# London Borough of Barnet Local Plan – Examination

**Inspectors’ Matters, Issues and Questions for Hearing Sessions - Autumn 2022**

**Matter 1: Legal Compliance and the Duty to Co-operate Issue:**

Whether the Plan has been prepared with due regard to the appropriate procedures and regulations and whether the duty to co-operate on strategic matters has been satisfied?

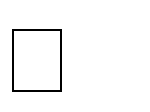
**Questions:**

# Consultation / Statement of Community Involvement (SCI)

1. Has the Plan been prepared in accordance with the statutory requirements of the Planning and Compulsory Purchase Act 2004 and the associated Regulations, including in respect of the publication and availability of documents, advertisements and notifications?

The Plan has been prepared in accordance with the relevant statutory requirements. The Council has followed the guidance set out in the PAS Local Plan Route Mapper Toolkit – Part 3 ([Core\_Gen\_23](https://www.barnet.gov.uk/sites/default/files/toolkit_part_3_local_plan_process_nov_2021.pdf)). The toolkit is a checklist prepared and recommended by the Planning Advisory Service (PAS). Amongst other things it lists the legislative requirements, and requirements set out for plan-making. The Council has completed the checklist up to the submission stage to demonstrate how it has complied with statutory requirements set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 including in respect of the publication and availability of documents, advertisements and notification. The toolkit makes appropriate cross references to the relevant documents which demonstrate compliance with the statutory requirements. Further evidence of the Council’s compliance with the relevant statutory requirements can be found in the Regulation 22 Consultation Statement ([Core\_09](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)), and more generally through the Reg 22 Signposting Document ([Core\_12](file:///C:\Users\frances.odikasigbue\Documents\Barnet%20Reg%2022%20Signposting%20Doccument%20July%202022%20Clean%202007.docx)).

1. Were adequate opportunities made available for participants to access and make comments on the Plan and other relevant documents?



***Yes. There were a range of opportunities for participants to access and make comments on the Plan and associated relevant documents, in accordance with the statutory requirements. The following engagement and consultation processes have taken place in the formulation of Barnet’s draft Local Plan:***

***In late 2017, the Council conducted a series of interactive workshops with***

***key stakeholders entitled “Planning for the Future of Barnet” from***

***September 2017-December 2017;***

* ***In early 2020, the Council consulted on the Regulation 18 Local Plan***
* ***Preferred Approach (27th January 2020 to 16th March 2020); and***
* ***In mid-2021, the Council consulted on the Regulation 19 Local Plan Publication (28th June 2021 to 9th August 2021).***

***A summary on the evolution of the Draft Local Plan is set out in the Reg 22 Signposting Document (***[***Core\_12***](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)***). Particular reference is made at para 4.2 on how the challenges of COVID19 were addressed during the Regulation 19 consultation.***

***The Local Plan documents have remained available on Barnet’s website for participants to access throughout the evolution of the Plan.***

***The Council carried out consultation exercises in accordance with its Statement of Community Involvement (SCI) (***[***Core\_Gen\_03***](https://www.barnet.gov.uk/sites/default/files/sci_2018.pdf)***) at the relevant stages. This is evidenced by the Regulation 22 Consultation Statement (***[***Core\_09***](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)***), in particular para***

***1.1.4 which highlights that Consultation on Regulation 18 was carried out in accordance with Barnet’s SCI (***[***Core\_Gen\_03***](https://www.barnet.gov.uk/sites/default/files/sci_2018.pdf)***) approved in 2018.***

***Consultation on the Regulation 19 draft Plan was carried out in accordance with the SCI – COVID19 Addendum (***[***Core\_Gen\_04***](https://www.barnet.gov.uk/sites/default/files/addendum_to_barnets_statement_of_community_involvement_sci_2018.pdf)***) approved in September 2020. This is also evidenced by the Regulation 22 Consultation Statement (***[***Core\_09***](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)***). The SCI Addendum clarifies how, in responding to the COVID-19 pandemic and complying with Government guidance, the Council engaged with the community to ensure that planning processes in Barnet remained fair, transparent and inclusive*.**

