SPD%20Growth%20Area%20draft%20final.pdf>

Objectives (p14)

Objective 13: Increase biodiversity and environmental resilience. Protect existing and create new habitats that supports diverse wildlife.

Waterways and Flood Risk (p21)

3.16. *Two waterways flow through the area - Dean's Brook and Edgware Brook – leading to some areas lying in Flood Risk Zone 3 (1 in 100 year or greater risk of flooding). There is also a surface water flood risk in some parts of the town centre.*

Open Spaces and Green Areas

3.17. *Edgware Town Centre lacks a network of open space and where there are open spaces in the wider area, access and routes to these spaces are not clear or well signed. Part of the SPD area is identified as being deficient in public open space, defined as being more than 400m from a local park or 1.2km from a district park.*

3.18. *Along the Deans Brook corridor and to the south and east of the Underground sidings is an area classified as a Site of Borough Importance for Nature Conservation. There are other wildlife sites in the local area, including Silk Stream, Burnt Oak Brook, Stoneyfields Park and Mill Hill Old Railway Nature Reserve, which have the potential to be better linked to the SPD area.*

Principle 8: Tackle Environmental Issues (p34)

Paragraph 4.50

“Fluvial flood risk is concentrated along Deans Brook and Edgware Brook, while surface water flooding is a risk in some parts of the town centre. Different sources of flooding interact and can exacerbate flood risk, for example an increase of impermeable surfaces from development and a lack of capacity within the existing drainage network will further contribute to risk.”

Paragraph 4.52

“There are areas of biodiversity recognised in Edgware, for example through the Deans Brook corridor classified as a Site of Borough Importance for Nature Conservation, and nature sites in the wider area, such as the Mill Hill Old Railway Nature Reserve Renewal in Edgware should seek ways to increase and enhance the biodiversity of the area and support wildlife to make it a home, including restoring the rivers and improving the river corridor habitat and spaces for wildlife. This should be combined with enabling people to experience nature at first hand, seeking potential opportunities to open up spaces such as the Deans Brook Corridor and Edgware Brook for public access, with the aim of connecting green spaces and habitats across the area where possible.”

Author's side-note: I do not entirely agree with paragraph 4.52. These spaces should be maintained at a distance. Opening these untouched nature reserves to the public will drive rare wildlife out, leading to a potentially damaging shift in biodiversity. The natural world should not be a zoo.

8. Surface Water Management Plan (Vol 1 & 2) (2011)

<https://www.barnet.gov.uk/planning-conservation-and-building-control-old/planning-policies/local-plan-old/ldf-evidence-and-2>

“Phase 2 - Risk Assessment

As part of Phase 2 Risk Assessment, direct rainfall modelling has been undertaken across the entire Borough for five specified return periods. The results of this modelling have been used to identify Local Flood Risk Zones (LFRZs) where flooding affects houses, businesses and/or infrastructure. Those areas identified to be at more significant risk have been delineated into Critical Drainage Areas (CDAs) representing one or several LFRZs as well as the contributing catchment area and features that influence the predicted flood extent. Within the London Borough of Barnet, 33 CDAs have been identified; these are shown in Figure 1.

The chief mechanisms for flooding in the London Borough of Barnet can be broadly divided into the following categories:

- River Valleys - Across the study area, the areas particularly susceptible to overland flow are formed by the river valleys of the Dollis Brook, Edgware Brook and the Silk Stream, and / or along narrow corridors associated with topographical valleys which represent the routes of the ‘lost’ rivers of London including the Decoy Brook and Montrose Ditch.*
- Sewer Flood Risk – areas where extensive and deep surface water flooding is likely to be the influence of sewer flooding mechanisms alongside pluvial and groundwater sources including the areas around Hendon, Edgware, Mill Hill Circus and Barnet;*
- Fluvial Flood Risk – areas where extensive and deep surface water flooding is likely to be the influence of fluvial flooding mechanisms (alongside pluvial, groundwater and sewer flooding sources) including Burnt Oak, Colindale, Golders Green, East Barnet and Brent Cross.*

