

Barnet Local Plan EIP – Note on Parks and Open Spaces

Reason for producing this note

On Day 8 (Wednesday 2nd November) at the hearing session's, consideration of Matter 9 - Parks and Open Spaces, Community Uses, Health and Wellbeing, Inspector Philpott requested provision of a Note covering the following:

Note on Open Spaces

- Para 8.19.1 and GSS13, ECC04 having a more prominent reference to district park and 13 parks needed. Presumably most effective with ECC04
- Provide explanation/methodology for proposed District and Local Park numbers – what evidence used
- Plan Review – consider or alternatively touch upon how evidence renewal will be included in review process
- Regional Park in Barnet – clarify how the London Plan and All London Green Grid and other supporting evidence is to be taken forwards in GSS13. Is a stronger commitment to deliver of the park in accordance with BSS01(a)(iv) required e.g. broad map location, commitment to masterplan within identified timeframe, allocation of resources
- Justification re provision of indoor sports centres in town centres and reflect that hubs are not in town centres
- Consider if similar approach to MM206 needed for provision of indoor sports and reflect on uses such a gyms
- Clarify nature, scale and use of any new buildings in open spaces and make clear that GSS13/ECC04 development will be subject to Green Belt inappropriate development tests where relevant
- Consider delivery of sports hubs within Green Belt. Is there a reasonable prospect that these schemes can be achieved (in particular King George V). Draw together committee report etc development to demonstrate that provision in GB is possible having regard to tests at para 149b of Framework
- Clarify why 1 district and 13 local parks reflected in policy when EB_GI_01 suggests that 4 district and 29 local parks necessary for geographical coverage
- Clarify role of Map 7 – consideration of how it will address quality of green space, in particular explanation of role of financial contributions towards green spaces, both existing and new.
- Consider signposting to CDH07 re children's play facilities
- Explain why standards in para 10.19.3 on playing pitches and children's play have been excluded from ECC04(b)(ii)
- Explain definition of natural greenspaces – use of 2009 study to be considered
- Clarify any new playing pitch requirements
- Modification of wording paragraph 10.19.1 and site 45 dev spec to tie into NPPF paras101 and 102. Rethink approach given designation of local green space should not predate grant of permission/creation of space. Consider potential wording with site promoter
- Ensure consistency of wording between GSS13 and ECC04

Background

Following submission of the Barnet Local Plan in November 2021 the Council in June 2022 produced a table of proposed modifications (EXAM 4). This document was produced after consideration of the Reg 19 soundness representations received, together with subsequent discussions with parties on the drafting of Statements of Common Ground. EXAM 4 includes proposed modifications to policies and supporting text pertaining to high quality design.

During the examination hearing session where Matter 9 was discussed, proposed modifications were considered, together with aspects of wording of policy and supporting text in the submission Plan. In light of that discussion, the Inspector has requested further clarification, explanation and justification of the matters detailed in this note; the Council now proposes a series of additional further modifications as set out below.

The following format has been used in this Note to denote further proposed modifications to the submission version of plan as revised by the proposed modifications listed in EXAM 4.

~~Strikethrough text~~ to indicate text proposed for removal.

Underlined text to indicate additional text.

Considerations

The following section addresses matters raised during the Local Plan Examination hearings in relation to Policy ECC04 – Barnet’s Parks and Open Spaces.

- ***Para 8.19.1 and GSS13, ECC04 having a more prominent reference to district park and 13 parks needed. Presumably most effective with ECC04***

To create consistency throughout the Local Plan in relation to the expectation for the delivery of new Parks and Open Spaces in the Borough the following amendment should be made to paragraph 10.19.3

...As highlighted in Chapter 4 Barnet’s Growth Areas, as Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040. To achieve this new developments will be expected to deliver adequate levels of open space in accordance with the standards below. Where a development is in an area of deficiency for publicly accessible open space, new open space should be provided in line with these standards:...

- ***Provide explanation/methodology for proposed District and Local Park numbers – what evidence used***

The methodology for the identification of need for district and local parks is set out in Chapter 6 of the Barnet Open Space and Recreational Facilities Assessment 2009 [EB_GI_01] this identifies that the Borough needs. The report analyses the need using two different methods, one on the basis of geography and the other on population.

