

**LONDON BOROUGH OF BARNET
LDF CORE STRATEGY AND
DEVELOPMENT MANAGEMENT POLICIES**

**Examination in Public – London Borough of Barnet’s Response
Hearing Matter 1: Spatial Strategy / Vision and Sustainability**

Matter 1 Spatial Strategy/ Vision and Sustainability

1. Does the CS (CS) provide an appropriate spatial vision for Barnet over the plan period, consistent with national guidance and the Sustainable Community Strategy? Will it satisfactorily and sustainably deliver new development needed in the borough? Is it clear how the DMP DPD will help to implement the CS?

We consider the spatial vision to be clear and appropriate for managing change within Barnet over the next 15 years

The core of the spatial vision as set out at CS Section 6 is that Barnet is a successful suburb in London. We set out the qualities such as the schools, open spaces, low levels of crime and good transport access that contribute to this success. We aim to ensure that Barnet remains successful as it changes, develops and grows between now and 2026.

For Barnet to grow successfully it is imperative that safeguards are in place to protect and enhance the suburban quality of the borough. The Characterisation Study (CD054) provides a detailed understanding of Barnet’s urban character. The Study is considered the most important part of our LDF evidence base as it underpins this distinctiveness and supports our spatial vision

Barnet’s distinctiveness as set out at CS Section 4 in terms of its places and its people contributes to its success as a London Suburb. This distinctiveness is reflected in the nine core objectives set out at CS para 6.2 which will deliver the spatial vision.

The CS spatial vision is consistent with the Sustainable Community Strategy 2010 to 2020 (CD067). The CS extends this vision up to 2026 and provides a clear indication of where Barnet will be in 15 years time. The linkages between the core objectives of the CS and the themes and ambitions of Barnet’s Sustainable Community Strategy are highlighted in Table 2 of the CS.

Barnet’s spatial vision and the nine core objectives to deliver it are consistent with national planning guidance. This is supported by a series of liaison meetings with Government Office for London between July 2008 and March 2010 as set out in Section 12.1 of the Consultation Report (CD006) together with feedback from the Planning Inspectorate through its Frontloading Visit of October 22 2009 (EVD030). Further to this we have published a general

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statement of conformity ([EXD017](#)) with the draft National Planning Policy Framework ([NAT015](#)).

The CS provides a framework to sustainably deliver the development that Barnet on the basis of its comprehensive LDF evidence base (CS para 3.2.2) needs. In Barnet, the ‘Three Strands Approach’ is central to the council’s thinking on sustainable development. CS1 – Barnet’s Place Shaping Strategy – Protection, Enhancement and Consolidated Growth seeks to concentrate and consolidate housing and economic growth in well located areas and provide opportunities for development, creating a quality environment that will have positive economic impacts on surrounding neighbourhoods.

Three Strands ensures that in consolidating planned and pipeline growth we can provide stronger protection for the suburbs, gardens and Green Belt / Metropolitan Open Land and enhance our quality residential neighbourhoods and town centres. Three Strands helps to keep what is best about Barnet, what makes this borough a distinctive place.

The CS Key Diagram (Map 2) shows areas where we expect the majority of housing and economic growth. Table 3 in the CS sets out the delivery of housing growth over the next 15 years, with a focus on the regeneration and development areas, priority housing estates and town centres.

Our consolidated growth by 2026 of

- 28,000 new homes ,
- 71,800 m2 (net) of comparison retail space (including 55,000m2 at Brent Cross Cricklewood)
- 2,200 m2 (net) of convenience retail space
- 370,000 m2 of office floorspace at Brent Cross Cricklewood which will account for the majority of 21,000 new jobs

will be complemented by the

- Protection of Green Belt and Metropolitan Open Land (CS 7- Enhancing and Protecting Barnet’s Open Spaces)
- Enhancement of priority town centres (CS 6 – Promoting Barnet’s Town Centres) and the historic suburban environment (CS 5 – Protecting and Enhancing Barnet’s Character to Create High Quality Places).

We consider that the role of the Development Management Policies (DMP) DPD is clear in how it will help to implement the

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CS. The DMP sets out the policy basis for delivering the long term spatial vision and strategic place-shaping objectives of the CS. Section 1.6 of DMP together with Appendix 1 (Appendix C in the CS) sets out the relationship between the two documents and individual policies. There is ample cross-referencing across both documents to ensure that they are used effectively as a basis for day-to-day decision making.

Section 1.8 of DMP sets out how the detailed LDF policy framework will be implemented and highlights the role of planning obligations and the Community Infrastructure Levy in delivering the infrastructure to support growth.

2. Have both DPDs emerged following consideration of all reasonable alternatives? Is there a clear audit trail to support the chosen/selected approach? Does the sustainability appraisal satisfactorily support the chosen/selected strategy?

Reasonable alternatives for evaluation in arriving at the preferred options in the CS Direction of Travel (CD025) have been assessed in the Draft Sustainability Appraisal (SA) of Barnet’s CS Direction of Travel November 2009 (CD027).

