

Appendix 06: Pre 2024 Chronology with London Borough of Barnet



18_04_2016 Notes of meeting between London Borough of Barnet and Hertsmere Borough Council

NOTE OF MEETING BETWEEN BARNET AND HERTSMERE COUNCILS

VENUE: Council Offices (Hertsmere Council), Borehamwood
DATE: 18 April 2016, 10.30am

Those attending:

Rita Brar (Rita) - Barnet Council
Nick Lynch (NL) – Barnet Council
Richard Blackburn (RB) – Hertsmere Borough Council
Tai Tsui (TT) – Hertsmere Borough Council

Reason for Meeting

- To share progress on plan-making;
- To explore matters of common concern;
- To identify actual or potential strategic planning issues; and generally
- To fulfil each council's obligations under the 'Duty to Co-operate'(DTC) introduced by the Localism Act 2011 and expanded upon in the National Planning Policy Framework

1. Introduction and Previous Minutes

TT introduced as new Principal Planning Officer (HBC).

The minutes of the previous meeting (23 January 2014) had been accepted.

2. Updates on respective Local Plans

(a) Hertsmere:

Site Allocations and Development Management Policies DPD (SADM) examination hearing finished last week. Likely adoption of Plan after consideration of Modifications was considered to be September 2016.

Elstree Way Area Action Plan (EWAAP) was adopted in July 2015. CIL charging schedule came into effect on 1 December 2014.

The review of the Core Strategy has started with work on the evidence base: late 2018 is the target date for adoption.

(b) London Borough of Barnet:

Core Strategy (to 2025/6) and Development Management DPDs adopted in September 2012. Site Allocations DPD is no longer being pursued.

Barnet is preparing a new Local Plan which will comprise a full review and incorporate site allocations. The target for completion is 2019. Issues and Options Paper expected in Autumn 2016.

B's current Core Strategy is aligned with the Greater London Plan (to 2026). Principle that London consumes its own smoke has been followed. But that view is changing.

The London Plan (FALP) sets the housing target for Barnet – i.e. 2,349 dwellings p.a. (compared to 2,255 under Barnet's Core Strategy). Delivery is running about 1,000 dwellings below target in Barnet, although there is a five year housing land supply. The failure of the market to deliver is typical of many boroughs across London. The Mayor has said there will be no Green Belt review.

Full review of the London Plan has started. NH said that Barnet's Plan will follow the new London Plan.

3. Evidence base work

Joint London SHLAA is due to commence in the autumn.

There is a London-wide SHMA which sets a framework for smaller ones to assess local needs. Barnet will either do their own SHMA or link with another authority (Brent and Enfield have done their own SHMAs).

Barnet is concerned about loss of SME office firms being forced out through prior approvals, and is considering the use of Article 4 directions in some areas. RB cited Watford as an authority looking to A4s. Hertsmere had a significant jump in prior approvals in 2013/14 – not sure if that is continuing.

Barnet will start a retail study focusing on the centres after the Issues and Options Paper. Rita considered that Morrisons in Borehamwood had had an impact on Barnet centre. In general discussion it was agreed that online shopping had taken the impetus away from needing new retail floorspace.

HBC with neighbours (Watford, Three Rivers and Dacorum) has completed a SHMA and Economy Study. Housing OAN is more than double current provision.

TT is commissioning a Green Belt assessment for Hertsmere. There will be overlaps into adjoining areas which TT will consult on. SFRA will be updated. Playing Pitch Study is due to be published this month.

HBC has completed a Gypsy/Travelling Showpeople Accommodation assessment with Addendum. There is a five year supply of sites, and beyond that new sites would need to be considered in the Core Strategy review.

4 South West Herts issues

The SHMA and Economy Study concluded that St Albans (SADC) fell within the same market area. SADC objected to their inclusion in this area, considering the market area should effectively comprise their own district alone.

SADC published their Local Strategy Plan in January 2016. This has been criticised by adjoining local authorities and developers for failing to identify a realistic housing OAN and for failing to show a jobs or employment floorspace target (or using them to justify its employment policies).

SADC says its housing OAN is 436 dpa. The SW Herts SHMA demonstrated an OAN for SADC (at just over 700 dpa); this is close to ONS forecasts.

The four authorities (HBC, Dacorum, Watford and Three Rivers) also commissioned an expert review of SADC's SHMA and OAN to check whether they could be considered robust. The housing OAN is far too low.

SADC is considering objections to their Local Strategy Plan presently.

5 Housing and Planning Bill

There was a brief discussion about the Technical Paper and general concern about the effect of starter homes on the delivery of affordable housing in general. NL said that Barratts were keen to build starter homes. No affordable housing was provided in Hertsmere in 2014/15. RB passed on a copy of Hertsmere's comments to DCLG on the Technical Paper.

6 Neighbourhood Planning

Elstree and Borehamwood Town Council has requested Barnet's agreement to a neighbourhood plan extending into Barnet (Barnet is unparished). Barnet has asked the Town Council to explain the purpose of the plan, and therefore the need to cross over into Barnet. (NB to include the whole of a caravan park site by Stirling Corner).

