

November 2021

Statement of Common Ground between

London Borough of Barnet and London Borough of Haringey

1 Introduction

- 1.1.1 This Statement of Common Ground (SCG) addresses the strategic planning matters specific to London Borough of Barnet (LB Barnet) and London Borough of Haringey (LB Haringey).
- 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.”
- 1.1.3 The purpose of the SCG is to document the strategic cross-boundary matters being addressed and the progress in cooperating to address them. It focusses on areas of agreement or disagreement between both authorities on strategic cross-boundary matters. 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 In London, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan. Specific strategic matters relating to heritage, environment, transport that are overseen by other organisations will be addressed in other Statements of Common Ground. This will serve to make the documents more concise for relevant parties
- 1.1.5 The document is intended to be ‘live’, updated as circumstances change and agreement occurs on any outstanding issues.
- 1.1.6 LB Barnet and LB Haringey have a good working relationship, mainly through duty to co-operate meetings and membership of the North London Waste Planning Group at officer, chief planner and councillor levels. LB Barnet and LB Haringey also work together on a pan-London level through Planning Officers Society, Association of London Borough Planning Officers (ALBPO) and London Councils.

2 Strategic Geography

- 2.1.1 Barnet borders Haringey to the southeast and shares cross border areas including Colney Hatch Lane, East Finchley and the New Southgate Opportunity Area. Key connections between LB Barnet and LB Haringey are the A406 and A1000.
- 2.1.1 LB Haringey have responded at Reg 18 and Reg 19 stages to Barnet’s Local Plan. LB Haringey has started work on a new Local Plan proposed to be adopted in 2023 and which is intended to run from 2022 to 2037. Consultation on the first document (pre-Reg 18) was completed in February 2021 and LB Barnet responded. LB Haringey is currently preparing a Reg 18 draft Local Plan for consultation in early 2022.

3 Strategic Matters

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

3.2 Housing Need and Housing Target

- 3.2.1 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 (as confirmed by the London Plan) while providing a supply of sites for up to 46,000 new homes. LB Haringey's housing target has been confirmed at 1,592 net new homes per year through the London Plan 2021.

3.2.3 LB Haringey welcomes LB Barnet's decision to set a minimum housing target of 35,460 new homes across the Borough over the next fifteen-year period consistent with the net housing completion targets set out in Policy H1 of the London Plan. LB Haringey note that LB Barnet has provided a supply of sites for to 46,000 homes representing the Borough's full objectively assessed need for housing as derived from the Barnet Strategic Housing Market Assessment (2018). They also note that a robust strategy is in place to deliver infrastructure to support growth above the London Plan target (see below) and therefore do not have any objection to the enhanced level of supply in the Local Plan.

3.2.4 **Agreements:**

- Both parties consider that they can meet their London Plan housing targets within their administrative boundaries

3.3 **Tall Buildings**

3.3.1 The London Plan requires Development Plans to define, based on local context, what is considered a tall building for specific localities. LB Barnet Policy CDH04 Tall Buildings identifies the criteria and strategic locations for such developments. Due to their potential impact, development proposals that include tall buildings will not only need to demonstrate compliance with Policy CDH04 but also the requirements listed in London Plan Tall Buildings Policy D9, which emphasises that proposals for tall buildings should address the visual, functional and environmental impacts of such structures.

3.3.2 Within Policy CDH04, LB Barnet identifies the New Southgate Opportunity Area as strategic locations where tall buildings (defined in LB Barnet as 8 storeys or 26 metres or more above ground level) may be appropriate. The consideration of the parameters for tall buildings in New Southgate will be a key feature of the joint area planning framework. Policy CDH04 states that appropriate siting within an Opportunity Area or Growth Area is a requirement for Very Tall buildings (15 storeys or more).

3.3.3 The London Plan states the Boroughs should clearly identify local views in their Local Plans. LB Barnet requires that visual impact is addressed in terms of long-range views from the top of a building, mid-range views from the surrounding neighbourhood and intermediate views from the surrounding streets. Within LB Barnet's Local Plan (Map 4) there is a Locally Important View from King George Playing Fields, Hadley Green towards Central London and Canary Wharf. This view traverses LB Enfield and LB Haringey. LB Barnet will seek to ensure that development is compatible with such views in terms of setting, scale and massing. Proposals for buildings that LB Barnet considers cause harm to these views will be resisted. LB Barnet has reviewed and clarified the Locally Important Views. The outcome of this work, represented by widening cones, should be reflected in Map 4 of the Draft Local Plan. LB Barnet considers that Map 4 should be revised to show these unverified cones rather than straight lines to represent the Locally Important Views. When notified of tall building proposals within LB Haringey, which may affect these Views, LB Barnet welcomes the opportunity to consider possible impacts on these long-distance views. Discussions will be informed within the context of London Plan Policy D9 – Tall Buildings.