Within the London Borough of Barnet, the greatest number of receptors are at risk from surface water flooding along the route of the ‘lost’ watercourses across the Borough, including the Decoy Brook, Mutton Brook, Clitterhouse Stream and Montrose Ditch, which run through the area to join up with the main Rivers crossing the Borough (Dollis Brook, Silk Stream and the Edgware Brook”

Section 3.7 Other Influences

Deans Brook, Edgwarebury Ditch, and Silk Stream mentioned as being some of Barnet’s watercourses that is “partially or fully designated as being Main River”

“The Environment Agency historic fluvial flood outline maps are displayed in Figure D-4 in Appendix D. The EA historic maps contain flooding records for the Silk Stream and Pymmes Brook. The largest outline was recorded for the January 1992 event on the Silk Stream where there was widespread flooding along the length of the watercourse.”

Section 3.9.1 Overview of Surface Water Flooding in Barnet

“The following conclusions are taken from the Phase 2 Risk Assessment, which has involved pluvial modelling combined with site visits and review of historical flood records provided by the Council, Thames Water and the Environment Agency:

- *Across the study area, the areas particularly susceptible to overland flow are formed by the river valleys of the Silk Stream, Dollis and Pymmes Brooks, and along narrow corridors associated with topographical valleys which represent the routes of the partially 'hidden/lost' rivers of London including the Dean's Brook, Decoy Brook, Montrose Ditch, Mutton Brook, Folly Brook, Strawberry Vale Brook and Clitterhouse Stream (Figure 1-4). The majority of these flow north to south through the whole of the Borough. Other low lying areas that are present throughout the study area such as underpasses, subways and lowered roads beneath railway lines are also at risk;*
- *The outputs from the intermediate level 2D pluvial modelling revealed that several areas within the Main River Valleys are susceptible to surface water flooding as well as fluvial flooding.*

There are three areas where surface water flooding is likely to be the influence of pluvial, sewer flooding and in some occasions groundwater flooding including:

- *Edgware – The pluvial modelling shows this area to experience significant flooding during the 1% AEP rainfall event to the north and south of the A41 (Edgware Way), which mirrors the route of the culverted sections of tributaries of the Silk Stream.*

Additionally the DG5 sewer flooding database records over 40 properties at risk of sewer flooding in this vicinity which is also identified as having an increased potential for elevated groundwater.

The pluvial modelling, along with flood risk from other sources and historical datasets identifies that pluvial flooding in Colindale, and Friern Barnet is likely to be the influence of both surface water, groundwater, fluvial / tidal (from Silk Stream and Dollis Brook) and sewer flooding.

The Problem

The issue for Barnet and similarly for most of the London Boroughs is that the borough is largely urbanised for most of the lower parts of Barnet meaning there is little natural space for water to flow naturally through its catchment. Huge volumes of water generated from storm events, due to both the natural and man-made impermeability of the Borough are all contained within the two main systems (as there is very little infiltration potential across the borough):

- *The watercourses – whose floodplains have largely been constrained by development and are either contained within canalised straight open sections or put into culverts and hidden away to secure additional land for development; and*
- *The below ground sewerage network, which as highlighted above has had its potential capacity eroded away.*

Each of these systems is by and large unable to take any additional flows (bearing in mind the foul system was designed for a population greater than that residing in the areas) and as such the historical development decisions and increasing need for development represents a

CRITICAL risk to the current and future level of flood risk experienced across LBB, particularly bearing in mind the climatic trends towards more intense storms. This problem is not restricted to LBB, the problem is further exacerbated in adjacent ‘downstream’ boroughs, where the surface water volumes from the upper boroughs such as Barnet contributes to the flooding issues within the Boroughs nearer the River Thames.”