7. Brent Cross

No change since 23/1/2014 – i.e. Brent Cross is a metropolitan town centre, with c 55,000 sqm of retail space: permission exists to double the retail area, build new housing (7,500 homes) and provide a major new office quarter around Staples Corner.

8. AOB

It was agreed to meet again in about 6 months' time. TT to arrange with Rita.

30_11_2017 Response from Barnet Council regarding Hertsmere Options and Issues Local Plan

The London Borough of Barnet has the following comments in respect of Hertsmere's Issues and Options Consultation Local Plan consultation.

The Council supports Hertsmere's spatial strategy to make provision for meeting its full Objectively Assessed Housing Need (9,000 new houses) and a similar number of jobs within the Borough Council's area by 2034. We also support the intention to meet the housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with the required supporting infrastructure.

We note that 3,000 homes are already planned for the area covered by the Elstree Way Corridor AAP, leaving around 6,000 additional new homes to be built across the rest of the Borough Council's area. We also note that the new homes are to be built in easy-to-reach places which may include brownfield sites previously used for industry or business, or possibly green belt land earmarked for a new garden suburb or village.

Under the Duty to Cooperate, (and potentially future Statement of Common Ground requirements), we look forward to discussing strategic cross-boundary planning issues over the next year as we develop our respective Preferred Approach Regulation 18 consultation Local Plan drafts. These are likely to include:

- the Green Belt, noting that Hertsmere undertook a Green Belt study completed in January this year, and the potential for limited release of Green Belt if a new garden suburb or village is the chosen favoured option. As part of the supporting evidence used to inform the new local plan Barnet also intends to undertake a study of the authority's Green Belt land.
- meeting the housing needs of existing and new communities, (ensuring appropriate levels of affordable and other specific forms of housing, including making sufficient provision for the needs of the elderly and the travelling community), at sustainable locations with supporting infrastructure;
- ensuring sufficient land / new sites are available to promote a wide range of employment and business opportunities, including continued support and encouragement for diversification within the rural economy; and
- supporting the development and improvement of the strategic transport network, in particular improved public transport, cycling and pedestrian routes and an expanded green infrastructure network.

18_12_2018 London Borough of Barnets Response to Hertsmere Borough Council's Planning for Growth: Potential Sites for housing and employment.

The London Borough of Barnet has the following comments in respect of Hertsmere's 'Planning for Growth; Potential sites for housing and employment' consultation. Barnet recognises the growth needs of Hertsmere for at least 500 new homes per year, along with jobs and supporting services and infrastructure. We are currently preparing Barnet's Local Plan, with the Draft Regulation 18 document expected to be published for public consultation in spring 2019. Due to location or size some potential sites within Hertsmere's 'Planning for Growth' document would have a greater impact on Barnet. I note that the following sites are either adjacent to, or in proximity to, the Barnet boundary:

- E1 - Land east of Elstree Hill South (Edgwarebury House Farm), Elstree, (28.4ha);
- BE6 - Land north of Barnet Lane, Borehamwood, (12.6ha);
- EMP3 - Land east of Rowley Lane, Borehamwood, (30ha), the southern part is outside Green Belt;
- BE1 - Land south of Allum Lane, Elstree, (12ha);
- BE4 - Land off Well End Road, Borehamwood, (106ha). There are also three very large sites which lie to the north of the M25:
- H2 - Tyttenhanger Estate, North of M25/B556 (612ha);
- PB1 - Land west of Dugdale Hill and Baker Street, Potters Bar (102ha);
- PB3 - Land south of Oakroyd Avenue and west of Barnet Road, Potters Bar, (64ha);

The great majority of the sites are on Hertsmere's Green Belt, and while we support Hertsmere's growth target, Barnet are concerned that the quality and integrity of open countryside should be protected to prevent urban sprawl. Much of the boundary shared by the London Borough of Barnet and Hertsmere Borough runs through designated Green Belt which Barnet will seek to protect.

I draw your attention to LBB Policy CS7 which protects Barnet's Green Belt, while DM15 requires that development proposals adjacent to the Green Belt should not have a detrimental impact on visual amenity and respect the character of its surroundings; any development which may impact on Barnet's Green Belt should comply with these policies.

If Hertsmere does move to designate development sites on its Green Belt, it is essential that the design and form of development minimises the impact on the surrounding area. One of Barnet's most importance Sites of Importance for Nature Conservation (SINC) - the Scratchwood Nature Reserve - lies close to the potential

Hertsmere sites E1, BE1 and BE6. It is essential that any development takes account of Policy CS7 which protects Barnet's areas of nature conservation areas, and that the development is designed and managed to avoid damage which may arise through additional pressures.

Traffic congestion is a problem in Barnet, particularly along major arterial roads such as the A1 and A1000, which cross into Hertsmere. As Hertsmere seeks to accommodate its growth, Barnet would encourage forms of development and supporting infrastructure that minimise dependence on the private car.

We would also encourage investment in active modes of travel and public transport infrastructure. Potential employment areas such as EMP3 may generate an increase in commercial traffic, including HGVs, and Barnet would expect measures to minimise the negative effects on the amenity of residents and the environment.

The Battle of Barnet is London's only registered Historic Battlefield site, and we are pleased to note that Hertsmere's plan does not show any development sites in the vicinity of this important heritage asset, or close to the Chipping Barnet Conservation Area. Furthermore, some research is now pointing to the battlefield site lying to the north of its current official location, between Wrotham Park and the A1081, and therefore within Hertsmere Borough.

