

Statement of Common Ground between London Borough of Barnet (LB Barnet) and London Borough of Harrow (LB Harrow) January 2022

1 Introduction

- 1.1.1 This Statement of Common Ground (SCG) addresses the strategic planning matters specific to London Borough of Barnet (LB of Barnet) and London Borough of Harrow (LB of Harrow).
- 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 considered and the progress made in cooperating to address them. It focusses on areas of agreement or disagreement between both authorities on strategic cross-boundary matters. The document is intended to be ‘live’, any updates to this document will be produced 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 LB Barnet and LB Harrow have a good working relationship, mainly through regular duty to co-operate meetings and membership of the West London Alliance. Both boroughs have worked on a series of joint evidence studies including Strategic Market Housing Assessment (SHMA), Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), Strategic Flood Risk Assessment (SFRA) and Strategic Infrastructure Delivery Plan (SIDP). Partnership working has been most recently demonstrated through the production of the SPD for the Edgware Growth Area. LB Barnet and LB Harrow also work together on a pan-London level through Planning Officers Society, Association of London Borough Planning Officers (ALBPO and London Councils.
- 1.1.6 As Outer London boroughs LB Barnet and LB Harrow work with neighbouring authorities in Hertfordshire through duty to co-operate and participation in wider meetings with the Rest of the South East organised by the Mayor of London.

2 Strategic geography

- 2.1.1 LB Barnet is located to the east of LB Harrow, with the A5 running north – south as the administrative boundary. Located along this are the two town centres of Edgware (Major) and Burnt Oak (District) which overlap the administrative boundary (Burnt Oak is also within the administrative area of LB Brent).
- 2.1.2 LB Harrow’s Local Plan currently comprises Core Strategy (2012) and Development Management Policies (2013) that set out the strategic approach to managing growth and development up to 2026.
- 2.1.3 LB Harrow have not responded to LB Barnet’s Regulation 19 Local Plan in Summer 2021. In their response to the LB Barnet Local Plan (Regulation 18), LB Harrow stated that it broadly supports the draft plan but would welcome further discussion on cross boundary matters.

3 Strategic Matters

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

3.2.1 **Housing need and housing target**

3.2.2 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.

3.2.3 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. LB Harrow's new housing target is now confirmed at 802 net new homes per year through the new London Plan March 2021.

3.2.4 **Agreements:**

- Both authorities 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's 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 the 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 Major Thoroughfares including A5 as a strategic location where tall buildings (defined within LB Barnet as 8 storeys or 26 metres or more above ground level) can be considered. LB Harrow have been made aware of LB Barnet's A5 Heights Study which forms part of the evidence base on tall buildings. This has helped inform LB Harrow's Characterisation and Tall Building Studies in 2021. CDH04 also identifies the Edgware Growth Area as a strategic location where tall buildings (defined as 8 storeys or 26 metres or more above ground level). 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.

3.3.4 Within LB Barnet's Local Plan (Map 4) there are 2 Locally Important Views towards Harrow on the Hill in LB Harrow which pass through LB Brent from Millfields Park, and Golders Hill Park in LB Barnet. This became a matter for LB Brent's Local Plan EIP. In response to the Brent Local Plan EIP Inspector's concerns LB Barnet (in December 2020) clarified the extent of these views, represented by widening cones, towards Harrow-on-the Hill and its willingness to discuss potential impact with regard to tall building proposals within LB Brent and LB Harrow which fall within the cones of the Locally Important Views. 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 4 Views. When notified of tall building proposals within LB Brent and LB Harrow, which may affect these Locally Important 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 Major road corridors through LB Barnet provide opportunities for infill and intensification. LB Barnet will work with Transport for London (TfL) and Highways England to help find and deliver appropriate sites. The routes currently most suitable for this form of development i.e. A5 Edgware Road divides

LB Barnet and LB Harrow. Policy GSS11 states that the A5 Edgware Road Major Thoroughfare may have potential for residential led tall building development in certain locations optimising site availability and good public transport accessibility, providing the opportunity for revitalising these areas.

