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# **Duty to Cooperate Statement**

Published in support of the Barnet Regulation  
18 and 19 Draft Local Plan 2021-2036

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# 1 Introduction

1.1.1 This statement outlines how the London Borough of Barnet is managing the requirements of the Duty to Cooperate throughout production of the Council's Local Plan. The Duty seeks to ensure a joined-up approach is taken in plan making, where collaborative working with other relevant organisations and bodies seeks to deliver sustainable development within the administrative boundary and the wider area. This statement details the work undertaken to date and identifies how the Council is responding to the key strategic and cross boundary issues identified.

## 2 Background

### 2.1 National Context

2.1.1 The Duty to Cooperate is a statutory duty for all Local Planning Authorities (LPAs), introduced in November 2011 through Section 110 of the Localism Act 2011, which established a Duty to Cooperate in relation to the planning of sustainable development<sup>1</sup>.

2.1.2 LPAs are under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. This includes the requirement to cooperate during the preparation of development plan documents and other local development documents with local planning authorities, county councils, and relevant bodies.<sup>2</sup> Relevant bodies include the Environment Agency, English Heritage, Natural England, Homes England, the relevant Primary Care Trust, the Office of Rail Regulation, the relevant Integrated Transport Authority, the Highways Authority and the Local Enterprise Partnership. Strategic policy-making authorities, in collaborating to identify relevant strategic matters covered in their plans, should engage with their local communities and infrastructure providers<sup>3</sup>.

2.1.3 The NPPF outlines the following matters on which strategic policies should be formulated to address the strategic priorities of the area, including any relevant cross-boundary issues, setting out the overall strategy for the pattern, scale and quality of development:

- i) housing (including affordable housing), employment, retail, leisure and other commercial development;
- ii) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- iii) community facilities (such as health, education and cultural infrastructure); and
- iv) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

- 2.1.4 Whilst, as Planning Practice Guidance (NPPG) makes clear, the Duty to Cooperate is not a duty to agree, LPAs should make every effort to secure the necessary cooperation on strategic cross boundary matters before submitting local plans for examination. The NPPG also states that ‘cooperation should produce effective and deliverable policies on strategic cross boundary matters.’ In order to demonstrate effective and on-going joint working, strategic policy-making authorities are required to prepare and maintain one or more statements of common ground documenting the cross-boundary matters and progress made through cooperatively addressing these.
- 2.1.5 The NPPF notes that the examination of a local plan should include an assessment to identify if the plan has been prepared in accordance with legal and procedural requirements which therefore includes the Duty to Cooperate. The duty requires a proactive, ongoing and focussed approach to strategic matters. Constructive cooperation is seen as an integral part of Local Plan preparation and should result in clear planning policy outcomes capable of being demonstrated through the examination process.
- 2.1.6 Cooperation should be a continuous process of engagement from initial thinking through to implementation. Therefore, it is too late at examination stage to seek to retrospectively rectify any deficiencies identified in relation to the legal compliance part of the independent examination. Consequently, it is normally the first matter that an Inspector will explore and, if not undertaken thoroughly and fully in compliance with legislation, can result in a local plan being found unsound.

### 3 Barnet’s approach to meeting the requirements of the Duty to Cooperate

- 3.1.1 It is very important that evidence of the Duty to Cooperate (DtC) starts as early as possible and that regular constructive engagement continues throughout the plan-making process. The most important aspect of the DtC will be the outcomes; being able to demonstrate the result of the strategic cooperation and how this has influenced the submitted Local Plan. It follows therefore the DtC must involve not only policy planners responsible for drafting the Local Plan, but senior officers and elected members must also be involved in the strategic planning and decision-making processes.
- 3.1.2 This section provides a brief overview of the geography, strategic development strategy and priorities and the key relationships and bodies involved. Setting out the local context for implementing the DtC, it will also be beneficial in helping to inform the contents of Statement(s) of Common Ground subsequently drafted and used to evidence how the DtC has been met.

- 3.1.3 The London Borough of Barnet is a Local Planning Authority that, in terms of local government hierarchy, sits below the Greater London Authority (GLA), which represents the London Mayor as the Strategic Regional Authority. To support the production of the Barnet Local Plan and meet the requirements of the DtC the Council is already, and will continue, engaging throughout the plan making process with its neighbouring authorities and other relevant bodies.
- 3.1.4 Particularly important will be the need to demonstrate constructive engagement with neighbouring authorities to resolve the issue of unmet housing need, including a robust mechanism for undertaking strategic cross boundary planning to examine how the identified needs could be accommodated. It will be necessary to consider the implications of any material changes in local housing need (using the outputs of the MHCLG's standard methodology as a starting point) with other relevant authorities and agencies. At the Local Plan Examination, the Council will need evidence the efforts made to address this key strategic matter through effective joint working, rather than seeking to defer to subsequent Plan updates. Therefore, in a letter sent 28<sup>th</sup> November 2019 to neighbouring London boroughs and all Hertfordshire authorities, the Council has formally asked whether these authorities are able to help meet some of Barnet's housing need. Account will be taken of responses received to this letter when drafting the publication version of the Local Plan to be submitted for Examination. Whilst there is no duty to agree to accommodate the needs of a neighbouring authority, if that is the conclusion that is reached, it must be based on clear and robust evidence and on a proper consideration of all the issues.

## 3.2 London Context

- 3.2.1 The Mayor's London Plan addresses London wide strategic planning matters. Whilst London Borough Local Plans can deal with cross boundary issues, they in the main concentrate on borough specific policies. These policies can be strategic in that they apply across the whole borough, or they can also be more localised. Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 requires borough plans to be in general conformity with the London Plan.
- 3.2.2 As made clear in national policy and guidance, effective cooperation between the Mayor, boroughs and local planning authorities bordering London is vital to ensure that important strategic issues are planned effectively. In meeting, the duty to cooperate it is therefore important that Barnet effectively collaborates with the GLA, adjacent London Boroughs and other relevant public bodies. This is to ensure that its Local Plan is effective and collaborative in addressing the requirements set out in national (NPPF) and regional (London Plan) policy.

3.2.3 The London Plan has been under review since 2017, with ongoing consultation and revisions made prior to and during the Examination held over Spring / Summer 2019. In October 2019, the London Plan Examination Panel issued their Report. The Panel deemed the London Plan sound, subject to suggested modifications. Having considered the Panel's report, the Mayor sent his 'Intend to Publish' version of the London Plan to the MHCLG Secretary of State on 9<sup>th</sup> December 2019. The Secretary of State now has six weeks until 20<sup>th</sup> January to consider whether the plan is in accordance with national policy and has the power to issue directions in relation to its adoption.

### 3.3 Hertfordshire

3.3.1 If London is unable to accommodate all its development needs, the most significant strategic issue facing the wider South East for the coming decades will be how and where to accommodate growth outside London in a way that will contribute towards achieving sustainable development. Therefore, as with the London Plan, Barnet's emerging Local Plan will also need to fully recognise the functional relationships with the wider South East – in Barnet's case in terms of immediate proximity, the Hertfordshire authorities. This is likely to include consideration of migration, commuting, shopping and leisure trips, transport infrastructure, supply chains, freight and logistics, waste management, climate change, and green infrastructure. Barnet's Local Plan needs to address these cross boundary strategic matters and will therefore include policies that have implications for development and infrastructure beyond the boundaries of London.

## 4 Statement(s) of Common Ground

4.1.1 Paragraph 27 of the NPPF introduced, (as part of the DtC process), a requirement for strategic policy making authorities to 'prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters being addressed and progress in cooperating to address these.' This is required 'in order to demonstrate effective and on-going joint working.' The purpose of the SoCG is to document cross-boundary matters and progress in cooperating to address them. It demonstrates that the Local Plan is based on effective and ongoing cooperation and that LPAs have sought to produce strategies that as far as possible are based on agreements with other authorities.

4.1.2 Produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues; it is necessary to have the SoCG on the Council's website at the latest by the time that the draft plan (Regulation 19 stage) is published. It should then aid the Inspector examining the Local Plan highlighting agreement reached on cross boundary strategic issues and sit together with an updated version of this DtC statement to show how the agreements have influenced the Local Plan.

- 4.1.3 It is expected that consultation on the Regulation 18 draft Local Plan will identify relevant cross-boundary issues and the authorities and organisations that the Council needs to engage with on such matters. This statement outlines the engagement undertaken to date and will be maintained throughout the plan making process to record, together with subsequent SoCG the outcomes of engagement. This will be evidenced by the 'actions' set out in the SoCG with neighbouring authorities submitted alongside the Draft plan for Examination. Taken together with the consultation statements on the Local Plan itself, these documents will provide an essential audit trail of decisions and consequential drafting changes made to the Local Plan.
- 4.1.4 Therefore, in reviewing the consultation responses received to the Regulation 18 Draft Plan, Barnet will consider the need for producing one or more SoCG that set out agreed spatial priorities. Whilst not necessarily needing to be lengthy, SoCGs should demonstrate a collective shared view of long-term priorities. In addition to setting out cross boundary issues, this could entail highlighting initial unresolved issues and setting out a clear strategy for when and how discussions to resolve them will take place.
- 4.1.5 The Local Strategic Partnership (LSP) might also be used as a sounding board for the Local Plan and any related DtC work arising. The LSP is an advisory Committee which brings together the key public, private and voluntary organisations within the Borough to identify and articulate the needs and aspirations of Barnet's local communities and provides a forum to assist the Council by collectively reviewing and steering public resources. The functions of the LSP are discharged by the Barnet Partnership Board which includes the following partners:
- Barnet Clinical Commissioning Group
  - CommUNITY Barnet
  - Barnet and Southgate College
  - Middlesex University
  - Brent Cross Shopping Centre
  - Metropolitan Police
  - Job Centre Plus
  - Groundwork London
  - Federation of Small Businesses (North London Branch)
  - West London Business
  - Argent Related
  - Saracens

4.1.6 North London NHS organisations are working together with five councils including Barnet to form a health and social care partnership. The health service is experiencing an increasing demand for services and an escalation in the cost of health and social care. A plan has therefore been produced to improve the health and wellbeing of local people by making local health and social care services more sustainable for the future. This Sustainability and Transformation Plan for the health and social care services covering the population of North Central London (NCL) recognises that the health and social care needs of local people are changing, and that there are serious issues facing health and care services. The aim is to ensure NCL is a place with the best possible health and wellbeing, however, many buildings are old and not designed or equipped to deliver a modern, 21st century health and care service. In order to provide the best possible place for patients to be cared for in modern, well-equipped and safe surroundings, there is a need to upgrade existing facilities in primary care, mental health and some hospitals. Establishing and maintaining regular liaison with relevant partners within the NHS is therefore essential to ensure a joined up and coordinated approach to planning services and that going forward, and working with resources available, the right facilities are provided in the right locations.