I would encourage Hertsmere to be mindful of the location and setting of this important historical site, not least in the context of your potential sites PB1 and PB3 at Potters Bar. We look forward to further discussion and cooperation on cross-boundary planning during the preparation of Local Plans for both Barnet and Hertsmere.

28_11_2019 Letter from London Borough of Barnet regarding Unmet Housing Need.

06_12_2019 – Email from Hertsmere borough Council to London Borough of Barnet regarding IDP.

Hertsmere Borough Council has appointed consultants ARUP to prepare an Infrastructure Delivery Plan (IDP) to establish the level of infrastructure provision (and associated cost) required to support growth in the Borough to 2036.

The IDP will also provide a basis for developing our new Infrastructure Funding Statement (IFS), which will set out the Council's spending priorities for infrastructure projects to be funded through money we have collected from developer contributions (both via our Community Infrastructure Levy and through S106 agreements).

In order to make our Infrastructure Delivery Plan as comprehensive as possible we are contacting duty to cooperate bodies to ask for any input that they have. If there are any cross-boundary infrastructure issues or other relevant information you think we should be made aware of please let us know.

The council would be happy to receive any comments that you have by email but if you would like to speak to our consultants about the IDP and any concerns that you can also book a time slot to speak with them. Please refer to the table below and let us know you availability.

If you could please send any comments by **Friday 20 December 2019** or if you would like a call instead, your availability as soon as possible.

Time	Mon 09 Dec	Tue 10 Dec	Wed 11 Dec	Thu 12 Dec	Fri 13 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Time	Mon 16 Dec	Tue 17 Dec	Wed 18 Dec	Thu 19 Dec	Fri 20 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Thank you for your time and cooperation.

11_12_2019 Hertsmere Borough Council's response to London Borough of Barnet Council's Unmet Housing Need Letter

Barnet Local Plan

Thank you for your letter of 29 November requesting our consideration of the unmet development needs in LB Barnet. Please note that this letter represents an informal response based on officer opinion only, and should therefore be considered as such. The purpose of our response is to help inform LB Barnet of the process being conducted in Hertsmere to meet its own development needs and whether we have the capacity and capability to meet some of your identified unmet development needs.

Hertsmere is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036. This is being undertaken alongside work with other authorities in South West Herts (Watford, Three Rivers, Dacorum, St Albans and Hertsmere) on the production of a joint strategic plan for South West Herts, which makes up our Housing Market Area and Functional Economic Market Area.

As part of the duty to cooperate process, Hertsmere has been actively engaging with all of its neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. In November, Hertsmere consulted on the Potential Sites for Housing and Employment (PSHE) document. This identified and summarised site proposals put forward by landowners and developers for possible inclusion within our Local Plan. In total, over 2,100 individual responses were received. Documents summarising the responses received from the both the general public and, site promoters, statutory bodies, and local interest groups can be found online: <https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/LocalPlan/New-Local-Plan/New-Local-Plan-Planning-for-Growth.aspx>

Our own adopted Local Plan sets out the requirement for housing provision for the Borough between 2012 and 2027, which equates to 266 dwellings per annum. The Council's strategic policies were five years old as of January 2018, towards the end of the 2017/18 monitoring year. The recently introduced standard national methodology and use of the 2014-based household projections has resulted in a significant increase in calculated need, amounting to 714 homes per year or 12,852 homes over an 18 year plan period (plus a 5% buffer).

Hertsmere's housing capacity is considered to be solely that which can be developed on urban land, and includes all sources on land not covered by Green Belt designation. There is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13). This new advice applies in any event to ensure the most effective use of land and applies as a preliminary requirement prior to assessing where the Green Belt land needs to be taken and whether exceptional circumstances exist for doing so.

Given this consideration, and the requirements within the NPPF Feb 2019, the updated Housing and Employment Land Availability Assessment (HELAA) (2019) reassessed the council's brownfield land allocation, to ascertain Hertsmere's housing capacity and ensure that urban land was maximised. This process concluded that there remains a significant shortfall between the potential capacity of Hertsmere's urban land and the level of identified need.

Hertsmere is therefore unable to consider LB Barnet's unmet housing needs as this capacity is not sufficient to meet our own needs. It is only once we identified this shortfall against housing need that the Council has considered looking at Hertsmere's Green Belt to see whether "exceptional circumstances" exist to justify release.

There remains the possibility of asking neighbouring authorities to take some of the growth shortfalls identified within Hertsmere but it is recognised that most authorities within our immediate Housing Market Area (HMA) in South West Hertfordshire are already having to consider Green Belt release to meet demand. In regards to the neighbouring London Boroughs of Barnet, Harrow and Enfield, we will be enquiring whether they have any additional capacity to meet Hertsmere's identified need. A joint plan for the South West Herts Authorities will involve a comprehensive and comparative assessment of Green Belt land but prior to that work being undertaken, the Council considers that exceptional circumstances do not exist for Hertsmere to release some of its Green Belt to meet the housing requirement of neighbouring authorities.