Section 3.9.3 Risk to Future Development

*“Land available for development is scarce within the Borough and is being put under increasing pressure due to the demand for new housing. It is essential that decisions are made through the spatial planning process which guarantees that land is used efficiently. **However, it is also essential that the impact of future development on existing infrastructure, including the drainage systems, is assessed and provisions made to help reduce the current susceptibility across the Borough.**”*

*Findings from the Risk Assessment (Phase II) of the SWMP identify that parts of Barnet, namely Brent Cross, Cricklewood, Colindale, Edgware and Hendon are at significant risk of flooding from pluvial and groundwater sources. **Given the residential and non-residential growth proposed for these areas, it is important that the risk of surface water flooding is clearly understood in order that measures to mitigate this risk can be adopted.**”*

- *All developments exceeding 0.5 hectares **must** include source control and/or natural surface water storage options within the site boundary; and design for greenfield run off rates;*

Author’s note: Ballymore’s development plot for the towers may not include substantial enough greenfield areas (although SuDS is mentioned in the 29th June proposal).

- *There are approximately 700 properties in LBB with basements. Following further review of these, post Drain London and these are deemed to be at risk, they should be fitted with resilience measures and their use controlled, i.e. used for storage rather than living accommodation;*

Author’s note: The underground bus garage is at risk from flooding. What measures are being taken to prevent this? Nearby Edgware Station is an “at risk” site.

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.

Deans Brook Nature Reserve should be left alone. It is a sanctuary for wildlife and an important flood plain, not a zoo, not a motorway, and absolutely not a development site. The most you should be doing is hiring environmental experts to sustainably maintain the area in order to preserve its natural beauty.

The underground bus station seems like a bad idea and potentially dangerous. Supposedly, London Fire Brigade has already stated that this project cannot go forward. Please consider revising the entire plan. What we have right now works quite well, although TFL could really put some money into the facilities to keep them maintained and up-to-date.

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Representation Form B

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

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

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

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

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

The Site No 28 description after our proposed Modifications

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

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	PTAL 2031:	6B
	Site Size:	8.17 ha
	Ownership:	TfL
	Site source:	Call for Sites and Edgware Town Centre Framework (2013)
	Context type:	Central <u>Suburban</u>
	Existing or most recent site use/s:	Transport operations
	Development timeframe:	6-10 years

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	Planning designations:	Town Centre; Site of Borough Importance for Nature Conservation	
	Relevant planning applications:	None	

Site
descripti
on:

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

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



1. **Green Area** (2.67 hectares): Edgware bus garage and bus station with operational infrastructure for approximately 200 buses and a

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Representation Form B

	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p><u>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure.</u></p> <p><u>Residential led mixed use development with town centre uses, commercial (retail and office), transport, leisure, community, public realm /open space, and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.</u></p>
	<p>Indicative residential capacity:</p>	<p>2317 <u>2316.0 dwellings.</u></p>
	<p>Justification:</p>	<p><u>The site can not be justified for housing let alone high density highrise development.</u></p>

<p>Site requirements and development guidelines:</p>	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site. <u>Consistent with Policy CDH04, all tall buildings will be subject to a detailed assessment of how the proposed building relates to its surroundings, responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD. Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, to ensure that the significance of nearby heritage assets are conserved or enhanced, and the relationship with surrounding low-rise suburban housing.</u></p> <p><u>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02.</u> Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.</p> <p><u>Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</u></p> <p>Proposals must be subject to an archaeological assessment.</p> <p><u>Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook.</u> The SFRA Level 2 provides a detailed assessment of flood risks and the impact from climate change and shows parts of the site are in Flood Zone 3 and at surface water flood risk. Where possible, proposals for the site should consider de-culverting of Deans Brook and <u>inclusion of an appropriate buffer zone either side of the main river. 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> <p>The emerging Edgware Growth Area SPD (2021) provides further guidance.</p>
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**Continue on a separate sheet if
necessary**

Please note:

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

Declaration of consent

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

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

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

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

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

Signature: Malcolm McLean

Date: 16th June 2024

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

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

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

Continue on a separate sheet if necessary

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

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

The general opinion of Edgware I've heard online and via word of mouth is that this town isn't a destination; it's a place to drive through to get somewhere else. The only reason people come here is for shopping, and there are much better places elsewhere like Brent Cross, Watford Harlequin, or Harrow (St George's/St Ann's Centres). Still, being able to drive nearby to pick up some clothes or groceries is more convenient than having to travel further afield, so the Broadwalk and its accompanying car park see a lot of use. Indeed, this car park is often filled to the brim by shoppers and commuters. Otherwise, Edgware doesn't have the right amenities to be desirable to those who don't live here. The description of a Major Town Centre is that the catchment area is at least Borough-wide. However, there's nothing here except a small shopping centre that isn't even two storeys tall. As before, this is not a destination, certainly not a Borough-wide one.

We have the bare minimum of leisure amenities. There are a few betting shops but these only serve to make the area more seedy and unhealthy. There's no cinema, no bowling alleys, no gaming or amusement arcades, really nothing to speak of at all beyond a gym and a small library.

We also do not have any publicly accessible green space or park land whatsoever in Central Edgware unless one counts the somewhat macabre St. Margaret's graveyard which is packed with headstones. I am unsure if the current 'Stop and Smell the Flowers' mural outside Edgware Station is supposed to be ironic or not; there's so little greenery that there isn't a flower to be seen anywhere (except, as previously stated, the graveyard).

There is only one small pub which still survives (The Three Wishes, buried at the far North end of Edgware High Street). There's also very little for children (if anything). For most, they won't see this town as anything but a declining and sad high street which has nothing for them to do.

Edgware has no town hall and no civic centre. If town meetings happen, they are not publicised anywhere that I'm aware of. Over the last year or so, one of the storefronts in the Broadwalk has been taken up as makeshift 'Edgware Town Centre', but it's always closed with the lights off. It's a dark, uninviting space that only seems to come to life when Ballymore is touting propaganda regarding their monstrous development.

Barnet Council themselves cannot see Edgware as a Major Town Centre, themselves being far too good to be seen here; their buildings are located far away in Colindale and Hendon, the latter of which is in Hendon Town Hall; again, something which Edgware doesn't have. There is no residents' association, and the Council has done nothing to facilitate the creation of one (although I gather that residents upset at these developments are trying to form one as Edgware Community Association).

There is no police station. We used to have one on Whitchurch Lane, but this was closed down and apparently turned into a "cannabis factory". There was a murder right outside this building in mid-2023, not only a tragedy but also an embarrassment for the Police Force and the Council. We have homeless refugees and drug addicts begging on the streets. Gun crime, knife crime, and gang warfare are up, including a shootout at Canons Park in February 2023. A woman was stabbed to death on Burnt Oak Broadway in May 2024. I could go on. Why this police station was closed is beyond me; surely the "Major Town Centre" of an entire Borough needs this kind of facility to function properly. My suggestion would be to reinstate this building as a major base of operations for a new active police force. And yes, again, technically this is in Harrow, but it's a mere stone's throw away from the border, and Edgware has for some reason been split into multiple Boroughs by the powers that be. However, it is just across the road from Barnet, and I am sure a compromise can be made and Councils can talk to each other to arrange what's best for all boroughs.

On that subject, it's absurd to suggest Edgware is Barnet's Major Town Centre when the town itself is split into at least two pieces by Borough lines. Not only that, the Councils do not communicate with each other, nor have any power over what the other side is doing. This is ludicrous. You should be working together, not apart. Coming to decisions and conclusions together would make for a much healthier town. When I spoke to Harrow Council personally, they were deeply upset by what Barnet Council is doing with this development, especially since they have their hands figuratively tied behind their backs. MP Bob Blackman even had to take the matter

before Parliament itself; this is all they can apparently do to have any say in Barnet's Plan.