4.1.7 It is possible that separate documents will be needed to address matters of varying detail and scale as not all matters will be relevant to all strategic partners. Having regard to the strategic matters outlined in the NPPF and detailed in para 2.3 above, it is envisaged that an overarching SoCG will be drafted involving as signatories the GLA, Hertfordshire County Council in addition to adjacent London and Hertfordshire authorities covering matters such as housing numbers, location of tall buildings, protected views, employment, transport, physical, green and social infrastructure and sports facilities. Additional SoCG may also be required with:

- Transport for London (TfL) and Highways England covering the following transport related matters: West London Orbital Line, New Southgate Crossrail Station, buses, station accessibility, station capacity, cycle network, freight, electric vehicle charging points, existing TfL infrastructure, and the TfL Road Network.
- The Canal and River Trust covering matters addressed: active transport, open space and biodiversity, freight, flooding, heating and cooling, boating and the Welsh Harp.
- The Environment Agency and Natural England addressing matters such as: air quality, open space, biodiversity and flood risk.
- Historic England in relation to heritage issues.
- Thames and Affinity Water addressing water related matters.



- 4.1.8 The intention is that these documents will address strategic matters in more detail than is appropriate within this DtC statement. It is envisaged that the SoCG will serve to evidence the Council's ongoing engagement work; consistent with the duty to cooperate seeking to address/ resolve issues raised with the relevant organisations throughout the Local Plan process.

## 5 Barnet Planning Policy Context and Local Plan progress

- 5.1.1 The latest version of the Council's Local Development Scheme (January 2020) sets out the timetable for production of Barnet's Local Plan documents. In addition to the Local Plan itself, details are given of the North London Waste Plan DPD, adopted and emerging SPDs as well as neighbourhood planning and Community Infrastructure Levy (CIL) activity.
- 5.1.2 Consultation and engagement on the Local Plan is being carried out in accordance with the measures sets out in Barnet's Statement of Community Involvement that was adopted by the Council in 2018 and updated in Spring 2020.
- 5.1.3 With regards the emerging Barnet Local Plan, at each stage summaries of comments received and responses from stakeholders will be produced and made available for viewing on the Local Plan pages of the Council's website [<https://www.barnet.gov.uk/planning-and-building/planning-policies/local-plan-review>]. Read alongside forthcoming SoCGs, these documents will demonstrate progress made on matters between the Council and stakeholders.
- 5.1.4 The Council started a review of its current Local Plan in 2017. Consultations on issues to be addressed in the Plan took place during 2017, including in the autumn of that year holding a series of Local Plan Visioning Workshops involving elected Members, senior Barnet officers and a range of local Barnet amenity society, residents' forum and interest groups. The outcomes of these discussions have informed the Preferred Approach Local Plan document that has been consulted on from Jan- March 2020. Comments received on the consultation draft Local Plan, together with any additional / refreshed evidence base work required, have been used to inform the Regulation 19 Publication document which the Council anticipates seeking representations on during Summer 2021. Representations received at that stage will be submitted, alongside the Local Plan and supporting evidence base documentation, for independent examination during 2021. If found sound by the Inspector then, subject to consultation on any modifications required, the Local Plan will be adopted in late 2021.

5.1.5 As evidence of the Local Plan's positive preparation, this DtC Statement will be updated and included as part of supporting documentation that accompanies the submission version of the Local Plan document. It will assist the Planning Inspector in determining that the Council has fulfilled its Duty to Cooperate responsibilities.

## 6 Summary of engagement

6.1.1 The Council has good relations with adjoining London boroughs. Due to the regular meetings it attends with most of them, (detailed in para 6.2 below), there is less of a need to meet each regularly on a one to one basis.

6.1.2 Officers representing Barnet meet regularly with London stakeholders to discuss emerging planning policy, London and local plan issues at forums including:

- *Association of London Borough Policy Officers (ALBPO) and officer sub-group* – quarterly. Addresses national policy, London Plan and borough Local Plan, Supplementary Planning Documents, Article 4 Directions and Neighbourhood Planning issues.
- *West London Alliance Planning Policy Officers Group* – quarterly. Addresses national policy, London Plan and borough Local Plan, Supplementary Planning Documents, Article 4 Directions, Neighbourhood Planning and Heathrow planning issues. This grouping of seven west London Boroughs (Barnet, Brent, Harrow, Ealing, Hammersmith & Fulham, Hounslow and Hillingdon) together with the Old Oak Common Development Corporation, have cooperated in commissioning a number of joint West London evidence base studies including:
  - i) Strategic Flood Risk Assessment Level 1 2017;
  - ii) Strategic Housing Market Assessment 2018,
  - iii) Gypsy & Travellers Needs Assessment 2018,
  - iv) Small Housing Sites Assessment 2018;
  - v) Employment Land Availability Assessment 2018;
  - vi) Affordable Workspace Study – underway and
  - vii) Strategic Infrastructure Delivery Plan 2019.
- *North London Waste Plan* – joint working with 6 other London Boroughs (Brent, Camden, Enfield, Haringey, Islington and Waltham Forest) to consider waste issues.
- *Planning Officers Society* – meets quarterly at Chief Planner or equivalent.
- *Urban Design London* – Barnet Council has an annual season ticket enabling access to a comprehensive programme of CPD, networking, seminar and training events

- 6.1.3 The Appendix below sets out further details of other meetings that have occurred since the start of 2017 and the topics addressed with adjacent boroughs, GLA, Transport for London and other statutory bodies. A full account of the statutory bodies consulted, and whether they responded, will be added post Regulation 18 consultation within the appendix.
- 6.1.4 The consultation on the Regulation 18 draft Local Plan identified relevant cross-boundary issues, the authorities and organisations that the Council needs to and continues to engage with on such matters. In order to avoid any repetition of submitted representations and council's responses (details of which are in a separate document published on the website) a brief summary, an audit trail of issues raised by neighbouring and statutory authorities, how they have been dealt with, and consequential drafting changes made to the Local Plan at Reg 19 for consultation in June 2021 are set out in Appendix C. Any unresolved issues will be set out in forthcoming SoCGs, demonstrating progress made on matters between the Council and stakeholders.

## 7 Appendix A - Meetings held from March 2017 onwards

Public body / Organisation	Meeting dates	Topics Discussed
GLA	24th November 2017 13th April 2017	London SHLAA Methodology & London SHMA Environment Strategy
GLA London Plan	1st December 2017 17th January 2018 19th January 2018 25 <sup>th</sup> October 2019 5 <sup>th</sup> Nov 2020 27 <sup>th</sup> May 2021	Launch Event North Sub Regional Event Borough Event  Good Quality Homes SPG General Conformity – Reg 19 Local Plan
GLA & LB Brent – Staples Corner	28 <sup>th</sup> March 2019 26 <sup>th</sup> September 2019 6 <sup>th</sup> January 2019 8 <sup>th</sup> April 2020	Masterplan meetings Masterplan meetings Masterplan meetings Stage 2 Workshop
Transport for London	11th December 2017 29 <sup>th</sup> January 2019 11 <sup>th</sup> May 2021 17 <sup>th</sup> May 2021 20 <sup>th</sup> May 2021	Liaison meetings  Attended Barnet Local Plan Viability Assessment Workshop
West London Orbital	16 <sup>th</sup> December 2019 29 <sup>th</sup> April 2020 20 <sup>th</sup> Jan 2021 21 <sup>st</sup> May 2021	Progress meetings Development Potential Economic Benefits Development Potential
London Development Database (LDD) meetings and related events providing updates from GLA's new data projects; GIS meetings on how London will work together to get a compatible set of GIS data on a map publicly available online hosted by the GLA, and automation of the LDD system.	17th May 2017 19th May 2017 28th July 2017 6th September 2017 31st January 2018 25th May 2018 4th October 2018 14th February 2019 26th February 2019 20th June 2019 21st June 2019 23rd September 2019 21st April 2020  30th March 2021	LDD Seminar LDD GIS Coordination Group LDD GIS Group LDD Management Group meeting LDD Management Group meeting LDD Seminar LDD Management meeting LDD Management meeting LDD Automation LDD Management meeting Housing Delivery Test Workshop LDD Automation Planning London Datahub meeting. The new name for the LDD and the group will meet quarterly to discuss Planning data and the Planning London Datahub LDD Management meeting.
Environment Agency meeting	24 <sup>th</sup> April 2019 15 <sup>th</sup> June 2020 Early to mid 2021	Duty to Co-operate Duty to Co-operate A number of emails to discuss Barnet Policies.
Affinity Water meeting	17 <sup>th</sup> July 2019	Hatfield
Natural England	11 <sup>th</sup> May 2021	Attended Barnet Local Plan Viability Assessment Workshop
Historic England and the Greater London Archaeological Advisory Service (GLAAS)	23 <sup>rd</sup> April 2020 26 <sup>th</sup> June 2020	Archaeological Priority Areas Duty to Co-operate
Highways England	25 <sup>th</sup> Nov 2020	Strategic Transport Assessment

