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Our ref: 100790
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Dear Alice and Team

Community Infrastructure Regulations 2010 (as amended) Publication of Draft Charging Schedule Consultation

Thank you for consulting us on the draft Community Infrastructure Levy (CIL) Charging schedule on 18 February 2021. We appreciate the opportunity to comment.

We would like to contribute evidence of green and flood risk infrastructure needs within Barnet to inform the evidence within the **Infrastructure Delivery Plan (IDP)**. This will help to ensure you have a more complete picture of what the environmental infrastructure needs are.

Flooding (pages 13 and 51)

We would like to raise awareness of our Brent 2100 Strategy. This strategy will develop plans to reduce flood risk to communities along the River Brent and its tributaries. The strategy will also aim to work in partnership with others to develop integrated environmental enhancements to the Brent, its tributaries and the surrounding environment. Together these will improve both the quality of the environment and quality of life for people in areas of regeneration along the rivers such as Colindale and Brent Cross. It's possible that the projects we identify within the Brent 2100 Strategy will have beneficial outcomes for growth in Barnet including Brent Cross Cricklewood, Colindale and Edgware Town Centre.

Paragraph 3.4 page 13 references the Silkstream project. We are in the process of identifying whether there are viable options to reduce flood risk to properties throughout the Silkstream catchment including Colindale. This work will include a more detailed economic assessment that will determine the viability of any potential flood defence schemes. This project is being delivered alongside the Brent 2100 Strategy which aims to identify ways to reduce flooding across the whole Brent catchment. Government funding rules dictate that if this project identifies suitable opportunities to reduce flood risk, it will be necessary for us to seek and secure additional funding from other sources in order to advance the project. For this reason we think the Silkstream FAS project should be listed on page 51 under the 'Flooding, Drainage, Waste and Air Quality' section.

We are aware that Barnet's Lead Local Flood Authority may wish to put forward information on flood risk projects they are leading on. For example, the Childs Hill catchment FAS and Decoy Brook catchment FAS which are aiming to reduce flood risk to 38 homes and 188 homes respectively as well as reducing flood risk on local roads.

Parks and Open Space Projects (page 34 and 59-62)

There are some parks and open space projects listed within the IDP, some of which relate to rivers. We recommend the following information on projects and 'infrastructure to be delivered' is added to the IDP.

Brent Park, the Decoy Ponds

There is a Water Framework Directive (WFD) project in development to remove or notch two weirs on the River Brent in Brent Park (location: TQ2400588870) to allow fish passage and improve the biodiversity through the park. We are currently undertaking flood modelling to understand the potential risk of weir notching/removal options, and are working with Thames21 to manage the project. Once these options have been considered, further funding will be needed to work up detailed designs. We are unsure of the costs currently. Previous work in the park included improving the water quality and biodiversity value of The Decoy ponds with London Borough of Barnet and this newer project is a continuation of this.

Oak Hill Park

We are currently developing a project within Oak Hill Park to notch or remove the weir within the Pymmes Brook main river by the car park, and include some upstream and downstream improvements to the channel. This will address several WFD actions for the Pymmes Brook. A replacement of the low bridge in the middle of the park that has caused a lot of issues with locals in 2020, and repairs to the footpath which is flooded for much of the year could be included within this project. We have approximately £12k funding for this project but would require further funding contributions to complete structural surveys of the bridge and implement further in channel improvements.

Welsh Harp Reservoir

We are aware of a potential project for improvements to Welsh Harp Reservoir. We believe this has been discussed between yourselves, London Borough of Brent and Canals and Rivers Trust. We are not sure of the details on this project but it might be one to include within the IDP.

Invasive species management

Invasive non-native species are a widespread issue across Barnet, on both the Brent and Lee catchment rivers, and are common across many green spaces in the borough (not always linked to the wetland environment). Currently, invasive species are one of the biggest threats to biodiversity across the world, second only to habitat loss. Additionally, under the Wildlife and Countryside Act, 1981 (as amended), there is a legal requirement for landowners to ensure that invasive species are not spread further. Local Authorities should also be ensuring that they are meeting these legal requirements within their open spaces.

Almost all of the Parks and Open Space projects identified on the IDP will likely need to consider invasive species management in order for successful outcomes to be achieved. For example, **Colindale Park** (page 59) and the surrounding area contains records of Giant Hogweed (also a public health risk), Japanese Knotweed, Himalayan Balsam, Butterfly bush and Signal Crayfish. Improvements to the park will likely need to consider strict biosecurity practices and invasive species management to avoid breaching legislation which could be costly. Similarly, **Rushgrove Park** (page 60) contains both Japanese Knotweed and Himalayan Balsam. The **Brent Cross area park projects** (pages 60-61) have multiple records of Giant Hogweed and Japanese Knotweed. **West Hendon Playing fields** (page 62) contains Himalayan Balsam, Giant Hogweed and Japanese Knotweed. We recommend that invasive non-native species management is added under '*Infrastructure to be delivered*' column for each of these projects. We believe this also recognises an opportunity for partnership working and cost savings.

Catchment wide action on invasive species are needed to tackle this growing issue. Management often requires action over several years and requires coordination across administrative and ownership boundaries to achieve meaningful results. For example, Japanese Knotweed requires a minimum 3 year program to achieve a successful reduction in extent. Funding uncertainty is often the biggest barrier to action being taken. Developments should be

encouraged to address invasive species issues on their land, however the issue is often more widespread and can't always be linked to a specific site. Meaningful action on invasive species could begin to be achieved across the borough if CIL funding can be used to support projects in addressing this issue. This will help to reduce biodiversity losses across the borough.

Action in Barnet is especially important as its rivers form the headwaters of the wider Brent and lower Lee catchments. By improving invasive species management within Barnet, this reduces the likelihood of invasive species spread to boroughs further downstream, further enhancing the biodiversity across London. The Brent Catchment Partnership is currently considering options for catchment wide action on invasive species. The inclusion of invasive species management to the IDP would support the catchment partnership in realising and implementing their plans. Therefore, we strongly recommend the IDP includes invasive species management within the IDP as both a general statement in Section 5 'Green Infrastructure' and linked to the specific parks and open spaces projects as already mentioned above.

The delivery of green spaces also support and provide platforms for improving the health and water quality of Barnet's rivers and water features, creating habitats for wildlife, reducing biodiversity loss and managing the risk of flooding and climate change. We think these benefits should be recognised within section **5.2 'Parks and Open Space'** page 34 or under the general heading of green infrastructure. Our legal responsibility also lies in providing good quality green and open spaces for our wildlife as well as our residents, and delivering on the Water Framework Directive (Thames River Basin Management Plan, 2015) to improve Barnet's rivers. There are significant opportunities to include Natural Flood Management measures and making space for water within parks and open spaces, particularly in upstream locations such as the Upper Dollis Brook (Stoneyfields Park and Moat Mount).

**Infrastructure Funding Statement:
Infrastructure List or Regulation 123 List**

There are quite a number of Park and Open Spaces projects and also a few improvement projects for rivers we have identified above. In the next available update to the CIL Infrastructure List we strongly recommend the inclusion of 'Improvements to water quality and habitats along Upper Dollis Brook, Pymmes Brook, River Brent and Silk Stream' as there are projects which may benefit from CIL funding. We would also recommend a reference to 'Strategic Flood Risk Management Infrastructure' to help enable the advancement of any LLFA or EA projects to reduce the risk of flooding.

We would welcome further discussion or feedback from yourselves on our comments above. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

**Keira Murphy
Planning Specialist**

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