The geographical analysis is based on the premise that the entire Borough should be with 1200m of a district park and 400m of a local park. This provides the figure of need of 4 additional district parks and 29 additional local parks.

This is not a practical measure for Barnet however as there are large swathes of the Borough that are not very densely populated and residents in the upper reaches of the Borough also live close the Green Belt. Accordingly, it makes better practical and economic sense to make

the Green Belt more accessible to residents in these areas rather than establish Local and District Parks which would not be readily accessible to the majority of residents.

Another reason for not using the geographical distribution of parks as a method of need and delivery model is that the majority of parks will be delivered in partnership with developers. Parks are therefore less likely to be delivered in areas where development is not occurring and there is less demand.

The other method of identifying the need for local and district parks was on the basis of population growth

The growth pattern for Barnet has, for some time, been focussed on the densification of the existing urban areas as there has been no justification to date for development in the Green Belt, except where this is on previously developed land such as the National Institute of Medical Research (NIMR). Therefore there is a preference for new parks and open spaces to be delivered as part of developments in the more densely populated urbanised areas, and where the demand for open space is more acute. This is particularly important in areas where development is delivering high rise flatted development where the provision of private amenity space as part of the development can be limited.

For these reasons the population increase model is preferred.

The population increase analysis model was used in the Barnet Parks and Open Space Strategy [EB_GI_08] and Local Plan policy to indicate the number of parks and open space that should be delivered in Barnet.

However since 2009, when the report was finalised, the Borough has formally secured parks through the Colindale and Brent Cross developments so it was deemed appropriate to lower the numbers in the report to 1 district park and 13 local parks. These numbers are also identified in the Barnet Parks and Open Spaces Strategy [EB_GI_08] as action point 2 on page 29 of the main strategy document.

- ***Plan Review – consider or alternatively touch upon how evidence renewal will be included in review process***

As highlighted in the Matter 9 Statement the Council is committed to a further review of the evidence base on open spaces post adoption so as to inform the next iteration of the Local Plan. The Council refers to EXAM 18 which sets out the commitment to an early review of the Local Plan.

The Council has signalled its intention to review evidence by commissioning a new Barnet Parks and Open Spaces Strategy (BPOSS). The aim of the new Strategy is that it :

- Delivers the Council's emerging corporate plan objectives
- Delivers the commitments of the new administration (which commenced in May 2022).
- Reflects the needs and aspirations of residents and ensures a sustainable financial basis for the service
- Provides a framework of Local Nature Recovery and Biodiversity Net Gain (in line with the requirements of Environment Act 2021)

- ***Regional Park in Barnet – clarify how the London Plan and All London Green Grid and other supporting evidence is to be taken forwards in GSS13. Is a stronger commitment to deliver of the park in accordance with BSS01(a)(iv) required e.g. broad map location, commitment to masterplan within identified timeframe, allocation of resources***

Figure 24 of The All London Green Grid SPG [EB_GI_05] provides a broad location recommendation for the Regional Park. The Barnet Growth Strategy [Core_Gen_18] provides more detail on where within that broad location the Regional Park could be situated 'in the green heart of the Borough' within the existing Barnet Green Belt. Further investigation would need to occur before the location could be finalised, which is not a matter for the Local Plan, and would be lead by the Council's Growth Team and Parks and Open Spaces Team. A stronger commitment within the Local Plan is not required.

- ***Justification re provision of indoor sports centres in town centres and reflect that hubs are not in town centres.***
- ***Consider if similar approach to MM206 needed for provision of indoor sports and reflect on uses such a gyms***

Indoor sports centres offer indoor exercise opportunities and are seen as being acceptable town centre uses. Depending on their size they may have a swimming pool and indoor courts for games such as squash, basketball and netball as well as the more usual gym equipment and machines.

The sports hubs offer both indoor and outdoor sports facilities including football and hockey pitches and other outdoor facilities such as a BMX track and children's play areas in general these are larger facilities than the indoor centres.

All of the sports hubs are currently in existence, they are being refurbished and enhanced to ensure they are able to stay current and continue to offer a range of leisure opportunities to residents.

The sports hubs are not situated in town centres due to the amount of land required to provide the facilities and playing fields.

