

Date: 30 July 2021
Our ref: 358213



London Borough of Barnet

BY EMAIL ONLY

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Dear Sir/Madam,

**Consultation: Barnet London Borough Council – Local Plan 2021 – 2036, Reg 19
Consultation Request**

Thank you for your consultation on the above dated 28 June 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the Council's approach to achieving sustainable development through its Local Plan, particularly through its suite of Natural Environment policies that include protection of nationally and locally designated sites, the enhancement of the local ecological network and the requirement for biodiversity net gain.

Brent Reservoir SSSI

Natural England welcome the changes that have been made to the local plan after our consultation response at Regulation 18. We are pleased to see that the SSSI is now referred to as both Welsh Harp and Brent Reservoir throughout the plan, and that specific wording has been added to Policy ECC06 to reference the protection of the SSSI. We note that the Local Plan identifies the opportunity to improve access to Brent Reservoir through regeneration proposals for West Hendon (10.22.1), and as mentioned in our Regulation 18 response, would suggest that recreational pressures for the Local Plan will need to be considered if more of the site is accessible for public use.

Climate Change

An increasing number of Local Authorities across England are formally declaring climate change emergencies. The UK became the first country in the world to declare a climate emergency and the government have recently set in law a climate change target to cut emissions by 78% by 2035 compared to 1990 levels, which will bring the UK more than three-quarters of the way to net zero by 2050. National planning policy outlines the need for Plans to take 'a proactive approach to mitigating and adapting to climate change', that policies should 'support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts'. The Government's 25 Year Environment Plan sets out a goal for mitigating and adapting to climate change.

Natural England advise all Local Plans acknowledge the climate and ecological emergencies

currently underway and recognise the important role of the natural environment to deliver measures that reduce the effects of climate change and enable nature recovery. We advise the Plan makes provision to secure appropriate reductions in carbon emissions over the Plan period to avoid further deterioration and make a clear commitment to net zero by an appropriate date that meets or exceeds the Government's international commitments.

In considering climate change 'mitigation' (reducing levels of greenhouse gases in the atmosphere) and 'adaptation' (preparing for and dealing with the consequences of climate change), we strongly recommend that the Plan incorporates the important role of the natural environment to address the effects of climate change. This can be delivered via the implementation of 'nature-based solutions', which involves the restoration of ecosystems by means such as woodland planting on low grade agricultural land or in urban settings, restoration of permanent species-rich meadow pasture or removal of inappropriate plantations on former priority habitat with restoration of the latter, for the long-term benefit of people and nature. It is recommended such measures are brought together into a strategic approach that delivers multifunctional benefits to people and wildlife that links to other aspects of the Plan, including green infrastructure implementation, health and wellbeing, delivery of biodiversity net gain, natural flood management, air and water quality benefits, as well as carbon sequestration (climate mitigation) and climate adaptation.

We recommend consideration is also be given to addressing issues on habitats and protected sites that will be exacerbated by climate change, such as fire risk, reduction of water resources and flooding. We also recommend the Plan makes clear that housing delivery policy will not be met at the expense of such targets or sustainability policies, to ensure sustainable development is properly achieved across the Plan period.

Natural England would be happy to advise further on this aspect. Further advice on Climate Change adaptation can be found within Annex A below.

Green Infrastructure

We would advise green infrastructure to be designed in accordance with Natural England Framework of Green Infrastructure Standards, which is to be published in 2021, as well as being in line with the [Accessible Natural Green Space Standards](#) (ANGST).

Natural England is currently leading national work on a Green Infrastructure Standards project, expected to launch later this year. This will be a vital contribution to delivery of the 25 Year Environment Plan. We will be happy to continue to advise your authority as this work progresses.

Additionally, we recommend the Plan outlines the need for securing the long term management of new and existing green infrastructure (GI) and for protecting it from future development. Options could include the use of conservation covenant agreements, LNR declaration, Fields in Trust designation, green space designation in neighbourhood plans or Town and Village Green registration. Alternatively land can be passed on to a suitable NGO, or to your Council, or a Town or Parish Council.

The Local Plan should also reference the following green infrastructure policy standards:

- Keep Britain Tidy runs the Green Flag Award scheme on behalf of Government. Anyone can apply to have their greenspace assessed against the Green Flag Award Quality standard, for payment of a fee. The Award is adaptable to a range of types of greenspace including parks, gardens, social housing, etc.
- The Sensory Trust published 'By All reasonable Means' which sets good practice guidance on providing access to the natural environment for people of all abilities. Although not all areas will be able to provide this (such as some wildlife areas), the aim is to get the majority of areas accessible to all at least in part.
- The Forestry Commission has developed guidelines for Tree canopy cover, to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level.
- The Woodland Trust recommend woodland access standards. Accessible woodland of at

least 2 ha should be available with 500 m of new homes and woodland of at least 20 ha within 4 km.

The plan should ensure new green infrastructure and habitat creation is monitored to ensure that it develops in accordance with its stated intention.