We will continue to discuss the issues covered in this response through ongoing collaboration with all relevant parties as part of the Duty to Co-operate requirements and the emerging joint strategic plan for South West Hertfordshire.

This informal letter provides a direction and basis for discussions going forward and we look forward to further engagement with LB Barnet in relation to the production of both authorities' Local Plans.

31_01_2020 Letter from Hertsmere Borough Council to London Borough of Barnet, regarding unmet Housing need.

Hertsmere Local Plan Hertsmere Borough Council is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. The standard national methodology for assessing housing need has resulted in an annual requirement of 750 homes per annum (incorporating a 5% buffer, as required by the NPPF) or 13,500 homes over the plan period. By comparison, our current Local Plan which was adopted 2013, has an annual housing requirement of 266 homes. That Plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

We recognise that there is an agreement in principle to progress a joint plan for the South West Herts Housing Market Area, which would involve a comprehensive and comparative assessment of Green Belt land. Clearly this will not be in place in time to inform our new Local Plan and there remains a need for Hertsmere to bring forward this new plan without delay.

Following a Call for Sites, we have consulted on a Potential Sites for Housing and Employment document which identified and summarised the site proposals initially put forward by landowners and developers. Hertsmere's current housing and employment land capacity is considered to be solely that which can be developed on previously developed land and includes all sources on land not covered by Green Belt designation. We also recognise that there is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13) as a preliminary requirement prior to assessing where Green Belt land might be taken and whether exceptional circumstances exist for doing so. Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- 1) Review the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assess the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Review the achievability and deliverability of Hertsmere's own land assets.
- 4) Contact owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

Our Housing and Economic Land Availability Assessment (HELAA), published in 2019, points to a capacity of less than 2,500 homes on previously developed land.

This includes an allowance for windfall development and existing commitments. We are hopeful that around two-thirds of our employment requirement of over 25ha of employment can be accommodated within land which has previously been safeguarded for such purposes in our current Local Plan.

There is therefore a very significant shortfall between the potential housing capacity of Hertsmere's previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere.

A similar request has also been sent to all neighbouring authorities and other authorities within our HMA. We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. In the meantime, I would be grateful for a response to this letter at the earliest opportunity.

If you have any queries relating to the above request, please do not hesitate to get in contact.

10_02_2020 Email sent from Hertsmere Borough Council to London Borough of Barnet regarding IDP

I was wondering whether you, or one of your Local Plan team would be able to reply to the email below, sent by my team on behalf of consultants ARUP, who are carrying out an update to Hertsmere's Infrastructure Delivery Plan (IDP)?

In particular they are keen to know your thoughts on the following questions:

1. To what extent do you consider there to be cross-boundary infrastructure linkages with Hertsmere, e.g. transport corridors, education flows, shared reliance on utilities?
2. Are there any notable infrastructure improvements in the pipeline in your local authority area that might be of relevance to Hertsmere?
3. Is there any infrastructure within Hertsmere which you will potentially be reliant upon to accommodate future growth within your local authority area?

The main linkages we are aware of relate to transport and to the fact that Barnet hospital is used by many residents in the south of our Borough.

A brief reply by email would be most welcome. However if you would like a more detailed chat, please contact Rob Webster at ARUP direct (cc'd into this message) to arrange a mutually convenient time.

10_02_21 Email from Hertsmere Borough Council to London Borough of Barnet regarding site allocation.

Hertfordshire County Council have identified that a site for a new secondary school in the Borehamwood area will need to be allocated in Hertsmere's emerging new local plan in order to provide for levels of growth anticipated to 2036/37. The outcome of their site search and initial feasibility work and consultation with us at Hertsmere is that the preferred site is one which straddles the boundary between Hertsmere and Barnet south of Barnet Road to the west of Stirling Corner (see below). The site is in the current green belt.

Can we discuss your views on this proposal and how it might best be achieved, and any other relevant matter, on a DtC basis? Would you be able to let me know when you would be available for a Teams meeting? Possible dates are:

Monday 15 Feb 10am or after 3.30pm

Wednesday 17 Feb – between 2pm and 5pm

Monday 22 Feb between 10am and 1pm

Tuesday 23 Feb – any time after 10am

22_02_21 Email from Hertsmere Borough Council to London Borough of Barnet regarding site allocation

Follow up to previous email.

23_02_2021 Email from London Borough of Barnet to Hertsmere Borough Council

Confirmation of time and date for proposed team meeting.

24_02_2021 Email from Hertsmere Borough Council to London Borough of Barnet

Teams link circulated.

01_03_2021 Email from Hertsmere Borough Council to London Borough of Barnet regarding South of Barnet Lane

We met with officers from LB Barnet Planning Policy this morning to discuss the potential for the site south of Barnet Lane, Borehamwood (BORE08), to be allocated for the delivery of a new secondary school to serve existing and future (growth related) need for places in Hertsmere. We outlined the growth strategy for Hertsmere, the need for additional school places that HCC has identified arising from existing and future demand, and the work that you have undertaken to date to identify and assess potential sites for secondary schools in Hertsmere.

