

Edgware Growth Area SPD

Schedule of Representations and Responses

June 2021

Edgware SPD Responses

Rep No.	Organisation
1	Resident
2	TfL (Infrastructure Protection)
3	Resident
4	Resident
5	Resident
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7	Resident
8	Resident
8a	Resident
9	Resident
10	The Barnet Eye (Blogspot)
11	Resident
12	Resident
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15	Resident
16	Resident
17	Resident
18	Resident
19	Canal & River Trust
20	Resident
21	Resident
22	Natural England
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24	Resident
25	Resident
26	Resident

27	Chairman Canons Park Estate
28	Metropolitan Police - Designing Out Crime Officer
29	HADAS (Hendon and District Archaeological Society)
30	Resident
31	Resident
31a	Resident
32	Residents
33	Resident
34	Resident
35	Highways England
36	Avison Young - 360 Burnt Oak Broadway
37	Residents
38	Sport England
39	Resident
40	Residents
41	Resident
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61	Resident
62	Resident
63	Historic England
64	Resident
65	Resident
66	Resident
67	Barnet Borough Arts Council
68	NHS HUDU
69	Savills on behalf of Ballymore Group and TfL Commercial Development
70	Centro Premier House
71	Resident
72	Historic England Archaeology
73	Environment Agency
74	TfL
75	Owner – Ballard Mews
76	Resident
77	Local Worker

Rep No.	Representor	Section	Summary of Comments	Councils Response
1	Resident	General	Residents are very proud of Edgware's history and to have it eradicated by the architect's futuristic vision that it should consist of bland concrete high rise flats is going to be a tipping point in view of the already massive eradication of buildings shops and sites to be replaced by over indulgence of high rise buildings on this side of the borough compared to the glaring lack in still picturesque, High Barnet.	Edgware's history and heritage are a key part of its appeal for local people and visitors. The SPD establishes parameters for high quality design that responds to the local context, while important but neglected heritage buildings - most notably the Railway Hotel - must be restored and brought back into use.
2	TfL (Infrastructure Protection)	General	We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015. Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.	Comments noted.
3	Resident	General	Our concern, which is shared by many of our friends in Edgware, is centred on the Broadwalk Shopping Centre, recently sold to private developers Our fear is that the Broadwalk will be reduced to a minimum of shops-Sainburys and not much else- and there will no longer be a range of shops, nor any parking for shoppers, as at present. If the Broadwalk goes, as a SHOPPING centre, that, by itself, will help to ruin Edgware, whatever other proposals are implemented.	The SPD seeks significant improvements to the environment to make a better town centre experience and encourage more people to visit and spend money in the local businesses.

4	Resident	General	Live in Burnt Oak and still waiting for regeneration to materialise. Viewed plans for the area some years ago which promised flower pots, limited parking and beautiful clean streets – none of this has been delivered.	The SPD is a framework for enabling positive change, shaping the future of the town centre.
5	Resident	General	<p>I recently saw that there is a plan to regenerate the Edgware high street area (e.g. Broadwalk etc.). I am strongly for the idea, as the area is in much need of TLC. I do have some thoughts:</p> <ul style="list-style-type: none"> - I typically avoid the area because of Burnt Oak and the dangers around there (frequently people high on heavy drugs and fighting, carelessness of people in the area when it comes to littering and keeping the streets clean). - The centre is definitely rundown, and I feel like I'm walking into a residential elderly home when going into Broadwalk. The ventilation is so bad there, and lack of natural light is almost depressing. Something like this can be solved by looking towards modern architecture (e.g. look at the way Westfield Shepherds Bush incorporates large window walls/ceilings). <p>Furthermore, I would like to raise the final concern around your affordable housing plan, which I can imagine involves large residential blocks now. With the growing amount of residential buildings that are ~10 floors high, there is becoming less and less sunlight passing through onto the streets. This is incredibly bad for the natural environment (one of your pillars in the redevelopment plans) and something that needs to be strongly considered by developers who build such buildings going forward. New building designs should start including designs that enable natural light to pass through every few meters. Please refer to this article in The Financial Times that demonstrates ideas upon which you can create building policies around. Concepts like "Atriums" for buildings should become commonplace.</p>	<p>The issues of crime and anti-social behaviour are addressed in the SPD. Renewal of the town centre and the regeneration of brownfield land will remove the spaces that can support these problems. The SPD supports a 'secured by design' approach such as ensuring that natural surveillance of places is achieved.</p> <p>While Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings, the SPD and other planning documents require that the design of any tall building must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			Overall I am glad to see the redevelopment of the area, and to give background on myself, I am a mid-20s professional with focus on tech & sustainability in my day-to-day projects for a large scale retailer.	
6	Resident	General	<p>If we are not careful Edgware Town Centre will die more than it has, with so many good shops already closed forever. What keeps it alive is the good car park , free for one and half hours behind the shopping mall In my and many people I talk too views the most important item is to make sure that the number of parking spaces in the main car park is not reduced by ANY spaces and the free time & current duration is confirmed. These two should be non negotiable in any plans put forward to the planning department.</p> <p>Secondly many high streets have already been ruined by poorly thought out cycle lanes , slowing cars and forcing many to find new places to shop.</p>	The SPD supports Edgware continuing as a Major Town Centre, with significant improvements to the shopping environment as well as more sustainable transport options. Car parking for town centre users will be assessed and designs will seek to make provision more efficient, e.g. through basement or podium parking.
7	Resident	General	<p>The document that has been circulated is optimistic about the current state of Edgware. It is in very poor condition, often dirty, full of charity shops and betting shops with very little heart. Most people use it for perfunctory purposes to get on the tube or buses or use the now depressing and bedraggled Broadwalk.</p> <p>The new proposed residential tower blocks squashed in next to an original commercial building converted in a perfunctory way to residential are disgraceful, compressed together with no green space or landscaping similar to the slum high rises removed from Spur Road for redevelopment making the centre even more depressing. So redevelopment is a good idea, somewhat overdue as word of mouth about Edgware currently is that it is a bedraggled centre with a small Kosher corner, three recent pizza places and three fish shops! Where is the planning there?</p>	The advantages and issues that characterise Edgware are highlighted. The SPD provides a framework to tackle the issues such as a lack of green spaces, an often poor quality street environment, etc, and guide development and to ensure that community benefits are realised, including new public open spaces and a much higher quality of environment. The renewal of Edgware seeks to improve the town centre offering, supporting Edgware as a destination for visitors. There will be an inclusive approach that provides a family-friendly place.

			<p>There should be a massive attempt to build a community for people of all ethnic origins and age groups, this is a last chance which must be grasped to raise standards, public satisfaction and keep everyone safe.</p> <p>I don't start with the need for housing although I am not against quality well planned housing. The Spur Road redevelopment is good and all new residents enjoy it those standards should be maintained. At the centre of that redevelopment is a Church/community centre it has a heart. Edgware needs a heart.</p> <p>There is currently nowhere and nothing for young people to do or any creative outlet for members of the public. Some food shops should be cheap and accessible for example a kosher/Halal/Vegan take away falafel shop healthier than chain outlets. A happy days style Coffee Shop warm and comfortable for older residents to meet up and have Coffee and Cake.</p>	<p>This includes the provision of community facilities which are key to supporting a successfully town centre. More places for people to meet and socialise are supported by the SDP, including new leisure and cultural offering.</p>
8	Resident	General	<p>I am very upset that you are ruining our area. Ever since I was a child I was aware that Premier House was such an eyesore. Instead of pulling it down, we now have an ugly twin going up besides it. Every time we drive up Manor Park Gardens it looms over the High Street, overshadowing the area like an inner city estate? It was bad enough when they got rid of the old Cinema and built that ugly Millennium House in its place, totally out of character with the surrounding area. What are the planners trying to do to our once pretty town center? Now they want to build 14 story tower blocks? Please stop!!! Edgware is not Colindale.</p>	<p>While Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings, the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
9	Resident		<p>Delighted that at long last the development of Edgware town centre is being considered.</p> <p>Two things immediately come to mind.</p> <p>If I read it correctly, you want to reduce off-street parking. But if you want people to use the town centre- you should be increasing it. People cannot carry their</p>	<p>More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through</p>

			<p>weekly shopping on public transport or carry it home. Edgware has both a young population with children in buggies - so carry shopping is impossible. Also it has an aging population with people who physically cannot carry a lot or walk far. For both groups, cycling is out of the question. Unless you live in the newly developed centre of Edgware, you really need to be able to park to use the town's facilities</p>	<p>more efficient designs, for example basement or podium parking.</p>
10	The Barnet Eye (Blogspot)	General	<p>This whole process should be put on the backburner until the Covid 19 crisis is out of the way. There are two reasons for this. The first is that no one can really be sure what the fallout from covid means for our town centres, transport, working arrangements or living arrangements. Working from home has become the norm for office workers. Retail has seen a massive shift towards online sales. Restaurants, cinemas, pubs, live music venues etc have been shut for the best part of a year. Many thriving businesses that may have been looking to expand a year ago, are in survival mode.</p> <p>I would love to see a cinema return to Edgware, but the better chains such as the Everyman will have a lot on their plate just rebuilding their existing business and balance sheet, let alone looking at new cinemas. My view of these sort of schemes is that they are often simply designed to attract developers to build luxury flats. The 'add ons' such as cinemas, leisure space etc are often the first thing to go one developers get planning permission. You only have to look at all of the so called 'minor changes' to the Barratts NIMR scheme in Mill Hill, to see what happens in the real world once developers get their hands on a site.</p> <p>With the massive increase in working from home, it is very likely that areas like Edgware will need a different mix of housing to the one which has emerged in the Borough over the last few years. Far fewer people will</p>	<p>The Council has continued to progress planning document during the Covid-19 restrictions. The impact of Covid-19 on the town centre is acknowledged in the SPD and approaches to recovery are included.</p> <p>The need for Edgware to provide a much-improved leisure and cultural offer is vital to renewal of the Town Centre, along with high-quality community facilities. The Railway Hotel is a distinctive local landmark building that the SPD fully supports bringing back into a sustainably use that is beneficial to the community.</p> <p>A mix of housing sizes and tenures will support a diverse and family-friendly town centre.</p> <p>The councils carried out extensive public consultation on the SPD. Online Zoom sessions were well attended, with high levels of feedback.</p>

			<p>need commuter pads and more will need homes with decent work spaces. This has not been mentioned, which implies that post covid planning has not been addressed in this document.</p> <p>Buried away in the section on community facilities, there is a rather ominous note that, to me at least, gives the game away, as to what the council and their development partners really want. In the first bullet point, I note the use of the word 'likely' rather than 'required'. As to the second bullet point, this implies that community facilities will be moved to 'more appropriate accomodation. My experience of this, from the experience of Watling Boys club, was that new accomodation is offered, then once the council got its hands on the space, the offer was withdrawn.</p> <p>One of our key issues is The Railway Hotel I believe there is huge potential for the space. We'd like to see the council enter a partnership with the owners to encourage a MicroBrewery to take over the space, using the upstairs space for community space and wedding venue usage. The owners have clearly bought the site to redevelop. As the site is grade II listed, it must be made clear to them that this will not happen and if anything happens to the building, they will need to rebuild it in its current form I agree with the Council that we need a plan. I agree that there are many issues that need addressing. I agree that we need to see modal change. I agree with many of the aspirations here. But I think the council should pause this process until we can ascertain the post covid landscape. That does not mean allowing assets like the Railway Hotel to deteriorate further. These should be addressed. But how can a council have proper engagement on such an issue with Zoom meetings? We doubt that this is properly inclusive. Many residents will not have the ability to join these. Proper public meetings are required for such important subjects, with online access for those</p>	
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			who can't attend in person. We believe the council will leave itself open to Judicial Review if they proceed at this time in this manner	
11	Resident	General	<p>There is already Pure Gym in Edgware, Canons Park with Lake Basin and OneStonegrove for the community besides other private community centres in the heart of Edgware and local small parks. We do not need anymore. We are all supporting local businesses including local charity shops and the Broadwalk shopping centre. This centre is vital which has indoors space for winter /rainy days. We do not need anymore</p> <p>New public open spaces are already in the above shopping centre so no need for any more as it gets too congested</p> <p>We need to ensure that the streets are well maintained with cleaning and flowerbeds so they are maintained well, pleasant and become attractive street environment. Celebrating local heritage - we are already doing this by protecting Canons Park and the Conservation area.</p> <p>We do not need more tower blocks stretching and putting huge demands on the utilities which are already at bursting point. Already huge block of flats have been built between Iceland and Sainsbury in Edgware, Spring villa park new homes and other residential roads. Huge development took place 5 years ago on Stonegrove. This must stop as the density is increasing and the users are still having cars, pressure on local roads and amenities.</p> <p>We have Edgware St. and Canons park station with ample transport links with a large bus station. We do not need anymore. Cyclist cannot be safe in the area as the A5 is not wide enough to have parked vehicles and vehicle users. There are just too many accidents that have happened in the local area especially on the Edgware high street.</p>	<p>New recreational activities and sports that would benefit local residents and the town centre are fully supported by the SPD. The planning framework supports Edgware's success as a Major Town Centre, with significant improvements to the environment to encourage more people to visit and spend money in the local shops. The changes include a better street environment. Edgware currently lacks open public spaces which can provide places for people meet, hold community events, and use for outside dining. Some heritage within the area is poorly maintained and at risk and must be protected and derelict buildings brought back in to use. A better environment for cyclists and pedestrians will enable people to move around the area more easily and safely. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

12	Resident	General	The parking at the Broadwalk shopping centre is badly needed for local shopping, commuting, and to prevent spillover into the local area	More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through more efficient designs, for example basement or podium parking.
13	Resident	General	This is not the right time to do this, it should be discussed by the community, not for you to bulldoze it through. New Leisure & Culture attraction; this is a positive move. "Supporting High Street Shops". The way you are dealing with this problem, is gross stupidity you are killing the high street shops. "New Public open spaces" There are plenty of parks in the area so this is rubbish. In Station Road there are more blocks of flats being built at the moment, I believe one block is 17 stories, think where they are going to park their cars? Road Congestion the area is already grid locked in the morning and evening, Just look at the traffic in London Road (Canons Corner) and Stonegrove, have you thought about Doctors and surgery's.	Public consultation on the SPD sought widespread community involvement and discussion. The SPD supports Edgware continuing as a Major Town Centre, with significant improvements to the environment to encourage more people to visit and spend money in the local shops. These improvements include a much better street environment and providing new public spaces. Delivering new homes in accessible town centre locations will help to provide the housing needed by the boroughs in a sustainable location.
14	Resident	Chapter 7 Transport and Movement Guide	Remove the middle bays of the road taxi/car bays - those are used for other purposes - loading and unloading, causing an excessive hazard on the street and slowing down traffic. Traffic lights to facilitate the exit of buses from the bus station.	Parking in the centre of Station Road has been identified as an issue. Amend: additional text in Chapter 7 to reference tackling the parking issues in the central section of eastern Station Road. Text has also been added in relation to bus movement (see responses to TfL).
15	Resident	Development Principle 1 - Renewal of the Town Centre and High Street as a Major Destination	If the councils do choose in favour of tall buildings please give preference to buildings that have ground floors occupied by retail spaces. I like Edgware, but for me there is little to do here besides eating and [food] shopping.	Activated ground floor frontages are important for vibrant and successful town centre. Amend: include further text under Development Principle 1 to strengthen reference to active building frontages at the ground floor.

