

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



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

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

Continue on a separate sheet if necessary

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I wish to support the representation from Save Our Edgware and the Edgware Community Association (Ref: SOE-Objection03-MajorCentre) concerning the protection of Edgware Bus Station and its services.

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

I live in Edgware and visit the shops on Station Road and the Broadwalk several times a week. I have yet to meet anyone who thinks this development is a good idea. The development of the Bus Station was initially supposed to be to create an electric vehicle hub but I understand this has now been dropped due to health and safety reasons so there is now no clear benefit for any of the planned changes to the current station.

Most importantly I do not believe that Edgware should not be classified as a Major Town Centre:

**Classification as a Major Town Centre vs. District Centre**

**1. Characteristics of Major Town Centres:**

- According to the London Plan, Major Town Centres are typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure, and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service, and civic functions.

**2. Edgware's Actual Characteristics does not qualify for a Major Centre:**

- **Retail Floorspace:** Edgware has a total retail floorspace of 40,472 sqm, which is substantially below the 50,000 sqm threshold required for Major Town Centres. Furthermore, Edgware's comparison retail floorspace (4,139 sqm) is significantly lower than its convenience retail floorspace (24,463 sqm). This indicates a mismatch with the

characteristic of a Major Town Centre where comparison floorspace typically dominates.

- **Leisure and Civic Functions:** Edgware lacks significant leisure functions such as a cinema or bowling alley and has minimal civic functions, which are crucial for a Major Town Centre classification.
- **Employment Functions:** There is a lack of substantial employment opportunities that would be expected in a Major Town Centre.

### **3. Comparison with District Centre Criteria:**

- District Centres provide convenience goods and services and social infrastructure for more local communities. They typically contain 5,000–50,000 sqm of retail, leisure, and service floorspace.
- Given Edgware's retail floorspace and its focus on convenience retail, it fits well within the District Centre category rather than a Major Town Centre.

## **Classification as a Central Area vs. Suburban Area**

### **1. Definition of Central Areas:**

- Central areas have very dense development, a mix of different uses, large building footprints, and buildings typically of four to six storeys.

### **2. Edgware's Urban Form:**

- Edgware is predominantly suburban, characterised by lower-density developments such as detached and semi-detached houses, small building footprints, and typically buildings of two to three storeys. This matches the suburban setting rather than a central area.
- Historical documents and local plans (e.g., Barnet Local Plan 2012 and Edgware Town Centre Framework 2013) consistently describe Edgware as a suburban town with suburban characteristics.

## **Conclusion**

The evidence clearly indicates that Edgware does not meet the criteria for a Major Town Centre or a Central area as defined by the London Plan. Instead, Edgware aligns more closely with the characteristics of a District Centre in a suburban setting. Consequently, the calculations for housing capacity based on Edgware being a Major Town Centre with a Central definition are invalid. Therefore, the London Plan's classification and associated density calculations should be revised to reflect Edgware's true status as a suburban District Centre.

The current plans for the building of several high rise blocks and the creation of thousands of new homes will totally destroy the unique nature of Edgware. It will also inevitably lead to increased congestion in an already very busy area,

**Major centres definition in London Plan** – typically found in inner and some parts of outer London with a **borough-wide catchment**. They generally contain over **50,000 sq.m of retail, leisure and service floorspace** with a relatively **high proportion of comparison goods relative to convenience goods**. They may also have **significant employment, leisure, service and civic functions**.