The main points of relevance to the proposal for this site arising were as follows:

- LB Barnet Education officers need to be consulted at the earliest possible opportunity; what arrangements for sharing of places might be necessary or could be anticipated? Ben Thomas would be the relevant officer at Barnet and should be contacted asap. Nick Lynch (Planning Policy) will brief Ben following our meeting this morning.
- LB Barnet intend publishing a reg 19 plan in summer 2021. This does not include any green belt changes; they anticipate meeting their housing need without releasing land from the green belt and have resisted proposals which would involve releasing green belt land.
- LB Barnet green belt study identified this area as strongly performing green belt. Their Planning officers would not support removing land at Barnet Lane from the green belt in order to facilitate an allocation for a school. They would not be looking to include a revision to the green belt boundary in the reg 19 plan. It seems clear given the stage of the Barnet local plan and its defence of existing green belt boundaries, that a change to the green belt boundary and/or a school allocation within Barnet in this iteration of their plan is unlikely; it would of course be open to you to challenge that when they undertake their reg 19 consultation but obviously they would be very keen to avoid this situation arising.
- The approach to green belt boundaries either side of the administrative boundary will need to 'make sense' – either revised boundary with site released, or boundary retained and site washed over, unless the built and unbuilt parts of the site are located in such a way that there is a logical new green belt boundary between the 2, enabling each part to be treated differently.
- LB Barnet Planning officers envisage that should the proposals for locating a school on the site be progressed, their preferred way forward would be for the

Barnet part of the site to remain in the green belt and HCC to pursue the proposals through a planning application which satisfactorily demonstrates a case of Very Special Circumstances. They would also want to see the evidence demonstrating that there are no more suitable sites, in particular which are not located within the green belt.

- The Mayor of London's Plan is also relevant as proposals within Barnet need to comply with it; experience elsewhere (Redbridge) suggests that the mayor will not agree to the de-designation of green belt in order to provide a school.
- LB Barnet Planning officers envisage that a proposal which did not include build zone within the Barnet administrative boundary would be preferable and potentially easier to achieve

So to conclude, given the site's location on and across the Hertfordshire/Barnet boundary there needs to be discussion between the two Education authorities as to how a school here would serve the surrounding area as this is likely to have an impact on LB Barnet's eventual view on the proposal.

LB Barnet Planners also need a proposal on which to comment. We would suggest that this needs HCC to undertake feasibility work to further consider how, taking into account the other constraints here, the main elements of a school proposal could be located across the site in a manner which both LB Barnet and Hertsmere BC could support.

I hope this is helpful and look forward to hearing from you as to your next steps. We are of course happy to discuss further.

01_03_2021 Email from Hertsmere Borough Council to the London Borough of Barnet following the meeting

Many thanks for meeting with us today. I will pass your comments through to the Growth and Infrastructure team at HCC who are working with their Educations and Highways colleagues on this.

I have attached a site boundary and HCC's development principles plan that I shared at the meeting. The latter is the result of HCC's initial site assessment work rather than any detailed feasibility study so is by no means set in stone.

The consideration of the potential for this site to deliver secondary provision is not in the public domain so please treat it and the plans as confidential.

02_03_2021 Email from London Borough of Barnet to Hertsmere Borough Council

Confirmation of receipt of previous message.

06_07_2021 Email from London Borough of Barnet to Hertsmere Borough Council regarding upcoming regulation 18

Dear Neighbouring Authorities

As you are aware from our previous email (from forward.planning@barnet.gov.uk), the Council has progressed the Local Plan to the next formal stage known as Regulation 19 (Publication) and now seeking Representations on the 'soundness' of the Regulation 19 (Publication) Local Plan from 28th June to 9th August 2021.

The representations will be submitted to the Planning Inspectorate for the Examination in Public along with the Local Plan and supporting evidence. It is likely that responses to this regulatory stage will result in further proposed changes to the Plan as part of the Examination in Public process. The Examination in Public hearing sessions are expected to take place in Spring 2022 and, subject to that examination, adoption of the new Local Plan is not expected until late 2022.

The Council welcomes your input on a document which will have an impact on the people who live, work, operate a business between Boroughs or visit the Borough as well as future generations. The consultation on the Regulation 18 draft Local Plan identified relevant cross-boundary issues that the Council needs to and continues to engage with on such matters. Details of Reg 18 engagement and the responses it generated including your council's representations are set out in the Reg 18 Consultation Statement & Schedule of Representations & Responses available on Barnet's website. It also shows the consequential drafting changes made to the Local Plan at Reg 19 for consultation.

Post all consultations including DtC meetings any unresolved issues will be set out in forthcoming Statement of Common Grounds (SoCGs), demonstrating progress made on matters between Barnet Council and yours. Therefore, we think it would be helpful to have a DtC catch up meeting anytime this month on any outstanding issues you may wish to discuss. Please let us know of your preferred day/time/slot and we will try our very best to accommodate everyone's needs.

Barnet's Publication Local Plan and accompanying documents can be viewed online at:

- Engage Barnet

FYI – in interested in attending, the Planning Policy Team will also be giving a presentation on the Publication Local Plan on the following dates. These online

events will be supported by an independent facilitator. Please follow the links on Barnet's engage website to register.

Thursday 8th July between 6pm and 7.30pm

Wednesday 21st July between 6pm and 7.30pm

Thursday 5th August between 6pm and 7.30pm

Please do not hesitate to contact us - The Planning Policy Team (cc'ed forward.planning) should you have any further questions.