		<p>Key Site - Forumside</p> <p>And</p> <p>Principle 5 - Improved Environment and New Public Spaces</p>	<p>I really like the idea of a Heritage Quarter, and think that a great way to attract people to the town centre is by making the area behind Railway Hotel a pedestrianised open space with an amphitheater and a market. COVID-19 made us stay at home and as a result it made people more isolated (especially the elderly) and impacted their mental health. Therefore, having an open place that we can go to and actually meet our neighbours would be a wonderful addition to the town centre. If we have a cinema, we can all go there, watch a film in silence and return home. However, if we have an open air amphitheatre that can do dancing evenings, music concerts on the weekends, etc. that would give the local community a place to go and mingle. Actually talk to each other. This will help us build a better community. Therefore, by creating a heritage quarter that incorporates a multitude of things we would be able to create a unique area that attracts a diverse crowd of people and tailors to many tastes and preferences. At the same time, all of these could be designed in a way that they will generate an economic benefit to the town centre and the wider community (jobs, fresh farmers produce, entertainment, etc.</p>	<p>Providing more places for people to meet and socialise is important to the future success of Edgware and is full supported by the SPD, for example through more public spaces and an increase in cultural and leisure opportunities.</p>
16	Resident	General	<p>Flytipping, lack of maintenance of public land, lax enforcement of unlawful coach transit/drop off activity at the Railway Hotel – are a result of the local authorities’ own failings, whilst some of the latter need questioning and supplementing.</p>	<p>Regeneration of brownfield land and a much-improved environment to the rear of the Broadwalk Centre and Railway Hotel are key to tackling issues of environmental crime and anti-social behaviour, changes which the SPD planning framework will enable.</p>
		General	<p>In particular I would resist strongly the aim – which is apparently driving the entire SPD – for “a broader town centre experience [...] that draws visitors both locally and from the wider region.” Edgware is a small suburban high</p>	<p>Edgware is a Major Town Centre and the SPD seeks to support its success and improvement of the, for example</p>

			<p>street area, closer literally and figuratively to a home counties market town than a 'destination', of which there are in turn very many within easy reach: Brent Cross, Borehamwood, Watford, etc. Partners should thus be aiming to improve Edgware within those boundaries, not turning it into a place like those others: repairing but not overreaching. Thus also omitted is recognition that the topography of Edgware – its height, the views, and especially the double curve (vertical and horizontal) of Station Road between the A5 junction and Peshurst/Hale Lane – are valuable and unique and should be considered specifically in relation to all other aspects of the proposals.</p>	<p>through providing a better shopping experience and an expanded cultural and leisure offering.</p>
		<p>Transport and Movement</p>	<p>The current linking of the tube station, bus waiting area and the Broadwalk via a continuous, mostly covered, pedestrian way is helpful and should be preserved but only subject to the pressing need to improve the bus entrance/exit to Station Road. Given other aims of the draft SPD, one obvious solution is to re-route buses behind Sainsbury's, along the far edge of the car park, to enter/exit using the current car route into/out – demolition of the old post office (a shame but probably necessary) would allow the road to be widened to allow this. This move would enable pedestrian-only access between Premier House and the tube station.</p>	<p>While Edgware benefits enormously from its tube and bus stations, the SPD supports improving the relationship of public transport to the wider town centre, in particular of the bus station.</p>
		<p>Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement Guide</p>	<p>The single biggest issue in the area – alluded to in the documents but not addressed fully – is the appalling siting, phasing and management of the traffic lights and crossings at the Station Road/A5/Whitchurch Lane junction. The four pedestrian crossings, one in each road, are far too far down into the roads; they should be right up at the actual crossroads.</p>	<p>Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow</p>

				and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.
17	Resident	Vision	I don't know if any of you actually live in Edgware. I would urge you to think again about the vision and instead base it on the attached posters which I think most Edgware residents are familiar with. It shows the promise of the town. The town should be recognisable when you juxtapose it with the posters. As you can see, in the poster the town has people, nature, and country but no motor vehicles, not even small ones.	Good design and celebrating Edgware's heritage are supported by the SPD, along with a much improved environment for pedestrians and cyclists.
18	Resident	General	The amount of rubbish and fly tipping in the centre, particularly around the Iceland area.	Regeneration of brownfield land and a much-improved environment to the rear of the Broadwalk Centre and Railway Hotel are key to tackling issues of environmental crime and anti-social behaviour, changes which the SPD planning framework will enable.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	Lack of pedestrian lights at the major crossroads at A5/Whitchurch Lane/High Street. There is only one set of pedestrian lights to cover all four crossings.	Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.

		General	Shops in Station Road tend towards cheap and cheerful. Lots of £1 shops and their equivalents. In the Broadwalk, where it's multiples, the closure of M&S was a blow and is sorely missed. No upmarket food shops eg M&S and Waitrose. The multiples tend towards the cheaper end of the market eg Clare, Poundland, Choice, Select etc. All the more upmarket shops have closed eg M&S, Body Shop, Panacea. Presumably they were not getting enough customers	Providing a better experience to encourage more visitors and shoppers will support a long-term viable town centre. With more leisure and culture as part of the offer, along with new public spaces and a better environment, the SPD seeks a successful future for Edgware.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	Poor pedestrian access to Sainsbury's between 7 and 9am, when the Broadwalk opens. Pavement access at entrance to car park is very narrow and impossible with a buggy or wheelchair. General area from Station Road alongside Iceland and new development is dirty, full of overflowing bins and other rubbish. Pavements don't always have drop down area for buggies etc. when crossing roads Automated real-time bus arrivals sign in bus station is a good recent addition (I wrote several times to tfl to encourage this) but there is no linked bus arrivals sign in the station. Access to bus station from tube station is not easy.	Better access to and across Edgware Town Centre is a key element in the SPD. There is particular focus on a better environment for pedestrian and cyclists to make journeys safer and more pleasant. This includes access to the bus and train stations. Improving the relationship between the bus station and wider town centre is addressed in Development Principle 2 and Chapter 7.
19	Canal & River Trust	General	Do not manage or own any waterways that lie within the area covered by the SPD. We do, however, own and manage Brent reservoir and waterways that are downstream of Silk Stream and Deans Brook, which both lie within the SPD Policy area. Having reviewed the document, the content does not directly impact the Trust. However, we do welcome the content of Principle 8 with regards to the efforts to enhance biodiversity. Improvements to biodiversity connected to the existing green infrastructure network could help to enhance green and blue infrastructure networks downstream; including our network.	Comments noted.

20	Resident	Chapter 4 Development Principles And Chapter 5 Key Sites Design Guide	You mention in your report that you hope to 'Deliver Community Facilities', including 4.32 'locations for community organisations and activities', which 4.50 'enables effective, ongoing communication and engagement.' And also that, 5.4 'Cultural and leisure uses, shops, cafes, restaurants and community amenities can all add vibrancy to neighbourhood character.' I wondered if these aspirations might be partnered with the issue of: 5.35 'The listed buildings and Mason's Arms should be retained and restored/ brought back into use to preserve the local historic character of the location.' Perhaps the building could be restored and serve as some kind of community facility.	Bringing the Railway Hotel and Masons Arms back into use for the benefit of the community are strongly supported by the SPD.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	And, secondly, I live on Edgwarebury Lane, and I cannot stress enough how dangerous, absurd and inconvenient it is that there are NO Zebra Crossings whatsoever from the centre of town (which is frequented by shoppers), through the entire length of the road to the A41, then from the A41 to the farm / park area — which is frequented by families, but especially children. Even the crossing with the A41 has no lights to cross over Edgwarebury Lane safely. I did not see any reference to this in your document, so wanted to highlight the issue.	Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.
21	Resident	General	I am pleased that an attempt is being made to adopt a holistic approach to development in Edgware, in particular the active involvement of both Barnet and Harrow Councils. This could be an opportunity to put right some of the mistakes that have been made in the town centre and to encourage the local community and businesses to thrive.	Comments welcomed.

		Chapter 3 Spatial Context	The west side of Edgware High Street, within the municipal area of the London Borough of Harrow, is divided between two wards: Canons and Edgware. You refer to this in your preamble (paragraph 3.1 page 15) but then you ignore Canons in your analysis of the area profile.	There is a lack of information on Canons Ward and this will be changed. Amend: add reference to Canons Ward data in Chapter 3.
		Chapter 3 Spatial Context	The map of open spaces in the vicinity of Edgware (figure 10, page 20) you have ignored Canons Park, an important local amenity and one that has historical connections.	Figure 10 does show Canons Park on the left side of the plan.
		Consultation Statement	Disappointed to find that you have not included the Church of St Lawrence Little Stanmore (also known as St Lawrence Whitchurch) among your list of stakeholders in Appendix A of the SPD Consultation Statement (page 7). The eastern boundary of the parish of Little Stanmore is the Edgware Road and it extends from Camrose Avenue in the south to the M1 motorway in the north, so it includes all of the Edgware town centre that falls within the municipal area of Harrow.	Extensive public consultation was carried out, including contacting those organisations on the consultation databases of the London Boroughs of Harrow and Barnet, along with a leaflet drop to all addresses within 1km of the SPD boundary.
		Chapter 3 Spatial Context	There is no mention of the gate posts in Canons Drive near the junction with the High Street that once formed the entrance to the Canons estate. Although Canons Drive is just outside the area you have defined as the town centre, if you were looking for heritage assets to help define the area, these relics of the Ducal estate ought to be mentioned.	Heritage assets close the SPD boundary should be included. Amend: include reference to the date posts in Canons estate.
		Principle 2 – Improved Transport and Movement Options	For a document that sets out to adopt a holistic approach to Edgware town centre, including the areas within the municipality of both Barnet and Harrow, I thought that there was insufficient examination of ways in which the Harrow side of Edgware could be better integrated into the town centre.	Agree that more can be said on improving these linkages. Amend: expand reference to the need to improve connections with the surrounding residential areas, and between the Barnet and Harrow parts of the town centre.

		Chapter 3 Spatial Context	Figure 12, page 21 and the Design Guide (figure 1) which you have incorrectly described as Station Road in the 1920s. The photograph depicts a mature shopping centre and a cursory glance at the vehicles, the post-war traffic signs and the clothes that people were wearing should have told you that this photograph dates from the early 1950s.	This needs to be corrected. Amend: update Figure 12 caption to reference the mid twentieth century.
		Chapter 3 Spatial Context	In your survey of the development of Edgware you claim that the construction of the branch line from Finchley in 1867 marked the beginning of the growth of the town. In fact there is very little evidence that it made much difference for the next 20 or 30 years. It was not until the first decade of the twentieth century that there were the first signs of a significant increase in population and building activity. In paragraph 3.25 it would be more accurate to say, "Edgware remained largely rural and agricultural until after the First World War.	The history of change in Edgware can be expressed more clearly. Amend: text to shift the focus of development to the early twentieth century.
		Objective 1	While I agree that it is important to retain Edgware's viability as a shopping centre, I cannot support your case for enhancing the centre. Contrary to your claim in the Edgware Town Centre Economic Strategy, Edgware is not in direct competition with Brent Cross any more than it is in competition with London's West End. The strategy also draws comparisons with Harrow town centre and Watford. I have no wish to see Edgware developed along the lines of these town centres, both of which are shocking eye-sores. Let us retain Edgware as a centre that serves predominantly its local hinterland.	Edgware is s a Major Town Centre on the basis of its shopping floorspace. The councils support the town centre's status and seek to develop Edgware as a distinctive place that can attract locals and visitors to spend money and create a viable and sustainable town centre.
		Objective 2	There is nothing wrong with the aspiration in the heading of Objective 2 but then this is elaborated with the surprising statement: "Potential options include a new cinema, swimming pool and a diverse range of eating-out options." Cinemas across the western world are continuing to close in response to competition from the likes of Netflix. Are you sure that this is a sensible	The approach of a much improved leisure and cultural offer in Edgware Town Centre is set out in the SPD. While a cinema and swimming pool are suggested, further work will be carried out to identify which options are desirable and viable.

			suggestion? As for your idea of a swimming pool, you must surely be aware that we already have one in the middle of Edgware. It is within Pure Gym (in the building that replaced the old cinema). When Pure Gym acquired the LA Fitness site just over five years ago, the company closed the swimming pool because it was not financially viable.	
		Objective 4	I will admit that the Bus Station is looking a bit tired but I am not convinced that Edgware needs a completely new facility. Before the existing bus terminus was built (around 1990) all the bus stops were in Station Road and we had to wait in the cold for the buses. So it is a vast improvement on what we had before and I am sure that with some modest investment its appearance and functionality could be improved. I do not support the proposal for a major scheme to create a new transport interchange.	Edgware benefits from an effective public transport interchange that provides an excellent link between trains and buses. The SPD supports improving the relationship of the bus and rail stations with the surrounding town centre.
		Principle 1	The SPD needs to consider why the population growth that has already taken place in and around Edgware town centre has failed to stimulate the retail and leisure activity that you wish to encourage. Part of the reason will be socio-economic factors that are affecting all town centres but I believe it is also because both the private and public sectors have failed to maintain an adequate level of investment in the town (this partly reflects the underfunding of local government by successive governments). I fail to see how the creation of a new high density development will regenerate Edgware's retail and cultural environment unless there is adequate community engagement, policing and maintenance of the town infrastructure.	The accessible town centre sites do provide an opportunity for delivery of housing and investment which can renew the town centre and provide new community facilities, public spaces, leisure and cultural options.
		Objective 6 And	I am completely opposed to your proposal for a high-rise development in Edgware. In your Design Guide the area comprising the Broadwalk Centre and the Station is described as a site with the "potential for the creation of	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that

		<p>Key site – Broadwalk Centre and the Stations</p> <p>And Principle 3</p>	<p>a modern urban environment with opportunities for tall building and higher densities in some parts" (paragraph 5.19 on page 39). This is madness. Edgware is an outer-London suburb that is still (just) on the edge of open country. Please do not allow high-rise buildings to deface our neighbourhood. Apart from destroying the character of the area, this will also increase the pressure on our overcrowded roads. In my opinion the idea that people living in close proximity to railway stations abandon all thought of owning a car is wishful thinking. In fact I see people from nearby roads parking their cars or service vehicles overnight in Montgomery Road because there is not adequate parking provision where they live. It seems to me that this gives the green light to overdevelopment and ought to be replaced by a statement that invites proposals that take account of local housing needs together with economic and environmental factors. I oppose the encouragement of developers to build a substantial number of new homes. 4.3.2 The SPD also aims to "Optimise sites to provide high quality housing in suitable locations" (paragraph 4.20, page 28). The wording is ambiguous. I hope that this means that all the sites approved for development will be high quality. I believe that any compromise on quality creates problems before very long.</p>	<p>the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The high levels of accessibility to public transport and town centre facilities reduce the need for car use.</p>
		<p>Principle 2</p>	<p>For both pedestrians and cyclists, crossing the Whitchurch Lane/Edgware Road junction is a risky undertaking. If a highways engineer can improve safety without creating more congestion it will be a major achievement. The document makes the observation that there is a "huge potential to improve cycling infrastructure" (paragraph 4.9, page 26). I agree. However, any development needs to ensure that this is not at the expense of pedestrian safety. I find that pavements are increasingly being used by</p>	<p>This key junction is an issue for pedestrians and cyclists and improvements supported by the SPD are needed to better link the town centre.</p>

			cyclists and people on electric scooters and this can be extremely hazardous. The development brief must endeavour to keep pedestrians, cyclists and motorised vehicles apart. Design Guide page 12 paragraph 3.25). I agree that the pavements along the High Street are unpleasant and ought to be improved. However, the document fails to mention that there is an important section of the pavement that is not wide. This is the pinch-point on the west side of the Edgware Road between Lidl and Whitchurch Lane.	
		Principle 4	I hope that the emphasis on preserving heritage assets is not being used as a sop to ease the passage of disastrous proposals for high-rise development in the middle of Edgware. 4.4.2 Paragraph 4.23 on page 29 states, "Edgware Town Centre within Barnet is identified by the Mayor of London as a tall buildings location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys." I urge Barnet and Harrow Councils to resist this unreasonable and ill-conceived designation. Buildings of this height have no place in Edgware and will place intolerable additional burdens on the local community and infrastructure that are already under stress.	Edgware's heritage assets are highly valued and the councils would like to see them in good condition and sustainable uses that support the local community. Planning applications must take into consideration the context of heritage assets. The SPD references the need to retain the heritage buildings and to be sensitive to the nearby low-rise residential streets. Amend: strengthen SPD text to reference that redevelopment proposals must carefully consider the setting and context of heritage assets.
		Principle 4	I agree that the Railway Hotel is an attractive landmark and it would be a shame if it disappeared from the street scene.	The importance of the Railway Hotel as a landmark building is emphasised in the SPD.
		Principle 4	The listed buildings in the High Street are all that remains of old Edgware village. They give character to the street scene and help to make Edgware a nicer place in which to live and work. I am pleased that you have singled out the former White Hart Hotel for comment because this is the only one of Edgware's old coaching inns that still survives.	Edgware's heritage and history provide a unique and distinctive character that must inform the renewal of the town centre.

