

Planning Policy Team,
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29 July 2021

Dear Planning Policy Team,

LB Barnet Draft Local Plan – Regulation 19 consultation

Thank you for the opportunity to further comment on LB Barnet's Local Plan.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust owns and manages the Brent Reservoir (Welsh Harp) and the Silk Stream (only between the reservoir and the A5) within the LB Barnet.

Our waterways do, or have the potential to, provide important areas for recreation, biodiversity, sustainable active transport (with related health and air quality benefit), business, tourism, a focal point for cultural activities, and they are heritage assets. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments.

The Welsh Harp, or Brent Reservoir, is owned and managed by the Trust. You will be aware that the reservoir falls within the administrative boundaries of both LB Barnet (to the north) and LB Brent (southern section).

The reservoir is designated a Site of Special Scientific Interest and is a very important over wintering location for birds, as well as for other biodiversity.

The Trust has the following comments to make on the draft Local Plan:

London and South East

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Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792. registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB

Background

The Welsh Harp (Brent Reservoir) is a key focus area for the Trust, and we are continuing to work on interpretation, waymarking and improved access to the reservoir to enhance the visitor experience. We know that access to water supports the wellbeing of visitors to our waterway network (see Simetrica, [‘Assessing the wellbeing impacts of waterways usage in England and Wales’](#)). We believe that by improving the quality of the visitor experience, alongside environmental quality, the reservoir can further support wellbeing (including mental and physical health) within Brent, Barnet and the wider area.

The reservoir was ‘drawn-down’ in January 2021 and this resulted in considerable public and stakeholder concern over debris/litter, siltation and the general environment condition. To address this, a consultation with the various stakeholders is being held to develop a comprehensive management plan. £100k obtained from People’s Postcode Lottery is going to fund a hydrological and topographical survey. The money will also be used to develop a pilot project that aims to create new wetland habitat for birds. The current bird rafts on the reservoir are over 30 years old. The plan is to replace them and put in new rafts that can attract birds, consistent with an ambition to improve the SSSI status. In addition, the story of the reservoir from its early 19th-century origins has an important role to play in public engagement and the promotion of the site as a visitor attraction.

Securing a circular route around the reservoir would require overcoming constraints that are chiefly located in the LB of Brent, yet such a key achievement would also benefit the LB of Barnet’s connectivity vision. We suggest that this should be identified as an aspiration within the Local Plan.

The Trust are supportive of the activities and involvement of other groups on the reservoir, including those facilitated by London Wildlife Trust’s post, funded by the S106 funds from the West Hendon redevelopment. We believe there are improvements that can be made on working together, and this is understood and recognised by other parties, such as the Environment Agency, Natural England and the London Wildlife Trust. It should be noted, however, that the Trust are required to follow a specific process when permitting third parties to carry out work at the reservoir, under Section 281 of the Wildlife & Countryside Act.

Page 79 – Strategic Parks and Recreation

The Trust generally welcome the intention to increase walking and cycling connections across the borough and in particular to the Brent Reservoir and inter-connecting green and blue spaces. In principle, we also welcome the intention to open up inaccessible waterways where this is possible and promote them as recreational and commuting routes, to enhance the offer to Barnet residents for health and wellbeing, strengthen the walking and cycling network, and potentially help to address some of the littering that currently goes on in these, at times, unseen places.

We also support the promotion of new green chain walking and cycling routes, and long-distance routes, such as the Edgware - Brent Reservoir route, the Barnet Loop, and the two new strategic routes proposed by the Ramblers connecting to either end of the Brent Reservoir (Forgotten Rivers Walk, and Counter’s Creek).

We note the proposals for a new Brent Cross West station at the eastern end of the Brent Reservoir with new and enhanced walking and cycling connections. This provides an opportunity to legibly connect to the reservoir, especially across the railway and M1 providing an alternative to the poor-quality environment of the Brent Park Road underpass/tunnel.