- 3.3.7 LB Harrow supports the overarching principle of Policy GSS11, specifically where it relates to an improvement to the A5. Development / regeneration of this corridor is considered to be an appropriate position, specifically where development is brought forward with the Healthy Streets Approach.
- 3.3.8 LB Harrow have prepared a Characterisation and Tall Building Study in 2021 to inform the forthcoming Local Plan review (and its response to London Plan Policy D9) and to be a material consideration in determining planning applications in the meantime. Consideration of this evidence base is encouraged for developments within LB Barnet located adjacent to the joint administrative boundary. The Study provided an opportunity to understand Barnet's approach to tall buildings and constructively engage with Barnet in the development of Harrow's evidence base in relation to tall buildings (including design principles).
- 3.3.9 LB Harrow does not object to any of the policies that have a direct impact on the development that would occur on or adjacent to the administrative boundary with LB Barnet. LB Harrow agrees with the policy approaches put forward, and accordingly agree that the alternatives put forward at Reg 18 stage were not appropriate. Notwithstanding this, development along the common administrative boundary has the potential to impact on LB Harrow and its residents. A holistic approach to development within these locations is considered appropriate to ensure that administrative boundaries are seamless in character and impacts on LB Harrow residents can be appropriately mitigated.

3.3.10 **Agreements:**

- Both authorities agree to engage constructively on matters regarding tall buildings, particularly proposals along the A5. LB Barnet intend (in 2022) to produce a new SPD on Designing for Density and look forward to engagement with LB Harrow on this strategic matter.
- When notified of tall building proposals within LB Harrow, which may affect these Locally Important Views, LB Barnet welcomes the opportunity to consider possible impacts on the long-distance views.

3.4 **Edgware Growth Area**

- 3.4.1 Edgware Town Centre is bisected by the A5, although the majority of the designated town centre lies within LB Barnet. Edgware Town Centre is classified within the London Plan as a Major Town Centre, with a high residential growth potential. LB Barnet's Reg 19 Local 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.
- 3.4.2 LB Barnet and LB Harrow's approach to Edgware is supported by the Edgware Growth Area SPD. LB Barnet was successful in bidding for funding under the Mayor of London's Homebuilding Capacity Fund, where it secured funding for the preparation of a jointly produced SPD covering the Edgware Growth Area. LB Harrow look forward to continuing the dialogue and cross working with LB Barnet in relation to implementing this SPD, which will assist in guiding development of the Edgware Town Centre, and also across administrative boundaries. Edgware Town Centre forms part of LB Harrow as well as of LB Barnet. Most recently both boroughs have worked on the joint Edgware Growth Area Supplementary Planning Document (SPD). This SPD planning framework will enable Edgware to realise its capacity as exemplified in LB Barnet Local Plan proposals 27 (Edgware Town Centre) and 28 (Edgware underground and bus stations), ensuring growth act to directly enhance the town centre. The SPD was adopted in June 2021.

3.4.3 **Agreements:**

- LB Barnet and LB Harrow will continue dialogue and cross working in relation to implementing the Edgware Growth Area SPD.

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 Burnt Oak District Town Centre sits across the three administrative boundaries of LB Harrow, Barnet and Brent. LB Harrow welcomes the opportunity to hold further discussions with LB Barnet in relation to how development would be delivered cross administrative borders, to ensure the success of the wider district centre. LB Barnet draft Local Plan seeks to support development in town centres such as Burnt Oak, through policy GSS08 (Barnet's District Town Centres) as such locations are more sustainable. LB Harrow supports the inclusion of such a policy, and the principle of development in sustainable locations.
- 3.5.3 LB Harrow supports 'generic' town centre policies at TOW01 (Vibrant Town Centres) and Policy TOW02 (development Principles in Barnet's Town Centres, Local Centres and Parades).
- 3.5.4 The Colindale / Burnt Oak Opportunity Area (located in Barnet) within the London Plan sets aside an indicative employment capacity of 2,000 jobs and also the minimum delivery of 7,000 new homes. LB Barnet adopted an area action plan (AAP) for Colindale in 2010 LB Barnet's Growth and Regeneration Team intends to produce a Colindale and Burnt Oak Masterplan in 2022 which will support the continued implementation of the Colindale AAP - and establish future priorities for healthy and connected places, place-based initiatives. LB Barnet will welcome the contributions of LB Brent and LB Harrow to this regeneration masterplan and joint working on maintaining the vitality and vibrancy of both Burnt Oak and Colindale town centres and to meet their neighbouring, strategic and London Plan commitments. LB Barnet is working with TfL to provide step free access at Burnt Oak station and will update LB Brent and LB Harrow on progress.
- 3.5.5 LB Barnet will continue to support development that preserves or enhances night time economy activities in an inclusive and accessible way within Edgware Town Centre.
- 3.5.6 **Agreements:**
- Both authorities agree to work on maintaining the vitality and vibrancy of both Edgware and Burnt Oak town centres and meet their neighbouring, strategic and London Plan commitments including the night-time economy at Edgware Town Centre.
 - LB Barnet will engage with LB Harrow on development density within Burnt Oak, as part of a holistic approach across the town centre to ensure its success.