Table showing the absence of Major Centre characteristics for Edgware

Major Centres characteristics	Edgware	Met Criteria?
<b>borough-wide catchment</b>	Does not provide borough wide catchment	No
<b>50,000 sq.m of retail, leisure and service floorspace</b>	only 40,472 sqm	No
<b>high proportion of comparison goods relative to convenience goods</b>	10.23% comparison vs 60.44% Convenience Edgware comparison turnover is below North Finchley	No
<b>Significant employment, leisure, service and civic functions</b>	No employment function No leisure function Yes, 22.73% floor space is Service No civic function	No

**Edgware Comparison Floorspace is well below Convenience**

**Edgware Convenience retail = 24,463 sq.m**

**Edgware Comparison retail = 4,139 sq.m**

To qualify as a Major Centre, comparison floorspace needs to be more than convenience floorspace. By this definition, Edgware is not a Major Centre. It is a District Centre

Definition: ("[Glossary](#)")

**Comparison retail**

Floorspace dedicated to providing a range of comparison goods, including clothing, shoes, furniture, household appliances, tools, medical goods, games and toys, books and stationery, jewellery and other personal effects.

**Convenience retail**

Floorspace dedicated to providing a range of convenience goods such as food and non-alcoholic beverages, tobacco, alcoholic beverages, newspapers and periodicals and non-durable household goods.

## MAJOR OR CANDIDATE MAJOR CENTRES

EDGWARE (MAJOR CENTRE)

Date of survey: 31/05/17



Diversity of uses

Category	No. of units	% of units	UK %	Floorspace (sq.m)	Floorspace (%)	UK %
Convenience	164	56.2	9.41	24,463	60.44	18.34
Comparison	32	11.0	39.10	4,139	10.23	44.18
Service	76	26.0	38.17	9,199	22.73	25.84
Vacant	16	5.5	12.13	2,141	5.29	10.71
Other	4	1.37	1.19	530	1.31	0.97
<b>Total</b>	<b>292</b>	<b>100</b>	<b>100</b>	<b>40,472</b>	<b>100</b>	<b>100</b>

Source: GOAD, PBA

Source: Appendix A to TCFNA PBA MAPS [https://www.barnet.gov.uk/sites/default/files/lb\\_barnet\\_tcfna\\_report\\_final\\_-\\_vol\\_2\\_appendices\\_reduced.pdf](https://www.barnet.gov.uk/sites/default/files/lb_barnet_tcfna_report_final_-_vol_2_appendices_reduced.pdf)

This table shows the floorspace of 40,472 sqm is substantially below the threshold of 50,000 sqm for a Major Town Centre. And the Comparison retail floorspace is less than 50% of the Convenience retail floorspace for a Major Town Centre.

(check Broadwalk centre's comparison shops)

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

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

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





MM	Original	Proposed modifications
MM 11	<p>4.3 Barnet's Growth Requirements</p> <p>4.4 Housing</p> <p>4.8.2 Delivery of new homes will mostly be in the key Growth Areas of Brent Cross – <del>Cricklewood (Opportunity Area)</del>, Colindale (<del>Opportunity Area</del>), <u>Cricklewood, Mill Hill East, Brent Cross West, and Edgware</u>, and <del>Cricklewood</del> alongside new housing in the <u>Mill Hill East Area and within the Borough's District Town Centres</u>. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.</p>	<p>4.3 Barnet's Growth Requirements</p> <p>4.4 Housing</p> <p>4.8.2 Delivery of new homes will mostly be in the key Growth Areas of Brent Cross – <del>Cricklewood (Opportunity Area)</del>, Colindale (<del>Opportunity Area</del>), <u>Cricklewood, Mill Hill East, Brent Cross West, and Edgware</u>, and <del>Cricklewood</del> alongside new housing in the <u>Mill Hill East Area and within the Borough's District Town Centres</u>. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.</p>

MM	Original	Proposed modifications
MM 20	<p>POLICY GSS05 Edgware Growth Area</p> <p><u>A. Level of Development</u></p> <p>To deliver growth and regeneration at <del>Edgware Town Centre</del>, the Council will seek the following from development proposals:</p> <p>a) <u>Approximately 5,000 4,740 new homes, with provision for uplift through the design-led approach</u></p> <p>b) Improved leisure options such as a new cinema, swimming pool and new eating-out options;</p> <p>c) Appropriate <u>location- based</u> floorspace for community, retail and <del>office-uses</del>; <u>other main town centre uses including offices that are proportionate to supporting proposed housing growth and the vitality and viability of Edgware Major Town Centre.</u> <del>Improved public realm, including new public spaces;</del></p>	<p><u>A, c)</u></p> <p><u>Edgware <del>Major</del> District Town Centre.</u></p>