Where appropriate the Council will allow for the provision of private indoor sports facilities such as gyms in town centres and Growth Areas. It therefore proposes the following modification to Paragraph 8.5.3 of the Plan :

Other priorities highlighted include provision of indoor bowls, fitness facilities, gymnastics and trampolining. To achieve this provision town centres and the Growth Areas are the preferred locations to ensure access to public transport links.

- ***Clarify nature, scale and use of any new buildings in open spaces and make clear that GSS13/ECC04 development will be subject to Green Belt inappropriate development tests where relevant***
- ***Consider delivery of sports hubs within Green Belt. Is there a reasonable prospect that these schemes can be achieved (in particular King George V). Draw together committee report etc development to demonstrate that provision in GB is possible having regard to tests at para 149b of Framework***

All planning applications in the Green Belt will need to satisfy the requirements of the NPPF. The Sports Hubs will be no different.

The King George V Playing Fields masterplan indicates that new indoor facilities will be built to provide a community sports hub. Unlike the new facility at Copthall this will not be a replacement of an existing facility . It would therefore need to have strong case to demonstrate it complies with, and has been designed to meet, the requirements of the Green Belt policies of the NPPF. The masterplan was produced by the Parks and Open Spaces Team in Barnet Council and is a document that yet has planning approval.

The Committee Report and Master Plan for King George V Playing Fields [EB_GI_40] both acknowledge that the development will need to respond to the challenge of the sports hub being situated in the Green Belt.namely, the requirements set out in NPPF paragraph 147(b). This includes the design of any new buildings being sensitive to its location and minimising it's impact on the openness. It is obviously inappropriate for the Local Plan or the examination to predetermine the planning applications. The uses and proposed buildings could theoretically meet the tests of the NPPF Green Belt policies, however it is the applications that will need to demonstrate the compliance.

- ***Clarify role of Map 7 – consideration of how it will address quality of green space, in particular explanation of role of financial contributions towards green spaces, both existing and new.***

Map 7 depicts where the district and local parks are situated across the Borough and the catchment areas. The Open Space category and the catchment area is set out in table 8.1 (page 320) of the London Plan [Core_Gen_16]. In areas where the map is not covered by a park or a catchment area are areas of open space deprivation. Areas of deprivation are of particular concern in areas of dense urban development, as these are areas where residents do not have easy access to open space. Where development is proposed in areas of Open Space deprivation the developer should work with the Council to ensure the residents will have access to Open Space whether that is through assisting in new provision of open space or through improving access to Open Space.

To provide clarity of this within the Local Plan the addition of new paragraph 10.19.8 after the map is recommended:

Areas of Map 7 that are not covered by a park or a catchment area are areas of Open Space deprivation. Areas of deprivation are of particular concern in areas of dense urban development as these are areas where residents do not have easy access to Open Space. Where development is proposed in areas of Open Space deprivation the developer should work with the Council to ensure the residents will have access to Open Space whether that is through assisting in new provision of Open Space or through improving access to and quality of existing Open Space. New Open Space and /or financial contributions towards improvements of existing Open Space will be secured through s106 agreements or utilising the Community Infrastructure Levy Infrastructure Payments Policy.

- ***Consider signposting to CDH07 re children's play facilities***

The following amendments are proposed in Paragraph 10.20.1 to cross reference the requirements of child play space to Chapter 6 and CDH07. The Council proposes the following modification to clarify the distinction between CDH07 and ECC04 in relation to play space provision.

10.20.1 As detailed in Paragraph 6.21.5 and CDH07, cChildren's play spaces should therefore be provided in all new residential development containing flatted

schemes with the potential occupancy of 10 or more child bed spaces as set out in the Mayor's SPG Shaping Neighbourhoods – Play and Informal Recreation. There may however be some situations where it is not possible, or it is inappropriate, to provide play space as part of the development. In these instances, contributions to the provision of new play space or the improvement to existing play space provision in a near-by public open space could be more appropriate.