		Chapter 6	Public Realm Guide (Section 6 on page 45) to see what improvements are likely to be made to the street scene and found many that I can support. Paragraph 6.9 on page 46 states, "Along the southern part of the A5/ High Street the central reservation raised planted strip is not maintained and has a unkept [sic] appearance; unless it can be improved removal should be considered." I agree. It either needs to be planted with an attractive mix of shrubs and trees or removed. However, if it is removed, I hope a row of trees will feature in the replacement. The SPD seeks to "create a better sense of arrival in Edgware" (objective 4 on page 13) and this is an opportunity to smarten up the southern approach to Edgware.	Public realm improvements are vital to providing a more attractive and safer environment for the town centre.
		Chapter 6	I also agree with the statement in paragraph 6.12 that the example of tree planting already adopted in the eastern part of Station Road should be extended along the remainder of Station Road, Whitchurch Lane and the High Street.	More greenery will add greatly to the appearance and experience of people using Edgware Town Centre.
		Chapter 6	I am less enthusiastic about the provision of street planters (paragraph 6.14). While I like to see plants and flowers in public areas, planters require maintenance and are often the first amenity to suffer from budget cuts. If planters are to be made a feature of the street scene, care must be taken to ensure that they do not impede the safe passage of pedestrians.	Ongoing maintenance is vital for a better town centre over the long-term and is specifically referenced in the SPD.
		Principle 7	This includes the statement that "Edgware has a need to ... encourage the location of public sector service delivery hubs" (page 32, paragraph 4.45). I hope that if this aspiration is pursued there will be a joint provision of these facilities so that individuals and businesses in both Barnet and Harrow will benefit.	Comment welcomed.
		Principle 8	I agree that all development proposals should address the global crisis of climate change. Unfortunately, in my opinion the SPD, in advocating a high density	All major development are required to demonstrate accordance with Part L of the Building Regulations and London

			development in Edgware with high-rise buildings, will add to the problems of climate change rather than reduce them.	Plan policies SI2 and SI3 including compliance with the Mayor's net zero carbon targets.
		Principle 9	"Renewal and redevelopment require the participation of local communities and stakeholders to achieve success" (page 34, paragraph 4.50). I completely agree. Regrettably, many people in Montgomery Road were unaware of the development proposals until one of my neighbours circulated a letter to residents last week urging them to attend your next Zoom meeting. Maybe that reflects the fact that we are in Canons ward and only receive a passing acknowledgement in the SPD. We are very much affected by these proposals and have long-standing issues of parking, noise nuisance and anti-social behaviour associated with business premises in Whitchurch Lane. I hope that our views will be taken into account.	Public consultation was widespread and sought to inform a very wide range of stakeholders, including a leaflet drop to all addresses within 1km.
		Key Site - Broadwalk Centre and the Station	I have already expressed my dismay that the SPD advocates a development of high-rise buildings. I urge you to limit the height of any development within this site to six storeys.	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The high levels of accessibility to public transport and town centre facilities reduce the need for car use.
		key Site – Forumside	Broadly support the proposals but I disagree with the statement that "south western areas [of the site] have more potential for height" (paragraph 5.30, page 42). In my opinion the height of any new buildings should not loom over the existing buildings on the street frontage. The trick will be to produce a workable design so that competing uses in close proximity (residential,	All proposals must show design that is appropriate to the context.

			commercial and Edgware School) can coexist satisfactorily.	
		Key Sites - Lidl and The Masons Arms	<p>This really is a key site in terms of its visual impact at the junction of the High Street and Whitchurch Lane. There is an opportunity to produce an attractive scheme that sets the tone on the approach to what is now the town centre in Station Road. The omens are not good. Up to now, developments along the High Street have made the southern approach to Edgware look more like a drab industrial estate. Even the frontage to the Lidl supermarket is characterless and depressing. So I would like the planning brief for this site to be imaginative and to complement the existing listed buildings. I recognise the point that is made in paragraph 5.33 that occupancy on the site will be intensified. However, it will be vital to ensure that the height of new structures does not overwhelm the existing buildings or the street scene. Also, spare a thought for the impact on the houses in Handel Way. This used to be a pleasant residential street.</p>	The design guidance sets out broad parameters for the sites; more detailed work will be provided through a planning brief or masterplan.
			Whitchurch Lane: the Madonna Haley Hotel opposite Montgomery Road now operates a Shisha Garden that attracts a young and boisterous clientele. I fail to understand why nightclubs have been permitted to operate here when they are in close proximity to residential streets and there is little or no offstreet parking for their customers.	The need for a safe evening economy is recognised in the SPD.
		Chapter 8	The SPD calls for higher densities of both residential and business use in the town centre and also for more "drinking out outlets" (page 54). I recognise that this is tempered by the statement that Edgware needs to "support growth in the evening economy, balanced with the need to avoid issues of anti-social behaviour" (paragraph 4.45, page 32), but unless incompatible uses are sufficiently separated, this will not only be miserable	The evening economy provides opportunities for socialising and leisure, as well as jobs. The planning framework acknowledges that the needs of residents must be full considered.

			for the people living there but it will also create a long-term problem for the enforcement agencies.	
			The former White Hart Hotel: applaud the inclusion of Objective 8 in the SPD. However, the way in which the former White Hart Hotel has been allowed to deteriorate recently does not bode well for the delivery of this objective. There used to be at least five coaching inns along the High Street in Edgware village but this is the last one still standing. I think it is shocking that the structure has been allowed to deteriorate. I hope the preservation and reinstatement of this building will be a priority. There is a footpath that runs through the site, continuing alongside the Edgware Brook until it emerges in Methuen Close. If the stated aims of the SPD are to be taken seriously, then a "pleasant, clean and safe" route should be devised for the people living on this estate to reach Edgware town centre. This could be a pleasant walk beside the stream and through an attractive seventeenth century building.	This is an important historic building and the planning framework fully supports its protection and being brought back into use.
22	Natural England	General	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not relate to our remit to any significant extent. We do not therefore wish to comment.</p> <p>In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However, a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or</p>	Comments welcomed.

			HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.	
23	Resident	NA	I agreed with everything Mr Stuart Cawthorne has said in his response to this consultation.	See responses to Item 21.
24	Resident	NA	I concur with and support every paragraph of Mr Stuart Cawthorne's response to the Draft SPD.	See responses to Item 21.
25	Resident	Chapter 1 And Objective 10 And Principle 6 – Deliver Community Facilities	Paragraph 1.26 on page 7 is far too weak and fails to address more than just the surface. For as long as I can remember, our health services, have been under immense strain. In the years since I move to Edgware, not only has the surgery in Manor Park Crescent closed but three local office blocks have been converted to residential use and at least 4 other major residential blocks have been built. More recently, so I understand, the Edgware walk-in centre has been closed, placing further strain on our existing GP surgeries. Under the circumstances, Developers must be forced to provide not 'be expected to support', and not just the items you mentioned, but also, telephones, water pressure, drainage, Internet, roads, parking - indeed the entire infrastructure required for each and every development, and to show how this has been calculated before any planning permission is granted. It is with this in mind that I turn to page 13 where the fact that it is only at that you begin to scratch the surface of this problem. This must be raised to a higher objective - it cannot be retrofitted.	Provision of community facilities is a key theme within the SPD but can be further strengthened Amend: strengthen wording in the Principle 6 to state that the renewal of the town centre should support and, where necessary, improve community facilities.
		Objective 12	The same comments apply - we have already seen the impact world-wide of climate change - if we are to make any sense of this development, this objective MUST come top of the list.	Climate change considerations are a key element in the SPD and the ordering of the objectives does not denote their importance.

		Chapter 3	Looking at the picture on page 21, I very much doubt that the vehicles shown picture a 1920's scene - more likely 1950's.	The image caption will be corrected. Amend: update Figure 12 caption to reference the mid twentieth century.
26	Resident	NA	I have been a resident in Edgware for 60 years and agree with all Stuart Cawthorne objections.	See responses to Item 21.
27	Chairman Canons Park Estate	General	<p>Re-- Sky scrapers ---Regrettably there was insufficient consultation prior to the second and third tower block being built in the middle of the Broadwalk Centre 17 Floors high , even higher than Premier House which was built about 45/ 50 years ago as office space and recently converted to residential . To have these tower buildings sited within 1/2--1 acre of Land is dreadful, these buildings dominate the town, they can be seen from Stanmore, Mill Hill, Burnt Oak and all the entry roads to Edgware Station creating an eyesore. These buildings will accommodate about 300 families virtually 1000 people. We trust this new regeneration scheme is designed sensitively and does not have the same eyesore and dominating features and created with a design element rather than a concrete jungle.</p> <p>Your presentation in January indicated a number of buildings of 8 floors on the brownfield Lands. Developers seem to be focusing on the number of people they can squeeze into an area of say 4/5 acres, a commercial benefit. This should not be the criteria. During your Consultation Zoom meeting in January you had many negative objectors and rightly so. It was implied that a few minor adjustments might be made suggesting that the proposals which have not been shared with the community is virtually in stone. The tall buildings are a given (too late in the day) , everything else needs to be carefully considered .</p>	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.
		Chapter 3 Spatial Context	The catchment now embraces section of Edgware running down Hale Lane and Edgware going towards Burnt Oak and down Whitchurch Lane ,it completely	Agree that Cannons ward data should be added to the SPD.

			<p>avoids the Canons Ward and area encompassing 342 houses and 64 flats . A five minute walk from the Broadwalk .</p> <p>In your Residents analysis you show the following</p> <table border="0"> <tr> <td>Barnet Ward</td> <td>Edgware Ward</td> </tr> <tr> <td>Canons Ward</td> <td></td> </tr> <tr> <td>=====</td> <td>=====</td> </tr> <tr> <td>=====</td> <td></td> </tr> </table> <table border="0"> <tr> <td>Jewish 33%</td> <td>Christian 37%</td> </tr> <tr> <td>Christian 28%</td> <td>Hindu 30%</td> </tr> <tr> <td>Muslim 11%</td> <td>Muslim 16%</td> </tr> <tr> <td>Hindu 9%</td> <td>Other 17%</td> </tr> <tr> <td>Other 19% / no religion</td> <td></td> </tr> </table> <p>Canons Ward should be part of the Scheme especially its population of minority groups . To exclude the Estate is absolutely wrong .</p> <p>a) I challenge the fact that there are No Jewish people living in the Edgware Ward .b) There is probably a Jewish population of 25%--30% living in the Canons Ward and their views ought to be included and accommodated.</p>	Barnet Ward	Edgware Ward	Canons Ward		=====	=====	=====		Jewish 33%	Christian 37%	Christian 28%	Hindu 30%	Muslim 11%	Muslim 16%	Hindu 9%	Other 17%	Other 19% / no religion		<p>Amend: amend to include data from Cannons Ward, including on religious beliefs.</p>
Barnet Ward	Edgware Ward																					
Canons Ward																						
=====	=====																					
=====																						
Jewish 33%	Christian 37%																					
Christian 28%	Hindu 30%																					
Muslim 11%	Muslim 16%																					
Hindu 9%	Other 17%																					
Other 19% / no religion																						
	General		<p>This area should be landscaped giving the elderly space to relax, easy accessibility for disabled and those in wheelchairs. Greenery with grass and colour. Children's play area of varying ages. The area would need to be safe, secure and impressive.</p> <p>It must be designed to be clean and tidy and people encouraged to keep it the same.</p>	<p>Creating an accessible, family-friendly town centre, with open and green spaces that support community interaction, are important elements of the SPD, and are reflected throughout the document.</p>																		
	Chapter 8 Delivery and Implementation.		<p>This is going to cause disruption for at least 3 years and as the community will have to endure the mess with limited access during that lengthy period, they must be considered , they must not be overlooked for the sole benefit of developers and investors . As joint Councils you should protect the thousands that will be inconvenienced during that period.</p>	<p>The councils expect measures be put in place to ameliorate the impact of the buildings works on residents and businesses, as required in the SPD.</p>																		

		<p>Vision Objectives 1 and 2</p> <p>Principle 1 Renewal of the Town Centre and High Street as a Major Destination</p>	<p>The shopping centre should entice established retailers offering a range of fine products, this should be widened to accommodate small retail outlets for individual artists or craftsman encouraging a cottage industry. The area does not need 90% of restaurants, the high street is smothered with these outlets.</p> <p>Shops that offer a varied supply of goods and services. Easy transport, the bus station can be repositioned. We realise space is not a commercial investment however this is absolutely crucial. The regeneration can transform Edgware into an exclusive centre saving locals going to the west end or the city.</p>	<p>Edgware offering a diverse town centre experience, including a mix of shopping, leisure and culture. Eating out will provide a strong element within this as many people value the experience of using cafes and restaurants.</p>
			<p>The police or a private security team should be a feature in the area.</p>	<p>Improving the sense of security and safety is vital to the renewal of Edgware Town Centre, supported through better design and a cleaner, more pleasant street environment.</p>
		<p>Principle 4 Ensure High Quality Design and a Sensitive Approach to Heritage</p>	<p>At the consultation meeting, it was not confirmed what the Masons Arms and the Railway Hotel will be converted into?</p>	<p>The SPD strongly supports bringing the Railway Hotel and Masons Arms back into use; this could be as pub/ restaurant, or other uses that are beneficial for the community.</p>
		<p>Principle 1 - Renewal of the Town Centre and High Street as a Major Destination</p>	<p>There could be individual musicians who perform weekly or even once a month, the artist should be registered and approved by the organisers.</p> <p>It could be that local schools can display the works of students, arts, crafts, performances, provide places for community activities and leisure.</p>	<p>This idea is fully supported and should be part of the SPD. Amend: add reference to encouraging activities, exhibitions and performances by local community and artistic groups to bring people together and foster a sense of pride and inclusion.</p>
		<p>Principle 2 Improved Transport and Movement Options</p>	<p>There should be sufficient cycle lanes, sufficient Parking as now please confirm the present number of parking spaces and the numbers you are predicting, making consideration for several hundred additional residents. Developers should estimate the increased number of</p>	<p>Better cycle infrastructure will be part of Edgware's renewal. The high level of access to public transport and town centre facilities will reduce the need for car use for new residents. Car parking</p>

			people that will be accommodated in the scheme and coming into the area.	requirements will be assessed as part of the development process.
28	Metropolitan Police - Designing Out Crime Officer	Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The report highlights ongoing concerns around crime and disorder at the rear of buildings, alleyways (eg. Church Way, Bakery Path) and within the public realm, briefly summarised in 1.28. As we identified within the environmental visual audit (EVA) and alluded to within your draft report, the designs of these alleyways are not ideal with long, narrow, winding pathways assisting crime and the fear of crime for legitimate users of these alleyways. A key Secured by Design (SBD) principle is to ensure that where a pathway is necessary, that these are as short, straight, wide and as well-lit as possible. They should also be devoid of potential hiding places and areas of concealment, with any provision for seating also carefully considered and avoided if possible.	Reducing crime and anti-social behaviour is vital to improving the experience for town centre users. Amend: referencing para. 4.24 to ‘Secured by Design’ approach.
		Chapter 1	It is very positive that section 1.31 includes and highlights one of the key aspects of the Barnet 2024 Corporate plan: Safe and strong communities where people get along well – tackling anti-social behaviour and environmental crime; a family friendly borough; support local businesses to thrive; focusing on the strengths of the community. The delivery of the Secured by Design scheme to both new and refurbishment projects within this area can greatly contribute towards this key aspect.	Comment welcomed.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The benefits of Secured by Design, supported by independent academic research, has consistently proven that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It has also had a significant impact on anti-social behaviour (SBD - Homes 2019 guide).	Set out more clearly the benefits of Secured by Design within the SPD. Amend: include reference to the benefits of the ‘Secured by Design’ approach
		Objective 1	The application of Secured by Design, helping to influence the design of the built environment and by using proven crime prevention/reduction/target-	Comment welcomed.