	11 <sup>th</sup> May 2021	Attended Barnet Local Plan Viability Assessment Workshop
North Central London CCG (previously Barnet CCG)	17 April 2019 21 August 2019 11 September 2019 9 June 2021	Local Plan and IDP Infrastructure Team also meets with them regularly to discuss s106 spend.
UKPN and National Grid	National Grid – 29 October 2019 UKPN 16 July 2020	Local Plan and IDP
Green Arc Meeting	10 <sup>th</sup> July 2017 at Theydon Bois	Meeting attended by reps from London Boroughs, Herts and Essex authorities to disseminate good practice, update on projects and discuss scope for joint working on environmental and Green Arc initiatives.
LB Camden meetings	22 <sup>nd</sup> Nov 2018 31 <sup>st</sup> Jan 2019 28 April 2021	Duty to Cooperate
LB Brent meetings	27 <sup>th</sup> March 2017 2 <sup>nd</sup> May 2019 20 <sup>th</sup> Nov 2020 2021 Nick? 11 <sup>th</sup> May 2021	Duty to Cooperate  Meetings on Brent Cros/A5 Attended Barnet Local Plan Viability Assessment Workshop
LB Harrow Duty to Cooperate meeting	21 <sup>st</sup> May 2019 11 <sup>th</sup> May 2021	Duty to Cooperate Attended Barnet Local Plan Viability Assessment Workshop
LB Harrow - Edgware Town Centre	12 <sup>th</sup> July 2019 7 <sup>th</sup> June 2021	Edgware SPD. Barnet Local Plan Viability Assessment
LB Enfield meetings	21 <sup>st</sup> March 2019 8 <sup>th</sup> December 2019 10 <sup>th</sup> February 2020 10 May 2021 13 <sup>th</sup> May 2020	Duty to Cooperate  Discussed Barnet's Local Plan Viability Study Burial study response
LB Haringey Duty to Cooperate meeting	1 <sup>st</sup> Feb 2021	Barnet's response to Haringey's new Local Plan first steps engagement consultation (Reg 18).
Hertsmere Borough Council	9 <sup>th</sup> May 2021	Discussed Barnet Local Plan Viability Assessment Workshop
Hertfordshire County Council	11 <sup>th</sup> May 2021	Attended Barnet Local Plan Viability Assessment Workshop
Estates Strategic Group meeting (NHS CCG)	27 <sup>th</sup> March 2019 21 <sup>st</sup> August 2019	
Neighbourhood Plan meeting	7 <sup>th</sup> October 2019.  10 <sup>th</sup> June 2020  25 <sup>th</sup> September 2020.	Meeting with Mill Hill to discuss the Neighbourhood Plan Discussed the West Finchley Neighbourhood Plan examination and Forum re-designation application Support call with Locality (MHCLG) for help on an application for designation of a new Mill Hill Forum
<b>Pan London &amp; Regional Meetings</b>	<b>Meeting dates</b>	<b>Topics discussed</b>
Association of London Borough Planning Officers (ALBPO) Meetings - <b>Development Plans</b>	Bi-monthly	
Association of London Borough Planning Officers (ALBPO) Meetings – <b>Policy Officers sub group</b>	Bi-monthly	

Association of London Borough Planning Officers (ALBPO) Meetings – <b>Neighbourhood Plans</b>	Quarterly	
West London Alliance Policy Officers & Chief Planners	Quarterly	
Transport for London	Quarterly	
Planning Advisory Service	Various Events	
New London Architecture	Various Events 31 <sup>st</sup> October 2019	Seminars, workshops etc including: Think Tank on the new London Plan
Urban Design London	Various Events	Seminars, workshops etc including: Discussion on London Plan panel report
Planning Officers Society - London	8 <sup>th</sup> November 2019	
Environment Agency	9th November 2017 5th April 2018 8th February 2019 Ngaire? Hatfield?	West London Strategic Flood Risk Assessment
Affinity Water	17 July 2019	Local Plan and IDP
Thames Water	9th November 2017 8th February 2019	West London Strategic Flood Risk Assessment
Wider South East Summit – GLA and authorities from South East England	26th January 2018 25 <sup>th</sup> October 2019	Duty to Cooperate strategic matters between London and the wider south east England region.
<b>Other Conferences and National Events</b>	<b>Meeting dates</b>	<b>Venues/ topics discussed</b>
Planning Officers Society / British Property Federation Conference	19 <sup>th</sup> April 2018	Birmingham
Planning Officers Society Conference	25 <sup>th</sup> January 2019	Central London

## 8 Appendix B - GLA & Neighbouring LPA Local Plan status

<b>GLA</b>	London Plan adopted March 2021.
<b>LB Brent</b>	The Council submitted its response to the inspectors actions which resulted from the Hearings sessions in 2020. In addition to this, on January 21st 2021, the Inspectors requested the Council consider the implications of the Secretary of States letter to the Mayor of London on December 10th 2020, and how this impacts upon the soundness of the Brent Local Plan. The Plan is expected to be adopted in 2021.
<b>LB Camden</b>	Local Plan adopted 2017. Evidence base gathering with Issues & Options 2021.
<b>LB Enfield</b>	Reg 18 (second round) Consultation opens from 21 June to 13 September 2021.
<b>LB Haringey</b>	Consultation on a first steps (Pre Reg 18) document ran until February 2021.
<b>LB Harrow</b>	Full Local Plan review underway –Reg 18 consultation in 2021.
<b>Hertsmere BC</b>	Reg 19 consultation later this year (2021).

## 9 Appendix C - Duty to Co-operate summaries and next steps

9.1.1 In order to avoid repetition of submitted representations at Reg 18 and council's responses (details of which are highlighted in a separate document published on the website) a brief summary, an audit trail of issues raised by neighbouring and statutory authorities, how they have been dealt with, and consequential drafting changes made to the Local Plan at Reg 19 are set out in this section. Any unresolved issues will be set out in forthcoming SoCGs, demonstrating progress made on matters between the Council and stakeholders. Feedback received from DtC partners played a key role in the production of both the Regulation 18 and Regulation 19 versions of the Local Plan.

9.1.2 The feedback has been received from:

- London Borough of Brent (LBBr)
- London Borough of Enfield (LBE)
- London Borough of Camden (LBC)
- London Borough of Harrow (LBH)
- London Borough of Haringey (LBHy)
- Hertsmere Borough Council (HBC)
- Greater London Authority (GLA) - The Mayor of London
- Transport for London (TFL)
- Environment Agency (EA)
- Historic England (HE)
- Natural England (NE)
- Highways England (HigE)
- Barnet CCG (Now North Central London CCG but at Reg 18 was known as Barnet CCG)

## 9.2 CHAPTERS 1 AND 2 INTRODUCTION, CHALLENGES AND OPPORTUNITIES

9.2.1 EA requested to revise section 2.4. Their response to the Integrated Impact Assessment Scoping Report consultation (February 2019) identified some of the environmental characteristics within their remit and they would like to see the section on environment broadened to include the points raised before, so there is a more complete picture of Barnet's environmental challenges and opportunities. For species and habitats data and to see population trends they recommend using the Greenspace Information for Greater London website ([www.gigl.org.uk](http://www.gigl.org.uk)). Barnet's environment features should be displayed on a map within the Local Plan, for example, flood risk and watercourses



9.2.2 Barnet CCG Welcomes paras 2.5.1 and 2.5.2 and the acknowledgement that health and wellbeing is strongly influenced by the environment in which people live and that planning policies and decisions can contribute to the prevention of ill-health and encourage healthy lifestyles. Health inequalities linked to deprivation should be recognised as a key challenge for the plan. In particular, the Council's programme of housing estate renewal has potential to positively address deprivation and inequalities. Helpful if the plan referred to specific opportunities to align health and planning.

9.2.3 They feel references to the Joint Strategic Needs Assessment would be helpful if the plan identified the key health needs and priorities facing the borough as summarised from the health and wellbeing evidence in the Local Plan Key Facts Evidence Paper (January 2020).

### 9.3 Summary and next steps

- Barnet agrees with the Environment Agency and has agreed section 2.4 as requested.
- Barnet also agrees with Barnet CCG that health inequalities linked to deprivation represents a key challenge for the plan and that housing estate renewal has potential to positively address deprivation and inequalities. It has also agreed to highlight strong relationship between health and planning particularly with regard to COVID19.
- In the interests of keeping length of the plan manageable and the contents not becoming dated, Barnet feels cross referring to JSNA is considered appropriate and not detailing out each and every area.

### 9.4 CHAPTER 3 BARNET'S VISION AND OBJECTIVES

9.4.1 EA felt at para 3.1 the Vision lacks ambition to support growth that benefits the natural environment and ensures resilience to climate change, for both people and wildlife. The Vision implies a continuation of the status quo for the environment rather than a firm ambition to improve it. For example, the vision could include aspirations to expand the green and blue infrastructure network in the Borough, reverse declines of biodiversity through net gain, restore rivers to more natural conditions making them more accessible and attractive for both people and wildlife, protect communities from flood risk now and into the future, seek measurable improvements in water quality, endorse tree planting and sustainable drainage measures across the Borough. We would like to see the Vision champion Barnet's environment and seek its betterment.