Whilst it is not a Trust waterway, we note that the spelling of Dollis Brook requires correction in the fourth line of p79.

Policy CDH03

The recent reservoir draw-down showed plastic pollution to be a key issue at the Welsh Harp (Brent Reservoir). We suggest that policy CDH03 might helpfully include a policy requirement for public realm plans to incorporate strategies that seek to prevent littering and fly-tipping. We can explore working together with Barnet (along with Brent) to develop plans to tackle plastic pollution at the Welsh Harp (Brent Reservoir) if there is a plan to increase visitor numbers.

Section 6.23 – Barnet’s Heritage

In our previous response to the Barnet Local Plan we stated that the Welsh Harp (Brent Reservoir) has significant heritage importance within LB Barnet, and is part of the industrial heritage of the London canal network. We suggested that the Local Plan should recognise its heritage value through local-designation or its identification as a non-designated heritage asset and encourage development to protect and enhance its historic character. None of its structures are designated heritage assets within LB Barnet, but we consider that the protection and enhancement of this waterway infrastructure is important in its own right, as part of historic transport infrastructure. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic reservoir. Greater recognition of the heritage importance of the reservoir would be consistent with paragraph 185 of the NPPF, which states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”.

Policy CHW02 (p182) - Promoting health and wellbeing

As noted above, the Trust supports greater use of the Welsh Harp (Brent reservoir) for recreational and community uses. Research undertaken for the Trust (by Simetrica – link above) has shown the wellbeing benefits of spending time by water. Our evidence (although not specific to the Welsh Harp) supports the Council’s statement that COVID-19 lockdowns have demonstrated the importance of publicly accessible open space (para 8.19.1), with many of our urban waterways experiencing significant increases in visitor numbers. We strongly support the following ambition from 8.19.2:

By providing better access to green public spaces and improving sports and community facilities the Council seeks to promote the integration of physical activities into the everyday lives of residents, as well as encouraging a better understanding of the natural environment.

However, we are somewhat surprised to see that policy CHW02 does not contain a clear reference to the importance of access to green/blue infrastructure and open space for health and wellbeing. It also does not appear to give the council a clear policy mandate for seeking improvements to the quality and accessibility of such infrastructure through developer contributions. We would suggest that this is reconsidered, especially given that ECC04 doesn’t appear to us to clearly provide for this either (see below).

Page 217 – Water Supply and Water Quality

Our regulation 18 response explained that the Pymmes Brook eventually feeds into the Lee Navigation, which is owned and managed by the Trust. Misconnections and other pollution entering Pymmes Brook can end up in the Lee Navigation, adversely affecting its water quality. **We, therefore, support the Council’s aspiration to enhance the biodiversity, water quality and amenity value of the Pymmes Brook (10.26.14).** We note from 10.14.5 that this may involve working within developers and the EA to reduce levels of urban runoff and remove invasive species.

Policy ECC04 (p233) – Barnet’s Parks and Open Space

The Trust supports many of the aims of policy ECC04. We understand that the aspiration to manage and enhance open spaces providing improved accessibility (through point a(i)) would apply to the Welsh Harp reservoir on the basis that it is designated as Metropolitan Open Land. However, we are surprised that policy ECC04 does not appear to give the council a clear policy mandate for seeking improvements to the quality and accessibility of areas such as the Welsh Harp reservoir through developer contributions. We would suggest that this is reconsidered in order that the council’s aspirations under this policy are more capable of being delivered.

Site No.14 – Sainsburys The Hyde, Edgware Rd

Although this site does not directly abut any land or waterspace in the Trust’s ownership, it will likely have a significant impact on the adjacent section of Silk Stream, which feeds into the stretch that the Trust owns and manages, between the A5 road and the Brent Reservoir itself. We support the requirement for the site development to avoid harm to the adjacent Site of Borough Importance for Nature Conservation, and include improvements to the Silk Stream River Corridor.

Yours faithfully,

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>