1. Were representations adequately taken into account?

Yes. The Council considers that representations have been adequately taken into account as evidenced by the Regulation 22 Consultation Statement ([Core\_09](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)) together with Schedule of Representations and Responses to Reg 18 ([Core\_Gen\_27](https://www.barnet.gov.uk/sites/default/files/schedule_of_representations_and_responses_to_the_reg_18_local_plan.pdf)), Initial Responses to Regulation 19 Representations ([EXAM 1K](https://admin.barnet.gov.uk/sites/default/files/EXAM%201K%20-%20LBB%20Initial%20Responses%20to%20Reg%2019%20Representations%20on%20Policies.pdf)) and the Proposed Modifications to the Draft Local Plan ([EXAM 4](https://admin.barnet.gov.uk/sites/default/files/EXAM%204%20-%20Table%20of%20Council%27s%20Proposed%20Modifications%20to%20Barnet%27s%20Draft%20Local%20Plan%20-%20June%2027th%202022%20PDF%20%282.35MB%29_0.pdf)). Changes and Proposed Modifications in response to representations have been flagged in these documents.

1. Is there any clear evidence that the public consultation carried out during the plan-making process failed to comply with the Council’s SCI or any legal requirements?

No. There is no evidence clear or otherwise that the Council has failed to comply with any legal requirements for public consultation, or that the Council failed to comply with its SCI. In carrying out public consultation on the Local Plan those requirements have been met, following Government guidance on COVID19 when necessary. This is evidenced through the Regulation 22 Consultation Statement ([Core\_09](https://barnet.gov.uk/sites/default/files/barnet_draft_local_plan_reg_18_19_consultation_statement_reg_22.pdf)).

# Sustainability Appraisal (SA)

1. Was the methodology used for the SA as part of the Integrated Impact Assessment (IIA) appropriate? Has the process been iterative and undertaken at each stage of plan preparation?

Yes. The SA forms part of the Integrated Impact Assessment (IIA) ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf) ). The Non-Technical Summary sets out how the SA has been produced, showing that this has been an iterative process, undertaken throughout the evolution of the Plan, with a SA Framework developed to explain and justify the inclusion of policies and site proposals at each stage with due consideration of reasonable alternatives.

1. To what extent has the SA informed the content of the Plan? Have the likely economic, social and environmental effects of the Plan been adequately and accurately assessed in the SA for both policies and proposed allocations?

Yes. Using baseline conditions data and sustainability objectives the SA has for each policy and proposed allocation considered the likely implications of social, economic and environment effects. The SA, included as part of the IIA, ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf) ) explains the assessment methodology undertaken and how this has influenced which policies and site proposals have been chosen for the final document. The SA assessment identified that many of the policies within the draft Local Plan would have positive impacts when assessed against the SA objectives. The draft policies and proposals were particularly beneficial for housing delivery, the built environment, public realm and economic growth. The draft local Plan ([Core\_01](https://admin.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission_0.pdf)) also places an emphasis on a healthy and inclusive Borough and the provision of open spaces were also considered to be positive. A number of negative effects were identified relating to the impacts that growth and development would have on transport infrastructure, community infrastructure, open spaces and natural resources. Policies and proposals were revised between Reg 18 and Reg 19 stages to mitigate these impacts.

1. Does the IIA methodology reflect and place sufficient emphasis upon the national planning policy objectives relating to the mitigation of, and adaptation to, climate change, including any long-term implications for flood risk and biodiversity?

Yes. The IIA is underpinned by the 13 SA Objectives which have been used to assess policies and proposals in the draft Local Plan ([Core\_01](https://admin.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission_0.pdf)). This is set out at Table 1 of the IIA – Part 1 ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf)). The SA Objectives include a range of objectives relating to the mitigation of, and adaption to, climate change: reducing the contribution to climate change and enhancing community resilience to climate change impacts; maximising protection and enhancement of natural resources including water and air, and minimising waste; minimising and managing the risk of flooding; and creating, protecting and enhancing suitable wildlife habitats wherever possible and protect species and biodiversity. As part of an iterative process the IIA

methodology was subject to consultation. This consultation has included the Environment Agency, Historic England and Natural England.