- 9.4.2 HE also felt that felt the Vision should make specific reference to the Borough's heritage and the need to conserve, and where appropriate, enhance the historic environment. They would expect to see the conservation and enhancement of the historic environment be referred as a key objective on page 21.
- 9.4.3 LBHy while supportive concerned as to how the vision and objectives have been translated into proposed Growth Strategy
- 9.4.4 EA feels there are positives within the objectives (3.3.2) such as 'to deliver an environmentally sustainable Borough' and 'enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and infrastructure.' However, given the environmental opportunities, the environment should feature more strongly. The objectives concerning the environment are towards the bottom of the list which implies (however unintentional, they like to see more ambition for the environment in the objectives and see an objective that recognises the value of water as a precious resource to homes and businesses whilst supporting wildlife habitats. There should also be an objective that seeks opportunities to integrate the natural environment into the urban landscape via green spaces, pocket parks, tree planting, sustainable drainage measures, so that there is habitat connectivity, water attenuation and resilience to climate change.
- 9.4.5 Barnet CCG Supports the objectives at para 3.3.2 including those promoting healthy living and wellbeing and to meet social infrastructure needs. The objectives underpin the 51 plan policies and it would helpful if the links between the objectives and policies were clearly identified, particularly in relation to the healthy living and wellbeing objective.
- 9.4.6 TfL requested that Crossrail 2 is not proposed to extend further north than New Southgate. The Council may wish to consider including the Strategic Cycle Network and potentially key bus corridors to the Key Diagram.
- 9.4.7 TfL CD felt housing growth should be focussed in all accessible locations, particularly those with good public transport connections. The Key Diagram should therefore also highlight areas around underground and other railway stations that are suitable for housing growth.

9.4.8 LBBrent suggests that Brent Cross/Cricklewood is identified as an Opportunity Area in the London Plan. To make the area more manageable for planning in more detail it is understandable that LB Barnet has divided it into three parts. Historically these have been identified as Brent Cross London, Brent Cross South and Brent Cross Thameslink/Brent Cross West. Within the preferred options document the names of these respective areas needs consistency. In addition, the terminology around Opportunity Areas and Growth Areas needs further explanation/clarity earlier on in the document. For example, the key diagram identifies Brent Cross as an Opportunity Area, whilst Policy GSS01 identifies what is presumably this area as Brent Cross Growth Area. Brent Cross London's area is identified on Map 3, whilst elsewhere within the text, what is presumably the same area is identified as Brent Cross North. It is only when you get to policy CDH04 Tall Buildings (a considerable way into the document) that some clarity is provided on sites with both the opportunity and growth area designations noted for sites at Brent Cross/Cricklewood and Colindale. Provide consistency/ clarity across throughout the document with regards to the 'growth areas'/ 'opportunity areas' and the opportunity area boundaries.

## 9.5 Summary and next steps

- Barnet Agreed with the EA and revised the vision accordingly.
- It also agreed with HE and made changes to the vision accordingly.
- Agreed in response to LBHy, the Growth Strategy Delivery Plan sets out the key projects where the Council will direct its future investment, therefore no further changes were required to the Plan.
- Barnet Agreed with EA's amendments for para 3.3.2 and had revised accordingly.
- Barnet CCG's Support for objectives welcomed. Table 2 has been revised accordingly.
- Barnet Agreed with the TfL and revised the Key Diagram to show Crossrail 2 stopping at New Southgate.
- Barnet feels its approach to sustainable growth is reflected throughout the Local Plan – particularly in Policy GSS09. All stations are already identified on the Key Diagram, therefore TfL's request to revise the key diagram has not been considered.
- Barnet agreed with LB Brent's suggestion and the Key Diagram has been revised and clarification on Growth Areas has been added including clear boundary maps.

## 9.6 CHAPTER 4 GROWTH AND SPATIAL STRATEGY

9.6.1 LB Enfield noted that a significant amount of new development, particularly housing will be focused in the growth areas and close to the Enfield borough boundary. Whilst they do not have an objection to this approach in principle, they seek reassurance that the cumulative impacts of development continue to be evaluated through the Integrated Impact Assessment and discussed between the agreed working groups to be established between our respective authorities and have been taken into account. This would also ensure opportunities for greater flexibility to plan, appraisal and prioritise schemes locally. They are willing to continue to constructively engage on this matter as part of the Duty to Cooperate arrangements for Barnet's Local Plan. A positive collaboration should in turn facilitate/unlock residential and mixed-use development opportunities offered by planned improvements on the Piccadilly line with Cockfosters, Arnos Grove Southgate and in the longer-term Crossrail 2. London-wide housing targets remain challenging for our respective boroughs. They feel that Barnet's housing levels of need remains substantial albeit lower than the housing needs arising from applying the Government's 'standard methodology'. Enfield supports Barnet's approach to meet need by focusing on the efficient use of land and increasing the intensity and use of land, in key town centres. This approach is considered likely to meet the quantum of new housing required. Enfield is supportive of Barnet's approach to meeting the OAN of its borough over the plan period. will need to be considered to meet the significant housing and employment need challenge. Enfield is willing to continue to constructively engage on this matter as part of the DtC arrangements for Barnet's Local Plan, as well as our wider neighbours to discuss how this issue can be resolved and to share technical approaches to evidence preparation.

- 9.6.2 EA, HE, LB Brent, LBHy and Mayor of London have commented on policy BSS01 and have proposed some amendments. At Policy BSS01 EA refers to NPPF para 20). NPPF para 149 which states that plans should take a proactive approach to mitigating and adapting to climate change taking into account the long-term implications of flood risk and water supply, etc. They recommend the Sequential Test is undertaken in tandem with a Level 2 SFRA. We have reviewed the Site Selection Background Report December 2019. They also wish to see evidence within the Integrated Impact Assessment, latest IDP and Local Plan (preferably supported by a background paper or Integrated Water Management Strategy) of how water supply and waste water capacity considerations have been taken into account in the planning for this level of growth (46,000 new homes plus office and retail space) and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment. They felt these crucial elements are missing, which makes the Local Plan unsound. HE feels the same policy BSS01 could improve the plan by making specific reference to heritage at the strategic level. Part c) of the policy could be amended to in this respects, alternative wording could be: where there is recognised capacity, and where the historic environment and local character can be conserved or enhanced as a result.
- 9.6.3 LBBr feels the same that an amendment to the punctuation would improve the clarity of this draft policy. c) In order to better manage the impacts of development on the climate, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections. LBHy questions why Barnet is not planning for the housing target specified in the Intend to Publish London Plan as a starting point – noting Haringey is not able to accommodate housing shortfall in other Boroughs.

- 9.6.4 The Mayor welcomes the spatial strategy which sets out where Barnet will deliver its new housing and wider economic and social needs. In this regard, draft Local Plan Policy BSS01 should reference Barnet's opportunity areas as set out in Intend to Publish London Plan Policy SD1, as well as its growth areas, and not simply note these as being town centres and transport nodes. Greater emphasis should be placed on the potential role of Barnet's Opportunity Areas to meet its housing and wider needs given the wider investment likely in these areas. It would also be useful to have a map that sets out the Site Allocations within the growth areas to provide an indication how and where the growth will happen in each growth area. The Mayor welcomes the acknowledgement that growth must be planned to ensure suitable supporting infrastructure can be provided. In this regard, the Mayor welcomes Barnet's support for delivering improved transport capacity and infrastructure in the borough. To better support this, he urges Barnet to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. Where there are opportunities to do so, development proposals should also contribute towards provision of step-free access and capacity enhancement at stations. The Mayor welcomes the joint working with Harrow to deliver development in the Edgware Growth Area.
- 9.6.5 Draft Local Plan Policy GSS07 – Mill Hill East should make it explicit that Green Belt must not be developed, except on previously developed land. With regards to the West Brent Growth Area, it would be useful to show this area more clearly on a map, as it is not shown on Map 3 Brent Cross regeneration. Most of Barnet's growth areas contain major road infrastructure and associated poor air quality. Barnet's growth policies should be clear that schemes should address air quality concerns and should not worsen air quality, for example by creating canyon effects along major roads. Future Supplementary Planning Documents (SPDs) and Masterplans should direct sensitive uses away from areas of poor air quality and include guidance on how to minimise exposure to poor air quality.
- 9.6.6 Barnet's growth strategy broadly reflects Annex 1 Town Centre Network of the Intend to Publish London Plan. It sets out that Edgware (shared with Harrow) is a major town centre and Brent Street, Chipping Barnet, Church End, Finchley, East Finchley, Golders Green, Hendon Central, Mill Hill, New Barnet, North Finchley, Temple Fortune, Whetstone, Colindale/ The Hyde (shared with Brent), Cricklewood (shared with Brent/Camden), Burnt Oak (shared with Brent/Harrow) are all district centres.

- 9.6.7 The Mayor welcomes draft Local Plan Policy GSS02 and the specific policy on creating a new Metropolitan Town Centre. Beyond the indicative job figures set out in Intend to Publish Policy SD1 for Barnet's Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. Of Barnet's district town centres only Temple Fortune and Cricklewood have been identified in Annex 1 of the Intend to Publish London Plan as having a medium potential for commercial growth including offices, with Barnet's other town centres having low potential. Small offices in Chipping Barnet, Church End (Finchley Central), North Finchley and Whetstone should be protected as these centres show demand for existing office functions, generally within smaller units. Barnet's site allocations that seek to protect office development should be focused in these areas.
- 9.6.8 On a specific note draft Local Plan Policy GSS08 could be mis-read as the parking standards being minimums. The policy should be amended to make it clear that parking provision should be minimised, and not exceed the parking standards as set out in Tables 10.3 to 10.5 of the Intend to Publish London Plan. The Mayor welcomes the preparation of masterplans for the growth areas. These will create certainty to bring sites forward and speed up delivery. Welcomes commitment above Intend to Publish Plan target for housing. Should include reference and greater emphasis on OAs. A map of site allocations within growth areas would also be useful
- 9.6.9 Both the Barnet CCG and Mayor of London have commented on para 4.3 and requested amendments. Barnet CCG feels the Increased level of housing growth will require significant investment in social infrastructure, including healthcare which should be mentioned in the section on Barnet's Growth Requirements. It is noted that the green, social and physical infrastructure needed to support Barnet's growth will be set out in an Infrastructure Delivery Plan (IDP). The CCG will continue to work with the Council to identify future healthcare infrastructure requirements as part of the IDP.

