

Statement of Common Ground between  
London Borough of Barnet and Thames Water  
July 2022

## 1 Introduction

- 1.1.1 This Statement of Common Ground (SCG) addresses the strategic planning matters specific to London Borough of Barnet, Thames Water and Affinity Water
- 1.1.2 This SCG ensures that the requirements set out in the National Planning Policy Framework (NPPF) have been met. The NPPF states, “Local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”, this includes infrastructure providers.
- 1.1.3 The purpose of the SCG is to document the strategic matters being addressed and the progress in cooperating to address them. It focusses on areas of agreement or disagreement between the parties. Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating. The SCG also forms part of the evidence to demonstrate compliance with the ‘duty to cooperate’.
- 1.1.4 Thames Water have responded to both the LB Barnet Local Plan Reg 18 and Reg 19 consultations. The Council revised the Plan at Reg 19 stage to accommodate the majority of revisions proposed by Thames Water.
- 1.1.5 The Council has set out a Schedule of Initial Main Modifications ([EXAM 4 - Table of Council's Proposed Modifications to Barnet's Draft Local Plan - June 27th 2022 PDF \(2.35MB\) 0.pdf](#)) to the Local Plan. Several of these modifications have been made specifically in response to Thames Water’s representations at Reg 19 stage. These Modifications are set out at :

- **MM 202 – new para 7.8.3A - Managing Hot Food Takeaways**

Another consideration for the Council is that drainage facilities are adequate for the purpose intended and that an effective fat/grease trap has been installed at the appropriate location to control fat and grease entering the drainage system. The Council will require, through a planning condition, that drainage plans for the premises show the location of the grease trap, and set out the proposed schedule of maintenance for the trap before commencement of use of the premises.

- **MM 204 – TOW03A – Managing Hot Food Takeaways**

of hot food takeaways and. The Council will not permit proposals that:

viii) Do not ensure that drainage facilities are adequate for the purpose intended and that an effective fat/grease trap has been installed at the appropriate location to control fat and grease entering the drainage system.

ix) Have not provided drainage plans for the premises which show the location of the grease trap, and proposed schedule of maintenance for the trap before commencement of use of the premises.

- **MM 257 – para 10.14.3 Water Supply and Quality**

- 1.1.6 Developers are encouraged to contact the water/waste water company as early as possible to discuss proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Thames Water encourages developers to use their free pre-planning service to help identify capacity constraints in Thames Waters water and/or wastewater networks that serve their development. Both Thames Water and Affinity Water participated in the development of the Barnet Infrastructure Delivery Plan (IDP) 2021 and the Strategic infrastructure Delivery Plan 2022 on behalf of the West London Alliance of which Barnet is part.
- 1.1.7 The IDP document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.

## 2 Strategic Geography

- 2.1.1 The potable water supply in Barnet is managed by two utility companies, Affinity Water and Thames Water. Affinity Water supplies the majority of the Borough with potable water, however, Thames Water does supply the areas at the southern end of Barnet's portion of the A5. The sewerage is managed solely by Thames Water.

## 3 Strategic Matters

- 3.1.1 This section sets out the factual position regarding strategic matters.

### 3.2 Housing Delivery and Infrastructure

- 3.2.1 Barnet's Local Plan is in general conformity with the London Plan (2021) which forms part of Barnet's Development Plan. The London Plan sets housing targets that boroughs should deliver as a minimum and identifies locations for future growth along with strategic policies for delivering the identified growth.
- 3.2.2 Over the Plan period to 2036, LB Barnet aims to deliver a minimum of 35,460 new homes equal to 2,364 new homes per annum while providing a supply of sites for up to 46,000 new homes.
- 3.2.3 The London Plan (published in March 2021) sets a target figure for Barnet of 23,640 net housing completions for the ten-year period up until 2028/29. As stated in the Reg 19 draft plan, LB Barnet considers this to be a minimum target
- 3.2.4 The Strategic Infrastructure Delivery Plan identified the mains water sources utilised by Thames Water and Affinity Water and acknowledges that Barnet as part of the South East is in 'serious' water stress and that the level of stress is likely to worsen due to a combination of population growth and climate change.
- 3.2.5 Demand forecasting shows that there is a significant supply-demand deficit against the dry year annual average (DYAA) demand in the London Water Resource Zone (WRZ) throughout the planning period (2016-2099). Without investment, security of supply would not be maintained.
- 3.2.6 In recognition of this issue Barnet will continue to work with water suppliers and developers to improve the water efficiency of developments and the infrastructure.

