

Second Draft

Statement of Common Ground between

London Borough of Barnet (LB Barnet) and London Borough of Camden (LB Camden)

December 2021

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 Camden (LB Camden).
- 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 Camden 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 Camden 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 LB Barnet is located to the north of LB Camden. Key locations include Cricklewood Town Centre which is shared between LB Camden, LB Brent and LB Barnet as well as Golders Green Town Centre and the Hampstead Garden Suburb.
- 2.1.2 LB Camden is updating its Site Allocations Local Plan and is due to publish the Reg 19 version in 2022. It also anticipates starting a review of its Local Plan next year.
- 2.1.3 LB Camden have not responded to LB Barnet’s Reg 18 and 19 versions of the Local Plan.

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 Camden's new housing target is now confirmed at 10,380 (1,038 new homes per year) through the new London Plan March 2021.

3.2.4 **Agreements:**

- Both authorities consider 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 the Cricklewood Growth Area as a strategic location where tall buildings (within Barnet 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). LB Barnet will seek to prepare a more detailed planning framework for this area, such as through an Area Action Plan or Supplementary Planning Document, potentially through working with LB Brent and LB Camden.

3.3.3 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.

3.3.4 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 crosses from LB Barnet into LB Camden. 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.

3.3.5 **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 Camden on this strategic matter.

3.4 Brent Cross Growth Area

3.4.1 LB Barnet supports comprehensive regeneration of Brent Cross to deliver a new Metropolitan Town Centre providing a range of uses including new homes, a new commercial office quarter, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurant and hotels supported by an extensive programme of infrastructure investment up to 2036. The regeneration of the Brent Cross Growth Area is being delivered in three parts – Brent Cross North, Brent Cross Town and Brent Cross Thameslink.

3.4.2 LB Barnet has signalled that it intends in 2022 to initiate a review of the 2005 Cricklewood, Brent Cross and West Hendon Development Framework and introduce a new planning framework Supplementary Planning Document for the area to reflect the updated masterplan and respond to changing circumstances around Brent Cross Shopping Centre. LB Barnet will welcome the contribution of LB Camden to the production and adoption of the new SPD by 2024.

3.4.3 **Agreements:**

- LB Barnet and LB Camden will continue dialogue and cross working in relation to proposals within Brent Cross Growth Area and the review of the Development Framework.

3.5 **Cricklewood Growth Area**

3.5.1 LB Barnet supports comprehensive regeneration of Brent Cross to deliver a new Metropolitan Town Centre providing a range of uses including new homes, a new commercial office quarter, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurant and hotels supported by an extensive programme of infrastructure investment up to 2036. The regeneration of the Brent Cross Growth Area is being delivered in three parts – Brent Cross North, Brent Cross Town and Brent Cross Thameslink.

3.5.2 Cricklewood Town Centre has been identified as a Growth Area within LB Barnet's Local Plan. This is a well-connected location that has been prioritised for improving its overall offer due to its larger scale and economic gravity. This is particularly reflected in encouraging employment hubs for small to medium businesses and LB Barnet Local Plan proposals Plan proposals 7 (Beacon Bingo) and 8 (Broadway Retail Park).

3.5.3 LB Barnet will work with LB Brent and LB Camden in developing a more detailed planning framework for Cricklewood.

3.5.4 **Agreements :**

- LB Barnet and LB Camden will continue dialogue and cross working in relation to proposals within Cricklewood Growth Area and any future planning framework covering this location.

3.6 **Town Centres**

3.6.1 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.

3.6.2 The London Plan classifies Cricklewood as having a night-time economy of more than local significance. LB Barnet will continue to support development that preserves or enhances night-time economy activities in an inclusive and accessible way within Cricklewood as well as Brent Cross and Golders Green.

3.6.3 **Agreements:**

- LB Barnet and LB Camden Both authorities agree to work on maintaining the vitality and vibrancy of both Cricklewood and Golders Green town centres and meet their neighbouring, strategic and London Plan commitments including the night-time economy.

