FORMAL SUBMISSION TEXT

MILL HILL RESIDENTS' ASSOCIATION
GLA Stage 2 Representation to the Mayor of London
Application Reference: 24/2686/OUT
Edgware Town Centre, Broadwalk Shopping Centre and Bus Station Redevelopment

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1. INTRODUCTION AND STANDING

The Mill Hill Residents' Association represents residents in the ward directly adjoining Edgware.

While this application sits within Edgware, its impacts extend well beyond administrative boundaries. Edgware functions as a strategic transport and town centre hub serving a wide catchment, including Mill Hill. Our residents rely on Edgware for Northern Line access, bus interchange connectivity, and essential town centre services.

This representation is therefore made on the basis that the proposed development will have material and lasting impacts on neighbouring communities, and should be assessed accordingly at a strategic, London wide level, consistent with the Mayor's role under the Town and Country Planning, Mayor of London Order 2008.

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2. STRATEGIC TRANSPORT FUNCTION: NET DETERIORATION

A central test for the Mayor is whether this proposal enhances or undermines the functioning of a key transport interchange.

The existing Edgware bus station provides:
A consolidated, off street interchange;
Immediate proximity to the Underground station;
A legible, efficient transfer environment.

The proposed arrangement replaces this with a series of dispersed on street stops, increasing interchange distances and introducing additional operational friction.

This represents a qualitative downgrade in passenger experience, interchange efficiency, and system legibility.

From a policy perspective, this conflicts with the intent of London Plan Policy T3, Transport Capacity, Connectivity and Safeguarding, which requires development to support and enhance the efficiency and attractiveness of public transport.

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3. DELIVERABILITY AND INFRASTRUCTURE RISK

The scheme is fundamentally dependent on the delivery of a large scale underground bus garage, which remains subject to unresolved technical and regulatory uncertainty.

This introduces a critical planning concern:

A core piece of strategic infrastructure is not yet demonstrably deliverable;
Key safety and operational questions remain unresolved;
The development is phased such that existing infrastructure may be removed before replacement is operational.

This creates a real risk of extended disruption or permanent loss of transport functionality.

From a strategic planning standpoint, major development should not proceed where essential infrastructure remains uncertain, particularly where that infrastructure underpins both the scheme itself and the wider transport network. This goes directly to the question of deliverability required by the National Planning Policy Framework and the London Plan's emphasis on coordinated infrastructure delivery.

At its core, this is a question of sequencing and risk. The scheme proposes to dismantle a functioning, high capacity transport interchange on the basis of a replacement that is not yet proven to be deliverable within existing regulatory or technical frameworks. That is not regeneration, it is a transfer of risk from the developer to the public. The Mayor's role at Stage 2 is precisely to prevent that outcome, by ensuring that strategic infrastructure is secured, not assumed.

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4. SCALE, DENSITY AND STRATEGIC ALIGNMENT

The proposed scale and density of development are significant, particularly in the context of outer London.

While housing delivery is a critical priority, the London Plan is clear that density must be supported by infrastructure capacity, and that tall buildings must be justified by context and function.

In this case, infrastructure capacity is not clearly secured, key design and operational elements are deferred, and impacts are acknowledged but not fully resolved.

This creates a misalignment between scale and supporting capacity, raising concerns about whether the scheme represents sustainable intensification or overdevelopment.

In particular, the scheme raises questions under London Plan Policy D9, Tall Buildings, which requires impacts to be acceptable and clearly justified, and that development proposals are plan led and infrastructure supported.

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5. EQUALITY AND ACCESSIBILITY

The replacement of a compact, sheltered interchange with dispersed on street stops introduces clear implications for accessibility.

In particular:
Increased walking distances between modes;
Reduced availability of sheltered, seated waiting space;
Greater exposure to traffic and environmental conditions.

These changes disproportionately affect disabled users, older residents, and mobility impaired passengers.

The Public Sector Equality Duty requires that such impacts are fully understood and addressed at the decision-making stage, not deferred.

From a policy perspective, this engages London Plan Policy T6, Car Parking and Accessible Transport, and wider inclusive design principles, which seek to ensure that transport infrastructure is accessible to all users.