			hardening measures can help to contribute towards a safer environment.	
		Objective 2	Secured by Design not only applies to residential dwellings but can also be applied to new commercial or refurbishment projects via our SBD 'Commercial 2015', 'Schools' guide and so on. With the incorporation of both physical security (target-hardening) measures and recommendations to the surrounding environment within site boundaries, this can help to prevent crime and disorder opportunities from potentially occurring.	Comment welcomed.
		Objective 6	With the inclusion of Secured by Design compliance for new build or refurbishment residential developments, this can help to contribute towards a safer and more secure environment, where communities can be allowed to flourish.	Comment welcomed.
		Objective 7	By applying Secured by Design to a development, this includes the need for the developer to incorporate physical security measures such as security-rated door/window-sets and so on that benefit from 'independent third party certification' from the fabricator of the product.	Comment welcomed
		Objective 9	Very similar to draft objective 1, by applying proven crime prevention methods at the design stage and with the application of Secured by Design measures at planning and through to completion, this can help to improve open and publicly accessible spaces. This includes assessing permeability, levels of activity and natural surveillance opportunities amongst other measures.	Comment welcomed
		Objective 10	With the different types of Secured by Design guidance and assistance from the local MPS Design Out Crime Officer (DOCO) at pre- application stage, planning and eventual SBD compliance and accreditation, this can help to enhance the safety and security for new or	Comment welcomed

			refurbishment projects and help to enhance the local community.	
		Objective 14	This objective is extremely helpful to aid the application of Secured by Design to new developments and to help shape the public realm. The services of an MPS DOCO are both free and impartial and this service is available to the local planning authority and those parties involved with relevant planning applications within this targeted growth area of Edgware.	Comment welcomed
		Objective 15	With an absence of crime and disorder within a local community, this can greatly improve the health and wellbeing of those in both the residential and commercial communities in Edgware. For instance, residents repeatedly targeted by anti-social behaviour may cause them such worry that it could lead to the use of medication, to help deal with the trauma that they could be experiencing. By designing out crime and disorder as early as possible and at the design phase, this could relieve a huge future burden on local services such as GP's, local authority services and so on.	Comment welcomed
		Section 3.1	Reflects some information regarding crime levels within the Edgware wards of both Barnet and Harrow. Burglary levels are high within each borough, whereby the local ward of Edgware (Barnet) recorded 147 burglaries within the last 12 months.	The information on burglaries will be changed. Amend: update Chapter 3 table to reflect that the prevalence of burglary within the Edgware area.
		Chapter 4	The Edgware SPD promotes a number of development principles, each helping to contribute towards sustainable development to help meet the needs of Edgware. These are clear and concise and will help to connect the local community together.	Comment welcomed
		Chapter 4	The early engagement of the LPA with key partners prior to this publication of this draft document is reflected within Section 4.51 and 4.52	Comment welcomed

		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Having also been invited to comment upon the draft SPD for ‘The Burroughs and Middlesex University’ within Barnet, it was really positive for the inclusion of the extracts as copied below. It would be extremely useful if an addition such as those reflected within sections 4.3.7 to 4.3.9 of the draft SPD for ‘The Burroughs and Middlesex University’ could be considered and incorporated within the Edgware (growth area) SPD, to help address levels of crime and disorder within the local area.	More specific guidance will be added. Amend: within Principle 4 include text from ‘The Burroughs and Middlesex University’ relating to Security by Design
29	HADAS (Hendon and District Archaeological Society)	Chapter 3	Paragraphs 3.22 to 3.29 on the Historic Character and Heritage Assets of Edgware are admirable as far as they go but fail to deal with that part of the heritage that is buried. In Barnet, part of Edgware Town Centre is in an Archaeological Priority Area (called an Area of Special Archaeological Significance in Policy DM06e) as listed in Table 7.2 and shown in the Map at Appendix 1 of Development Management Policies 2012; the whole of the Edgware Road is the line of Roman Watling Street. In Harrow there is an Archaeological Priority Area named Edgware Village.	Information on the APAs should be part of the SPD. Amend: include reference to the Archaeological Priority Areas.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The SPD must make it clear that in Barnet any development that may affect archaeological remains will need to demonstrate the likely impact upon the remains and the proposed mitigation to reduce that impact. This may mean that a condition is imposed on any planning application, requiring archaeological investigation before the development takes place. HADAS is not aware of the details of the regime in Harrow but it is likely to be very similar to that in Barnet. We ask for the draft SPD to be amended accordingly.	Update the SPD to reflect this feedback. Amend: include reference to the Archaeological Priority Areas and the potential need to carry out an assessment as part of a development proposal.
30	Resident	NA	I refer to the consultation on the project which, although it will have been running for six weeks from 11th January 2021 until 22nd February 2021, it has only just been brought to my attention and I am very concerned. I note	Extensive public consultation on the draft SPD was undertaken, including flyers delivered to all addresses within 1km of the SPD boundary.

			that there have been only two consultations - each lasting one hour but, due to the Covid situation, neither of these have been face to face. I am of the opinion that, on this basis, the matter should be adjourned for approximately twelve to eighteen months. This is mainly due to the fact that, going online to review this very complex matter, the average/lay person would not be fully able to understand the proposals, nor have a platform on which to challenge them.	Due to COVID-19 restrictions the two public consultation sessions were held online – these attracted a high attendance and participation.
31	Resident		<p>I am extremely concerned about the impact the proposed SPD for Edgware will have on the local area. Whilst Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London’s targets for new housing and new affordable housing and is not for the benefit of local residents. This translates into high density housing and tall buildings over 14 stories in the centre of Edgware.</p> <p>This is based on the fact that Premier House is already located in Edgware and Premier Place is being built. Both of these buildings are unattractive and not in keeping with the characteristics of the local area.</p> <p>High density housing over 8 stories (or even 5) would be totally not within the scale and character of Edgware and would adversely impact the area.</p> <p>There are brownfield sites in the centre of Edgware which can be used for redevelopment however the push to have high density housing which we were told in the online consultation would be “significant” will change the nature of the area completely and in a negative way.</p> <p>I urge you to limit the redevelopment to 5 storey buildings with proper provision for family living to ensure the nature of the area is preserved as is the welfare and safety of local residents.</p>	Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The SPD seeks a family-friendly environment that is safe for residents and visitors.
32	Residents		I am extremely concerned about the impact the proposed SPD for Edgware will have on the local area. Whilst	

			<p>Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London's targets for new housing and new affordable housing and is not for the benefit of local residents. This translates into high density housing and tall buildings over 14 storeys in the centre of Edgware. (see Edgware SPD p29 para 4.23 Edgware Town Centre within Barnet is identified by the mayor of London as a tall buildings location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys...)</p> <p>Also Edgware SPD Design Guide para 5.17 Proposals for tall buildings should locate them in the heart of the site where there is more potential to establish a high-quality urban design that achieves higher densities). This is based on the fact that Premier House is already located in Edgware and Premier Place is being built. Both of these buildings are unattractive and not in keeping with the characteristics of the local area. This however is not in line with the Mayor of London's document on "London Living Spaces and Places" which says that high rise buildings should:-</p> <ul style="list-style-type: none"> • only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building • relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; • individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London <p>High density housing over 8 storeys (or even 5) would be totally not within the scale and character of Edgware and would adversely impact the area.</p>	<p>Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The SPD seeks a family-friendly environment that is safe for residents and visitors.</p>
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			There are brownfield sites in the centre of Edgware which can be used for redevelopment however the push to have high density housing which we were told in the online consultation would be “significant” will change the nature of the area completely and in a negative way.	
33	Resident	NA	For text and response see item no. 32 above	For response see item no. 32 above
34	Resident	NA	For text and response see item no. 32 above	For response see item no. 32 above
35	Highways England	NA	Given that this SPD includes only local highways and transport matters, we have no comments or objections to this consultation. Therefore, we are satisfied that the outcome of this consultation will not materially affect the safety, reliability and / or operation of the Strategic Road Network.	Comment noted.
36	Avison Young	NA	We write to provide representations on behalf of the owners of 360 Burnt Oak Broadway, Edgware, HA8 5AN. We support the vision, objectives and principles set out within the draft SPD. However, there is a key opportunity for it to go further in planning for the appropriate growth of Edgware in recognising that the area that immediately surrounds the town centre also offers significant capacity and potential for redevelopment, particularly for housing. We therefore recommend that the Growth Area boundary is extended to include 360 Burnt Oak Broadway as it can be demonstrated that this suitable, available and achievable site meets the criteria for a Key Site which would assist in achieving the objectives of the SPD.	The SPD boundary is largely aligned with the town centre boundary. Renewal of the town centre will not be enhanced by extending the boundary to include 360 Burnt Oak Broadway.
37	Residents	General	We have seen how overcrowded Edgware has become in recent years and wanted to understand what new infrastructure was going to be put in place to alleviate this situation.	New development within Edgware must be supported by the community facilities needed to support that growth, as required by the SPD.

			<p>The main purpose of the plan is to insert mass ‘local affordable housing’ into Edgware via multi high-rise blocks blighting the skyline. It is only a few years since the 3 monstrous tower blocks at the north end of Green Lane were dynamited and replaced by the modern attractive housing estate in the area between Green Lane and Stonegrove. This shows what can be achieved with creativity and imagination to the benefit of all.</p> <p>How do these plans for high rise buildings comply with the Mayor of London’s London Living Spaces and Places which limits the occasions when high-rise buildings should be considered? Such buildings should not be where the character of the area would be adversely affected by such buildings’ scale, mass or bulk; Neither would placing such buildings in Edgware town centre comply with the requirement that they emphasise ‘a point of civic or visual significance where appropriate, and enhance the skyline and image of London’.</p> <p>Should the plans be revised to redevelop the area with low-rise buildings as has been done between Green Lane and Stonegrove, you will find local residents more supportive but all plans must include real plans to put more infrastructure in place per head rather than less.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
38	Sport England	Vision	<p>It is welcomed that the vision does expect that Edgware will be a healthy town centre as this entrenches health, wellbeing and physical activity aspirations within the entire document.</p>	<p>Comment welcomed.</p>
		Principle 4 – Ensure High Quality Design	<p>To assist developers and further inform the SPD Sport England recommend that the strong links between the SPD and Active Design are drawn out further in the document, particularly within the Principle 4 commentary that seeks to design in health and wellbeing. For instance, the SPD could have clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and completing the</p>	<p>Enabling an active lifestyle and participation in sports support Edgware as a health town centre.</p> <p>Amend: Principle 4 include reference to Active Design and the checklist.</p>

			<p>checklist, for example, could be a requirement for development proposals. More information on Active Design, including the guidance, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p>	
		<p>Objective 10 And Principle 6 – Deliver Community Facilities</p>	<p>Sport England notes that Objective 10 and Principle 6 seeks to deliver/meet the need for community infrastructure. Although sport facilities are not specifically mentioned Sport England assumes that this Objective and Principle is intended to cover indoor and outdoor sports facilities as well as the other community infrastructure stated. Sport England would welcome reference to sport and recreation facilities in the commentary of this Objective and Principle so that it is clear to all. Sport England would also like to highlight that currently both Council's do not have up-to-date and robust assessments and strategies relating to indoor and outdoor sport provision, including playing fields/pitches, therefore it is unclear how the SPD could meet the supporting needs if these needs are unclear at this stage. Although the London Borough of Barnet are currently refreshing their assessment/strategies/evidence base relating to sport and physical activity the London Borough of Harrow have not and do not have an up-to-date and robust evidence for sport needs/demand that could inform any decisions. Sport England, therefore, strongly recommends that the London Borough of Harrow develop Playing Pitch and Built/Indoor Sport Facility Strategies to not only inform this SPD, but also sporting and planning needs/decisions throughout the borough to ensure that they are well-informed and robust. Sport England is happy to help with the process of developing this evidence base.</p>	<p>To ensure sports and active lifestyles are fully supported by the planning framework further text can be included. Amend: Objective 10 and Principle 6 to reference considering the need for sports facilities.</p>

39	Resident	General	How come we don't have a local cinema? I remember we had one in Edgware when I was a child. We don't all drive so getting to Borehamwood or Wembley is not ideal, plus neither of these are in the London Borough of Barnet. Is there any plans in the pipeline for one to be built close by?	A much-improved leisure and culture offering, potentially including a cinema, are prominent elements within the SPD.
40	Residents	NA	See item no. 37 above.	See response to item 37.
41	Resident		<p>In recent years, Edgware has already seen a massive increase in population due to new housing, which has led to the area becoming overcrowded and causing congestion in our streets. There has been absolutely no improvement to the infrastructure in order to align it with the influx of new residents into the area. The streets are very congested, there are limited parking spaces available, even for paid parking bays, and there has also been a substantial increase in crime in recent years.</p> <p>It appears that the main purpose of the plan in the Edgware SPD is to add affordable housing into Edgware with high-rise blocks. This will significantly impact the welfare and safety of the existing local community and impair the skyline of the area, not to mention the aesthetics of the town as a whole.</p> <p>I strongly object to the current plans where no thought whatsoever has been given to the local residents. The new blocks will impact Edgware's character and historic significance of being a safe residential suburban town. I urge you to consider the redevelopment of up to 5 storey buildings with full focus on family living. Furthermore, the general nature of the area must be preserved along with the well-being and security of the local residents, some of whom have been in the area since birth.</p>	New development offers the opportunity to improve and provide new infrastructure for the town centre. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The planning framework seeks a mix of housing sizes and tenures, including affordable housing, to help people access the housing they need.
42	Resident	General	More CCTV cameras around the shops and also Station Road, particularly to deter anti-social behaviour and dangerous.	Security and safety features strongly in the SPD, including embedding of a secured by design approach to

			A fixed 20 MPH zone along Station Road, the busy stations of the High Street along the A5 and also parts of Hale Lane near the local Tesco's and Nat West. Speed cameras to re-enforce the 20 MPH zone, Raised bumps at all island crossing points along Station Road and parts of Hale Lane with red pedestrian priority crossing markings on the road and also traffic signs, thereby encouraging and warning drivers to drive more slowly and if necessary, to stop and give way to pedestrians.	development proposals. The need for security cameras is recognised. The need to provide an improved environment for pedestrians is recognised numerous times in the document.
43	Resident	NA	See item no. 37 above.	See response to item 37 above.
44	Resident	NA	See item no. 32 above.	See response to item 32 above.
45	Resident	Vision, Objectives 1 and 2 Principle 1 Renewal of the Town Centre	I have looked at the Edgware Town Center Economic Strategy document. Generally I am in agreement that there is a lack of flow and connectivity with no public space to meet apart from a few benches in the broadwalk. My concern is that the document does not give me much confidence of a strategy for a niche or element of differentiation that will give the town centre a uniqueness that will attract visitors and ensure they continue to return other than development of the Railway Inn (why has this never happened? - Could Barnet buy and develop the site as a community/art/leisure space?). Edgware can not compete with Brent Cross or Watford as a retail centre. No mention has been made of Mill Hill or Stanmore with their range of hospitality outlets (including national chains). Why are they more successful than Edgware?	Renewal of Edgware provides an opportunity to improve and expand the town centre offering. This is expected to include more leisure, cultural, community, shopping and eating out. The SPD provides a framework to help Edgware create its own identity and compete effectively with other north London town centres. This approach will include drawing on its unique heritage, location and community.
46	Resident	General	We were appalled when Premier House was built so we are shocked to find that far from its universal unpopularity serving as a deterrent against it's ever being replicated, the SPS includes many more such monstrosities. So we can only conclude that the wishes	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that

			<p>and interests of the local community have been wilfully disregarded because one would have to be singularly ill-informed not to be aware of the strong local disapproval of Premier House in particular and of highrise buildings in general. In addition under the plans included in the SPD, Edgware would become even more congested, with even less parking space available. Given that the three polls carried out during the call clearly reflected the community's hostility to the SPD, I now look forward to a totally revised plan being drawn up which local residents can support.</p>	<p>the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
47	Resident	General	<p>I am extremely concerned about the impact the proposed SPD for Edgware will have on our local area. Whilst Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London's targets for new housing and new affordable housing and is not for the benefit of local residents. It appears that the main purpose of the plan is to insert mass local affordable housing in Edgware via multi high-rise blocks which will blight the skyline. It is only a few years since the 3 monstrous tower blocks at the north end of Green Lane were demolished and replaced by the modern attractive housing estate in the area between Green Lane and Stonegrove. This shows what can be achieved with creativity and imagination to the benefit of all. We strongly object to the current plans where no thought whatsoever is being given to the local residents. For decades, Premier House has been an eyesore but at least it was isolated. The SPD plans will be the death knell of Edgware's shopping high street with the shopping experience likely to fall below that experienced in shopping centres of Golders Green, Hendon or Watford. How do these plans for high rise buildings comply with the Mayor of London's London Living Spaces and Places which limits the occasions when high-rise buildings</p>	<p>Renewal of the town centre through an improved environment and better offering of leisure, culture and shopping, will enable Edgware to compete through providing a unique offering and experience. The Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			<p>should be considered? Such buildings will adversely affect the character of the area due to their scale, mass or bulk; Neither would placing such buildings in Edgware town centre comply with the requirement that they emphasise 'a point of civic or visual significance where appropriate, and enhance the skyline and image of London'. Should the plans be revised to redevelop the area with low-rise buildings as has been done between Green Lane and Stonegrove, you will find local residents more supportive. A key metric that should be observed in the redevelopment plans is that the infrastructure per head supporting the planned no. of residents in Edgware should be at par or increased from the level prior to the development. Over the years, we have seen the population density increase but the infrastructure supporting the area such as parking and policing appears to have remained the same.</p>	
48	Resident	General	<p>Whilst the regeneration of Edgware town centre is desperately needed this should be in a way that enhances the benefits of living in this beautiful suburb and not in a way that is likely to destroy its atmosphere and skyline. I therefore am writing to urge you to rethink the plan to build a number of high rise blocks of flats in the centre and to add another three floors to an already 17 floor block currently under construction. In addition to the impact that these will have on the environment and the 'country' feel that is so special to Edgware, the influx of residents will also strain key services potentially to breaking point.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
49	Resident		<p>My comments relate to the Draft Design Guide in particular. Edgware Town Centre can certainly benefit from improvement and some taller (maybe 5,6 or even 7 storey buildings) may be appropriate. Spaces between buildings must be most carefully considered - the SPD</p>	<p>More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through</p>