3.7 **Site Proposals**

3.7.1 LB Barnet have identified a number of site proposals across the Borough. Proposals close to LB Camden are located within the Brent Cross and Cricklewood Growth Areas.

3.7.2 **Agreements :**

- LB Barnet will ensure early engagement with LB Camden with regard to planning applications in the Brent Cross and Cricklewood Growth Areas.

3.8 **Transport**

3.8.1 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).

3.8.2 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, benefiting LB Barnet and LB Camden. Although construction work on the WLO may begin by 2026, the earliest date when passenger services are likely to operate is 2029. LBB agrees to revise text to reflect later date.

3.8.3 **Agreements**

- Both authorities agree to work collaboratively on enhancing all transport routes including WLO as mentioned above and work with/on TfL initiatives to unlock their capacity for growth.

3.9 **Gypsies and Travellers**

3.9.1 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.

3.9.2 In Camden there are two permanent Gypsy and Traveller sites at Carol Street and Castlehaven Road providing a total of five pitches. In addition Camden is home to a site for Travelling Showpeople at the North Fairground Site. Camden carried out GTAA in 2014 on the basis of the former PPTS published in 2011. The Camden GTAA indicated that there would be a need for 16 additional pitches for gypsies and travellers over the period 2016-2031, but no need for transit sites and no need for additional plots for travelling showpeople. No sites in Camden have been identified for additional pitches at this stage.

3.9.3 The London Plan 2021 commits the Mayor of London to initiating a Londonwide GTAA in accordance with PPTS 2015. This is expected to form part of the review of the London Plan. LB Barnet and LB Camden will work with the Mayor on the Londonwide GTAA. In the interim, LB Camden intends to commission a Camden GTAA in accordance with PPTS 2015. If the new GTAA continues to show a need for additional pitches, and no sites in Camden can be identified to provide them, LB Camden may need to explore the potential for neighbouring boroughs to meet some of its need for pitches.

3.9.4 **Agreements:**

- LB Camden understands that provision in the Barnet Draft Local Plan 2021 to 2036 for gypsies, travellers and travelling showpeople is justified by evidence from a GTAA produced in accordance with PPTS 2015.
- Both parties agree that LB Camden is not currently asking other boroughs to meet any of its need for gypsy and traveller pitches, but that LB Camden may need to explore the potential for other boroughs to meet some of its needs in the future.
- Both parties also agree that new evidence from the Londonwide GTAA and the review of the London Plan will inform future plan-making in relation to gypsies, travellers and travelling showpeople within LB Barnet and LB Camden.

3.10 **Air Quality**

3.10.1 LB Barnet and LB Camden 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.

3.10.2 **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.

3.11 **Flood Risk and Water Management**

3.11.1 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).

3.11.2 Agreement

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

3.12 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 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.

3.12.2 Agreement

- Both LB Barnet and LB Camden will continue to identify infrastructure needs through the provision of new or improved facilities.

3.13 Waste

3.13.1 Barnet and Camden are part of a group of boroughs that are jointly preparing the North London Waste Plan (NLWP). The NLWP sets out the planning framework for waste management in North London for the next 15 years. It identifies sites for waste management use and sets out policies for determining waste planning applications. At the time of writing, the NLWP has passed examination and is due to be adopted by each of the boroughs in early 2022.

3.13.2 Through the preparation of the NLWP, separate SoCGs have been produced. Details are available on the NLWP website - <https://www.nlwp.net/>

4 Governance Arrangement

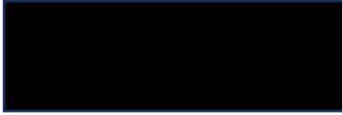
- This statement has been informed by on-going engagement between the parties. This statement of common ground is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.
- 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 Camden	2017	tbc	tbc	tbc	tbc

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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London Borough of Barnet

Date: 17th December 2021



Signed:

Name: Daniel Pope

Position: Chief Planning Officer

London Borough of Camden

Date: 4 January 2022