There's also no fire department, with the closest one being in Stanmore . While this is close enough, one would expect this sort of service to be in the "Major Town Centre" itself rather than a neighbouring town. Considering the extremely dangerous fire hazard Ballymore wants to build, this sort of facility will be necessary to have on hand, especially since it's at the other end of Whitchurch Lane, a road prone to traffic jams at peak hours. And even though we used to have a fairly sizable building dedicated to the post office, this has in recent years been relegated to the back room of a coffee shop, further showcasing the town's steady decline.

Edgware has always been made up of primarily low-rise buildings, with the exception of the Grenfell-clad Premier House (and Premier Place which seems in development hell) and a few other such mid-sized buildings around Burnt Oak. We're mostly a suburban sprawl. Low-rise buildings amidst residential suburbia are not a quality of a "Major Town Centre".

Prospects for employment are low, especially since the Job Centre was closed. There are no facilities to accommodate employment as far as I am aware. This town is on life support, barely functional at this point.

Edgware has been on a downward decline for many years, possibly even decades. Barnet Council has been putting seemingly as little money as possible into maintaining the area, cleaning up the streets, repairing pot holes, maintaining the Broadwalk Centre, keeping crime down, and keeping the High Street and Station Road alive. The Railway Hotel has stood empty for a terribly long time with no attempt at revival, and the lot immediately behind it (Forumside) is nothing but a dumping ground and a disgrace. The Council clearly does not care enough about Edgware unless it can make money by exploiting people with this monstrous development who cannot be supported by the current barebones infrastructure.

Considering these factors, how Barnet Council sees us as the one and only "Major Town Centre in Barnet" when they clearly can't be bothered to even maintain it is laughable.

To even consider any kind of development, Edgware first needs to be cleaned up and beautified with a proper infrastructure put in place, including the aforementioned facilities.

I back Edgware Community Association's research and support them in their claim that Edgware is a Suburban District Centre. We have never been the heart of Barnet, and we are not a Major Town Centre.

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

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

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

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

MM	Original	Proposed modifications
	<p><u>for uplift through the design-led approach</u></p> <p>b) Improved leisure options such as a new cinema, swimming pool and new eating-out options;</p> <p>c) Appropriate <u>location- based</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>	
MM 20	<p>4.18 Edgware Growth Area</p> <p>4.18.1 Edgware has evolved from a small market town into a <u>major town centre</u> and <u>has become</u> <u>e</u> a well-known suburban hub of North London.</p>	<p>4.18.1 Edgware has evolved from a small market town into a <u>major district</u> town centre and <u>has become</u> a well-known suburban hub of North London.</p>
MM 20	<p>4.18.4 Edgware is identified in the <u>London Plan town centres hierarchy as Barnet's only Major Centre and is also highlighted in the</u> Growth Strategy as one of Barnet's main</p>	<p>4.18.4 Edgware is identified in the Growth Strategy as one of Barnet's main District town centres;</p>

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

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

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

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

Continue on a separate sheet if necessary

Please note:

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Declaration of consent

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Signature: Malcolm McLean

Date: 16th June 2024

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

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

Continue on a separate sheet if necessary

I wish to support the representation (Ref:SOE-Objection05-Site27) from Save Our Edgware and the Edgware Community Association concerning the wrong classification of Edgware as a Major Town Centre.

I wish to support the Proposed Modifications (Question 4) and revised words in the representation (Ref:SOE-Objection05-Site27) from Save Our Edgware and the Edgware Community Association.

Sites 27 and 28 are planned to be redeveloped into at least 25 very tall high-density residential tower blocks (up to 29 storeys, most 20-25). The buildings will not be in keeping with the rest of the local area; there's nothing of this scale for miles around, and there's both an historic church (St. Margaret's) and an old pub (The Railway Hotel) which will be utterly dwarfed by the development just across the road. The whole site could house as many as 10,000 new residents, increasing the population of Edgware Ward by 50% and putting an enormous strain on local services which are not prepared for this influx of people. We simply do not have the infrastructure. To begin this scale of development in the hopes that infrastructure will come later is quite mad. Where is that money coming from?