		Design Guide	<p>mentions access to views and sunlight and this should be prioritised for any new dwellings. The spatial quality of dwellings is also important, not just adhering to minimum standards, working from home should now be considered as a factor for some dwellings.</p> <p>3.14 Should 'Edgware Lane' read "Edgwarebury Lane"?</p> <p>4.2 Although, as locals, we recognise the locations, pictures should all be titled.</p> <p>6.10 No 'y' in Church Walk.</p> <p>Assuming there is still to be a supermarket, the reality is that people will still want to use their cars, though, hopefully more electric vehicles, maybe more sharing. Parking will need to be provided and the design of car parking is also very important if it is able to contribute to an improvement for the Town Centre.</p>	<p>more efficient designs, for example basement or podium parking.</p> <p>The Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p> <p>Amend: correct typos in paras 3.14, 4.2 and 6.10.</p>
50	Resident	General	<p>Happy for redevelopment, very against the skyline being filled. Lower density not tower blocks. Good quality family homes please that can be supported by the existing infra structure and not strain already struggling services. Some consideration to the style and scale of the architecture of the area rather than using blocks that were pushed through without the appropriate consultation as a precedent to ruin the skyline, aesthetic and quality of life of the local residents.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
51	Resident		<p>I am concerned by high rise developments which will ruin the skyline and increase densification to unsustainable levels.</p> <p>A new cinema was promised on the site of the broad walk car park when the previous cinema was knocked down on Manor Park Crescent and we are still waiting 20 years later.</p> <p>The high street needs regeneration and encouraging to avoid just being charity and betting shops.</p>	<p>A much-improved leisure and culture offering, potentially including a cinema, are prominent elements within the SPD. The planning framework encourages a broad renewal and improvement of Edgware's environment and town centre experience.</p>
52	Resident		<p>I would agree that Edgware town centre requires renewal, with an improvement in the quality of shops,</p>	

			<p>renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in the quality of shop signage. It is noted by residents of and by visitors to Edgware that the town has been "going downhill" in the last 10 years. Please could Barnet Council consider the following:</p> <p>1) Edgware is a suburban town. Any development for housing should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities. It also impacts the sense of Edgware being a leafy suburb, so new/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, in particular it cannot replicate Premier House). Emphasis should be on quality and not quantity.</p> <p>2) There should be a focus on green, communal spaces with both trees and also greenery at eye level and ground level (shrubs and grass, rather than a lot of hard surfaces).</p> <p>3) High quality shops, restaurants and leisure facilities should be encouraged, with appropriate frontage. The recent renovations of Nationwide building society and Izgara restaurant are good examples of appropriate signage and frontage. Many shops have poor quality signage and frontage. There are also too many discount, charity, and pay-lending shops, nailbars/tanning shops and betting shops. A better mix of quality retail and leisure should be encouraged with a focus on presentability to encourage frequent family footfall.</p> <p>4) The council should ensure sufficient and frequent refuse collection of public bins to ensure a pleasant experience when moving through public spaces and reduces the likelihood of fly-tipping.</p>	<p>Providing a much improved town centre environment, including more attractive and cleaner streets and new green spaces, are vital to the renewal of Edgware. It is a Major Town centre and the SPD supports this in terms of maintaining retail, food outlets, offices, and other town centre uses. Delivery of new housing is also an important element in redevelopment of Edgware. The town centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
53	Resident	NA	For response text see Response no. 52 above.	See response to item 52.

54	Resident		<p>There is no doubt from the meetings, that everyone agrees that Edgware town centre needs regeneration and improvements. However, there is one specific area that we take strong objection to as did the attendees at those meetings.</p> <p>Edgware now has a 17 storey tower block under construction. It is overbearing on the whole area and can be seen for miles around. This is an outer London suburban area and all the surrounding buildings are at a far lower level in keeping with the district. This ugly giant block should not have received permission as it is completely out of character for the area, but it is too late now. Worse is that the owners are now attempting to get permission to make this tower block into 20 storeys high! We do hope that this will be refused. I believe if the Barnet council planners are truly interested in Edgware regeneration, they will add to the SPD a limit to the height of any further developments which is in keeping with surrounding buildings in Edgware and not permit any further tower blocks. Tower blocks concentrate large numbers of people in a very small area and the result of overdevelopment include:</p> <ol style="list-style-type: none"> 1. Overstretching facilities such as schools and doctor surgeries 2. Loss of a sense of community & pride in the area which increases anti-social behaviour, crime, litter, pollution etc. 3. Causes irreparable damage to Edgware as a suburban area by changing the skyline from existing lower building heights associated with outer London suburbs to overbearing 20 storey high tower blocks associated with city centres. <p>For the above reasons, tower blocks will become the slums of the future and it is noteworthy how those 1960's blocks at the top of Stonegrove near Canons</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
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			corner were demolished and replaced with a pleasing suburban lower level development.	
55	Resident	NA	For response text see Response no. 52 above.	See response to item 52
56	Resident	NA	For response text see Response no. 52 above.	See response to item 52
57	Resident	-	<p>The cost of the proposed works to improve Edgware are not costed and identified. The impact of the appearance of the proposed development on the surrounding area is highly understated</p> <p>The Edgware Town Centre Framework published in June 2013. The approach of the SPD is that all the work and its content were irrelevant. Perhaps in eight years' time the same will be said of this SPD. The point is that when the Framework was published it was considered by its authors to be the correct approach. Why are the councils sure that this SPD document will not be considered in the future to be equally misguided?</p> <p>The Economic Strategy document was prepared for TfL, who have a vested interest and therefore not impartial Little attention has been paid to previous survey.</p> <p>The car parking proposals are wholly unrealistic both for the developed properties and the loss of spaces used by commuters as well as shoppers</p> <p>The reference to the provision of a "heritage quarter" appears to be meaningless and something invented by marketing teams rather than based on reality.</p>	<p>The economic circumstances within Edgware Town Centre have changed since the 2013 document was prepared, with increased pressure on retailers, and greater demand for new housing. The Economic Strategy provides some of the evidence of the changing town centre needs and pointers as to the direction which the town centre could take.</p> <p>Car parking for town centre uses will be provided, albeit more land efficient designs will be sought.</p> <p>The Railway Hotel listed building context must be considered by proposals, with the potential for a 'heritage quarter' offering a realistic and interesting approach.</p>
58	Resident	Chapter 3 Spatial Context, Heritage	<p>The area covered by the SPD appears to contain two areas of Special Archaeological significance which do not appear to be reflected in the document. This needs to be rectified. The text from the 2007 document on LBB Areas Archaeological Significance by the greater London Archaeology Advisory Service is reproduced as is an extract from the online UDP map which I believe is the extant Local Plan map.</p>	<p>There should be reference to the APAs and the SPD will be updated.</p> <p>Amend: update to include areas the Archaeological Priority Area.</p>

		<p>Chapter 3 Spatial Context, Heritage</p>	<p>Edgware is mentioned in the Domesday Book but under the parish of Stanmore and formed nucleated villages within the forested area until the 13th century. There is no Edgware manor mentioned in the Domesday book, but there may be a farmhouse, recorded since 1216 AD. However, this is probably located at Edgwarebury (ASAS 10). Agriculture developed in the 16th century which was quite mixed and it became a small market in the 17th century. In 1862 AD it was said that the market town had disappeared. Industry had little impact on Edgware's economy, but it is likely that there were gravel pits being worked from 1802 AD continuing into the early 20th century. This ASAS consists of two sections:</p> <p>(a) Hale Lane (eastern area): In the area next to Hale next to Hale Lane, there is evidence of a mediaeval farmhouse (1294 AD), with 13th/14th century pottery sherds. Evidence here also suggests post-mediaeval development, including pottery sherds and 19th century landscaping.</p> <p>(b) Watling Street (western area)</p> <p>(c) A mediaeval settlement developed along the Edgware Road next to Edgware Brook. Edgware is a Saxon name, originally 'Aeges Weir'. This was so called because there would have been a nearby dam or weir constructed for the Silk Stream and Deans Brook for fishing or irrigation (the latter is mentioned in a charter of 972-8 AD). The church of St. Margaret is located here which had a tower dating to the 14th century. In 1370 AD, the Prior of St. Bartholomew's, Smithfield had land holdings in Edgware. Edgware Bridge is located here crossing the Edgware Brook, which is evident on a map from 1597 AD. A bridge was first mentioned in 1370 AD, called 'Eggewerebrigge'. A History of the County of Middlesex: Volume 4 (Victoria County history, 1971)</p>	<p>The additional detail is appreciated, however, the SPDs historical context information is aimed to provide an overview of the areas development and - notwithstanding the amendments set out in this schedule - is considered to be sufficient.</p>
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		Principle 5 - Improved Environment and New Public Spaces	<p>I would support the emphasis on provision of good quality, well maintained open spaces throughout the development. In addition I would ask that the SPD reflects the Mayor of London's Public London Charter principles for any privately owned open spaces.</p> <p>I would also like to see a clearer commitment for the long term maintenance of all open spaces and facilities created through these developments given that lack of maintenance and investment across much of the existing parks and green spaces network is a cause of Borough wide concern. There are a number of mechanisms through which this could be achieved and it would be helpful if these were set out in the final document.</p>	<p>New green spaces are a priority for Edgware Town Centre and ongoing maintenance will be key to their long-term success. Amend: additional bullet point to ensure plans are in place for the long-term maintenance of the public and open spaces with the Edgware SPD area.</p>
59	Resident		<p>These meetings were poorly attended due to a lack of publicity! I am sure there would be more than 100 people interested in this matter!</p> <p>While I welcome the regeneration of Edgware I am Very unhappy about the prospect of high rise buildings which are completely against the character of Edgware as I have known it for 40 years!</p> <p>I and lots of other people living here would prefer to Keep the character of Edgware as a quiet town with nice restaurants cafes with outdoor sitting areas and good commercial Centre with ample parking (not everybody lives within walking distance of the underground and the shops) . At my age I cannot bicycle with my shopping from Sainsbury and the centre to my house!</p> <p>Under the pretence of renovation this project will only add hundreds of flats and tenants with no additional Facilities like doctors, communautés facilities etc. Where all these people will park their cars?</p>	<p>The online consultation events received a significant level of publicity and attendance was high at both events.</p> <p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
60	Resident		<p>I agree that Edgware town centre requires renewal, with an improvement in the quality of shops, renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in</p>	<p>Renewal and improvement of the Town Centre is multi-faceted and requires an improved environment, new commercial opportunities, and delivery</p>

			<p>the quality of shop signage. Edgware town centre has been in decay for a number of years, a trend accelerated by the Broadwalk Centre, the financial crisis and most recently the Covid-19 lockdowns. However, I object to a central tenet of the plan, tall tower blocks. Edgware is a suburban town, a leafy suburb . Housing development should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities. New/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, such as Premier House). Emphasis should be on quality and not quantity and anything that resembles the new, ugly, skyline in Colindale must be avoided.</p>	<p>of community facilities. Change and growth includes new housing and a more intensive use of the town centre. This area is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
61	Resident		<p>I feel that any development has to be in keeping with the surrounding areas, which are primarily low density semi detached , or detached houses. This is the reason that the majority of people were attracted to Edgware in the first place.</p> <p>I believe there is a lot of scope for development of brownfield areas, for the benefit of the whole community without any further need for high level buildings. I think that 2 tower blocks is already over generous, also the additional recent conversion of the office block adjacent to Edgware Primary School. This does not seem to have been beneficial to the whole community, as it appears to make the area run down.</p> <p>I am concerned that any future development must meet high standards of health and safety, and be of Long term quality for the community of Edgware, not just for the developers.</p> <p>I had an idea for the use of the Railway Hotel Building, I was thinking that this could become a major attraction and benefit for Edgware. I was thinking that it could have</p>	<p>Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. The Railway Hotel is recognised as neglected and the SPD strongly supports bringing this heritage asset back into a suitable use. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			a multi use, as a museum for model railways, and engineering, and building. Perhaps it could also house a small hotel, or restaurant.	The SPD seeks a family-friendly environment that is safe for residents and visitors.
62	Resident		The proposed Edgware plan copies Mill Hill and Colindale. Massive blocks of flats with limited outside space. Covid 19 changes our world. People need houses with gardens not sterile sixties style slums of the future.	Redevelopment must deliver new green and open spaces to the town centre.
63	Historic England	Chapter 3 Spatial Context, Heritage	The SPD refers to the Edgware High Street Conservation Area in the table on page 22, but does not mention the Watling Estate Conservation Area, the Cannons Park Conservation Area or Canons Park Grade II Registered Park and Garden. They are all designated heritage assets that have the potential to be impacted upon and the SPD should be revised to refer to these and ensure that their setting is taken into account.	Reference to heritage assets adjoining the SPD boundary should be included. Amend: update to include reference to the Watling Estate Conservation Area, the Cannons Park Conservation Area and Canons Park Grade II Registered Park and Garden.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The SPD makes no reference to the setting of heritage assets generally, nor to archaeology.	The setting of heritage assets is an important design consideration and should be referenced. Amend: update text to state that redevelopment proposals must carefully consider the setting and context of heritage assets.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Paragraph 4.23, page 29 – states that the London Plan identifies the town centre as suitable for tall buildings and gives a prescribed height; however, the emerging London Plan does not identify it as an area for tall buildings. Instead, boroughs are required to set their own definitions for what constitutes ‘tall’. This paragraph should be revised to reflect the emerging London Plan.	Amend: update text to state that the Local Plan identifies Edgware as a tall building location.
		Chapter 5 Key Sites Design Guide	The key opportunity sites should not be included in the SPD; this is premature until the Local Plan is found sound. The inclusion of sites goes well beyond the scope of what a non-development local plan can do in the absence of a corresponding adopted local plan. We agree that the	The inclusion of these sites is indicative, providing guidance further to the identification of these sites within the Draft Local Plan. Heritage, context and

			sites do have development potential, but presently there is no evidence to show to what extent they can be developed. While the Reg 18 Local Plan Site Selection Background Paper is helpful it does not show how heritage was factored in. In addition the SPD may require and SEA if it precedes the Local Plan. The sites could be added into the SPD as a revision after the plan has been adopted. Only sites that are already allocated under the adopted plan could be included.	environmental considerations are covered by the Draft Local Plan.
		Chapter 5 Key Sites Design Guide	The area has a lot of regeneration potential and could accommodate higher buildings if they are carefully considered in design and heritage terms. However, as the SPD does not properly consider the heritage assets that could be impacted on. We would expect this type of evidence to be compiled in support of the sites allocated in the Local Plan. Given that the Local Plan is in its early stages it may be the case that is evidence will be forthcoming.	The Local Plan designates Edgware as a location potentially suitable for tall buildings location. To be acceptable proposals must ensure high quality design and fully consider the context, including of heritage assets.
		Design Guide Document	It is not clear if the Edgware SPD Design Guide forms part of the consultation. It is listed as a supporting document so it is assumed it is not part of the consultation and so we have not commented on it. We support the production of area-based design guides and look forward to being consulted on this in due course.	The Design Guide was prepared to inform the SPD.
64	Resident	NA	For response text see Response no. 32 above.	See response to item 32.
65	Resident		I agree that Edgware town centre requires renewal, with an improvement in the quality of shops, renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in the quality of shop signage. Edgware town centre has been in decay for a number of years, a trend accelerated by the Broadwalk Centre, the financial crisis and most recently the Covid-19 lockdowns. However, I object to a central tenet of the plan, tall tower blocks. Edgware is a	Improvement of the Town Centre is multi-faceted and requires an better environment, sensitive renewal of certain heritage assets, new commercial opportunities, and delivery of community facilities. Change and growth includes new housing and a more intensive use of the town centre. This are is identified by the Local Plan as