9.6.10 On section 4.3, Mayor of London welcomes Barnet's commitment to deliver 46,000 homes over the 15-year plan period (2021 to 2036) which equates to 3,066 homes a year. This is in excess of its Intend to Publish London Plan 10-year net housing completions target of 23,640 homes between 2019 and 2028. Of this Intend to Publish London Plan target, 4,340 completions should be identified from small sites. In this regard, the Mayor welcomes the acknowledgement that 5,100 homes in Barnet will come from small sites. With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019. While Barnet's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Barnet's housing target is set out in the London Plan. Barnet's 10-year housing target is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Barnet fed into; and a methodology for small sites. The Mayor is working with Barnet and other London Boroughs to deliver transport improvements that were not considered as part of the SHLAA process. The Mayor supports further work to assess whether additional homes and jobs could be brought forward as a result of these transport improvements, subject to no significant conflicts with other policies in the London Plan.

9.6.11 At para 4.7.2, HE welcomes the plan's intention to focus growth in specific identified areas, and to ensure development is delivered in a way that responds to the distinctiveness and individual characteristics of these areas to ensure good place making.

9.6.12 At this stage, Enfield Council requests confirmation from Barnet Council as to whether there any other identified unmet needs that would require a formal request under the requirements of Duty to Cooperate.



- 9.6.13 For para 4.14.7 LB Brent , states that the Brent Cross West Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a growth area for industrial intensification and potential housing delivery. The Council welcomes Barnet's recognition of the capacity for positive changes to the wider area, the potential of which is also identified within the emerging draft Brent Local Plan.
- 9.6.14 LB Harrow feels Edgware Town Centre is bisected by the A5, although it is noted that the majority of the designated town centre lies within LB Barnet. Edgware Town Centre is classified within the draft New London Plan (2019) (Intend to Publish Version) as a Major Town Centre, with a high residential growth potential. The draft plan includes Policy GSS05 (Edgware Growth Area), which provides support to planning proposals that deliver growth and regeneration of the Town Centre, subject to delivering certain proposals. LB Harrow support the introduction of such a policy, recognising the growth opportunity for a highly sustainable location. As such, it agrees that the alternative option of not including an Edgware Growth Area policy would forgo this opportunity. Following on from the above, this policy is intended to be supported by a SPD. LB Barnet was successful in bidding for the Mayor of London's Homebuilding Capacity Fund, where it secured funding for the SPDs preparation for the Edgware Town Centre. By reason of the town centre overlapping administrative boundaries, LB Harrow are involved in the preparation of this SPD, and would be adopting it as part of its policy suite. LB Harrow look forward to continuing the dialogue and cross working with LB Barnet in relation to progressing this SPD, which will assist in guiding development of the Edgware Town Centre, and also across administrative boundaries.
- 9.6.15 At para 4.20.11, TfL supports the redevelopment of station car parking to deliver growth and as part of a shift towards sustainable travel. The Intend-to-Publish London Plan sets that car-free development should be the starting point in all well-connected locations, and that provision should reflect the new approach and not exceed this based on previous provision. Any station car parking retained must therefore be assessed against the same test proposals for a new station with a car park would be subject to. Where there is sufficient bus access to the rail lines in question, TfL strongly urge the Council to support the reduction in commuter car parking as part of redevelopment at stations.
- 9.6.16 At para 4.20.1 Correct the description of the West London Orbital to say: 'The WLO will deliver a new passenger service along existing tracks between Hounslow/Kew Bridge and Hendon/West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood.'

9.6.17 At policy GSS01, EA supports the statement in the policy that infrastructure is key to supporting growth, including investment in transport, education, health and open spaces. However, we'd like to see flood risk, waste water, water supply, and green infrastructure included as part of this statement in the policy. Lack of consistency between GSS01 statement on small sites and the WLA Level 1 SFRA] We recommend you assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not.

9.6.18 Barnet CCG feels this policy and Table 5 and helpfully set out the housing capacity by source / area, for example in Growth Areas. A different pattern of housing growth across the borough will have implications for healthcare infrastructure and may require different approaches to deal with site specific impacts, for example in the six Growth Areas and estate renewal areas and cumulative growth in other areas and on small sites. Understanding the timing of growth is important to identify when investment is needed to provide additional capacity. TfL Comfortable with the suggested 1,000 homes capacity for TfL and Network Rail car parks. Suggest it should be a minimum of 1,000 homes.LB Haringey Welcomes but would emphasise importance of a robust IDP.

9.6.19 Regarding policy GSS02, EA recommends Barnet assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not. Some fluvial flood risk from River Brent and surface water flood risk including the Hendon Way Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.

- 9.6.20 Highways England States under ‘Transport Improvements’: “Development proposals will need to bring forward the following through detailed design, planning conditions and/ or Section 106 agreements:... Connections and/ or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and the Highways Agency in relation to the M1 motorway, based on up to date mode share targets”. Highways England must be consulted with respect to any development proposals that have the potential to impact the SRN, in this case the M1. With reference to Policy GSS02, the wording should be updated to refer to Highways England, in place of the Highways Agency.
- 9.6.21 Barnet CCG Supports policy stating that development proposals within Brent Cross Growth Area must provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity. Brent Cross West Growth Area is a new growth opportunity supported by the new Thameslink station. Healthcare capacity provided in Brent Cross South should therefore consider the impact of 1,800 additional homes in Brent Cross West. The CCG welcomes the opportunity to contribute to a Supplementary Planning Document for Brent Cross West.
- 9.6.22 TfL We welcome the Council’s commitment to delivering Healthy Streets in the Brent Cross growth area. Improvements to Brent Cross station are an integral part of facilitating this growth. We would expect to see a reference to delivering capacity enhancement and step-free access to Brent Cross station as part of new development in the area. When significant time has passed since transport assessments for development that has not yet commenced, they should be revisited to reflect the latest proposals for Brent Cross station and the current status of transport services in the area. Current assumptions are that public transport use will be higher in future than predicted when the commitment to provide step-free access to Brent Cross station was made by the developer. There is ongoing work to update the models by Argent Related, which the Council could use to test how they submit Good Growth outcome before the local plan is finalised.
- 9.6.23 At policy GSS03, EA feels Some fluvial flood risk from the River Brent and surface water flood risk including the Claremont Way Industrial Estate Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.

9.6.24 LB Brent suggest Growth and Spatial Strategy GSS03 In addition, there are opportunities to restore and enhance River Brent along the section associated with the Brent Cross West Growth Area, for example, through Kingsbury Park. A similar policy criteria to GSS02 should be added to acknowledge the potential for restoration and enhancement of the River Brent and it's corridor to provide amenity and biodiversity benefits for the area. The Council supports the policy framework that seeks a more 'joined up' approach between the two boroughs and other stakeholders to ensure a more comprehensive development occurs. This will maximise the efficiency of the regeneration of the area, taking account of the opportunities that the improvements to public transport can provide in its attractiveness to inward investment that enhances its place-making characteristics. The Council welcomes the approach that seeks to ensure appropriate social and physical infrastructure is provided to support a new community and that areas/ developments within the respective boroughs make a proportionate contribution to their provision. Whilst some preliminary work has been started in with regards to Staples Corner SIL with the GLA, which LB Barnet are also contributing towards, there could perhaps be a greater clarity on the extent to which LB Barnet will seek to work with LB Brent in adopting a more co-ordinated approach to joint planning for the area. Suggested modification as in other LB Barnet's draft Local Plan Growth Area Policy GSS03: "...The Council will seek to prepare a more detailed planning framework for this area, such as through an Area Action Plan or a Supplementary Planning Document, potentially ideally through joint working with LB Brent."

9.6.25 The Mayor feels that it is useful to show this area on a map as not shown on Map 3 for Brent Cross regeneration.

9.6.26 For policy GSS04, EA feels Surface water flood risk is prevalent in this area, along with two or possibly three CDAs (Brent Terrace and Lichfield Road). We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.

9.6.27 TfL request that the Council add specific reference to supporting development proposals that facilitate access to and delivery of the West London Orbital. They have also requested that the Council provide clarity on the number of new homes expected to be unlocked in Barnet as part of the scheme. TfL will continue to work with the Council to update this assessment. We welcome that the Council will request contributions towards both new and improved active travel routes to Brent Cross West station, as well as improved interchange, onward travel facilities and public realm outside the station. They ask that the Council include potential contributions toward delivery of the West London Orbital scheme itself in this list. Similarly, they ask that the Council request contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.

9.6.28 For avoidance of repetition (from the representations table), a number of suggestions, comments and changes were requested by all statutory and neighbouring authorities on policies GSS05-GSS013.