Within the Plan policies CDH02 – Sustainable and Inclusive Design and ECC01- Mitigating Climate Change set out an approach to mitigating climate change including use of sustainable technology and design principles. Policy ECC01 is consistent with the approach in the London Plan and the objective to make London zero-carbon by 2050. The Plan’s approach to managing natural resources is further set out in Policy ECC02 – Environmental Considerations covering air and noise quality while with respect to water, Policy ECC02A – Water Management sets out requirements to achieve a positive reduction in flood risk, helping to ensure there is sufficient capacity for water supply and wastewater networks. The Plan has a specific policy ECC06 on Biodiversity. The Technical Paper on Biodiversity ([EXAM1H](https://admin.barnet.gov.uk/media/13555)) sets out the measures undertaken within the Local Plan to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.

1. Are the reasons for selecting the development supported by Policies BSS01, GSS01 to GSS13 and identified in Annex 1, sufficiently clear, have reasonable alternatives been identified, and have clear reasons for discounting any alternatives been provided?

Yes. At the Regulation 18 stage, for example, policies BSS01 GSS01 to GSS13 had at least one alternative option presented within the IIA ([Core\_Gen\_25 Pt1](https://www.barnet.gov.uk/sites/default/files/part_1_iia_report._.pdf) Core\_ [Gen\_25 Pt2](https://www.barnet.gov.uk/sites/default/files/part_2_iia_report.pdf) & [Core\_Gen\_25 Pt3](https://www.barnet.gov.uk/sites/default/files/part_3_iia_report.pdf)). Each of the sites (supported by BSS01 and GSS01 to GSS13) in the schedule of site proposals in Annex 1 were assessed and scored against the 13 Sustainability Appraisal objectives and an overall conclusion for each site reached ([Core\_Gen-02 part 2](https://www.barnet.gov.uk/sites/default/files/iia_part_two.pdf)). Stage B of the SA looked at developing the Local Plan options including consideration of reasonable alternatives as well as evaluating the likely effects of the Local Plan and alternatives. As part of the Draft Local Plan preferred approach (Reg 18) ([Core\_07](https://www.barnet.gov.uk/sites/default/files/draft_local_plan_reg_18.pdf)), a preferred policy approach was set out. The scope to consider what might otherwise be considered reasonable alternatives is, of course, shaped in part by the Mayor’s London Plan that sets Borough housing targets and strategic policies that identify locations deemed suitable for future growth. Where reasonable alternatives existed, these were considered ([Core\_07](https://www.barnet.gov.uk/sites/default/files/draft_local_plan_reg_18.pdf)) with justification provided for the selection of the preferred approach. Where no reasonable alternative policy approaches were advanced in all cases the option of not including the policy was overtly considered and rationale provided explaining why the inclusion of a particular policy is necessary.

1. Are the reasonable alternatives considered by the SA sufficiently distinct to highlight the different sustainability implications of each, particularly in terms of growth scenarios, the spatial strategy and alternative sites for development, and have they been assessed on an appropriate basis?

Yes. The Council assessed reasonable alternatives in terms of in terms of growth scenarios and the spatial strategy. These are set out in the Local Plan – Preferred Approach ([Core\_07](https://www.barnet.gov.uk/sites/default/files/draft_local_plan_reg_18.pdf)). The Council’s approach to the selection of proposals sites is set out in the Housing Technical Paper ([EXAM 1B](https://admin.barnet.gov.uk/sites/default/files/EXAM%201B%20-%20Housing%20Technical%20Paper.pdf)). Reasonable alternatives need to have a realistic chance of being delivered over the plan period and in several policies the only realistic alternative was to have no policy. The Alternative Options together with the reasons they have been discounted are set out within Appendix 8 of the IIA ([Core\_Gen\_ 02 part 3](https://www.barnet.gov.uk/sites/default/files/iia_part_three.pdf)). As such it considered that the IIA has been used as a positive iterative tool to shape and inform the emerging Plan and improve its overall delivery and outcomes. The IIA Scoping Report Jan 2019 (appendix 2) and IIA produced at Reg 18 stage (Core\_Gen25 part 3) also included an appendix 8 setting out alternative options and development of reasonable alternatives.