21_07_2021 Email from London Borough of Barnet to Hertsmere Borough Council regarding Duty to Co-operate

Following on from Rita's email it would be good to get a date in the diary for a DTC meeting in August. Factoring in summer leave I realise that this will probably be too late to discuss how Hertsmere intends to respond to the Reg 19.

06_08_2021 Email from Hertsmere Borough Council to London Borough of Barnet in response to Regulation 19

Thank you for the opportunity to comment on your regulation 19 Local Plan. Please find attached completed forms relating to

- Housing target
- Green belt

We have the following further comments:

- The plan period of 2021-2036 will not provide for a 15 year period post-adoption.
- Following on-going Duty to Cooperate discussion between our two local authorities and with Hertfordshire County Council we would want to see an appropriate designation of the part within Barnet's boundary of the site at Stirling Corner which is being proposed for a new secondary school.
- Para 4.28.3 indicates the intention to produce a masterplan for open spaces in the North West Green Belt areas of the Borough. As these areas directly adjoin Hertsmere we would request consultation on this when the work is being planned and undertaken.
- Para 5.19.1 Policy HOU 07 – the policy could usefully commit to delivering suitable G+T sites in the event that the anticipated London wide G+T accommodation needs assessment indicates a need for new pitches/sites within the borough
- The commitment in TRC02 to work with TfL and neighbouring boroughs to review and improve the bus network and overall public transport provision is noted; as Hertsmere is a neighbouring borough with public transport links with Barnet we would anticipate that this would include Hertsmere.

Form B Housing Target

Question 1: To which part of the Local Plan does your representation relate?

BSS01 Para 4.4.5 Policies Map Designation

Question 2: Do you consider that this part of the Local Plan is legally sound?

No

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

The proposed housing target of 35,460 falls far short of the level of need identified through the application of the standard method and also through the SHMA. Whilst we note the Inspector's advice to set the housing requirement to match that handed down by the adopted London Plan the potential implications of such under provision in terms particularly of increased pressure on housing in Hertsmere, where there are already acute affordability issues, are of concern.

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above.

Consideration should be given to setting a higher housing target, more closely related to that arising from the application of the standard method.

Form B Greenbelt

Question 1: To which part of the Local Plan does your representation relate?

Paragraph 10.25.2 – Policies Map Designation

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Neighbouring authorities in Hertfordshire, including Hertsmere, and elsewhere in London are having to look again at green belt boundaries in the context of housing need identified through the application of the standard method. It appears that only minor inconsistencies/errors in the current green belt boundary are addressed in the Barnet local plan, with there having been no assessment of whether exceptional circumstances exist which would justify release of green belt in order to enable a higher housing target to be achieved.

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above.

Consideration of whether exceptional circumstances justifying the release of green belt exist such that a housing target closer to that indicated by the application of the standard method could be achieved should be undertaken.

13_08_2021 Email from Hertsmere Borough Council to London Borough of Barnet regarding Duty to Co-operate

My apologies for not responding sooner as we have been extremely busy finalising our draft Local Plan, scheduled to be published next month (Reg 18). My colleague Ann Darnell recently provided a response to your Reg 19 plan which you may have seen but we'd be happy to meet for a DTC meeting. I am on leave next week but perhaps you or Rita can liaise with Ann on some dates to meet up in September.

19_10_2021 Email from London Borough of Barnet to Hertsmere Borough Council regarding Duty to Co-operate

Firstly, our sincere apologies for not responding sooner to your email below as we have been extremely busy with sorting out Reg 19 reps, reporting to our Council's Committee in Sept and now preparing for PINs submission in November.

Secondly, thank you for your response to our Reg 19 which has also been considered whilst drafting the attached Statement of Common Ground (SoCG) between LB Barnet, Hertsmere and Hertfordshire County Council (HCC). Please bring along comments to our next DtC meeting being set up. We are also reviewing your Reg 18 document so will be submitting our response soon.

We would like to meet up with yourselves and HCC to go over the SoCG to discuss issues, if any. We hope you will not mind us extending this invite to your HCC colleagues as well. Do you have any specific contacts in mind from HCC or you feel Jamie and Russell are the only appropriate contacts for this meeting. A combined DtC meeting will ensure that all three authorities (LBB, Hertsmere and HCC) are familiar with each other's development/local plan issues and understand the content of SoCG better. We can also bring along our Transport Planner, if need be.

Most of us will be on leave during October half term, so I was wondering if you, Ann or any of your other colleagues will be available to meet up in early November – anytime on Wed 3rd, Thurs 4th or Fri 5th Nov. We should finish within an hour but can aim to pencil in 1.5 hrs at least as all three authorities might have something to share/discuss.

Please let me know of your preferred slot – date and time by tomorrow afternoon, if possible.

25_11_2021 Email from London Borough of Barnet to Hertsmere Borough Council regarding Agenda for upcoming duty to Co-operate meeting.

06_12_2021 Response from London Borough of Barnet to Hertsmere Borough Council Regulation 18 Consultation.

London Borough of Barnet (LB Barnet) has the following comments in respect of Hertsmere's Regulation 18 Local Plan.

