



13 September 2021

**Re: The London Borough of Barnet's Response to the draft Enfield Local Plan Main issues and preferred approaches (Regulation 18)**

Thank you for the opportunity to review and comment on the above document. Barnet Council welcomes the publication of Enfield's Reg 18 Local Plan.

We support Enfield's overarching spatial strategy to provide for sustainable growth with supporting infrastructure across the Borough whilst facilitating nature recovery and improvements to green and blue spaces and access to them.

We welcome the promotion of sustainable travel and will seek to work with Enfield to improve orbital connectivity, including support for cross boundary east-west links for active modes of travel and public transport.

There are areas of specific interest to Barnet, due to their proximity to the Borough, which we set out below.

***Southgate***

Section 3.3 and Strategic Policy PL6: Southgate. This recognises that Southgate town centre is close to our boroughs' boundaries and that a significant part of its catchment lies within Barnet. While we support the town centre renewal, this must take into consideration any impact on the character of the adjacent low-rise suburban housing, a significant part of which is in Barnet. This must be a significant consideration in the siting and design of any tall buildings within Southgate.

## ***New Southgate***

We support Section 3.4 and Strategic Policy PL7: New Southgate and delivering a comprehensive, masterplanned approach. This location borders Barnet and Haringey and we would like to see a reference to the need for cross-borough cooperation. This can set out the potential for a joint area planning framework. We would therefore welcome consistency with Barnet's emerging Local Plan Policy GSS09 and supporting text.

## ***Tall buildings***

Policy DM DE6: Tall buildings and Figure 7.4 show five locations (Hadley Wood, Cockfosters, Southgate, Arnos Grove and New Southgate) considered appropriate for tall building that are close to the boundary with Barnet. Proposals for tall buildings should take account of the impact on neighbouring boroughs, in particular Green Belt, heritage assets such as Monken Hadley Conservation Area and their settings. Heritage assets in the area include St Martha's Convent (The Mount House) and Access Gate to Hadley Common, Camlet Way, both Grade II listed.

## ***Site Allocation SA45 Land Between Camlet Way and Crescent Way***

The site is allocated for housing (160 homes proposed). The site is adjacent to Green Belt in Barnet. The Council is concerned that any development on this site should not have a significant detrimental effect on the openness of the Green Belt. The site is adjacent to the Monken Hadley Conservation Area. The Character Area Appraisal describes this land as *'almost completely undeveloped agricultural land, included in the Green Belt ... The field boundaries are long established, as evidenced by hedgerows and hedgerow oaks. It is likely that the field patterns reflect early enclosure which makes them of considerable historical significance.'* The Council will resist proposals which have a harmful impact on the Conservation Area's character and appearance, including its setting. We request that both the Green Belt and Monken Hadley Conservation area are specifically referenced by site allocation SA45.

## ***Duty to Cooperate***

Earlier this year a formal request was made for Barnet to assist Enfield in meeting some or all of its unmet housing and employment requirements. In our response we highlight that Barnet faces similar challenges, and to that effect formally wrote to Enfield Council in November 2019 for help in accommodating the higher housing number calculated by the Government's Standard Method approach. Based on the methodology applied by MHCLG at that time, this amounted to 62,000 new homes over 15 years. This challenge, which will come through the next review of the London Plan, cannot be ignored in planning for the long-term futures of our boroughs.

Barnet's emerging Local Plan already has a challenging housing target of 35,460 new homes which is based on the housing targets in the London Plan (2021).

In terms of employment land Barnet has a relatively low supply of established industrial sites and office accommodation. Future employment expansion is largely focused on the successful regeneration of Brent Cross with the consolidation and revival of space in Barnet's town centres. With such a low base the potential for expansion is limited and Barnet is also constrained by Green Belt / Metropolitan Open Land which amounts for one third of the Borough.

Although the Council is unable to assist in meeting Enfield's requirements it continues to support joint-working between the boroughs, establishing a greater understanding of cross-borough transformational growth and regeneration potential and the need for joint evidence to build consensus into our emerging respective Local Plans.

The Council notes that Enfield's High Growth scenario of 55,000 homes is above Enfield's requirements during the plan period, and as such it may be that, were Enfield's plan to proceed on the High Growth basis, we could again discuss the potential for Enfield to accommodate some of Barnet's increasing growth needs.

### **Barnet's Local Plan**

Barnet's Local Plan (Regulation 19) was approved by our Policy and Resources Committee on 16 June 2021 for public consultation. The plan subsequently underwent public consultation from 28<sup>th</sup> June to 9<sup>th</sup> August.

As part of the consultation process and to meet our duty to cooperate requirements we met with Enfield's Policy Planning team on 27<sup>th</sup> July.

We expect to seek approval by the Policy and Resources Committee and Council to submit the Local Plan (Regulation 22) to the Secretary of State this autumn.

Prior to examination of Barnet's Local Plan we will seek a Statement of Common Ground (SoCG) with Enfield to clarify those areas of agreement and areas where we may continue to disagree.

Yours sincerely,