Our shopping centre is set to be demolished and not replaced, and the car park will be reduced tremendously. Both are vital for a town in the outer suburbs. Independent traders who have stalls in the Broadwalk will be driven out with no compensation, their livelihoods and futures dashed. Everyone working there now is at risk of losing their jobs. My understanding is that under the current plan, shops are to be distributed on the ground-floor levels of some of the tower buildings. This is not good enough. Our current shopping centre is fully covered and weatherproof, while the new development will be open air with significantly larger walking distances between shops (including crossing roads).

Please understand that I am not against the redevelopment of the area, but this sort of gross over-development by dropping this number of people in one place on one single small town is nothing short of absurdity. If the towers were dropped to 6 storeys with the remainder spread across Barnet, it wouldn't be quite so bad. As it stands, it feels like a cynically-driven attempt to generate money at the risk of not only wrecking the town but also exploiting people who need homes by cramming them into high-density towers which have been proven to cause negative

behaviours. The entire construction time will be at least 10 years, a significant portion of which we will be without our main retail centre which doesn't just service Edgware but also surrounding areas. This is particularly unfair to nearby elderly residents who will be living their final days in the shadow of a colossal building site.

The tallest 29-storey 'Marker Building' has an enormous cube at its peak. This appears to be the size of several houses and is to be lit up like a lighthouse (increasing the building's true height far beyond the stated 29 floors). While I understand an aircraft warning light is a requirement for a building of this height, its scale is simply ludicrous. One has to wonder how much energy it would take to power it. This is not Mordor. We do not need an Eye of Sauron.

Premier House and Premier Place are not in keeping with the rest of the area. These are ugly buildings that no one likes. They should not be used to reflect the sort of architecture (both style and scale) of any new development. The idea of 25+ more buildings, all over double the height of these grotesque constructs is appalling. They cause massive updrafts with winds whipping around them on inclement days, and thus are not enjoyable to walk under nor are they pleasant to look at.

Ballymore states that there will be new green space, although this is somewhat misleading. The podium area directly on top of the new Sainsbury's building is to be a park. This sounds great until one realises that it and the other small green squares function as a garden for 10,000 new residents. This is not large enough of a space to accommodate such a huge number of people. Additionally, these spaces will likely exist in the shadows of the massive structures around them. One wonders if they'll have enough sunlight.

Our current car park is about 1235 spaces, with 900 for shoppers, 250 for commuters using Edgware Station, and the remainder for Broadwalk workers. This car park frequently fills up, especially on weekends, and during major holidays, finding a parking space can be difficult. The main Sainsbury's car park is not only used by Broadwalk shoppers but also by those shopping on Station Road. It's also paramount to worshippers at nearby churches, mosques, and temples, and useful for those dropping their children off at Edgware Primary School. Regardless of one's opinions on personal vehicles, one cannot deny that this car park is the lifeblood of the town. Since the car park is being demolished, Ballymore are providing 769 spaces in total for the entire site, with a mere 250 for Sainsbury's, about 90 or so for commuters, and the rest as private parking for the new residents in the towers. All this said, there will greatly diminished car parking space for current residents, and only enough space for about 4% of the new residents. The rest will be forced to rely on public transport, which at this time doesn't seem to be being improved, rather under the current proposal, it will be greatly worsened. The fear is that new residents and visitors who don't have space for their cars will park them in all surrounding roads, choking out the whole area. Many current residents of Edgware and neighbouring areas won't be able to use the new facilities as there'll be nowhere to park, thus people will stop coming to Edgware and the entire area will stagnate. This situation will again be especially bad for the elderly and disabled who rely on parking to visit the town centre and carry their shopping home safely. Let me re-iterate that this car park is used often and is frequently completely full.