1. Overall, is there clear evidence in the SA to indicate why, having considered reasonable alternatives, the Plan’s strategy is an appropriate one?

Yes. During the preparation of the policies and proposals contained within the Reg 18 draft Preferred Approach Local Plan, alternative options for a range of policy issues were appraised. Alternative assessment findings are presented within the IIA. Notable alternatives considered (including ‘No Policy’ alternatives) are identified in the Reg 18 draft plan ([Core\_07](https://www.barnet.gov.uk/sites/default/files/draft_local_plan_reg_18.pdf)) as well as the accompanying Reg 18 stage IIA ([Core\_Gen25](https://www.barnet.gov.uk/sites/default/files/part_1_iia_report._.pdf)) These reasonable alternatives are summarised in Appendix 8 (part 3 of the Reg 18 IIA).Supported by the IIA ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf) ) the draft Local Plan ([Core\_01](https://admin.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission_0.pdf)) is well considered , clearly setting out the locations where growth will be directed within a suite of 13 Growth and Spatial Strategy policies. Local Plan policies seek to direct growth to the most sustainable locations in the Borough and to places where there are suitable sites available to support a quantum of delivery. Policy BSS01 introduces the Plan by setting out the Spatial Strategy while Policy GSS01 establishes how Barnet will deliver sustainable growth. The policies to this effect have been assessed throughout the Plan process via the SA as part of the IIA, an iterative process, intended to identify the most sustainable policy and site allocation outcomes.

# Habitats Regulations Assessment (HRA)

1. How was the HRA carried out and is the methodology appropriate?

The initial HRA Screening report was carried out as part of the IIA ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf) ). for the Regulation 18 Local Plan. The HRA was updated through to submission of the draft Local Plan. The methodology followed by the HRA is set out in the Revised Screening Report, June 2022 ([EXAM 8](https://admin.barnet.gov.uk/sites/default/files/Exam%208%20Habitats%20Regulation%20Screening%20Assessment.pdf)). In consultation with Natural England the Screening Report identified the relevant designated sites and potential pathways. Using criteria in guidance and information supplied by Natural England on each of the designated sites, the report assessed the potential for significant effects, and the likelihood of significant effects from the proposed policies within the draft Local Plan. The assessment concluded that there was unlikely to be

significant effects from the proposed policies within the draft Local Plan. Further assessment of in-combination effects concluded that these were again unlikely, based on criteria relating to distance and the discrete nature of some of the designated sites (particularly enclosed water bodies). Natural England have confirmed in their letter of 20 June 2022 that “On the basis of the material supplied with the consultation, it is our advice that the relevant statutory designated sites have been considered within the HRA screening report, alongside the likely

‘pathways’ that may impact them. Where potential impact pathways have been identified, we agree with the justification given in the report as to why no likely significant effects are likely as a result of the local plan either alone or in- combination with other plans and projects. We therefore agree with the conclusions presented in the screening report regarding the HRA”. Accordingly, it is considered that the methodology adopted is appropriate.

1. Is the approach of the HRA legally compliant when having regard to the Court of Justice of the European Union’s judgment in *People over Wind, Peter Sweetman v Coillte Teoranta* and any other relevant case law?