New development located in easy walking distance from existing natural greenspace and publicly accessible nature reserves will benefit substantially by the presence of such facilities in the locality and will through an increase in visitors, inevitably increase ongoing visitor management costs. Where the management of the green infrastructure is not already secured, local plan policy should require development to make a financial contribution appropriate to the scale of the development to the managers of the reserve / greenspace to cover these additional costs. This is particularly important where the nature reserves, or nature parks, are run by charities that do not have secured income to cover the in perpetuity management costs associated with new housing development.

The Plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (as required by NPPF paragraph 171). This should include detailed requirements for new areas of green infrastructure along with a review of existing to ensure that they are meeting the multifunctional benefits and thereby maximising their Natural Capital.

Biodiversity (and Biodiversity Net Gain)

Natural England welcomes the inclusion in the local plan of a policy for biodiversity. The policy should refer to the benefits to Borough residents from the ecosystem services that being close to nature provides, and outline an expectation that offsite net gain must be sought as close to the development as possible. In some instances this may be difficult, and Natural England recommends that consideration is given to developing a suite of projects that development within the Borough can contribute to, thereby ensuring the biodiversity within the Borough is protected and enhanced. For example, partners that manage Local Nature Reserves and Sites of Importance for Natural Conservation in the Borough could submit projects to the local planning authority to enhance the ecological value of these sites. These projects could be funded by development that requires offsite compensation or additional enhancements to achieve biodiversity net gain. This approach can also be used by development with limited opportunities for biodiversity net gain on-site.

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF.

We welcome the planned guidance on how net gain will be applied within the Borough, but advise strengthening this wording within a net gain policy by making provision for a net gain supplementary planning document (SPD). Within this SPD, we would encourage the Council to consider requiring more than a 10% biodiversity net gain, where it can be appropriately evidenced locally that this is required.

- *Calculating net gain*

Please be advised that Biodiversity Metric 2.0 has been updated and replaced by [Biodiversity Metric 3.0](#) which was published on the 7th July 2021. We advise that the Biodiversity Net Gain Policy includes this metric to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain.

Please note that Natural England and Defra are developing an Environmental Net Gain/metric for Natural Capital Net Gain that can be used in conjunction with the Biodiversity Metric (but not instead of). Further information will be available later in 2021.

- *Monitoring of net gain*

Natural England advise that your Plan includes requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to

take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

Local Nature Recovery Strategies

Work is underway within Natural England and with partners on several of the key elements of the Environment Bill, including Nature Recovery Networks and Local Nature Recovery Strategies. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. They will cover the whole of England and will be developed by Responsible Authorities (RAs) appointed by the Secretary of State, usually at a county scale. Each strategy will:

- Map the most valuable existing habitat for nature
- Map specific proposals for creating or improving habitat for nature and wider environment goals
- Agree priorities for nature's recovery

It is the government's intention that mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRs have also been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area.

There are currently 5 LNR pilots; these pilots are testing various aspects of development of LNRs, including their relationship to strategic planning, to inform secondary legislation and statutory guidance. According to the current timetable LNRs should be rolled out in Spring 2022.

Given that national guidance on LNRs and their relationship to strategic planning is still in development, we advise that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNR covering the area.

We would be very happy to comment further as the plan process progresses. If you have any queries relating to the detail in this letter please contact me by return email.

Yours Faithfully,

Isabella Jack
Adviser, Sustainable Development
Thames Team

Annex A – Climate Change Adaptation

We have put together the following list of resources that can help to embed climate change adaptation into the Local Plan:

- The [Climate Change Adaptation Manual](#) provides extensive information on climate change adaptation for the natural environment. It includes the Landscape Scale Climate Change Assessment Method that can help people through an assessment of the impacts and vulnerabilities of their natural environment features and the adaptation they can plan. There are sections on habitats, species, green infrastructure, access and recreation and geology and geomorphology.
- The [Nature Networks Evidence Handbook](#) – again, a repository for our current evidence, tools and action regarding nature networks, it contains practical suggestions for designing and delivering a network and there is a practitioners version.
- A range of spatial data including - [National Biodiversity Climate Change Vulnerability Assessment](#) (NBCCVA), National Habitat Network, [Species Risks and Opportunities](#) climate envelope modelling, etc. These datasets are included in the Landscape Scale Climate Change Assessment Method in the Climate Change Adaptation Manual, the Data and Tools chapter in the Nature Networks Evidence Handbook and NRN toolkit list. Furthermore, the fragmentation metric of the NBCCVA tool provides the Biodiversity and Connectivity Tool within the Biodiversity Metric of Net Gain.
- A range of introductory climate change webinars ([Natural England Climate Change webinars](#)) are available on our YouTube channel.

The following are planning and climate change documents which looked at climate change, species responses, ecological networks and spatial planning:

- Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (NECR004) <http://publications.naturalengland.org.uk/publication/41006?category=10003>
- Making space for wildlife in a changing climate (NE263) <http://publications.naturalengland.org.uk/publication/47002?category=10003>
- Spatial planning for biodiversity in our changing climate (ENRR677) <http://publications.naturalengland.org.uk/publication/63010?category=10003>