			<p>suburban town, a leafy suburb. Housing development should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities.</p> <p>New/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, such as Premier House). Emphasis should be on quality and not quantity and anything that resembles the new, ugly, skyline in Colindale must be avoided.</p>	<p>an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
66	Resident	NA	See item no. 65 above.	See response to item no. 65.
67	Barnet Borough Arts Council	<p>Principle 1 - Renewal of the Town Centre and High Street as a Major Destination</p> <p>Principle 5 - Improved Environment and New Public Spaces</p>	<p>I write as Secretary of BARNET BOROUGH ARTS COUNCIL which links individuals and societies the borough and aims to promote the arts through BARNET ARTS MAGAZINE and festivals. Most of our member societies are based on the eastern side of the borough. In or near Edgware are The Good Companions, a drama group producing a pantomime and other productions in their excellent venue at John Keble Church in Hale, the nearest art society is Milldon who exhibit at Holy Trinity Church in Mill Hill, and musical shows are presented in St Michael's Church in MILL Hill which also houses the Pro Arte Choir. There's very little in Edgware, although the library is an oasis. We suggest local festivals can act as focal points, and there seems little floral or horticultural activity and these might be good starting points in the spring and autumn on stalls.</p>	<p>Drawing on Edgware's local artistic and cultural organisations can play a key role in renewal of the town centre.</p> <p>Amend: add reference to encouraging activities, exhibitions and performances by local community and artistic groups to bring people together and foster a sense of pride and inclusion.</p>
68	NHS HUDU	General	<p>The Edgware Growth Area SPD presents an important opportunity to revitalise the town centre, introduce a significant amount of new housing supported by social infrastructure, including healthcare in a highly accessible location. The impact of development will extend beyond GP surgeries and includes community and hospital services. The strategy in North Central London is to ensure that infrastructure supports integrated health and</p>	<p>Ensuring good social infrastructure, including healthcare, is a vital element of renewal.</p>

			care services. This includes a wider range of services provided by a multi-disciplinary workforce across a network of GP practices and community services.	
		Principle 3 – Enable Diverse Housing Delivery	Under Principle 3 (enable diverse housing delivery), we note that the Barnet’s emerging new Local Plan will establish a future housing capacity for the town centre. This should also include Harrow Council’s emerging Local Plan as one of the Key Sites, Lidl and The Masons Arms, identified in the draft document is in Harrow.	The boroughs will each set out their own housing targets and locations for delivery within their borough boundaries.
		Principle 6 – Deliver Community Facilities	We support the Development Principles, including Principle 6 to deliver community facilities. However, we suggest that the principles refer to health and wellbeing to reflect the vision to promote Edgware as a healthy town centre. As Objective 15 implies health and wellbeing is a cross-cutting theme which requires a holistic policy response.	The health and wellbeing objective is reflected within the Principle 6.
		Principle 6 – Deliver Community Facilities	In response to Barnet’s Draft Local Plan (Regulation 18) consultation the CCG noted that Policy GSS05 ‘Edgware Growth Area’ identified a potential new housing capacity of 5,000 homes. This scale of development will require new healthcare infrastructure and we would welcome the opportunity to work with both Councils to identify future requirements and site opportunities to deliver new and improved infrastructure. This is endorsed under Principle 6 to deliver community facilities, including healthcare.	Barnet is preparing an Infrastructure Development Plan to set out the borough’s requirements over the Local Plan period. Proposals within Edgware must demonstrate how the healthcare requirements for the new developments will be met.
		NA	Draft Local Plan site No 27 ‘Edgware Town Centre’ includes the Old Redhill Clinic in Station Road and there is an opportunity to redevelop or re-provide the medical centre taking a holistic view of all public sector assets and opportunities in the growth area. Paragraph 8.8 notes that Transport for London is the largest public landowner.	Redevelopment of this area will provide an opportunity to consider re-provide medical facilities in suitable and well-located premises.

		NA	Development in the Growth Area will also impact on future plans for Edgware Community Hospital to the south. Barnet's draft Local Plan (Regulation 18, January 2020) identifies the community hospital site (No 5) as a site with development potential with an opportunity to consolidate services and release some land for housing.	Edgware Hospital is identified within Barnet's Draft Local Plan Schedule of Sites.
		Chapter 8 Delivery and Implementation Section 106	In terms of delivery and implementation we support paragraph 8.18 which sets out the infrastructure priorities for the growth area, which includes community facilities including for education, nursery provision and health facilities. We suggest that the document clearly refers to the role of section 106 planning obligations to mitigate site-specific impacts which could include both financial and 'in kind' contributions towards healthcare. This could include improvements to existing premises to increase capacity or supporting the new delivery of new facilities.	Amend: include reference to the role of S106 obligations to mitigate site-specific impacts which could include both financial and 'in kind' contributions.
		Chapter 8 Delivery and Implementation	The text will need to be updated to refer to the role of the Infrastructure Funding Statement (CIL Regulation 121A) which has replaced the Regulation 123 List and identifies the infrastructure required to support development in an area and how it will be funded, using Community Infrastructure Levy, or section 106 obligations, or a combination of both. We would welcome the opportunity to work with both Councils to identify the healthcare infrastructure requirements and timescales and funding and delivery options.	Acknowledge that the text should be updated. Amend: update to reference the Infrastructure Funding Statement (IFS) and the Planning Obligations SPD.
		NA	The draft SPD addresses other issues which will impact on health and wellbeing, including air and noise pollution, active travel, open space deficiency and opportunities, employment opportunities, unhealthy town centre uses and the impact of climate change. To tackle these issues in a holistic way, we suggest that a health impact assessment is submitted with large development proposals to ensure that measures are introduced to	As noted by the response, Health Impact Assessments are required on larger developments by the councils Local Plans.

			mitigate the negative impacts of developments and maximise health benefits. It could also consider the longer-term health and wellbeing implications of Covid-19 in terms of travel, changing working patterns and demand for office space, the future of town centres and design of buildings and spaces. We note that the Barnet's draft Local Plan Policy CHW 02 'Promoting health and wellbeing' supports the use of health impact assessment for larger developments.	
69	Savills (on behalf of The Ballymore Group and Transport for London Commercial Development (TfL CD)	Chapter 1, Strategic Context	We are generally supportive of the document and its ambition. In the same vein, it is our view that the SPD must go further in recognising Edgware's role in helping meet LBB's and London's housing need. This should be done by greater explanation of the significance the Major Town Centre and how the key sites within the design guidance can embrace such designation. To assist in demonstrating this potential, LBB should further consider adopting a more visual approach to the SPD which provides impressions/overlays on the key sites illustrating what these sites could look like in the context of their local and regional planning policy designations.	The requirement to provide housing to meet the boroughs targets is covered in the Strategic Context section. The SPD provides a framework for development and would be too inflexible if more specific design guidance were included. More detailed images and drawings will be provided through the masterplan and application processes.
		Chapter 1, Strategic Context	The London Plan makes clear at paragraph 1.2.5 that using the city's land more efficiently will need to include the redevelopment of brownfield sites and intensification of existing places, including in outer London. In order to meet the city's housing needs, Policy H1 in the London Plan instructs boroughs to optimise the potential for housing delivery on sites with high public transport accessibility and proximity to stations and within town centres. Table A.1 of the London Plan outlines that Edgware has high residential growth potential. The SPD makes reference to this strategic context (paragraphs 1.13-1.15). However, it ought to	The strategic context can be expanded to clarify the Mayor's approach. Amend: update to reference the Mayor's Good Growth Principles that underpin the approach in Edgware Town Centre, in particular Policy GG2 Making the best use of land, which expects application of a design-led approach to determine the optimum capacity of sites. A high density approach in Edgware Town Centre is a sustainable way of meeting the boroughs growth needs while

			<p>emphasise that high density development in Edgware town centre is a sustainable response to meeting London’s growth needs while also protecting the Borough’s Green Belt as set out in the London Plan.</p> <p>There are a number of good growth objectives, one of which is making the best use of land (GG2) achieved in part by applying a design-led approach to determining the optimum development capacity of sites and, promoting higher density development in locations well-connected to jobs, services and public transport. It is our view that the SPD can be a positive response to this strategic framework but that it should be clearer and more direct in its ambition.</p>	protecting precious green spaces, including Green Belt.
		Chapter 1, Strategic Context	The London Plan provides the strategic policy context for the Council’s identification of Edgware as a growth area capable of accommodating substantial growth including the thousands of new homes that the SPD rightly seeks to deliver. This relationship between regional and local policy ought to be emphasised in the introduction to the SPD in both the text and through diagrams.	Reference to thousands of new homes is made in Objective 6, making clear the potential within Edgware Town Centre.
		Principle 3 – Enable Diverse Housing Delivery	Paragraph 4.20, paragraph 5.15 - in line with Figure 31 the core of the centre is the shopping centre and station site and this site is identified as having “higher development potential” and represents the largest higher development potential segment in the SPD area. The text in both paragraphs therefore ought to recognise that the core of the centre should accommodate the “thousands” of new homes needed as referenced in Objective 6 of the SPD.	Reference to thousands of new homes is made in Objective 6. paragraphs 4.20 and 5.15 reference high levels of housing delivery within SPD, providing an appropriate and flexible description to achieve the quantum of growth within Edgware.
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station	The Broadwalk Centre and Station site is the largest town centre site with high development potential and identified in the draft Local Plan as having capacity for over 4,000 new homes. This level of new housing would need to be accommodated in a number of tall buildings,	Amend: update text to reference tall buildings in the plural.

		Para 5.19	not just one. Paragraph 5.19 should therefore be amended to state: <i><u>“potential for the creation of a modern urban environment with opportunities for tall buildings and higher densities in some parts...”</u></i>	
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station Figure 36	While figure 36 seeks to depict the figure ground plan, it suggests houses along Brook Avenue sit hard up against the boundary of the redevelopment site which is not accurate given the presence and buffering effect of the railway. We would suggest therefore that this diagram be amended to include the railway. Similarly, figure 31 currently shows the boundary of the shopping centre/station development segment extending over the railway and could also be amended to reflect that the railway will provide a buffer between the site and houses to the north east.	The site boundaries are consistent with those set out in Barnet’s Draft Local Plan Schedule of Sites. Text will be added to indicate the buffering effect of the railway infrastructure, as set out in the response to Paragraph 5.20 below.
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station	While we agree that development of the site ought to respond to its immediate context, particularly at its edges, the SPD ought to clarify what it defines as the east and southern edges. The site is bordered to the north east by the railway which provides a buffer of approximately 76m from the edge of the site to the rear gardens on Brooke Avenue. This separation afforded by the railway together with proximity to the station makes this part of the site suitable for taller buildings. A tapering down to lower heights is more appropriate to the south to respond to existing low rise development around Parkfield Close and Fairfield Crescent where the SPD should recognise that the existing tree line will assist in screening new development. The first bullet point of paragraph 5.20 should therefore be amended as follows: <i><u>‘Towards the southern and eastern edges...the height and massing of buildings must should respond to the suburban context.’</u></i>	To provide more clarity and direction on the siting and context for development proposals the bullet point will be updated. Amend: update text as follows- ‘towards the southern and eastern edges where the site is in proximity to low-rise residential areas – notably Parkfield Close and Fairfield Crescent and Brook Avenue – the height and massing of buildings must should respond to the suburban context. <u>Proposals must also carefully consider the setting and context of heritage assets in the surrounding area, such as the Railway Hotel. Along the eastern boundary the railway lines provide a buffer to residential areas, although the raised topography of the site must</u>

			<p>While we agree that good design should avoid undue loss of lighting and privacy to neighbours, we note that through high-quality design and various design measures it is possible to mitigate against impacts such as overshadowing or loss of privacy, even in schemes comprised of tall buildings wording of this The first bullet point in paragraph 5.20 sentence should be amended as follows:</p> <p><i><u>'The height of new development should be considered in the context of its impact on overshadowing and loss of privacy which will themselves need to be assessed in the context of Edgware as appropriate for an urban town centre be sufficiently modest as to avoid overshadowing and loss of privacy.'</u></i></p>	<p>be a design consideration. The height of new development should be <u>considered in the context of its impact on sufficiently modest as to avoid</u> overshadowing and loss of privacy.</p>
		<p>Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station</p>	<p>The second bullet point of paragraph 5.20 - the SPD provides no definition of the site's "heart" or indication of where this is located. Notwithstanding, both the buffering effect of the railway and the location of the Underground station provide sound urban design reasons for also locating taller buildings to the north of the site in addition to the centre as the term "heart" implies. Considering the town centre as a whole, there is also a sound design and place-making argument for the transport interchange forming a gateway into the town centre and one of its "hearts" in addition to the central area in our site. The third bullet point in paragraph 5.20 states "the overall design must be provided in the context of the Underground Station and demonstrate wayfinding towards the public transport hub." The locating of marker buildings close to the station will consolidate a sense of arrival and together with the appropriate design of routes and spaces will aid wayfinding.</p>	<p>Directing tall buildings to the northern and eastern parts of the site in the SPD is considered to be too restrictive in design terms. The text will be updated, however, to allow more flexibility in delivering tall buildings in the most suitable location.</p> <p>Amend: update the second bullet point to read - 'Proposals for tall buildings should locate them in <u>those parts</u> heart of the site where there is more potential to establish a high-quality urban design that achieves higher densities. Within this area Building heights and massing should be varied to achieve an attractive mix of building types that is beneficial to the urban landscape and allows new residents access to views and sunlight.'</p>

			<p>Paragraph 4.23 explains that there is potential for “very tall buildings” in Edgware. The adopted plan makes clear that tall buildings should be directed towards growth areas. It therefore follows that it is the principal sites in the SPD area on which very tall buildings will be expected to arrive. Given the development potential of the station/shopping centre site and its location in the core area of the town centre, the SPD ought to direct “very tall buildings” here. We therefore suggest that the second bullet point of paragraph 5.20 be amended to read as follows:</p> <p><u>“Proposals for tall and very tall buildings should locate them towards the northern and eastern edges and in the heart centre of the site where there is more potential to establish a high-quality urban design that achieves higher densities</u></p>	
		Chapter 5 - Key Sites Design Guide, Design Vision	<p>The section on ‘Intuitive flows’ in paragraph 5.4 refers to minimal exposure to noise but it should be acknowledged that there will be general town centre noise and noise associated with transport movements from the transport hub. We suggest that the sentence is reworded to reflect this so the focus is on mitigating the impact of noise on more sensitive uses.</p>	<p>Amend: update to ‘with minimal minimised exposure to noise and air pollution ...’</p>
		NA	<p>Given the status of the London Plan which has now been approved for adoption, it would be appropriate for the SPD to amplify its definition of high quality/good design and ensure that this is rooted in the Mayor’s definition of a design-led approach. While contextual considerations are key, a design-led approach ought also to consider the following aspects as set out in Policy D3 (Optimising Site Capacity Through the Design-led Approach) of the London Plan: Form and layout; Experience; Quality and character.</p>	<p>The SPD provides a framework for development and the councils are concerned that the inclusion of more specific design guidance would be too inflexible. The masterplan and application stages will be used to consider more detailed images and drawings.</p>