3.3.5 LB Barnet will be producing a Designing for Density SPD to provide detailed parameters to Local Plan policy to provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use and development capacity; including the assessment of appropriateness of tall building proposals in

strategic locations with identified site-specific, and character considerations to ensure that the development of tall buildings occurs in the most appropriate parts of the borough.

3.3.6 **Agreements:**

- Both parties agree the importance of protecting Locally Important Views and that a key feature of joint working in the New Southgate Opportunity Area will be considering the appropriateness of, and parameters for, tall buildings as defined in Policy CDH04. LB Barnet intend (in 2022) to produce a new SPD on Designing for Density and look forward to engagement with LB Haringey on this strategic matter.

3.4 **New Southgate Opportunity Area**

3.4.1 LB Barnet and LB Haringey recognise the regeneration potential at New Southgate aligned with the newly defined designation as an Opportunity Area (OA) in the London Plan 2021. Ambitions for the regeneration of the New Southgate OA and a new joint Planning Framework to deliver it are set out in the London Plan paras 2.1.36 to 2.1.38. These cover enhanced accessibility and connectivity (with the potential arrival of Crossrail 2 at New Southgate) to support regeneration in the wider area and mitigate the severance effect of major transport corridors through the area. The area to the west of the East Coast Main Line and to the south of the A406 North Circular suffers from poor quality environment and lack of proper connections to the stations and the wider area. The high traffic flows on the North Circular Road have a dominant and adverse impact on local residents and businesses by way of congestion, noise, air pollution and poor public realm along the corridor. The London Plan highlights potential to deck over a small section of the North Circular immediately to the south of New Southgate Station and/or tunnel a section of the North Circular between New Southgate and Green Lanes. The Planning Framework should also consider the benefits and viability of these options, including their potential to unlock the delivery of new homes and jobs as well as complement other transport initiatives in the area and the wider environmental, health and public realm benefits.

3.4.2 This potential is further reflected in LB Barnet's Local Plan. Within the Vision to 2036 New Southgate is highlighted, due to its good public transport and active travel choices, as one of Barnet's most sustainable locations, where growth has been directed. Within Policy BSS01 – Barnet's Spatial Strategy New Southgate is listed as one of the most sustainable locations where growth will be concentrated in order to better manage the impacts of development on the climate. The contribution of New Southgate OA to delivering sustainable growth is outlined in Policy GSS01 – Delivering Sustainable Growth. Policy GSS09 Existing and Major New Transport Infrastructure outlines that the Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on Crossrail 2.

3.4.3 LB Haringey stated in response to Reg 19 that they “remain committed to engaging with Barnet through the plan-making process, working together on strategic matters and cross-boundary issues, particularly in respect of the New Southgate area where both boroughs have strategic objectives for managing growth and development.”

3.4.4 **Agreements:**

- Both parties agree to work together on progressing the joint planning framework for the New Southgate Opportunity Area with strategic partners and meet their neighbouring, strategic and London Plan commitments.

3.5 **Town Centres**

3.5.1 LB Barnet's town centre hierarchy is set out in Local Plan Table 13. The hierarchy consists of one Major Centre, 14 District Centres, 16 Local Centres (including Colindale Gardens) and a Regional Shopping Centre (with the future potential designation as a Metropolitan Centre) at Brent Cross. In addition to this, there are seven out of town retail parks, over 50 local parades and several weekly markets in the Borough.

3.5.2 There is only one Local / Neighbourhood Centre shared with LB Haringey – Colney Hatch Lane. LB Barnet's Policy TOW02 emphasises more protection of retail uses as part of the Commercial Business & Service uses in town centres, local centres and parades as well as more protection of retail in local centres and parades (Use Class F1). LB Haringey notes that East Finchley is identified as a District Town Centre, with plans for further development and growth in this area and expressed an interest in being kept updated on proposals for this area given its proximity to Muswell Hill District Centre. Likewise, LB Barnet requests to be kept updated with regards to any proposals in Muswell Hill Town Centre.