## 9.7 Summary and next steps

- Regarding Enfield's suggestions listed above, they will be reflected in Barnet's Statement of Common Ground with LB Enfield.
- In response to the EA's concerns Barnet feels Key findings of the IDP are reflected in BSS01 and an additional/expanded policy included in the Environment and Climate Change Chapter. A Level 2 SFRA has been published alongside the Reg 19 which includes and been used to inform revised site proposals.
- On amendments to policy BSS01 Barnet agrees with EA ,HE, LB Brent, LB Haringey and the Mayor and has amended the policy accordingly.
- In response to Barnet CCG's comments on para 4.3 Barnet feels Chapter 8 reference and provide details on healthcare infrastructure provision requirements. The IDP has been published as part of the Local Plan evidence base.
- Barnet Agrees with the Mayor on para 4.3 and revisions to the Reg 19 clarify the contribution that small sites will make to the housing target. The Council looks forward to working with the Mayor on delivering transport improvements.
- Barnet welcomes HE's support.
- Barnet can confirm to Enfield that There are no other unmet needs identified.
- A framework for the Brent Cross West area will be progressed and Barnet looks forward to working with LB Brent on producing this.
- Barnet agrees with LB Harrow and agreed to revise text to acknowledge importance of town centre to LB Harrow residents.
- Barnet's approach on the development of surface car parks is set out in GSS12. Also, approach on car-free development is set out in TRC03. These policies will help the Council to make informed decisions on proposals involving station redevelopment, so no changes required. But Barnet does agree with TfL suggestion on amending the description of west London orbital.
- In response to GSS01, Reg 19 is supported by the Level 2 SFRA, Table 5 has been revised. BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to delivering that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility. IDP published with Reg 19
- Revisions made to policy GSS02 as proposed by EA, Highways England, Barnet CCG and TfL.
- Similarly, as suggested and advised by all statutory and neighbouring authorities, various revisions have also been made to policy GSS03-GSS013. For more details see the responses to representations table.

## 9.8 CHAPTER 5 Housing

- 9.8.1 On policy HOU01 Barnet CCG Suggests that fifth paragraph of the policy is amended to read:“Innovative housing products that meet the requirements of this Policy will be supported, including approaches that set aside a proportion of homes on land owned by Government departments and agencies for key workers, such as health and education professionals.” It Supports affordable housing policy, including the affordable housing tenure split and notes that the Council will support innovative housing products that meet the requirements of the policy. The Mayor welcomes the reference to his 50% strategic affordable target in draft Local Plan Policy HOU01 and at paragraph 5.4.8. In this regard, the reference to a 35% strategic target at paragraph 5.4.6 should be clarified as being a 50% strategic target or 35% minimum threshold for schemes of 10 or more residential units. As stated above under the Spatial Strategy (Estate renewal and infill) section, the policy and supporting text must ensure affordable housing floorspace is replaced.
- 9.8.2 TfL is concerned that the Council will only support the conversion of larger homes where ‘appropriate car parking is provided in accordance with Policy TRC03’. This again appears to set a minimum required level of car parking provision, or at least a presumption that development is expected to provide car parking.
- 9.8.3 The Mayor suggests that proposed Local Plan Policy HOU04 should make it clear that specialist older persons housing provision should be delivered in line with Intend to Publish London Plan Policy H13, including the requirement for affordable and accessible housing.
- 9.8.4 TfL (CD) wants Barnet to Include a planning policy to promote the development of Build to Rent housing which is broadly in line with Policy H11 (Build to Rent) of the Draft NLP. The Mayor welcomes Barnet’s positive approach to Build to Rent (policy HOU06) development, noting its distinctive economics and ability to contribute to the delivery of new homes. Under the Schedule of Proposals (Annex 1), Built to rent could be an option for accessible sites that are suitable for housing.

9.8.5 EA recommend a policy criteria for Hou07 is included that the site is not located in an area at high risk of flooding from rivers taking into account climate change to ensure residents and occupants are safe. GTTS definition from PPTS rather than Mayor's definition. Para 4.14.8 of Intend to Publish Plan refers to a London-wide needs assessment which should be taken into account if completed before adoption. LB Haringey feels that GTTS definition from PPTS rather than Mayor's definition. Para 4.14.8 of Intend to Publish Plan refers to a London-wide needs assessment which should be taken into account if completed before adoption. The Mayor noted that the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 identifies no gypsies and travellers and travelling show people in Barnet and therefore no demand for pitches. However, the 2011 census suggests there is a small population of gypsies and travellers in Barnet. It would be helpful to understand if this population is still present or if residents have moved elsewhere in London.

## 9.9 Summary and next steps

- Barnet agrees with Barnet CCG and TfL (CD) on making minor wording changes to HOU01 however policy on keyworker housing is largely a matter for the Housing Strategy. Support for policy including affordable housing tenure split is welcomed. The policy is consistent with the London Plan
- On TfL's comments re policy HOU03, the intent of the policy is to ensure that car parking is within the required standards outlined in Table 23; however, the text has been revised to reflect the Council's support for reducing car dependency in the Borough.
- Barnet agrees with the Mayor on proposed wording to policy HOU04 and HOU05 and has amended the text accordingly. Small sites delivery clarified by Policy CDH01.
- The build to rent is covered in HOU06.
- Barnet agrees with EA on HOU07 wording. Local evidence on the GTNAA has been updated, re-assessed and published.

## 9.10 CHAPTER 6 CHARACTER, DESIGN AND HERITAGE

- 9.10.1 The Mayor of London welcomes Barnet's opening statement in this chapter that notes as the borough grows its character will inevitably change – an important role for the Local Plan is to manage change. In addition to its design policies and Residential Design Guidance SPD, Barnet should produce design codes to bring forward development, especially on small sites. The Mayor welcomes the reference to the Agent of Change principle to protect existing residential amenity. He also welcomes the proposed approach to sustainable design and construction and the reference to the Mayor's Energy hierarchy.
- 9.10.2 EA proposes a few minor changes to policy CDH01 part (b) makes reference to the Sustainable Design and Construction SPD, we think the policy could be improved by providing a more explicit reference to ensuring high-quality design for the natural environment. For example, the policy could state 'Apply the requirements of the Sustainable Design and Construction SPD to ensure the local environment, biodiversity, water management and sustainable drainage measures are incorporated.'
- 9.10.3 At para 6.14.1 TfL proposes Standard 18 of the Mayor's Housing SPG published in early 2016 has been superseded by the Intend-to-Publish London Plan policy T6.1 H. Disabled persons parking should not be allocated specific dwellings unless within the curtilage of the dwelling, as Blue Badge holders may not necessarily live in the wheelchair user dwellings of a development at any given point in the lifetime of the development. We suggest that disabled persons parking is dealt with solely in the transport section of the local plan.
- 9.10.4 At para 6.16.7 Historic England are very pleased to see that the plan advocates a proportionality approach which encourages the delivery of denser development without resorting to a tall building. A few minor changes have been suggested to paras 6.21.2-4.
- 9.10.5 EA proposes some minor changes to policy CDH03. EA, HE, TfL (CD), LB Brent, Mayor of London proposed a few minor changes to policy CDH04. There is some concern that important strategic issues such as the parameters for tall buildings will be set in an SPD, which does not form part of the development plan, and not in the local plan itself. In our view these parameters are integral to the strategic delivery of the plan and guidance should be included in the plan. Notwithstanding this, they welcome part iv in relation to heritage. They are also pleased to see that this policy makes reference to HE's guidance on tall buildings and the Borough's Characterisation Study.



- 9.10.6 TfL Do not support the definition of ‘tall’ and ‘very tall’ buildings which do not accord with Draft NLP policy D9 (Tall Buildings) which states that the definition of a tall building should be based on specific localities and that the height ranges should vary by local context. It is unclear what might constitute ‘exceptional circumstances’ and a design-led approach would be more appropriate, in accordance with Draft NLP policy D9.
- 9.10.7 The Council is supportive in principle to the approach to tall buildings as set out in this policy in terms of their potential impact on Brent borough. A key element for it however is clarity on the boundary of opportunity areas. It is noted that there is a different approach to sites within opportunity areas and those outside in terms of maximum heights considered appropriate. Clarity on the boundary of opportunity areas along Edgware Road associated with this policy is needed.
- 9.10.8 The Mayor welcomes the inclusion of definitions for tall buildings and very tall buildings in its draft Local Plan and the identification of areas that are most suitable for tall buildings as well as very tall buildings. These correspond with the growth area policies. As some of the proposed locations may be linear along a high street, the policy should also ensure that development does not result in a canyon effect that can result in, or exacerbate poor air quality. It would be helpful if Map 4 showing local views also shows the areas that are most suitable for tall buildings so that the local views can be taken into account, especially where SPDs and masterplans are being produced.
- 9.10.9 The Mayor welcomes Barnet’s proposed policy on basement development (policy CDH06) in order to protect residential amenity and the local environment.
- 9.10.10 EA supports the policy criteria for provision of new and existing wildlife habitat including tree and shrub planting to enhance biodiversity, we recommend this is reviewed in light of the imminent introduction of Biodiversity Net Gain. Biodiversity Net Gain will be mandated through the Environment Bill when it is enacted, likely to be 2022. This will require developers to achieve at least a 10% biodiversity net gain as a result of development proposals, either within a site or off-site.
- 9.10.11 On policy CDH08 HE recommends that this policy makes specific reference to heritage at Risk; “Archaeological Interest” First line should be changed as follows: “Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance...” Policy CDH04 on Tall Buildings makes reference to Historic England guidance on tall buildings and This policy makes no reference to Registered Parks and Gardens, we recommend that the policy is expanded upon to provide guidance on how these important, designated assets and their settings will be conserved.