- ***Explain why standards in para 10.19.3 on playing pitches and children's play have been excluded from ECC04(b)(ii)***

This is an error. The Council acknowledges the importance of provision for play space and playing pitches. To correct this matter the following modifications are proposed for ECC04 (b) (ii)

The Council will seek to improve provision in these areas of deficiency in accordance with the following standards :

- Parks (1.63 hectares per 1,000 residents)
- Natural green spaces (2.05 hectares per 1,000 residents)
- 0.5m2 of play space per child under 15 years.
- Majority of residents within 1.2km of a playing pitch

- ***Explain definition of natural greenspaces – use of 2009 study to be considered***

Natural greenspaces are those greenspaces that are less 'managed' i.e. mown lawn and might consist of areas of longer grass, ponds, hedges and areas of scrub and woodland. According to the Operational Plan for the Management of the London Borough of Barnet's Green Spaces 2007 to 2011 (2007) quoted in Section A1.43 of Appendix A of the Barnet Open Space, Sport and Recreational Facilities Needs Assessment 2009 [EB_GI_01]; '*The priority of the Operational Plan however, is to manage the Council's green space resource cost effectively and sympathetically, providing the residents of Barnet with a diverse range of green spaces, both managed and natural.*'

Barnet also has a Site of Special Scientific Interest (SSSI) and many Sites of Importance to Nature Conservation (SINC) on land that have degrees of public access e.g. walking routes and bridleways that should not be considered as a traditional park but are important for residents to access and experience nature.

Leaving areas in a more natural state has benefits for the local biodiversity (see e.g. Nature Isn't Neat <https://www.monmouthshire.gov.uk/nin/> and see further <https://businesswales.gov.wales/walesruralnetwork/news-events-and-case-studies/news/nature-isnt-neat>). The retention and provision of biodiverse areas has increased in policy importance since this report was written, with areas of 'traditional managed' open space now being used as places to create meadow grassland to encourage invertebrate diversity and increase tree planting.

- ***Clarify any new playing pitch requirements***

The Playing Pitches Strategy 2017-2022 [EB_GI_13] analyses the use and need for playing pitches for a variety of sports in Barnet

Football –Demand could be resolved by providing more pitches or improving the quality of the existing pitches, for instance more all weather pitches would assist in meeting the demand.

Gaelic Football – replacement of pitch lost at Copthall is planned for the King George V Playing Fields [EB_GI_40].

Cricket – There is a sufficient supply of pitches, especially if the quality is improved and cricket pitches brought back into use.

Rugby – demand could be met by improving the quality of pitch and provision of a 3G pitch (conversion of an existing grass pitch would be acceptable).

Hockey – no additional pitches required.

Tennis – there is no requirement for new courts.

General conclusion of Playing Pitches Strategy – all pitches and public tennis courts should be protected.

- ***Modification of wording paragraph 10.19.1 and site 45 dev spec to tie into NPPF paras 101 and 102. Rethink approach given designation of local green space should not predate grant of permission/creation of space. Consider potential wording with site promoter.***

Proposed modification to para 10.19.1 reflects the Statement of Common Ground signed between LBB and Hill Residential Ltd, Trustees of the Gwyneth Cowing Will Trust and Trustees of the Gwyneth Cowing 1968 Settlement (EB_SoCG20):

10.19.1 Barnet has 10 district parks and 77 local parks ranging in size from Hamilton Road Playground (0.04 ha) to Monken Hadley Common (41 ha). These are categorised according to the London Plan public open space hierarchy. Changes to the Policies Map show Barnet's parks and public open spaces. The Schedule of Proposals in Annex 1 highlights the provision of new publicly accessible Local Open Space open space at Whalebones (Site 45) Park which will be designated in accordance with NPPF para 99 to help address an existing local deficiency in open space.

- ***Ensure consistency of wording between GSS13 and ECC04***

While the intent of Policies GSS13 and ECC04 are not inconsistent an additional policy point in ECC04 could insure improved interaction between the two policies.

Proposed additional policy point

ECC04 (a) (iv) promoting the delivery and use of the sports hubs in GSS13

Conclusion

The Council is committed to continue to improve and invest in greenspace facilities. Ensuring residents have access to a range of parks and open spaces that offer different experiences and recreational opportunities to residents and visitors. The matters detailed above and suggested amendments to the Policy ECC04 and supporting text of ECC04 are intended to provide clarity and consistency to the Local Plan.