3.5.3 **Agreements:**

- Both parties agree to work on maintaining the vibrancy of Colney Hatch Lane local centre.
- Both parties agree to share information on plans and proposals affecting East Finchley and Muswell Hill Town Centres.

3.6 **Transport**

3.6.1 Managed by the Transport for London (TLRN), both the A406 North Circular and A1000 Great North Road connecting Barnet and Haringey, could potentially be enhanced. However, to do so will require more substantial public transport investment, alongside the healthy streets initiatives, to unlock their capacity to accommodate growth.

3.6.2 LB Barnet's Local Plan is supported by a Strategic Transport Assessment which has assessed the cumulative impact expected from projected growth up to 2036. This includes impacts relating to the highway network (strategic and non strategic) and public transport (bus and rail).

3.6.3 LB Barnet's Local Plan references the proposed Crossrail 2 routes as directly connecting north and south London while providing a continuous rail link beyond the capital into the southern and northern home counties. One of the northern spurs would connect to New Southgate. Although Crossrail 2 is subject to confirmation, the earliest possible delivery date would not be before the latter part of LB Barnet's Plan period which runs up to 2036. Whilst work on project development and seeking consent for the Crossrail 2 scheme has been paused, TfL continues to work with DfT on a suitable timetable for updating the safeguarding directions so that the latest Crossrail 2 design is protected from future development. This safeguarding refresh will include the alignment of the proposed New Southgate branch which is a part of the Crossrail 2 route that is not currently safeguarded.

3.6.4 **Agreements**

- Both parties agree to work collaboratively on any transport issues, especially on enhancing both A1000 and A406 routes, working with TfL on initiatives to unlock capacity for growth.

3.8 **Air Quality**

3.8.1 LB Barnet and LB Haringey are committed to reducing the air quality impacts of traffic, particularly freight and construction traffic. Emerging regulatory and technological changes are likely to have a significant impact over the lifetime of the Local Plan. This should lead to a much-improved environment as highlighted in LB Barnet's policy GSS11 and LB Haringey's Pre Reg 18 Draft New Local Plan: First Steps Engagement November 2020 and LB Haringey Air Quality Action Plan 2019-2024.

3.8.2 **Agreements:**

- Both parties agree to work together to implement policies in Local Plans to address issues of air quality, seeking to reduce pollution at source.

3.9 **Pinkham Way**

3.9.1 LB Barnet and LB Haringey share an interest in the Former Friern Barnet Sewage Works site, also known as the Pinkham Way site on the borders of Muswell Hill, Bounds Green and Friern

Barnet. Within the Proposed Submission North London Waste Plan (NLWP) this land is designated as site A22-HR – Friern Barnet Sewage Works (LEA 4) /Pinkham Way, Haringey. It comprises 5.95ha of land owned separately by the North London Waste Authority and LB Barnet. There are a number of policy, environmental and amenity issues impacting on this area, although it previously accommodated a sewage treatment works. Haringey's Local Plan has designated this area as Local Employment Area (LEA) and a Borough SINC – a Site of Importance for Nature Conservation Grade 1, Local Employment Area/ Employment Land, Flood Zone 2 and 3 (part). The area is subject to key Haringey Local Plan policies: - SP13: Open Space and Biodiversity, DM 20: Open Space and Green Grid, SP8: Employment, DM 37: Maximising the Use of Employment Land and Floorspace, and DM 24: Managing and Reducing Flood Risk.

3.9.2 The NLWP identifies the planning constraints including flood risk and nature conservation around Priority Area A22-HR and sets out the need for mitigation and enhancement to be considered as part of any development proposals. The NLWP Inspector's Report published in October 2021 states that Priority Area A22-HR has a dual designation as Site of Importance for Nature Conservation (SINC) and Local Employment Area (LEA) in the Haringey Local Plan Strategic Policies (2013) and is protected for employment use, subject to consistency with its nature conservation status. The NLWP Inspector has stated that it is not the purpose of the NLWP Examination to determine if both, or either, of these designations should continue to apply.

3.9.3 **Agreements:**

- Both parties recognise the sensitivities with regard to flood risk and nature conservation and agree to work together on any future proposals affecting the Former Friern Barnet Sewage Works site also known as the Pinkham Way site. Although the boundaries of the New Southgate Opportunity Area are yet to be determined and a planning framework yet to be produced LB Barnet will welcome early engagement with LB Haringey about realising its opportunity.