The alternative approaches considered as part of the 80 options at the Issues and Options stage (CD032) are summarised in the CS Direction of Travel document along with our reason for not choosing them. Our justification is based on the SA (CD027) of the Direction of Travel together with feedback from consultation (set out in our Consultation Report (CD031) on the Issues and Options document.

Alternative approaches for the CS included :

- **Allow growth to take place across all parts of Barnet**
- **Allow further shopping and commercial town centre related development to meet projected demand in any town centre in Barnet**
- **Allow redevelopment of employment sites when mixed use development is proposed incorporating residential uses and replacement employment use**
- **Seek mixed and balanced communities by delivering affordable housing in areas where that tenure is underrepresented**
- **Restrict ability to travel in ways that make non public transport usage less attractive**

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- **Protect existing community facilities (including sport, leisure and recreation) where fully utilised, from displacement by development, ensuring re-provision of facilities**
- **Climate change should be the overriding principle for new development**

Alternatives approaches considered for DMP included:

- **identifying particular areas of special character and providing extra guidance to maintain and improve their character**
- **setting higher standards for energy reduction**
- **setting percentage targets for dwelling size priorities**
- **setting an indicative sliding scale for affordable housing delivery for schemes with 10 or more units**
- **protecting all retail uses in local centres**
- **changing the protection for employment land**

Reasons for not pursuing alternatives are clearly set out at the end of each policy in the CS Direction of Travel and the DMP Preferred Approach and the accompanying Draft SAs.

The first draft of the DMP, the Preferred Approach (DM017), took account of the wide range of responses received at the CS Issues and Options stage along with the evidence/information collected, the initial sustainability appraisal and national and regional policy. For each policy section, the Preferred Approach document set out other options including those suggested during consultation on the emerging CS that we have not taken forward. These alternative options were summarised and the Council’s reason for not choosing them set out. Where alternatives existed these were appraised in the SA which sets out in more detail the impacts of the alternatives.

3. Do the two DPDs take forward the policies of the London Plan, reflecting local issues and objectives? How do they relate to those of neighbouring authorities within and outside London?

The CS has taken account of the London Plan (Feb 2008) (CD071) and the draft Replacement London Plan (Oct 2009) (CD070) and expanded on it where appropriate to reflect the specific circumstances of Barnet.

Our spatial policies expand upon London Plan policies and detailed guidance is provided on Opportunity Areas and on housing provision. These policies have been developed to reflect local

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issues and are supported by local plans and studies including the Area Action Plans for Colindale (CD055) and Mill Hill East (CD060), the development framework for Brent Cross – Cricklewood (CD050) and the North London Strategic Housing Market Assessment (SHMA) (REG033).

In DMP we highlight in boxed tables at the start of each policy section the connection between DM Policies and their strategic counterparts in the London Plan.

In his letter of 22 June 2011 (EXD022) the Mayor of London confirmed general conformity of the CS with the 2008 London Plan and the draft Replacement London Plan. Following the letter of general conformity the London Plan was published on 22 July 2011 (CD072).

With regard to the DMP the Mayor of London’s letter of 22 June 2011 (EXD023) confirmed that it was not in general conformity with the 2008 London Plan and the draft Replacement London Plan in respect of residential parking standards. The parking standards are discussed at Matter 7 (1).

The relationship of the CS with the London Plan is set out at Section 2.7. We highlight the Mayor’s vision and objectives together with the work of the Outer London Commission in ensuring that borough’s like Barnet can contribute to London’s economic success. In preparing the CS we have signposted the changes in policy direction with the revisions to the London Plan.

Representations from the former Government Office for London (GOL) raised no fundamental issues affecting the CS. Through GOL we received advice in April 2010 from the Planning Inspectorate on how to proceed with a policy approach on Brent Cross-Cricklewood (BXC) (CD077).

GOL advised in April 2010 that the proposal to use 2006 UDP Saved Policy as the development framework for the BXC opportunity area is broadly acceptable, on the basis that Barnet;

- commits to a review of CS2 in the policy, setting out the triggers and/or timescales for such a review.
- Include any key infrastructure planning issues and requirements (and any necessary contingencies if this infrastructure is delayed/not forthcoming).

On the basis of this advice we proceeded with CS2 which requires comprehensive redevelopment of this area. In view of the 2010 grant of planning permission for the majority of this area it

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provides monitoring arrangements for implementation of the development on that basis by reference to the milestones set out in CS Appendix B. It also indicates that in the event of actual or likely failure to achieve those milestones a review of the CS will be considered along with the possible introduction of further LDDs. On that basis, it was decided that the saved UDP policies on BXC and the Development Framework (DF) (CD050) produced in 2005 would provide the most appropriate detailed policy framework unless and until such a review becomes necessary. We take the view that this is an appropriate basis for delivery of the strategic vision for this area and avoiding unnecessary delay, disruption and waste of resources.

CS Map 1 highlights Barnet’s spatial relationships.

Section 20.12 of the CS provides more detail on our joint working relationships with neighbouring authorities and how we ensure a consistent approach is taken in relation to growth areas and town centres which adjoin or cross borough boundaries. This section also highlights sub-regional and cross-boundary working in producing evidence that supports the approach in the CS.