- 3.2.7 London Plan Policy SI 5 Water Infrastructure requires borough Plans to recognise the need to manage the supply of potable water and reduce the usage of water to 110 litres a day per person. This is consistent with the National Framework for Water Resources. LB Barnet's Sustainable Design and Construction SPD already requires developers to design their development to encourage residents to limit their water consumption to 105 litres per day, this is carried forward into the draft Barnet Local Plan. LB Barnet also requires developers to liaise with utility infrastructure companies to ensure that proposed development can be supported.
- 3.2.8 The London Plan also promotes borough Plans to support the upgrade of water and wastewater infrastructure to support development. LB Barnet's Draft Local Plan supports these requirements in Policy ECC02A, Table 20<sup>1</sup> and the supporting text. This is acknowledged and supported by Thames Water and the Environment Agency in their respective responses to the draft Local Plan.
- 3.2.9 **Agreement:** LB Barnet will continue to work closely with Thames Water and Affinity Water and require developers of proposed major developments to liaise with infrastructure providers at the early stages of development and submit Foul Sewerage and Utilities Assessment with their applications. Utilities providers will also be consulted on applicable applications by LB Barnet. Thames Water and Affinity Water will assist LB Barnet during any updates to the Barnet Infrastructure Delivery Plan by identifying areas of the Borough where infrastructure upgrades are required.
- 3.2.10 **Agreement:** LB Barnet will address the need for pumps in basements through the Sustainable Design and Development Guidance Supplementary Planning Document (SPD) which will incorporate and update the previous advice provided on basements in the 2016 Residential Design SPD.
- 3.2.1 **Agreement:** LB Barnet has addressed the need for fat/grease traps in hot food and takeaway establishments by proposing MM 204 with regards to TOW03A..

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<sup>1</sup> Table 20 requires 105 litres a day per person excluding the 5 litres for outdoor use as set out in the 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010.

### 3.3 Site Proposals

- 3.3.1 LB Barnet has incorporated within the Reg 19 Local Plan – Annex 1 – Schedule of Proposals three main forms of wording proposed by Thames Water.
- 3.3.2 The Draft Local Plan references the need for developers to liaise with Thames Water to identify any potential water or wastewater network capacity constraints. This will help to determine whether any water or drainage infrastructure upgrades are required.
- 3.3.3 Proposals in the Draft Local Plan also highlight locations where a critical Thames Water trunk sewer runs through or close to the site.
- 3.3.4 Proposals in Annex 1 also highlights locations where the scale of development is likely to require upgrades to the wastewater network. Proposals highlight that both the developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.
- 3.3.5 The Council has through the Main Modifications proposed the removal of Site 6 – Watling Avenue and Site 9 – Colindeep Lane. This is because the Council has reconsidered the dangers of flood risk following the production of new evidence in the form of the Sequential and Exceptions Test.
- 3.3.6 References to the need to work with Thames Water are set out for 20 of the Site Proposals listed in Annex 1. Thames Water has welcomed these additions to the site proposals in Annex 1.

## 4 Governance Arrangements

- 4.1 This statement of common ground is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.

### Signatories

All signatories agree that this statement is an accurate representation of areas of agreement and disagreement between the parties

Signed:   
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Position: AD Planning & BC

London Borough of Barnet  
Date: July 15<sup>th</sup> 2022

Signed:   
Name: Nicky McHugh  
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Development Planning Lead  
Thames Water  
Date July 14<sup>th</sup> 2022