3.6 Site Proposals

- 3.6.1 LB Barnet have identified a number of site proposals across the Borough. Proposals close to LB Harrow are site 5 - Edgware Hospital (Major Thoroughfare, site 6 - Watling Avenue car park & market (Burnt Oak Town Centre, site 27 - Edgware Town Centre (Edgware Growth Area), site 28 - Edgware Underground & Bus Stations.
- 3.6.2 LB Harrow has not objected to the proposals and has acknowledged them as sustainable locations for more intensive development.. Notwithstanding this, the quantum of development set out in the proposals will have some impact on LB Harrow and its residents.
- 3.6.3 **Agreements**
- LB Barnet and LB Harrow will share notifications on planning proposals affecting each Borough. This will help ensure early engagement between both parties as these proposals become planning applications.

3.7 Transport

- 3.7.1 LB Barnet and LB Harrow are connected by A5 Edgware/Watling Avenue, A41 and M1 in the north, managed by the Transport for London (TLRN) and Highways England which could potentially be

enhanced, but will require more substantial public transport investment, alongside the healthy streets initiatives, to unlock their capacity for growth.

- 3.7.2 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).
- 3.7.3 West London Orbital (WLO) will deliver a passenger service along existing rail tracks between Hounslow/ Kew Bridge and Hendon/ West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood. The WLO will have positive impacts through unlocking housing delivery and creating leisure, community and amenity opportunities along the corridor. Delivery is expected by 2029 at the earliest. Whilst WLO does not have planned stations in LB Harrow, it is nonetheless in such proximity as to have a positive impact on orbital connectivity.
- 3.7.4 Several stations within Barnet currently benefit from Step Free Access, however the Council is working with TfL and National Rail to increase the number further. There are currently plans to make improvements at four stations to provide step free access including at Burnt Oak station.
- 3.7.5 **Agreements**
- Both authorities agree to work collaboratively on enhancing all transport routes including WLO mentioned above and work with/on TfL initiatives to unlock their capacity for growth as well as with Highways England.
 - Both authorities agree the transport assessments / aspects that underpin the Edgware SPD should be the basis for addressing impacts of the planned developments in the Major Town Centre.

3.10 Gypsies and Travellers

- 3.10.1 The housing needs of Gypsies and Travellers and Travelling Showpeople households are a strategic issue. 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.
- 3.10.3 There is one permanent Gypsy and Traveller site at Watling Farm with two pitches in Harrow. Similar conclusions for Harrow on demand for pitches in accordance with PPTS was reached by the West London GTAA. The Mayor of London will commission a Londonwide 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.

3.10.5 Agreements:

- Both parties understand 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 and LB Harrow.

3.8 Air Quality

- 3.8.1 LB Barnet and LB Harrow 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.

3.8.2 Agreements:

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

3.9 Flood and Water Management

- 3.9.1 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).
- 3.9.2 Both LB Barnet and LB Harrow have worked together on the production of the West London Strategic Flood Risk Assessment. Both boroughs are also working together (LB Barnet as lead authority) on the Silk Stream Flood & Resilience Innovation (SSFRI) project (2021 – 2027).

3.9.3 Agreement

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

3.10 Strategic Infrastructure

- 3.10.1 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 LB Barnet's infrastructure needs comprehensively while highlighting some uncertainties around funding from Government departments that may affect how planning for future provision is considered. Barnet's is committed to maintain strong relationships with transport providers to ensure that when provision issues are identified, steps can be taken to help delivery to ensure that growth can be delivered in a sustainable manner.
- 3.10.2 The West London Strategic Infrastructure Delivery Plan (SIDP) will assist in identifying infrastructure required to support development in the sub-region where it serves more than one borough. In addition there has been on-going dialogue as part of the West London Alliance boroughs with regard to strategic infrastructure, specifically with reference to the West London Orbital Railway.

3.10.3 Agreement

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

4 Governance Arrangement

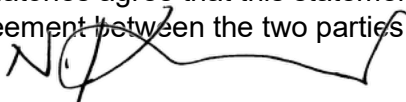
- 4.2.1 This statement has been informed by on-going engagement between the parties. This statement of common ground is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.
- 4.2.2 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.

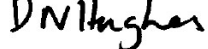
Local Authority	Present Plan Adoption	Reg 18	Reg 19	Submission	Adoption
LB Barnet	2012	January 2020	June 2021	Late 2021	Early 2023
LB Harrow	2013	Mid - 2022	Winter 2022	Spring 2023	Winter 2023

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: 
Name:
Position:
London Borough of Barnet
Date: 02022022

Signed: 
Name: David Hughes
Position: Planning Policy Manager
London Borough of Harrow
Date: 27/01/22