From a strategic perspective, any scheme that reduces accessibility to a major transport hub is difficult to reconcile with London's objective of creating an inclusive and accessible transport network.

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6. TRANSPORT RESILIENCE AND OPERATIONAL PERFORMANCE

The current bus station provides a contained and flexible operational environment.

The proposed on-street model introduces increased interaction with general traffic, greater reliance on limited kerbside capacity, and reduced operational flexibility.

This is likely to result in increased delays, reduced reliability, and greater congestion.

For neighbouring communities such as Mill Hill, which depend on Edgware as a reliable interchange, this represents a material deterioration in network performance, again engaging London Plan Policy T3.

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7. TOWN CENTRE FUNCTION AND WIDER IMPACTS

Edgware serves as a major town centre for surrounding areas, including Mill Hill.

Changes to accessibility, transport convenience, parking provision, and interchange efficiency have the potential to affect the viability and attractiveness of the centre.

There is a risk that, taken together, these changes could weaken Edgware's role as a destination centre, with knock on effects for neighbouring communities and the wider sub regional economy.

This would be contrary to the objectives of London Plan Policy SD4, which seeks to strengthen the function, vitality and viability of town centres.

This scheme presents a fundamental strategic choice. The Mayor can endorse a model of outer London growth that prioritises housing numbers while accepting reduced transport functionality and increased complexity for users, or he can insist on a model where growth is anchored in strong, accessible, and resilient infrastructure. Edgware is not an isolated site, it is a transport gateway for a large part of North London. Decisions taken here will set a precedent for how outer London is allowed to evolve.

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8. CONCLUSION AND REQUEST TO THE MAYOR

The Mill Hill Residents' Association recognises the need for regeneration and housing delivery. However, we do not believe that this scheme, in its current form, achieves the necessary balance between growth and infrastructure.

In particular:

The transport interchange function is weakened;
Core infrastructure deliverability remains uncertain;
Accessibility is reduced for vulnerable users;
Operational resilience is diminished;
The scale of development is not clearly supported by secured capacity.

We therefore ask the Mayor to:

Reassess the scheme against London Plan policies on transport, accessibility and sustainable growth;
Consider whether the current proposal delivers genuine strategic benefit, or introduces long term structural weaknesses;
Require substantial revision or strengthened conditions to ensure that infrastructure, accessibility and deliverability are fully secured prior to implementation.

Given the strategic importance of Edgware, and its role for neighbouring communities such as Mill Hill, this is a decision that will have long lasting consequences.

It is essential that those consequences are positive, not detrimental.

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9. FORMAL REQUEST TO THE MAYOR, GLA STAGE 2

9.1 Primary Request: Direction to Refuse

We request that the Mayor exercise his powers under the Town and Country Planning, Mayor of London Order 2008 to direct refusal of application 24/2686/OUT on the following grounds:

Conflict with London Plan Policy T3, through the deterioration of interchange efficiency and bus network performance;
Failure to demonstrate deliverable and secured strategic transport infrastructure, contrary to National Planning Policy Framework requirements;
Adverse impacts on accessibility and inclusive transport, engaging the Public Sector Equality Duty and London Plan accessibility principles;
Lack of clear justification for scale and density in relation to infrastructure capacity, contrary to Policy D9;
Potential harm to the vitality and viability of Edgware as a Major Town Centre, contrary to Policy SD4.

9.2 Alternative Request: Direction to Secure Conditions

In the alternative, should the Mayor be minded not to direct refusal, we request that any consent is subject to robust, binding pre commencement and pre demolition conditions, including:

No demolition of existing bus infrastructure until a fully deliverable, approved and funded replacement interchange is secured and operational;
Full demonstration of deliverability of the underground bus garage, including safety, regulatory compliance and operational viability;
A detailed, site specific Equality Impact Assessment addressing interchange distances, accessibility and user experience;
A fully worked and policy compliant interchange design meeting Transport for London and London Plan requirements prior to implementation;
Secured continuity of transport operations, ensuring no degradation in service during any phase of development.

These matters are fundamental and should not be deferred to later stages.

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