1. INTRODUCTION AND BASIS OF REPRESENTATION

Canons Park Estate Limited (CPEL) represents residents of the Canons Drive Estate, a designated Conservation Area of recognised historic and landscape significance.

Although the application site lies within Edgware in the London Borough of Barnet, its impacts extend materially beyond administrative boundaries and directly affect:

the setting and experience of the Canons Drive Conservation Area;

cross-borough movement between Canons Park (Harrow) and Edgware (Barnet);

access to transport infrastructure and town centre services;

access to the principal green spaces serving the wider area.

This representation addresses the proposal as a strategic development and raises serious concerns regarding:

transport safety, capacity, and modelling;

infrastructure deliverability and sequencing;

heritage impact and visual harm;

access to green space and liveability;

cumulative and cross-borough impacts.

2. STRATEGIC ROLE OF EDGWARE AND INFRASTRUCTURE DEPENDENCE

Edgware functions as a Major Town Centre and a key transport interchange serving a wide catchment area, including residents of Canons Park.

The proposed development represents a substantial increase in residential density and activity. Such growth can only be considered sustainable where:

infrastructure is demonstrably capable of supporting it;

transport systems are safe, accessible, and resilient;

key dependencies are secured rather than assumed.

In this case, there is a clear concern that the scheme is density-led rather than infrastructure-led, with critical infrastructure either uncertain or unresolved.

3. LOSS AND DEGRADATION OF TRANSPORT FUNCTION

The proposal removes the existing off-street bus station — a consolidated, legible, and efficient interchange — and replaces it with dispersed on-street stops.

This represents a functional downgrade in:

interchange efficiency and passenger experience;

accessibility, particularly for vulnerable users;

operational flexibility and resilience.

The scheme is also dependent on a large underground bus garage, which raises unresolved concerns regarding:

fire safety and operational risk;

regulatory compliance;

deliverability within existing frameworks.

There is therefore a clear risk that existing infrastructure is removed before a viable replacement is secured, resulting in long-term degradation of transport function.

4. HERITAGE IMPACT AND CONSERVATION AREA SETTING

The Canons Drive Conservation Area is defined by:

a formal tree-lined avenue of significant maturity;

long, uninterrupted views;

a consistent low-rise, landscape-led character.

The proposed development introduces multiple tall buildings into its wider setting, resulting in:

skyline intrusion above the tree canopy;

erosion of visual depth and perspective;

loss of landscape dominance;

introduction of incongruous high-rise form.

This harms the way the Conservation Area is experienced and understood.

The statutory duty to preserve or enhance the character and appearance of conservation areas, including their setting, must be given considerable weight.

5. GREEN SPACE DEFICIENCY AND CROSS-BOROUGH RELIANCE

The principal green spaces serving this area — Canons Park and Chandos Recreation Ground — are located within the London Borough of Harrow.

These represent the most significant and accessible green spaces for residents in and around Edgware.

By contrast, Edgware (within Barnet) is characterised by a deficiency in accessible, high-quality green space, particularly near the application site.

The development will:

significantly increase residential density;

increase demand for green space;

rely on parks located outside the borough.

However, it does not provide equivalent new green infrastructure.

6. ACCESS TO GREEN SPACE AND THE A5

Access to these parks requires crossing the A5, including at Whitchurch Lane.

This route is:

constrained;

not demonstrably safe for all users;

not shown to have sufficient capacity for increased demand.

This creates a disconnect between:

reliance on green space;

and the ability to access it safely and conveniently.

7. WELLBEING AND HIGH-DENSITY LIVING

Access to green space is essential to:

physical health;

mental wellbeing;

children's development;

social cohesion.

This is particularly important in high-density and high-rise developments.

In this case:

density is significantly increased;

on-site provision is limited;

reliance on off-site parks is high;

safe access is not secured.

Green infrastructure appears to have been treated as secondary, rather than integral.

8. CUMULATIVE AND LONG-TERM IMPACTS

The proposal must also be considered in terms of:

extended construction impacts;

cumulative pressure on infrastructure;

long-term effects on accessibility and town centre function.

These raise concerns regarding sustainability.

9. CONCLUSION

CPEL considers that the proposed development:

fails to demonstrate that infrastructure can safely support its scale;

relies on transport modelling that is incomplete and over-optimistic;

exacerbates a known safety issue at the A5 / Whitchurch Lane crossing;

causes harm to the setting of a Conservation Area;

increases demand for green space without providing adequate access or provision.

10. FORMAL REQUEST

10.1 Primary Request

That the Mayor directs refusal on the basis that:

transport impacts are not properly assessed or mitigated;

modelling is not robust or realistic;

infrastructure is not secured or deliverable;

heritage harm is not justified;

safe access to green space is not ensured.

10.2 Alternative Request

If not refused, any consent must require:

full re-modelling including A5 and Whitchurch Lane improvements;

delivery of crossing upgrades prior to occupation;

independent safety and capacity assessment;

design changes to reduce heritage harm;

a strategy for green space access and provision.

Signed:

[redacted]

Chair, Canons Park Estate Limited (CPEL)