			<p>We consider that the Edgware SPD must go further in supporting the delivery of sustainable, well designed higher-density, taller buildings in this location given its strategic potential. The SPD ought also acknowledge the contribution a critical mass of new residents will make to the long term vitality and economic health of a sustainable Edgware town centre. The Edgware SPD can do so by introducing the following into the document:</p> <ul style="list-style-type: none"> • Key Sites design appendix to provide design codes, statements and concept diagrams of what these sites could look like based on both local plan and London Plan designations and ambitions. This would assist in providing a visual references of the key sites design guides, which we consider a useful tool for all end-users but also is in keeping with the NPPF. • Greater explanation of what the Edgware’s designation as a Major Town Centre means and how this strategic designation underpins the growth ambitions of the SPD. 	
70	Centro Planning Consultancy (on behalf of Betterpride Limited, the freehold owner of Premier House)		<p>We are broadly supportive of the draft SPD, and the general principles it lays out for the long term development future of the Town Centre. Of particular importance is the emphasis on intensifying development at underused brownfield sites to provide an adaptable and vibrant town centre, and the suitability of this area for increased development height.</p> <p>We support the principle of intensifying the land uses in underutilised areas of the Town Centre, and we particularly support residential intensification at those areas identified as Key Sites later in the draft SPD.</p> <p>The principle that tall and very tall buildings are suitable in the Town Centre is fully supported.</p> <p>The spirit of encouraging taller buildings in the central part of the site, that can form a defined and coherent cluster near the station, at the entrance to the town, is</p>	<p>Amendments to the Key Site Design Guidance on the Broadwalk Centre and Station site – as set out in the response to Savills above - provides greatly flexibility to the siting of tall buildings, referring to locating <i>‘them in those parts of the site where there is more potential to establish a high-quality urban design that achieves higher densities.’</i></p>

			considered to be beneficial. This also allows for mid height developments on the edges of the key site to act as a stepping down to the lower height residential buildings at the edge of the SPD area.	
71	Resident		<p>The official designation of Edgware as a major town centre, and the proposal of “thousands of new homes” (Draft Edgware Growth Area SPD, section 2.2.6) should be of major concern to all Edgware residents, especially homeowners, and anyone who genuinely cares about the quality of urban environments.</p> <p>Edgware as a major town centre – since when?? Harrow, Watford, and Croydon town centres, yes. Clearly, these are examples of major town centres and set up as such, unlike Edgware. This idea is totally the opposite of what Edgware needs. The classification of Edgware as a major town centre is very convenient as it paves the way for approval of the idea of thousands of new homes.</p> <p>Edgware needs essential regeneration; it is more about restoring the order and harmony of a relatively new suburban town centre (less than 100 years old) to its original form and character as opposed to finding a new function or a new identity for the town.</p>	<p>Edgware Town Centre is identified within Barnet’s Draft Local Plan as a location for housing delivery, based on the accessibly location, and in line with London Plan policy.</p> <p>It is classified as a Major Town Centre by the London Plan and the councils support the success Edgware through the SPD.</p> <p>High-quality design that is responsive to context is vital to delivering effective and attractive redevelopment.</p>
72	Historic England Archaeology	Objective 8	<p>The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning.</p> <p>The SPD should include using archaeology to tell the story of the areas heritage.</p>	<p>The archaeological of Edgware offers potential to support the historical identity of the area. Amend: include reference to heritage in Objective 8. More specific references to archaeology are included in Chapter 3 Spatial Context and Chapter 4 Development Principles.</p>
		Chapter 3 Spatial Context, Heritage	<p>Include reference to the Barnet Designated Edgware: Hale Lane and Watling Street Archaeological Priority Area (APA) which covers part of the SPD area. The Description for this APA is as follows:</p>	<p>The SPD should reference these APAs. Amend: include reference to Hale Lane and Watling Street APAs.</p>

		<p><i>“Edgware is mentioned in the Domesday Book but under the parish of Stanmore and formed nucleated villages within the forested area until the 13th century. There is no Edgware manor mentioned in the Domesday Book, but there maybe a farmhouse, recorded since 1216 AD. However, this is probably located at Edgwarebury (ASAS 10). Agriculture developed in the 16th century, which was quite mixed and it became a small market in the 17th century. In 1862 AD it was said that the market town had disappeared. Industry had little impact on Edgware’s economy, but it is likely that there were gravel pits being worked from 1802 AD continuing into the early 20th century. This APA includes:</i></p> <p><i>Watling Street: A medieval settlement developed along the Edgware Road next to Edgware Brook. Edgware is a Saxon name, originally ‘Aeges Weir’. This was so-called because there would have been a nearby dam or weir constructed for Silk Stream and Dean’s Brook for fishing or irrigation (the latter is mentioned in a charter of 972-8 AD). The church of St Margaret is located here which had a tower dating to the 14th century. In 1370 AD, the Prior of St Bartholomew’s, Smithfield had land holdings in Edgware. Edgware Bridge is located here crossing the Edgware Brook, which is evident on a map from 1597 AD. A bridge was first mentioned in 1370 AD, called ‘Eggewerebrigge’.</i></p>	<p>The SPDs historical context information is aimed to provide an overview of the areas development and - notwithstanding the amendments set out in this schedule - is considered to be sufficiently detailed.</p>
	Chapter 3 Spatial Context, Heritage	<p>Also include reference to the Harrow designated “Edgware Village” APA which lies on the Harrow side of Edgware Road.</p> <p>Please note that the APAs within Barnet were last updated in 2007. GLAAS is currently reviewing all such areas and the Barnet APAs are due to be reviewed in 2023. The Harrow APAs are due to be reviewed in 2021</p>	<p>Amend: Include reference to Edgware Village APA.</p>
	Principle 4 – Ensure High Quality Design	<p>Heritage, including archaeology, can be used to enhance the experience of an area by telling the story of the areas</p>	<p>Heritage provides an opportunity to enhance Edgware’s identify and</p>

		and a Sensitive Approach to Heritage	heritage through sympathetic and imaginative public realm design.	environment. Amend: add text to state that archaeology can be used to enhance the experience of the area by telling the story of the area's heritage through sympathetic and imaginative public realm design.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Any applications within the APA should be supported by an archaeological desk based assessment. In some instance this may also need to be supplemented by an archaeological evaluation. Consultation with the GLAAS should sought as part of any pre-application discussions.	Amend: add text to state that proposals within an Archaeological Priority Area should be supported by an archaeological desk-based assessment.
73	Environment Agency	Chapter 1 Strategic Context	Strategic Context – Paragraph 1.16 - The SPD should also seek alongside growth (green growth) the delivery of benefits for the natural environment and climate change, which will also have benefits for social amenity, health and wellbeing, wildlife and the local economy. This paragraph should be amended.	Agree that the Strategic Context should refer to the need for green growth. Amend: include text referencing green growth that delivery benefits for the natural environment including tackling climate change.
		Chapter 2 Vision	The vision lacks an ambitious approach to improve the local environment in a wider sense. Although there is reference to creating a healthy town centre with substantial new and integrated public spaces and landscaping, the aims should be wider than that as there are broader environmental issues applicable to Edgware Growth Area that need to be directly addressed.	The vision can be expanded to encompass environmental concerns. Amend: Vision to reference environmental resilience through addressing pollution, biodiversity and climate change.
		Chapter 2 Objectives	We support objectives 12 and 13, but there should be an explicit objective to manage and improve the water environment to reduce flood risk and future water shortages, increase resilience to climate change and improve water-related habitats. As a minimum there should be an additional objective that deals with addressing flood risk and climate change, given the prevalence of this issue within the area.	Amend: add reference to flood risk in Objective 12 Objective 13 refers to habitats generically, including water habitats, and these are addressed more fully in Chapter 3 Spatial Context and Principle 8 - Tackle Environmental Issues

		Chapter 3 Environmental Profile	The SPD provides an opportunity to promote sustainable growth and bring about significant improvements to the natural environment. Although the 'Environmental Profile' on page 20 alludes to waterways and flood risk the commentary needs to be expanded to provide a more complete picture. This should be based on existing evidence base documents which haven't yet been fully utilised, but we would also recommend a Level 2 Strategic Flood Risk Assessment informs the SPD to further characterise the level of flood risk.	A Level 2 Strategic Flood Risk Assessment has been carried out for Barnet's emerging Local Plan. This includes a detailed assessment of the key sites within Edgware.
		Chapter 3 Environmental Profile	Paragraph 3.16 identifies the two waterways (Deans Brook and Edgware Brook) leading to some areas lying in Flood Zone 3 and also surface water flood risk in parts of the town centre. Flood zone 3 is indicative of an area which is at risk from fluvial (river) flooding in a 1 in 100 year annual probability or greater (1% chance) so the current definition within brackets is incorrect (i.e. a 1 in 100 year or less risk of flooding).	Amend: update reference to flood risk probability.
		Chapter 3 Environmental Profile	Paragraphs 3.17 and 3.18 identify the deficiency in access to or a network of open spaces and the presence of Deans Brook (Site of Borough Importance for Nature Conservation). However, more could be said about this. There are quite a few local wildlife sites around the perimeter of town centre including Deans Brook and Stoneyfields Park, Silk Stream and Burnt Oak Brook and Mill Hill Old Railway Nature Reserve (Bentley Priory SSSI is 2.2km away from the town). There is potential to improve biodiversity value and think about the SPD area's potential impact and link to wider habitats. In addition, you have utilised the data available on Water Framework Directive (or referenced the Thames River Basin Management Plan, 2015).	Reference to wildlife sites in the wider area should be included in the SPD. Amend: include information on other wildlife sites in the local area, including Silk Stream, Burnt Oak Brook, Stoneyfields Park and Mill Hill Old Railway Nature Reserve.
		Chapter 3 Environmental Resilience	Under 'Environmental Resilience' paragraphs 3.19 and 3.20 identify air pollution and noise pollution as key issues. Whilst we agree, this should be broadened out to	Amend: add reference to the impact of climate change being expected to increase the likelihood of extreme

			<p>other resilience issues such as flood risk, water resource stress and climate change. For example, Barnet is located within a wider south east area that suffers from serious water stress, and so water efficiency measures should be a requirement for all new developments (achieving 110 litres per head per day in accordance with the Optional Higher standards of Building Regulations for residential and BREEAM 'Excellent' with maximum water credits for non-residential). Climate change is likely to exacerbate and increase the risks from flooding and therefore flood resilience measures across the growth area will be vital to protect residents and the local economy and infrastructure.</p>	<p>weather events that pose a risk to health, including summer heatwaves, flooding, and drought.</p>
		<p>Principle 5 - Improved Environment and New Public Spaces</p>	<p>Principle 5 - Improved Environment and New Public Spaces. An opportunity has been missed to combine the principle of creating public open spaces with a sense of greenery and nature, with other objectives such as the provision of sustainable drainage, attracting wildlife and carbon capture through initiatives such as tree planting. The type of planting used and the ways in which the open spaces can contribute to water. Could boundary treatments and street furniture also include wildlife friendly planters? Where hard surfacing requires replacement, could greener options such as grassed areas, gravel or permeable paving be introduced?</p>	<p>Amend: add reference for green spaces to deliver environmental benefits such as attracting wildlife, natural SUDS, and carbon capture.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Deans Brook and Edgware Brook are classified together as the Silk Stream and Edgware Brook GB106039022970. This surface water body is currently failing to reach good status and is currently at moderate status. Multiple factors contribute to reasons for not achieving good status. The opportunity to improve the local rivers in tandem with opportunities to create new public open spaces should be championed within this SPD. For example, we identified a specific WFD action measure to improve the Edgware Brook near Hendon FC Stadium</p>	<p>The SPD supports the approach of a network of green linkages and enabling people to experience nature. The wording can be expanded and emphasised. Amend: update text to reference restoring the rivers and improving the river corridor habitat and spaces for wildlife, along the aim of connecting</p>

			<p>with buffer zone and riparian habitat improvements which might include river restoration, renaturalising river banks, river edge planting and habitat creation. We have also identified a number of weirs which are causing an obstruction to fish passage, which could also be improved by introduction of fish passage or removal if the weir is obsolete. Improving the rivers in this area will bring about improvements to nature and wildlife as a whole, as a wider range of species will be attracted to the habitats provided. Improving the rivers can also benefit flood risk by increasing flood storage and natural processes. This can also have other benefits such as improving health and wellbeing of residents and visitors, increasing the number of visitors (footfall) to the area and thereby benefitting the local economy. This SPD should encourage a net gain approach to biodiversity and the natural environment in general (Planning Practice Guidance definition: Net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand)</p>	<p>green spaces and habitats across the area where possible.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>This SPD should make explicit reference to applying the Sequential Test and Sequential approach to ensure sites within areas of lowest risk are prioritised ahead of selecting sites in areas of medium to high fluvial (and surface water) flood risk. The West London SFRA also provides climate change extents for each of the river models. The climate change flood outlines for the Silk Stream model also show an increase in the extent of flood risk from rivers in this area for the 35% and 70% allowances (for example, along Brook Avenue to north-east of Edgware Station). Consequently what this is showing is that there are areas where fluvial flooding would occur during these climate change scenarios which are currently at low risk.</p>	<p>Amend: add a bullet point to reference application of the sequential test and approach</p>

		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Surface water flood risk is also mapped within the West London SFRA and is more extensive than the fluvial risk. Unless a further study is undertaken using the correct climate change allowances, the 0.1% annual probability extent from the Surface Water Flood Risk map represents the potential climate change adjusted impact of current risk. Barnet and Harrow’s Surface Water Management Plans have both identified Critical Drainage Areas (CDA) within the Edgware Growth Area. It’s important to recognize within this SPD that the different sources of flooding interact and can exacerbate flood risk. Increasing impermeable surfaces from development and a lack of capacity within the existing drainage network will also contribute to risk.</p>	<p>Amend: add text to reference that different sources of flooding can interact and exacerbating flood risk.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Small pockets of the SPD Area benefit from flood storage areas north of Edgware in Edgwarebury Park, Stoney Wood Lodge and near to Bransgrove Road over the border into Harrow which is evident from the ‘Flood Storage Areas’ and ‘Areas Benefiting from Flood Defences’ layer in the SFRA Policy Map. These flood storage areas were constructed as part of the Silk Stream Flood Alleviation Scheme approximately 10 years ago. We are currently working on a new Silk Stream Flood Alleviation Scheme intended to protect areas in Colindale and Rushgrove Park from flood risk. This is likely to require partnership funding contributions to be viable, and it’s possible that planning contributions to this scheme may be sought, where appropriate.</p>	<p>Amend: reference that Planning contributions towards the new Silk Stream Flood Alleviation Scheme may be sought.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Reducing and managing flood risk and requiring sustainable drainage measures in this area is a must-do and should be strongly reflected in this SPD. There should be a sentence within the SPD which requires all development to utilise the guidance within the existing SFRAs to design layouts, mitigate and make space for water to help with the reduction of flood risk. In addition,</p>	<p>Amend: add text to state that proposals should utilise the guidance within the existing SFRAs to design layouts, mitigate and make space for water to help with the reduction of flood risk.</p>

			growth within the town centre and beyond may also be required to contribute financially to improving strategic flood defences, upgrading flood storage areas and defence assets and flood resilience in the area.	
		Principle 8 - Tackle Environmental Issues	Principle 8 - Tackle Environmental Issues - Whilst we support the references to mitigating and adapting to climate change, managing flood risk and creating new habitats, we think this section could be more specific and detailed. For example, paragraph 4.49 talks about the potential for opening up spaces such as the Deans Brook but we would like to see an explicit reference here to the opportunity to restore the rivers and improve the river corridor habitat and spaces for both people and wildlife. We'd also like to see the aim to plan to connect these green spaces and habitats across the area wherever possible. Paragraph 4.49 should seek to achieve net gains for biodiversity as a result of new developments. We support paragraph 4.49; but it doesn't really translate into what would be expected of new developments to achieve that aim. For example, do we want growth in Edgware to find a way of connecting to wider environmental assets by creating green networks and linkages? Growth should incorporate environmental measures that deliver multiple benefits, e.g. pocket parks that provide public access and amenity, spaces for wildlife, flood attenuation and carbon capture through tree planting.	Amend: expand bullet point to include reference to a net gain approach, restoring river habitats, and providing green networks and linkages.
		Principle 8 - Tackle Environmental Issues	Paragraph 1.9 identifies that in particular there is a lack of open public open spaces within the town centre, with no parks and little tree coverage or planting. This SPD should also be championing opportunities to make provision for this and creating a network and linkages between green spaces. There are potential opportunities to integrate the natural environment within the District's Town Centre's in addition to providing better access to	Through the Vision, Objectives, Development Principles and design guidance the SPD supports and encourages new and better open spaces and planting. Inclusion of further references are set out in other parts of this response.