LB Barnet supports Hertsmere's spatial strategy to make provision for meeting its full identified housing need (12,160 new houses) and jobs within the Borough's area for the next 15 years. We also support the intention to meet the housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with the required supporting infrastructure.

Hertsmere Local Plan proposals that are closest to Barnet include urban extensions around Borehamwood as well as redevelopment within the urban boundary. For LB Barnet, proposal BE6 (Land north of Barnet Lane (east)) for a new sustainable neighbourhood and HEL197 (Land north of Barnet Lane (west)) for a neighbourhood extension are of particular interest as Barnet Lane largely serves as the boundary between LB Barnet and Hertsmere. We would welcome being consulted during the design and application stages of BE6 and HEL197 so as best to understand any impacts the proposals will have on Barnet.

Hertsmere Local Plan proposal (HEL800) on the south side of Barnet Lane is identified for a potential secondary school. From previous discussions with Hertsmere Borough and Hertfordshire County Council (HCC) earlier this year LB Barnet are aware that land within Barnet's Green Belt would be required for playing fields for the secondary school to serve Borehamwood and Elstree. We consider that Hertsmere should within HEL800 acknowledge the need for land within LB Barnet to deliver the secondary school. Further, if a proposal for the secondary school was forthcoming, LB Barnet consider that HCC should demonstrate very special circumstances with regard to the Green Belt at the planning application stage. Early engagement and collaborative work between LB Barnet, Hertsmere Borough and HCC including planners and education colleagues covering justification for this school and the contribution it makes to secondary school places for Barnet. would assist and inform the content, timing and delivery of the planning application.

LB Barnet supports Policy H5 New and Extended Park Homes sites. The boundary between LB Barnet and Hertsmere splits the Elstree Park site at Stirling Corner. We would welcome this being acknowledged in the Park Homes paragraph on page 68 of the draft Local Plan.

Other site proposals close to the boundary with Barnet are Media City (employment) and Potters Bar which has a sizable housing allocation. Again we will welcome being notified of proposals with regard to these sites.

LB Barnet requests that the Hertsmere Local Plan strengthens its wording for the requirement for improvement to public transport links in and around Borehamwood and Potters Bar. Transport for London (TfL) and HCC both operate bus services from either Borehamwood and/or Potters Bar to Underground and Rail Stations within Barnet. Developers should be strongly encouraged to liaise with these bodies

to ensure there is sufficient provision of public transport into Barnet for residents of Hertsmere to utilise so as to discourage, as much as possible, the use of private vehicles being driven into Barnet to access the wider TfL network.

We support the improvement of cycling and pedestrian routes and an expanded green infrastructure network.

We look forward to continuing to work with Hertsmere and HCC on Green Infrastructure and will work with both authorities to improve sustainable transport and Green Infrastructure links across the boundaries to ensure walking and cycling routes are improved and maintained.

LB Barnet welcome the reference to the Watling Chase Community Forest project as part of the Community Forest is within Barnet. We look forward to working with Hertsmere and HCC on reinvigorating this project and realising the opportunity to improve biodiversity and assist in meeting climate change challenges.

July 2022 Summary of Statement of Common Ground Between London Borough of Barnet, Hertfordshire County Council and Hertsmere Borough Council.

Purpose

The SoCG documents how Barnet, Hertsmere, and Hertfordshire County Council cooperate on **strategic cross-boundary planning matters**, fulfilling the **Duty to Cooperate** required by the NPPF. It records areas of agreement, disagreement, and ongoing collaboration.

Strategic Geography

- Hertsmere lies directly north of Barnet, connected by the **A1** and **M1**.
- Key centres near the boundary: **Borehamwood** (Hertsmere) and **Edgware** (Barnet).
- **Watling Chase Community Forest** spans both authorities.
- Hertsmere is reviewing its Local Plan but has paused work after 2021 consultation feedback.
- Recent cooperation includes discussions on a **new secondary school** near the boundary and participation in infrastructure and green-infrastructure consultations.

Housing Delivery & Green Belt

Barnet

- Minimum housing target: **35,460 homes (2,364 per year)** to 2036.
- Capacity identified for up to **46,000 homes**.
- Target aligns with the **London Plan**, which Barnet must follow.
- Barnet's Green Belt study concludes **no exceptional circumstances** to justify Green Belt release.

Hertsmere's concerns

- Barnet's target is **below its standard method need** (5,361 homes/year).
- Under-provision may increase housing pressure in Hertsmere, which already faces affordability issues.
- Hertsmere argues Barnet should consider **higher targets** and **Green Belt review**.

Agreements

- Redistribution of housing need is a matter for the **Mayor of London** in the next London Plan review.
- Both councils are in **different Housing Market Areas**.
- Neither authority can meet the other's **unmet housing need**.
- Future Local Plan reviews will first seek to meet needs within their own HMAs.

3. Gypsies & Travellers

- No cross-boundary issues identified.
- Barnet's GTAA (2018, updated 2021) finds **no need** for pitches.
- Hertsmere's GTAA (2017) identifies **27 additional pitches** needed.
- Both councils agree to meet their own needs; neither can meet the other's.