## 9.11 Summary and next steps

- Barnet agrees with the Mayor and has revised to clarify approach on design codes
- In accordance EA and TfL's suggestions to policy CDH01 revisions have been made to part (b) and paragraph iii.
- Barnet agrees with TfL's suggestions regarding amendments to the disabled persons parking allocations.
- The Council welcomes HE's support and has agreed to make suggested changes to paras 6.21.2-4.
- The council agreed and made changes to policy CDH03 with relation to sustainable drainage provision.
- Barnet agreed to make changes to text and policy CDH04 as proposed by the EA, HE, LB Brent and the Mayor. Through SPD there is an opportunity for more detailed design work around parameters which supplements CDH04 as well as proposals in Annex 1. Sites in strategic locations where tall buildings may be appropriate have been identified. Reg 19 provides clarification on boundaries of Growth and Opportunity Areas
- The Council welcomes this support. The Council refers to the Mayor's positive response on CDH04. The Council will not support any tall buildings outside of the locations identified in Policy CDG04. The Council is developing a Building Heights SPD to guide proposals and ensure building height is located appropriately
- Map 4 has been revised to reflect the Mayor's proposed changes. Barnet welcomes the support on Basements policy. Policy and text has also been revised to policy CDH07.
- Barnet agreed to make changes to policy CDH08 as suggested by HE.

## 9.12 CHAPTER 7 TOWN CENTRES

9.12.1 LB Enfield expressed interest in greater understanding of the future strategy for Brent Cross. Enfield supports the policy in relation to affordable workspace, where this is secured in the most appropriate locations as they feel it indicates that this will be directed to town centres across Barnet. Enfield would welcome the opportunity to further discuss any emerging evidence.

9.12.2 TfL strongly supports that development in town centres will be expected to enhance the public realm, and that reducing car travel will be encouraged. To facilitate this, they have urge the Council to consider opportunities to reduce on-street and off-street car parking as part of town centre development.

9.12.3 The Mayor of London (GLA) welcomes Barnet's proactive approach to the management of its town centres through various frameworks, strategies and SPDs and the overall planning policy approach set out in the draft Local Plan. It is noted that the District Centre of Finchley Central is called Church End in Annex 1 of the Intend to Publish London Plan. It is unclear how the borough will control the type of Class A1 floorspace delivered in line with proposed Local Plan Policy TOW01.

9.12.4 The Mayor suggests that smaller scale mixed use residential development should also be promoted in Barnet's Local Centres, in line with draft Local Plan Policy TOW02(e) which strongly encourage residential use on upper floors in town centres. The Mayor welcomes the reference to the Agent of Change principle in order to protect residential amenity from new development, however, the principle should also be applied in the main policy to protect existing businesses from residential development introduced nearby, and not just in the supporting text at proposed paragraph 7.9.3.

9.12.5 The Mayor welcomes Barnet's approach to managing the clustering of certain uses in its town centres, especially hot food take-away Class A5 uses within 400m of the boundary of an existing school or youth centre, in line with Intend to Publish London Plan E9. The GLA also welcomes Barnet's positive approach to the night time economy and the broad definition that it includes all economic activity taking place between the hours of 6pm and 6am.

### 9.13 Summary and next steps

- Revisions have been made to the section on Brent Cross. The Council welcomes Enfield support and looks forward to continuing its constructive engagement with LB Enfield.
- Barnet agrees with TfL that improvements to the public realm are essential in getting people back in Barnet's town centres. The Council supports the Healthy Streets approach to reduce car dominance and improve street safety and has reflected this in its new policies.
- Barnet welcomes the Mayor's support.
- With the changes to the Use Classes Order the Local Plan can no longer pursue this requirement.
- Plan revised to clarify Church End Town Centre now known as Finchley Central.
- Town centre policies were revised with greater emphasis on Agent of Change.

### 9.14 CHAPTER 8 COMMUNITY USES AND PROMOTION OF HEALTH AND WELLBEING

9.14.1 The Mayor welcomes Barnet's overall approach to delivering community infrastructure and health and well-being in Barnet. This is reflected in Barnet's site allocations that seek the re-provision of community infrastructure where a site is to be developed. The Mayor also welcomes Barnet's approach to protecting public houses in line with Intend to Publish London Plan Policy HC7.

9.14.2 Barnet CCG wants Barnet to define health impact assessment in the supporting text or glossary as follows: “Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, or particular groups within it. HIA should be undertaken as early as possible in the planning application or plan making process to mitigate any potential negative impacts and maximise potential benefits.”

9.14.3 Barnet CCG Amend wording of second clause c) to read: Supporting the North Central London Estate Plan and the implementation of NHS Long Term Plan in responding to demand and integration of health and social care, including the use of developer contributions to support investment in healthcare infrastructure.”

9.14.4 Para should 8.11.2 read as “A key focus of the North Central London integrated health and care plan is to prevent ill health, which includes partnership working to tackle the wider determinants of health. An integrated care system will deliver services at different levels, including neighbourhood networks based around GP practices, ‘Borough Partnerships’ and as a North Central London ‘Integrated Care System’.”

9.14.5 Historic England supports the inclusion of a standalone pub protection policy given the cultural and heritage value of pubs. But the policy should be amended and aligned with the London Plan and marketed for 24 months.

## 9.15 Summary and next steps

- Barnet welcomes the support from the Mayor of London, Barnet CCG and Historic England.
- Barnet agrees with Barnet CCG on defining HIA and had agreed with amending the requested wordings on merging sections of policy CHW02. CHW02 has been revised to be more specific in terms of relevant policies.
- The Council welcomed Historic England’s support and agreed to amend reference to 24 months marketing to be consistent with London Plan.

## 9.16 CHAPTER 9 ECONOMY

9.16.1 Whilst the Mayor strongly supported Barnet's policies that protect and seek to intensify industrial land, he had raised concerns to other West London Alliance boroughs regarding the West London Employment Land Review (WLELR). As noted in Local Plan paragraph 9.4.8 the methodology for forecasting industrial demand in the WLELR uses a labour demand methodology which does not follow the economic demand methodology at set out in the London industrial land demand study 2017, which has been accepted by the London Plan Examination Panel. In addition, the methodology for the WLELR does not take into account the demand for waste and transport over the plan period. The Mayor welcomes Barnet's acknowledgement that the London wide strategic evidence and the WLELR both identify a demand for additional industrial capacity in Barnet. Barnet has responded positively to this evidence by designating additional Locally Significant Industrial Sites (LSIS) and generally only allowing industrial uses within these areas. The Mayor would also welcome the intensification of these areas in line with draft Local Plan Policy ECY01d). The Mayor has no objection to the de-designation of LSIS where the area no longer functions as a predominantly industrial area. However, to protect remaining well-functioning industrial sites Barnet should include a policy on non-designated industrial land or refer to Intend to Publish London Plan Policy E7C. In this regard Barnet's Site Allocations should not allocate non-designated industrial sites for other uses so that their potential for continued industrial use can be fully assessed. The Mayor also welcomes the approach in draft Local Plan Policy ECY01c) limiting office use within LSIS to an ancillary use. It should be made clear that any office use should be ancillary to a business operating within the LSIS. The protection of Class B1(a) floorspace as set out in proposed Local Plan Policy ECY01h should not apply to LSIS where it can be replaced with an industrial use such as B1(c) floorspace. The Mayor strongly welcomes the design criteria set out in draft Local Plan Policy ECY01k requiring all employment space to be designed to appropriate floor to ceiling heights and space requirements for the intended uses including on site servicing and space for waiting or goods vehicles.

9.16.2 As set out above, beyond the indicative job figures set out in Intend to Publish policy SD1 for Barnet's Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. The Mayor welcomes draft Local Plan Policy ECY01 which seeks affordable workspace where office uses are no longer suitable or viable. This approach could extend to general B1(c) light industrial where there would be no adverse environmental impacts on existing and nearby occupiers.

9.16.3 The Mayor supports Barnet's aim to deliver a range of business space as well as to secure affordable workspace. Proposed Policy ECY02 should distinguish between the two as set out in Intend to Publish London Plan Policies E2 and E3 and set out the specific requirements for affordable workspace in line with Intend to Publish London Plan Policy E3.

### 9.17 Summary and next steps

- Barnet's Local Plan clarifies that both studies demonstrate that industrial space is needed and safeguarding of existing industrial land is important. With the changes to the Use Classes Order and the removal of Class B1 the Local Plan can no longer pursue this requirement.
- Barnet welcomes the on support. ECY01 which has been further revised to reflect changes to the Use Classes Order. Policy ECY02 has also been revised to reflect the London Plan requirements for affordable workspace.

### 9.18 CHAPTER 10 ENVIRONMENT AND CLIMATE CHANGE

9.18.1 NE feels there may be further opportunity for thinking on Natural Capital within the Local Plan. We suggest that an additional objective could address Natural Capital, such an objective might be "to conserve and enhance Barnet's natural capital and ecosystem services". It could also be considered as a cross-cutting theme.

9.18.2 Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

9.18.3 At para 10.3.12 ES feels that Barnet's main water courses are of fair to poor chemical quality. The sentence above is inaccurate, and may be using out-of-date terminology. The Water Framework Directive ecological status data should be used to qualify the current condition of watercourses in Barnet. The three WFD designated river waterbodies (listed below) in Barnet are currently at 'moderate' ecological potential, with the aim to reach 'good' ecological potential by 2027.