			<p>open spaces. This can be achieved in a number of ways such as native tree planting, pocket parks, rain gardens, natural swales, permeable paving, green roofs and walls, bird and bat boxes and wildlife friendly planters. The geographic location of these measures can also link up to new green open spaces and existing green corridors such as river corridors. This SPD needs to be clear how growth will be expected to contribute to improving green spaces, green networks and biodiversity to improve health and wellbeing, reduce flood risk and increase resilience to climate change.</p>	<p>Amend: add reference to placing emphasis on measures that enhance and support the Urban Greening Factor as detailed in the London Plan.</p>
		<p>Principle 5 - Improved Environment and New Public Spaces</p> <p>Principle 8 - Tackle Environmental Issues</p> <p>Chapter 6 Public Realm Guide, Planting</p>	<p>Also- '<i>Managing flood risk through the design and location of development and make use of sustainable urban drainage systems</i>'... is positive but there is a lot more we should be pushing growth to achieve, such as creating more space for water, incorporating sustainable drainage systems as a must-do, selecting sustainable drainage measures that have multiple benefits (such as improving water quality and biodiversity) and designing for climate change. Additional hard surfacing is going to exacerbate the situation rather than alleviate it placing greater pressure on existing drainage networks to receive surface water runoff therefore developments need to achieve more green space, SuDS and more permeable paving. Measures such as rain gardens, pocket parks, green roofs and walls, planters, swales and tree planting can all help to capture and absorb rain water and are suitable in an urban setting. We think this section would benefit from providing references to further information such as the West London SFRA (2018) and the future Level 2 SFRA. It is essential that there is the physical infrastructure in place (flood risk infrastructure, surface water and waste water networks) to accommodate new developments. We'd also like to see a reference to water</p>	<p>Amend: add reference to the benefits of SUDS throughout the SPD, namely Principles 5 and 8, and the Public Realm Guide.</p>

			saving measures (water efficiency) as a requirement for both residential and non-residential uses.	
74	TfL	General	<p>An SPD should help guide decision makers on putting into action London-wide and local policy on development proposals that they may receive in this area. In general, TfL is supportive of how the policy has been developed, the level of engagement with TfL through various forums and technical supporting information.</p> <p>In accord with Barnet long-term Transport Strategy, we need investment in LU capacity to support growth in London including growth in Barnet and at sites such as Edgware. TfL would expect through the planning system to seek direct obligations and safeguards to deliver enhanced capacity on Edgware branch of the Northern Line, when that investment can happen will be decided through TfL Business Plan and Mayor's Transport Strategy. This may limit what can be built at Edgware until such investment has been made and at this stage.</p>	Welcome the support for the planning framework.
		Objective 3 Improving transport options	<p>Edgware Town Centre will move towards being more sustainable, with better options to walk and cycle ... TfL suggests that you should add 'better public transport' (buses) will be needed for local travel as well as for 'those coming from further afield' as not everyone can walk or cycle and the socio economic profile of the area shows significant percentage of the populations in both Barnet and Harrow are people with protected characteristics, including a growing population of older age groups, with a forecast increase of 26% in over 65s up to 2030 in Barnet. The EqIA (for the SPD) says that there will be no adverse impact on people with protected characteristics.</p>	Amend: update text to - '...with better options to walk, and cycle or take the bus to the Town Centre for those living locally ...'
		Chapter 2, Objectives Objective 3	<p>TfL queries why there is no objective relating to cutting down the amount of traffic.</p> <p>Objective 3 talks about improving transport options to move towards being more sustainable but these improvements must not lead to significantly adverse</p>	<p>These concerns are addressed through the change to Objective 3.</p> <p>Amend: '... far better local environment that and seek to ameliorate does not</p>

		traffic congestion impacts. This implies that the SPD aiming not to make traffic congestion worse which lacks ambition as the Council should be trying to reduce it in accordance with the Publication London Plan.	lead to significantly adverse traffic congestion impacts
	Objective 12 Tackle Climate Change and Pollution	This should also mention the reducing motorised traffic as a way of reducing air pollution and prioritising active travel`	The Objectives are intended to be high level, with more details provided in Development Principle 8 Environmental Issues.
	Chapter 3	Figure 12 on page 21, looks 1930s or even later	Amend: update Figure 12 caption to reference the mid twentieth century.
	Chapter 3 Spatial Context	In 3.27, the Council should acknowledge a third major change in the 1960s with the construction of the tall office block (Premier House and associated retail on the south side of Station Road. TfL understands that this was on the site of the Great Northern Railway station, not the Broadwalk shopping centre as stated.	Amend: include reference to Premier House in the development of the area.
	Chapter 3 Spatial Context	In 3.28, there's a typo in the table of listed buildings: 'Edgwarebury' (not 'Edgware bury').	Amend: typo corrected
	Principle 2 Transport Options Chapter 7 Transport and Movement Guide	In 4.11 (and 7.6), TfL would dispute the statement that 'trains [through Edgware station] are highly congested during peak-hours'. There are fewer than 500 people travelling in either direction in any fifteen-minute period. Given there's a train every three minutes and each can carry almost 800 passengers, this is a considerable exaggeration. The capacity constraints are towards central London. This will change with growth at Burnt Oak, Colindale, Hendon Central and Brent Cross.	Amend: update wording in paras. 4.11 and 7.6 to remove reference to train usage levels at Edgware.
	Principle 2 Transport Options Chapter 7 Transport and Movement Guide	In 4.11, the statement that 'the station operates within capacity', should be verified through data analysis though likely to be correct. TfL provides open source data on passenger numbers and analysis of baseline station capacity could be undertaken. TfL advice is the station	Station capacity information is based on the Transport Study. The text will be rephrased for clarity. Amend: 'Whilst busy, the station <u>is observed to</u> operates within capacity'

			observed capacity should be verified to create a base position to assess the growth assumption in the SPD.	
		Chapter 5 Key Sites Design Guide	The area analysis by segmentation fails to identify any opportunities where development sites could contribute to increasing permeability for walking and cycling and removing pressure from the main thoroughfares.	While movement and linkages through the sites are referenced, the wording can be strengthened. Amend: for the Broadwalk Centre and Forumside sites reference better and new walking and cycling routes to reduce pressure on main thoroughfares.
		Chapter 5 Key Sites Design Guide	There are references to reduce the severance impact of the Northern line on the area – however, it is not clear what is expected. TfL would be open to discuss this aspect. Its important that any works in or around LU infrastructure safeguard our ability to operate and maintain the railway.	Amend: include references in the Broadwalk Centre site section to reducing severance caused by the Northern Line, and the need to maintain LU operations.
		Chapter 5 Key Site – Broadwalk Centre and the Station	In 5.20 fifth bullet, the wording should be tightened. The Council should explain why there should be retention of some car parking for town centre users and especially commuters and what quantity with evidence that takes account of the MTS. The policy starting point is car free in areas of good accessibility such as Edgware.	Update to reference the need for evidence. Amend: para. 5.20 There should be retention of some The provision of car parking for town centre users, and potentially commuters, must be based depending on evidence of assessed need
		Chapter 5 Key Sites Design Guide	In 5.30 first bullet, typo ‘metres’ (not ‘meters’).	Amend: typo corrected
		Chapter 5 Key Sites Design Guide	In 5.12, the area appears to include the depot too. Why does the boundary line not cover the circular drop off area in front of the station or the building directly to the west of the bus station access road facing on to Station Road?	Boundary lines were drawn to follow building frontage alignments.
		Chapter 5 Key Sites Design Guide	In relation to point 5.12 and figure 31 & 32 TfL is concerned to see the area TfL have discussed at length with Barnet Council previously in relation to potential	The boundary reflects that within Barnet’s Draft Local Plan Sites Schedule. Further text can be added to clarify the

			expanded stabling for a future Northern line upgrade and expanded fleet continue to be highlighted as an area of 'high development' opportunity (see above). It important that this operation LU land remains available for operational purposes for the longer term. This is supported by the Barnet Long term transport strategy.	importance of this area for LU requirements. Amend: add a new bullet point to para. 5.20 – ' <u>London Underground infrastructure comprising tracks and sidings to the eastern part of the site is expected to remain available for operational purposes for the longer term.</u> '
		Chapter 7 Transport and Movement Guide	Something ought to be mentioned about ways of preventing or deterring use of the central part of Station Road to the east of the station for informal car parking.	Amend: insert in Chapter 7 the need to deter informal parking along the central section of Station Road.
		Chapter 7 Transport and Movement Guide	Bus priority should be explored where queuing occurs. Drop off at LU station creates conflicts with bus operations; referring to picture on page 31 of Edgware Transport Strategy Appendix 1 Recognise that there will be a substantial increase in bus usage (Principle 2 of the Development Principles). The Transport Assessment baseline Appendix points to a 46% in bus boarding and 28% in alighting activity. 33% of LU station users arrive by bus during the am peak, 33% during the day, rising to 50% in the pm peak.	Amend: through a new sub-section in Chapter 7, include references to the expected increases in bus usage, the potential for bus priority, and traffic conflicts at the Tube station
		Chapter 7 Transport and Movement Guide	The section on 'Promoting Active Travel' (page 50) needs to make more reference to promoting bus travel as well as not adversely affecting bus travel. Bus travel incorporates active travel, prioritising road space for buses directly benefits bus users, as well as benefiting walkers and cyclists.	This section includes support for bus travel as an important means of moving around the area.
		Chapter 7 Transport and Movement Guide	The aim is no one to be killed or seriously injured by or in a bus by 2030, and all serious injuries and deaths to eliminated on London Streets by 2041. Your particular focus on the interaction between the bus station vehicle access and Station Road needs to be set within a broader	Promoting a safe and Secure environment for all road users is set out in the Active Travel section of Chapter 8. Amend: 'Promote a safer and more secure environment for all road users

		<p>set of interventions along Station Road, to making the street less vehicle dominated.</p> <p>TfL recommendation is to reduce road speeds to 20 mph within the study area and the introduction of slow street (less than 12 mph) where pedestrian flows are higher or being encouraged to increase due to development e.g. Station Road.</p>	<p>including pedestrians and cyclists, <u>making the roads less vehicle dominated, and considering a 20 mph zone on Station Road.</u></p>
	Chapter 7 Transport and Movement Guide	<p>Safer streets, the focus is on junctions, in this case this should include the access to the bus station, as well as the access to the car park, and major junctions such as the A5/ Station Road junction. This should include better facilities for cyclists and pedestrians, a more pleasant walking environment, and a safe, simpler and more accessible experience for bus users</p>	<p>An additional bullet point has been added to Chapter 8, Promoting Active Travel, relating to new and improved road crossings.</p> <p>The new section on Roads and Traffic addresses bus priority and managing conflict with other users around the station.</p>
	Chapter 6 Public Realm Guide	<p>The public realm guide currently only considers wayfinding, street furniture, planting and signage as relevant factors. Reference should be made to Healthy Streets which considers a wider range of influencing factors in the public realm and should be made specific to Edgware.</p>	<p>Amend: included reference to Healthy Streets in Chapter 6 the Public Realm Guide.</p>
	Chapter 6 Public Realm Guide	<p>As well as Healthy Streets indicators, other issues related to public realm:</p> <ul style="list-style-type: none"> • noise and air pollution need to be considered in this context; • the high street footways as a zone for shop fronts, display or catering, seasonal activation (e.g. Christmas lights, or festivals), • importance of sensitive design with regard to accessibility and heritage, simplified material palette etc. • Management of cycle parking, deliveries and rubbish removal. 	<p>Amend: Insert new paragraph to Chapter 6 providing further opportunities offered by public realm improvement.</p>

			<ul style="list-style-type: none"> • Harmonising footway lighting v highway lighting 	
	Throughout	There is recognition that maintaining the high PTAL rating is important and that public transport operation must remain viable. There are useful headline principles offered for any relocated bus station on page 36/37 of the main Transport Strategy.		Support for maintaining PTAL levels is present throughout the SPD, including in the Vision, Objectives and Design Principles.
	Chapter 8 Delivery and Implementation	The 'Delivery Timelines (Transport)' measures for the bus station need further consideration on pages 55 and 56. The first one says 'Reduce conflict between bus station and other users'? The Council should clarify what this means and what is envisaged to achieve it. Shouldn't the primary measure be to improve and ensure a high quality interchange with the tube station and between bus services within the bus station?		Amend: update the text to - ' Improve the relationship Reduce conflict between <u>the</u> bus station and other town centre users'
	Chapter 8 Delivery and Implementation	The 'Delivery Timelines (Transport)' measures for the bus station need further consideration on pages 55 and 56. The fourth one says 'Develop proposals for a relocated bus station....'. The requirements for the bus station as set out in 7.9 do not assume the bus station is going to be moved, rather they set some key tests for any development proposals. These criteria also place considerable importance on ensuring integration with the station. It would therefore be premature to include relocation as a delivery test for the SPD – TfL suggests that ' <i>Develop proposals for a new or upgraded integrated bus station facility</i> ' would be more appropriate at this stage, to allow for a range of options to come forward.		Amend: update the text to - 'Develop proposals for a new or upgraded integrated relocated bus station facility following detailed principles'
	Chapter 8 Delivery and Implementation	<p>Delivery timelines:</p> <ul style="list-style-type: none"> • Healthy Streets and Active Travel Zone approach needs to be followed from the outset • Cycling infrastructure from the outset • Traffic reduction and reduce speeds from the outset • Delivery and consolidation needs to be considered early on as it impacts on ground floor 		Amend: updated timelines

75	Owner – Ballard Mews	Principle 7 - Promote Economic Growth and Local Jobs	You plan includes no provisions whatsoever for commercial / light industrial which is a strong provider of jobs in the locality.	Principle 7 does make reference to office and light industrial uses. LB Harrow support Ballards Mews as a functioning light industrial site.
		Chapter 5 – Key Sites Design Guide	You identify Ballards Mews as an area of low development potential (as shown on your map). This is a surprise given it is a relatively easy to develop site for housing or commercial use.	The location is within a Conservation Area which restricts the intensity of potential redevelopment.
76	Resident	General	My concern still remain that the document is more aspirational than one that would give sense of direction for integrated and comprehensive improvement of greater Edgware.	The SPD provides a planning framework for the area. More detailed approaches will be established through masterplans and development proposals.
		Chapter 1	I further feel that the town centre SPD should embrace Edgware Hospital site given its importance to the health of the local community and as a major non-retail employment site. I'm sure you are aware that Edgware General was downgraded to a community hospital and the A and E facility moved to Barnet Hospital. The free transport between the two hospitals has quietly been withdrawn - thereby adding to congestion on our roads. I am not sure, if the Local Authority has been effectively engaged to expand its services with imminent increase in the local population resulting from the large-scale housing developments that would be approved by the council. I am very concerned that Edgware community hospital is disposing of its "surplus" land. I would like the SPD to protect this hospital site in light of the large-scale population increases resulting from the massive A5 Edgware Road corridor housing developments currently taking place from Stone Grove along Burnt Oak/Colindale to West Hendon and Cricklewood.	The SPD boundary largely follows the town centre boundary. Extending to include Edgware Hospital would not support renewal of the town centre. The hospital is treated as a site in its own right in Barnet's Draft Reg 18 Local Plan Schedule of Sites.

		General	The issues of congestion in Station Road and Edgware town centre is well known. If the vacant site adjoining the Sainsbury's car park is to be developed, then a direct road link to Deans Lane (A5109), needs to be conditional, before any development commences.	While the SPD requires improvements in movement and circulation, detailed proposals will be prepared as part of masterplanning or development proposals.
		Objective 10 Principle 6 – Deliver Community Facilities	The document refers to improved community facilities that potential developments may lead to, but it would be useful to have a list of amenities that developers would be required to provide. There are references to public toilets which has been an ask (outside the Broadwalk when it is shut) by the local community for more than a decade and nothing has come of it.	The SPD requires that renewal of the town centre should support and, where necessary, improve community facilities.
		General	Tall buildings are now increasingly of concern to many - not least in the light of the Grenfell Tower fire. A tall buildings capacity study was asked for, when such an exercise was undertaken some 10 years ago. Is such a study to be produced for underpinning this SPD?	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings.
77	Local Worker	NA	I am a consultant who works at both Northwick Park and Edgware Hospital. As a Director of Screening for North London Breast Screening, access for transport has been found to be a major factor to access screening. I am therefore asking this is not lost in your consultation. Furthermore, there does not appear to be any plans to support the move to electrified vehicles. The provision of publicly accessible charging points is essential. The creation of housing these days mean that flat owners do not have the ability to charge outside their own homes, which would increase the deprivation of those who do not live in a house and deprive them access to transport (as not everybody's work can use public transport eg keyworkers who work shifts and nights still need access to vehicles).	Electric vehicle charging requirements are set out in the councils' Local Plan documents.