Our relationship with neighbouring authorities as well as those with whom we share transport links in London, Hertfordshire and Bedfordshire is of particular significance to the success of the North West London to Luton Corridor. Section 2.8 and para 20.11 of the CS highlights the North West London to Luton Corridor as a basis for delivering transport and social infrastructure to support economic growth.

With the focus of much of our growth in the west of the borough we have recently become a partner in the West London Alliance. This enables the council to develop collaborative strategies and initiatives on key issues such as transport and economic development with partners in the west as well as maintaining linkages with boroughs in the North London sub-region as a member of the North London Strategic Alliance. This places Barnet in a unique position of strategic relationships with 13 London boroughs.

4. Is there a local justification for the plans and policies in both documents supported by a robust and credible evidence base? Is it appropriate that so many policies in both plans and supporting text to policies should contain an element of flexibility and generality in their application?

Barnet's LDF evidence base is robust and credible. The comprehensive evidence base underpins both documents. The

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extent of the local evidence base is set out at para 3.2.2 of the CS. Additional evidence with regard to the DMP is set out in section 1.5 of that document. The majority of evidence highlighted at para 3.2.2 of the CS was commissioned by the council or produced in-house.

There are also additional studies produced by other bodies such as the GLA and Natural England which we have utilised. The evidence is considered to be up to date and fit for purpose. Many areas are the subject of ongoing evidence gathering as reported through the AMR.

Policies in both documents are designed to respond to the transition from a development control culture to a development management process which involves seeking balanced planning decisions that support positive and sustainable development. This will enable officers to apply policy flexibly where appropriate. However we do not consider that it is appropriate for the DPDs to always be flexible. There are areas such as tall buildings where it is necessary to be prescriptive to provide certainty to developers / local communities over our approach to such proposals. The supporting text provides detail on where this approach is appropriate. We consider that a more flexible policy approach will enable DPD’s to better respond to long term change.

5. Why does the CS seek to rely on Area Action Plans (AAPs) to guide new development in some areas where substantial change is anticipated (e.g., Mill Hill East and Colindale) and a non statutory framework for others (Brent Cross-Cricklewood (BXC))? Should the CS be used as an opportunity to initiate a review of AAP policies?

The relationship of the CS to the AAPs for Colindale and Mill Hill East is set out at Section 1.3. We state at para 1.3.3 that the reason why we frontloaded the AAPs was to support the early delivery of housing. It also reflected the adoption of Barnet’s UDP in 2006 as an up-to-date and fit for purpose borough-wide planning framework.

The London Plan states that Opportunity / Intensification Planning Frameworks can take different forms dependent on local circumstances. It recognises in Annex One that the BXC SPG has the status of an adopted Opportunity Area Development Framework.

Legal advice to the Council relating to the lawfulness of Barnet’s approach to saving the UDP policies on BXC (and the DF) to which they refer) is attached. The advice directly responds to questions raised on the lawfulness of this approach in correspondence

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submitted on behalf of Bestway. In our response to Q3 above we also highlight the advice on this approach we received from the Planning Inspectorate through GOL.

In addition to the PINS/GOL advice and legal advice, we reiterate the words of the Mayor of London when the DF was published in 2005. The DF represents the fruitful co-operation of both public and private sectors in particular the council and the Mayor of London. The level of collaboration recognises the importance of this development project at both local and sub-regional levels; its scale and the complexity of the potential development proposals and the time period over which it is being planned. The 20-year period that the Framework seeks to cover means that this document must, of necessity, include an in-built flexibility whilst ensuring robust and rigorous tests to capture up-to-date policies and best practice methodologies as well as ensuring good design and high quality buildings. To this end, the DF establishes strategic design principles, thereby ensuring the delivery of the sustainability agenda that is at the core of national and strategic planning policy.

The relationship of the CS to the BXC DF is set out at Section 1.4. This provides the background to how the regeneration of the area has progressed since DF adoption in December 2005 and UDP adoption in May 2006.

Given progress already made at BXC and the magnitude of the regeneration envisaged, it is questionable what the benefits of an alternative approach would generate given delay, disruption and use of public resources.

We consider that mechanisms are already in place to ensure that the context and assumptions behind the vision, objectives and delivery policies for each AAP are still relevant. Both AAPs have been recently adopted and have been followed by planning applications and consents to deliver housing, retail space and open space.

In the Colindale AAP at Policy 8.5 on Monitoring Development in Colindale it is stated that the Council, as part of its Annual Monitoring Report (AMR), will monitor and measure progress against the monitoring frameworks contained within this AAP. The Council will involve the Colindale AAP Stakeholder Group in this review process and consider any policy adjustments needed to keep the plan on track to help deliver AAP targets.

Similarly in the Mill Hill East AAP at para 7.1.4 it states that the Council will monitor AAP implementation and assess the extent to which objectives and policies are being achieved. Where targets

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are not being met, the council will explain why and set out steps to correct this through the AMR.

Each AAP is supported by a suite of monitoring indicators. Our most recent AMR ([CD045](#)) highlights the progress made in both areas. It is therefore not our intention to instigate a review of recently adopted planning documents that are fit for purpose and are being successfully implemented.