The loss of the car park wouldn't be so awful if public transport were given a huge boost. Unfortunately, it's all being downgraded. We are to lose our current bus station in favour of a smaller one, and current plans are for the whole of Station Road to be one street-length bus stop. This doesn't seem like it'll end well. I wrote about this in greater clarity in the Site 28 document, so please refer to my thoughts there. Apparently, since there are no bus standings provided in their poorly thought plans, buses will have to stand along the sides of the road all across Site 27.

Another fear stems from the scale of the development itself. Just dumping 10,000 people on Edgware cannot be the final plan. These residents will need facilities, services, civic buildings, things to do, and so on. There isn't enough space in Ballymore's developmental region for everything. This will result in not only the centre of Edgware being redeveloped but **a knock-on effect to *all* surrounding areas** (Belmont, Stanmore, Whitchurch, Highwood Hill, Mill Hill, Burnt Oak, etc), resulting in a gross over-development of a much larger area than simply the Broadwalk and car park.

Building so many enormous tower blocks filled to the brim with new residents is unsustainable. It will destroy not only Edgware but also affect all neighbouring areas. We simply do not have the infrastructure to support it.

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.

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).

What I propose is for the current Sainsbury's car park to be converted into several new buildings (no more than ten in total; seven or eight sounds about right), all with a

maximum height of six storeys. While this may seem too few to the developers, the remainder of the proposed housing could instead be spread evenly and intelligently across the rest of Barnet to prevent strain on the Edgware area's infrastructure. All of these lodgings should be affordable by normal working human beings, not to be rented out as luxury penthouses at exorbitant rates.

The Broadwalk right now is okay but could really use a revamp. I propose expanding it to allow a second floor of shops and other facilities. Ballymore seem very proud about offering a cinema. While I'm unsure how viable this plan will be given the rise of home streaming services, perhaps consider it; it might bring more people into Edgware. Also consider adding shops and activity spaces for children; Edgware doesn't even have a toy store. A gallery for local artists to show and possibly sell their work may also be a good idea. New/more toilets would be great. Potentially, the roof could be opened up to the general public for more parking or green space. The Broadwalk should be the priority to be redeveloped before anything else in order to serve both existing and new residents as soon as possible. Please remember that this shopping centre is the heart of Edgware, and without it, we are not a destination worth visiting.

Edgware has too many poor quality fast food chicken shops and far too many gambling joints. These sorts of places are unhealthy for body and mind. Please consider shutting these down, and instead open stores which support independents in the community. While the Broadwalk is being redeveloped, these wastes of space could be used as temporary locations for some of its shops.

A multi-storey car park seems like a good idea, as long as it is designed well, doesn't look horrid, and can accommodate not only Edgware's current needs but the needs of the new residents, too. Perhaps this could be located on the Forumside lot which has been a dumping ground and overall dodgy area for decades. If the geology allows, perhaps this car park could even be underground, but be advised that the whole area is prone to flooding due to the Deans Brook/Edgwarebury Brook confluence, and thus measures will have to be made to ensure the space is safe. Parking for electric vehicles should be kept above ground in the event of batteries exploding and causing fires.



All new buildings (including the new car park) should be in keeping with the rest of the area. We don't want 'functional', ugly eyesores. For inspiration, please look at the parade at the North end of Station Road (which houses Nationwide). Also see the Railway Hotel and the Tudor-esque facades on the High Street.



Additionally, all new buildings should be designed well, built well, built to last, and maintained by professionals who know what they're doing.

Central Edgware doesn't have any green space. With this in mind, the remainder of Site 27 should be converted into park land with plenty of trees planted. Provide benches, bins, and toilet facilities. Make it beautiful; something we can be proud of and love. Take on a team of arborists, gardeners, people who know how to look after plants and care about the natural world.

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: Malcolm McLean

Date: 16th June 2024