3.10 **Flood Risk and Water Management**

3.10.1 Barnet hosts nearly half of the headwater tributaries to the main River Brent (including the Dollis Brook, Silk Stream, Edgware Brook, Deans Brook, Folly Brook, Burnt Oak Brook and Mutton Brook).

3.10.2 **Agreement**

- Both authorities agree to work together to implement policies in Local Plans to address issues of flood risk and water management.

3.11 Gypsies and Travellers

- 3.11.1 The housing needs of Gypsies and Travellers and Travelling Showpeople households is a strategic issue, However LB Barnet note that LB Haringey have not identified it through their response on LB Barnet's Reg 19 Local Plan.
- 3.11.2 LB Barnet as part of the West London Alliance commissioned ORS consultants to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in 2018 in accordance with the Government's Planning Policy for Traveller Sites (PPTS). The GTAA identifies no gypsies and travellers and travelling show people in Barnet and therefore no demand for pitches. LB Barnet have re-examined this evidence and identified incidences of unauthorised encampments as part of a GTAA update in 2021. With this new evidence there still remains no known need for providing accommodation within LB Barnet. This conclusion is supported by ORS consultants.
- 3.11.3 The Mayor of London will commission a London-wide GTAA in accordance with PPTS 2015. This will form part of the review of the London Plan. LB Barnet will work with the Mayor on the Londonwide GTAA.
- 3.11.4 There are two existing permanent Gypsy and Traveller sites in Haringey, one at Wallman Place, N22 providing 6 pitches and the second on Clyde Road, N15 providing four pitches. The existing Local Plan contains a policy to protect these two sites and sets out criteria that a new site or substantial alteration to an existing site will have to meet. The Plan identifies that the borough requires four additional pitches up to 2017 to meet the need identified in the London Gypsy and Traveller Accommodation Needs Assessment 2008.
- 3.11.5 As part of the process of preparing a new Local Plan, LB Haringey has commissioned ORS consultants to prepare a Gypsy and Traveller Accommodation Needs Assessment. This is being prepared consistent with the Government's PPTS and will inform relevant policies in LB Haringey's emerging new Plan.

3.11.6 Agreements:

- Both parties agree that provision in their respective Local Plans for gypsies, travellers and travelling showpeople is justified by evidence from GTAA produced in accordance with PPTS 2015.
- Both parties also agree that new evidence from the Londonwide GTAA as part of the review of the London Plan will inform provision within LB Barnet.

3.12 Strategic Infrastructure

- 3.12.1 LB Barnet's Infrastructure Delivery Plan (IDP), published in January 2021, identifies infrastructure needs to support future growth of 46,000 new homes over the next 15-year period. The IDP identifies Barnet's infrastructure needs comprehensively while highlighting some uncertainties around funding from Government departments that may affect how planning for future provision is considered.
- 3.12.2 LB Haringey welcomes Policy GSS01 Delivering Sustainable Growth which states that infrastructure is key to supporting growth in Barnet, including investment in transport, education, health and open spaces. They also welcome the identification of major transport infrastructure upgrades in Policy GSS09 Existing and Major New Transport Infrastructure which are expected to be delivered in LB Barnet over the plan period and will support growth and development in the Borough.
- 3.12.3 LB Haringey's IDP update (2016) and latest draft Local Plan suggest allocating suitable sites in town centres to accommodate new development and infrastructure that is needed such as civic,

cultural, community and leisure. They will continue to support the provision of new and enhanced social infrastructure to enable residents to access the right support, training and education to improve their outcomes, health and wellbeing to meet the needs of an expanding population.

3.12.4 Agreements

- Both LB Barnet and LB Haringey will continue to identify infrastructure needs across the strategic opportunity area through the provision of new or improved facilities.

4 Governance Arrangements

- 4.1 This statement has been informed by on-going engagement between the parties. 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.
- 4.3 Key stages of each borough’s plan making process (set out in Table 1) will be triggers for the SCG to be reviewed, however, strategic matters will be dealt with on an on-going basis in between formal reviews of the SCG.

Local Authority	Present Plan Adoption	Reg 18	Reg 19	Submission	Adoption
Barnet	2012	January 2020	June 2021	Late 2021	Early 2023
Haringey	2013 (2017)	Early 2022	Early 2023	2023	2023

Table 1: Plan process

Signatories

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



Signed:
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 Date: 15 December 2021



Signed:
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 Date: 13 December 2021