MM	Original	Proposed modifications
MM 20	<p>4.18 Edgware Growth Area</p> <p>4.18.1 Edgware has evolved from a small market town into a <b>major town centre</b> and <u>has become</u> <u>e</u> a well-known suburban hub of North London.</p>	<p>4.18.1 Edgware has evolved from a small market town into a <b>major district</b> town centre and <u>has become</u> a well-known suburban hub of North London.</p>
MM 20	<p>4.18.4 Edgware is identified in the <u>London Plan town centres hierarchy as Barnet's only Major Centre and is also highlighted in the</u> Growth Strategy as <del>one of Barnet's main town centres,</del></p>	<p>4.18.4 Edgware is identified <del>in the Growth Strategy</del> as one of Barnet's <del>main</del>-District town centres;</p>

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

MM	Original	Proposed modifications
MM 26	<p data-bbox="387 309 891 341"><u>4.21 <b>Barnet's District Town Centres</b></u></p> <p data-bbox="387 384 1223 756"><u>4.21.1 Barnet has an extensive town centre network with a range of locations where appropriate renewal and regeneration can support the Borough's growth needs. Thriving town centres are essential for the Borough to grow sustainably and successfully. Barnet's Growth Strategy highlights those town centres (Burnt Oak, Chipping Barnet, <b>Edgware</b>, Finchley Church End (Finchley Central), Golders Green and North Finchley) that have been prioritised, for improving the town centre offer.</u></p>	<p data-bbox="1279 277 2078 341">We fully support this text, which shows that Edgware is a District Town Centre.</p>

MM	Original	Proposed modifications
MM 53	<p><u>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p>a) ...</p> <p>b) <u>Edgware Major Town Centre (see in accordance with Policy GSS05) where regeneration will consolidate the quantum together of retail floorspace alongside with qualitative improvements to the quality of the retail floorspace. Proposals for and leisure offer, whilst providing a range of community uses and other main town centre uses (including offices and leisure) will be supported where they enhance the Major Town Centre’s viability and vitality and complement the delivery of intended levels of .New housing growth will form a key part of significant growth of the local economy.</u></p>	<p><u>A. The Council will support an appropriate mix of uses within designated centres:</u></p> <p>a) ...</p> <p>b) <u>Edgware District Town Centre (see policy GSS05) where regeneration will consolidate the quantum of retail floorspace alongside improvements to the quality of the retail and leisure offer, whilst providing a range of community uses.</u></p>
MM 53	<p><b>Major Town Centre</b> 1. Edgware</p> <p><b>District Town Centres</b></p>	<p><b>Major Town Centre</b> <del>1. Edgware</del></p> <p><b>District Town Centres</b></p>

MM	Original	Proposed modifications
	1. Brent Street 2. Burnt Oak 3. Cricklewood 4. Chipping Barnet 5. Colindale - the Hyde 6. East Finchley 7. Finchley Central 8. Golders Green 9. Hendon 10. Mill Hill 11. New Barnet 12. North Finchley 13. Temple Fortune 14. Whetstone	1. Brent Street 2. Burnt Oak 3. Cricklewood 4. Chipping Barnet 5. Colindale - the Hyde 6. East Finchley <del>6b. Edgware</del> 7. Finchley Central 8. Golders Green 9. Hendon 10. Mill Hill 11. New Barnet 12. North Finchley 13. Temple Fortune 14. Whetstone



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**Continue on a separate sheet if necessary**

**Please note:**

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

**Declaration of consent**

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

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

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

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_