4. Strategic Infrastructure

Schools

- Barnet's IDP identifies **£1.2bn** infrastructure need for growth.
- Hertfordshire County Council has identified need for a **new secondary school in Borehamwood**.
- A preferred site straddles the **Hertsmere–Barnet boundary**.
- Buildings would be in Hertfordshire; playing fields potentially in Barnet.
- Barnet cannot add a new policy at the late Reg 19 stage.
- The school is likely needed **beyond Barnet's current plan period**.
- Future Local Plan reviews will consider an education allocation.

Transport

- HCC supports Barnet's focus on growth in sustainable locations.
- All parties agree to early engagement on major transport matters.

Agreements

- Continued collaboration on infrastructure planning, especially **education and transport**.
- Joint working on the secondary school proposal, including demonstrating **very special circumstances** if Green Belt land is required.

5. Biodiversity – Watling Chase Community Forest

- The Forest is a shared green infrastructure asset.

- Barnet recommends updating the **WCCF Plan** to reflect new legislation (e.g., Biodiversity Net Gain).
- All parties agree to collaborate on:
 - Updating the Forest Plan
 - Securing funding
 - Considering the Forest in planning decisions
 - Identifying potential areas for **off-site biodiversity net gain**

6. Governance

- The SoCG is a **live document**, reviewed regularly.
- Key Local Plan milestones trigger updates.
- Ongoing communication will continue through meetings, consultations, and correspondence.

22_05_2024 London Borough of Barnet's response to Hertsmere Borough Council Regulation 18

Response to Hertsmere's draft Local Plan 2024 – Regulation 18

The London Borough of Barnet (LB Barnet) welcome the opportunity to provide written representations on Hertsmere's updated Regulation 18 Local Plan. Our comments are set out below under the relevant subtitle.

Housing need and housing target

In the 16-year period following the proposed submission of the Local Plan in 2025, Hertsmere Borough Council aims to deliver 9,400 new homes which is equal to just under 590 homes per annum. This is a notable reduction from the previous target of 12,160 new homes (720 new homes per annum). The previous target fully addressed Hertsmere's identified housing need in accordance with the application of the Government's standard method. Hertsmere Council seek to justify the reduction in housing delivery in order to protect areas of 'strongly performing' Green Belt which make an important contribution towards the overall Green Belt purposes and therefore are now protected from development.

In their representations on Barnet's Reg 19 Local Plan Hertsmere highlighted how Barnet's proposed target of 35,460 new homes falls far short of the level of need identified through the application of the standard method. Hertsmere highlighted the potential implications of such under provision in terms of increased pressure on housing in Hertsmere, where there are already acute affordability issues.

Hertsmere's reduction in housing delivery will exacerbate these affordability issues in LB Barnet as well as Hertsmere. Consideration should therefore be given to setting a higher housing target, more closely related to that arising from the application of the standard method.

LB Barnet awaits publication of the full Local Plan for details on how specialist housing will be delivered in light of reduced housing figures if Hertsmere's current housing figures move forward.

Housing allocations Hertsmere

Local Plan proposals for housing allocations that are closest to Barnet include;

- Site HEL209 (Land north of Barnet Lane (east): (Residential development indicative of provision of 250 homes)
- Site HEL197 (Land north of Barnet Lane (west): (Residential development indicative of provision of 75 homes)

We would welcome being consulted during the design and application stages of HEL209 and HEL197 so as best to understand any impacts the proposals will have on Barnet.

Other site proposals close to the boundary with Barnet are:

- Site HEL274 (Edgwarebury Farm Elstree Village) (Residential development indicative of provision of 100 homes) The boundary between LB Barnet and Hertsmere splits the Green Belt within Edgwarebury Farm.

We would welcome this being acknowledged in any future policies concerning this site.

Employment site allocations

LB Barnet are pleased that Hertsmere have been able to allocate sufficient sites for meeting their estimated employment floorspace need for industrial and warehousing and distribution land uses.

Hertsmere Local Plan proposals for employment allocations that are closest to Barnet include;

- Site: HEL171(1040) Land to the South of Aldenham Reservoir: (Commercial and Industrial (B2/B8/E)) indicative provision of 20,700 sqm floor space
- Site HEL387 Land north of Hilton Doubletree and south of Sky Studios Commercial and Industrial (B2/B8/E)) indicative provision of 11,000 sqm floor space Site HEL1041 Caspian and Tasman House, Aldenham: (Mixed Use: B2,B8 and E Class) indicative provision of 5700 sqm floor space.

LB Barnet do not have any immediate concerns with these sites but would welcome being notified of proposals with regard to these sites due to their proximity to LB Barnet's Boundary.

Other matters:

LB Barnet note that the previous Regulation 18 consultation based on Hertsmere's 2021 draft local plan has been 'set aside' whilst additional work is undertaken to inform a local plan spatial strategy, whilst awaiting clarity from the Government on changes to law or policy law or policy affecting this. As such our comments given in December 2021, relating to the proposed secondary school south of Barnet Lane to Stirling Corner and cross boundary issues relating to this location will not be repeated here but still stand.

We look forward to continuing to work with Hertsmere and HCC on Green Infrastructure and will work with both authorities to improve sustainable transport and Green Infrastructure links across the boundaries to ensure walking and cycling routes are improved and maintained