- 9.18.4 We welcome para 10.3.16 where it recommends >10 width of buffer zone, however we think this standard should be included in Policy ECC02. We would recommend a caveat with regards to tall buildings that wider buffer zones may be required to mitigate for the impact of over-shadowing of the watercourse corridor where tall buildings are proposed.
- 9.18.5 HE, EA, Mayor of London supports policies ECC01, ECC02 (d, g) and have requested some minor changes to the policy.
- 9.18.6 ECC02 Part (g) should be reviewed in light of NPPF para 149 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, etc.'
- 9.18.7 At Policy ECC02h EA support (part h) where it refers to Table 20 and the requirement for new dwellings to be designed to ensure that a maximum of 105 litres of water is consumed per person per day. We would prefer if the policy itself stated the requirement rather than refer to Table 20.
- 9.18.8 LB Haringey Supports this policy and will continue to work with Barnet and other councils involved.
- 9.18.9 The Mayor welcomes the proposed Local Plan policies on sustainable waste management. The Local Plan should set out on a map which sites and areas in Barnet are to be safeguarded for waste as identified in the North London Waste Plan. In this regard, the safeguarding of all existing waste sites in Barnet is welcome as is the allocation of Scratchwood Quarry for continued and more intensive waste use.
- 9.18.10 Overall the Mayor supports the additions to the Green Belt and MOL, however, he has strong objections to the removal of the MOL designation where it covers green open space that are still distinguishable from the built-up area and forms part of the open land.
- 9.18.11 Map 25 – the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area. Map 26 – this area is predominantly green and along with the railway verge contributes to the physical structure of London by being clearly distinguishable from the built-up area. Map 36 - the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area. Map 37 Green area should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area

9.18.12 The Mayor welcomes policy ECC05 and the inclusion of the green grid approach to green infrastructure in the draft Local Plan and its aim to provide additional open space and enhance existing green and open space as well as biodiversity across the borough.

9.18.13 NE recommend strengthening wording to better reflect the concept of biodiversity net gain as an aim for all development. Wording could also reflect usage of the Biodiversity Metric 2.0. EA suggests Part (a) of the policy should also include 'existing priority habitats and species according to the NERC 2006.' In addition to the London Wildlife Trust we recommend the Brent Catchment Partnership is included in part (a) as a key partner. part (d) of this policy includes the requirement to achieve a biodiversity net gain rather than making 'the fullest contribution, welcome part (f) but recommend floodplain habitat is also included, to read as follows: f) supporting opportunities that facilitate river and floodplain habitat restoration in particular for the River Brent, Silk Stream and Pymmes Brook (See Policy ECC02).

## 9.19 Summary and next steps

- The Vision and Key Objectives have been revised to integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure.
- Barnet agrees with He on examining how the Plan Policies & Site Allocations can contribute to wider environmental enhancement. supporting text of Policy ECC06 revised ensuring Barnet's network of public rights of way are protected and enhanced as a means for walking is a crosscutting feature of the Local Plan. The Local Plan is supported by the London Environment Strategy and the London BAP. The Council intends to commission a Barnet BAP as part of it's actions for biodiversity enhancement and look forward to working with Natural England on it's production.
- Supporting text for Policy ECC04 makes reference to the Accessible Natural Greenspace Standard (ANGSt). Barnet Agrees and have revised the wording at para 10.3.12, 10.3.13, 10.3.16, 10.3.5 as advised by both EA and NE. Barnet has demonstrated a strategic approach to Green Infrastructure through its SPD in 2018. This approach is further strengthened by the policies in this Local Plan
- Barnet agrees with proposed minor changes to policies ECC01 and ECC02 and have revised text accordingly. As proposed by EA a new policy ECC02A has been included. Agreed for ECC02h, however we consider that making cross-reference to Tables is a more effective way of getting the message of policy across.ECC02 (i) has also been revised.
- Barnet welcomes LB Haringey and the Mayor's support on ECC03. Agreed. New map of safeguarded waste sites reflecting the (soon to be adopted) NLWP
- Barnet feels its sensible to alter Green Belt and MOL boundaries in order to support the robustness of their designations and their practical application. The Green Belt Study highlighted that there is no practical



benefit in the MOL boundary cutting through a building. The Green Belt Study recommended this revision to align with the footpath. For map 36 the Green Belt Study recommended a more rational and therefore stronger boundary. In response to map 37 the Green Belt Study recommended that this would create a stronger and more defensible boundary

- Barnet Agrees with NE and EA's proposed wording ECC06 (a-f) as well as to Table 19.

## 9.20 CHAPTER 11 TRANSPORT AND COMMUNICATION

9.20.1 TfL suggested a number of changes to paras 11.3.2, 11.3.5, 11.3.6, 11.3.7, 11.5.11, 11.5.12, 11.16. With relation to paras 11.3.1-4 TfL welcomes the section explaining the current public transport network in Barnet. While overall the section is an accurate reflection of the current situation, there are several points where we would urge greater nuance. TfL Welcomes Council's commitment on policy TRC01 to implementing the Healthy Streets Approach (including applying the ten Healthy Streets Indicators) and to achieving the Mayor's Vision Zero ambition. They also commend the Council for its recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality. They have some minor suggestions how the Council could further build on this policy to achieve its stated aims. TfL strongly welcomes the Council's support of delivery of new and enhanced transport infrastructure in TRC02 and request minor changes under part a iv). With regards to policy TRC03 Welcome the approach to reduce car use, implement Healthy Streets and achieve Mayors Vision Zero ambition. Concern in regard to higher provision of spaces per dwelling (0.5) than London Plan. Would welcome further dialogue on approach to CPZs.

9.20.2 TfLCD feels Table 23 does not fully accord with Table 10.3 of the draft NLP which requires that all areas in London with a PTAL of 5 or 6 should be car free. The Council's proposed standard is also higher than the draft NLP for sites with PTAL 4, 3 and 2. Oppose the paragraph b) requirement for a CPZ to be in place within the immediate vicinity before occupation of a 'car free' development. the introduction of a CPZ does not fall within the control of an applicant and this objective has to be driven and promoted by the Council.

9.20.3 Mayor of London requests Table 16 should be consistent with draft Local Plan policy TRC03, which states that electric points will be delivered in accordance with draft London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.

9.20.4 LB Brent notes that some of these standards, more specifically those for the low PTAL areas, are more generous than those set out in the Secretary of State's Direction to modify the Intend to Publish London Plan. It understands the challenges around encouraging more sustainable forms of travel in low PTAL areas and that LB Barnet is prioritising the majority of its development in areas with higher levels of PTAL to reduce car dependency. Nevertheless, increasing parking provision will encourage greater movement by car, producing additional trips outside the LB Barnet. As such LB Brent encourages LB Barnet to use the parking standards in the emerging London Plan.

9.20.5 Amend residential parking standards to be consistent with those in the London Plan.

## 9.21 Summary and next steps

- Para 11.3.2 text has been updated to reflect progress on Step Free Access.
- Barnet welcomes the opportunity to have further engagement on crowding and capacity of the Northern Line in parallel with the Long Term Transport Strategy in para 11.3.5 and 11.3.6.
- Barnet agrees to revise text at para 11.3.7 and 11.5.12 . In response to para 11.5.11 with high levels of car dependency in the Borough Barnet support a more gradual modal shift that includes use of electric vehicles in line with provisions within the London Plan, so further changes made to this.
- In response to para 11.5.6 and 11.5.8 the Council has indicated its support for active travel and sustainable transport as well as proposing to develop car parking space at stations as part of its approach to reduce car dependency.
- In response to para 11.16 and TfL CD request, Barnet's Car Parking Study and Update sets out the evidence to justify this policy, helping to understand the pattern between property size and PTAL including orbital PTAL in the Borough, therefore no further changes made.
- Barnet welcome engaging with TfL on assessing and meeting transport demands in the Borough. Section 11.3.1-4 has been updated to reflect the Long Term Transport Strategy and Strategic Transport Assessment.
- TRC01 has been revised. The Council continues to support modal change and will continue to seek ways to bring forward initiatives to facilitate active travel. Text revised to focus on highway safety. Revisions also include a footnote in the London Plan (p465) the link will be included as suggested. There is no stipulation in the London Plan to make Transport Assessments a requirement for minor developments.
- Barnet agrees with TfL proposed changes to policy TRC02 and welcome support and refer to our discussions with TfL about stabling and future capacity plans. In response to TfL CD Barnet's Car Parking Study sets out the evidence to underpin this policy, helping to understand the pattern between property size and PTAL in the Borough.

- Barnet agrees with the Mayor of London on revising Table 16 but not with LB Brent on Table 23 as the Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances. It therefore justifies a variation with the London Plan

## 9.22 CHAPTER 12 DELIVERING THE LOCAL PLAN

9.22.1 TfL suggests paras 12.1.1 and 12.3.1 text should be amended. Planning obligations are used to address site specific issues and must meet the three legal tests in the Community Infrastructure Levy (CIL) regulations. Notably, recent changes to the CIL regulations have also removed Section 106 pooling restrictions and the requirement for a regulation 123 list, and Section 106 and CIL can now be used to fund the same piece of infrastructure. This text should be amended. Government has published amendments to the CIL Regulations, which took effect on 1 September 2019.

9.22.2 At para 12.4.1 both TfL and Barnet CCG have requested amendments. TfL suggests NPPG sets out that formulaic approaches to planning obligations should not be set out in SPDs, as they are not examined. The Council may wish to consider what obligations may be subject to formulas and include these in the local plan, particularly in relation to supporting improved bus services and managing any cumulative impacts of growth.

9.22.3 Barnet CCG Supports section on planning obligations and welcomes this paragraph which recognises that section 106 contributions may be secured for an item of infrastructure, in-kind, or a financial contribution towards it. At para 12.7.1 Referring to a set of key indicators and targets developed to monitor the effectiveness of policies against the objectives, these indicators and targets should be included in the draft plan.

## 9.23 Summary and next steps

- Barnet agrees with TfL's requested revisions and have amended 12.1.1 and 12.3.1 accordingly.
- Changes requested by TfL at para 12.4.1 are being confirmed with Barnet CIL team.
- Barnet welcomes Barnet CCG's support and agreed to add an appendix to the plan providing the monitoring framework listing the key indicators and targets used to measure the effectiveness of the of the plan policies.

## 9.24 SITES SCHEDULE

9.24.1 For the avoidance of repetition, the Council's Reg 18 representations and response report highlights all changes made to Sites 1-65 as a result of comments and input received from all neighbouring and statutory authorities listed above (C.2).