Yes. The HRA Screening Report does not consider mitigation at the HRA ‘screening stage’ in relation to the draft Local Plan and moreover, neither does it suggest mitigation for inclusion within the suite of policies. The Report acknowledges the conclusions within the HRA of the London Plan 2021 ([Core\_Gen\_16](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)), as it is a relevant ‘higher level plan’. The London Plan HRA concludes that there are sufficient ‘protective measures’ to ensure there are no likely significant impacts from policy. The draft Local Plan does not ‘rely on mitigation in the London Plan’ this is because regardless of any mitigation measures under the London Plan there are unlikely to be significant effects from Barnet’s suite of policies upon the designated site network. The London Plan 2021 requires London boroughs to consider impacts on designated sites when preparing planning documents. As part of the work on updating the Screening Report, the HRA Reports for other London boroughs were reviewed where appropriate in respect of the designated sites that are of potential relevance to development in Barnet. As there is little or no connectivity to the designated sites from development in Barnet, there are unlikely to be any significant effects in combination with other Plans. No mitigation measures were relied upon in reaching this conclusion.

1. Would the HRA be reliant on proposed mitigation and avoidance measures, including any secured by other plans and projects, to ensure that they would avoid or reduce any potential for adverse effects on the integrity of any identified site within the national site network (formerly known as European or Natura 2000 sites), either alone or in combination with other plans and/or projects?

No. The Council refers to its response to Q12. The HRA Screening Report does not rely upon any mitigation measures.

1. Has sufficient engagement with Natural England taken place with respect to the HRA and if so, are they satisfied with the content of the Plan and associated evidence in the HRA?

Yes. The Council has a good working relationship with Natural England who have been closely consulted in respect to HRA and other matters throughout the Local Plan process. As set out in response to MIQ Q11, Natural England agree with the conclusions presented in the HRA.

The Council are pursuing a revision to the existing SoCG with Natural England ([EB\_SoCG\_06](https://www.barnet.gov.uk/sites/default/files/Natural%20England%20SCG.pdf)). The revision will reflect subsequent correspondence between the Council and Natural England since the SoCG was agreed in December 2021.

1. Have any necessary adjustments been made to the HRA approach as a result of the changes to the Conservation of Habitats and Species Regulations 2017, pursuant to the UK’s exit from the European Union, which came into force on 1 January 2021?

Yes. Paras 8 to 11 of the HRA Screening Report 2022 ([EXAM8](https://admin.barnet.gov.uk/sites/default/files/Exam%208%20Habitats%20Regulation%20Screening%20Assessment.pdf)) explain that the HRA approach has been reviewed against The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The revisions made to the Update :

* reference the designated sites (formally European sites).
* explain that ‘designated sites’ or ‘sites within the designated network’ include for ease of reference Ramsar sites – albeit that these sites were not previously included within the definition of European sites, but are protected through International Convention.

1. Overall, have the requirements of the Habitats Regulations been met?

Yes. The Council considers that the requirements of the Habitats Regulations have been met. The methodology and conclusions within the IIA are supported by Natural England.

# Equalities

1. How does the Plan seek to ensure that due regard is had to the three aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

The requirement is of course to have ‘due regard’ to the aims of s.149 of the Equality Act 2010 (EA 2010). The Council’s consideration of the three aims set out in section 149 of the Equality Act 2010 is explained in the Equality Impact Assessment (EqIA). The EqIA (included as Appendix 6 of the IIA) ([Core\_Gen\_02 pt3](https://www.barnet.gov.uk/sites/default/files/iia_part_three.pdf) ) was produced as part of an iterative process followed throughout the production of the Plan, providing commentary as to how the policies have been drafted having due regard to the matters set out in section 149(1) of the EA 2010 and through consideration of protected characteristics. In terms of potential negative impacts identified by the

EqIA, revisions have been made to the Local Plan between Reg 18 and Reg 19 stages to manage and mitigate these. Accordingly, it is considered that the obligation t have ‘due regard’ to the aims in s.149 of the EA 2010 has been met.

1. Is there any evidence that the Plan would have significant effects on equalities that have not been identified in the IIA?

No. The EqIA considers the impact of the Plan on all protected characteristics under the Equality Act 2010. The Council has also undertaken further work to assess how the Plan would impact other characteristics that are not protected.

In addition to the EqIA, the Council has produced a Health Impact Assessment (HIA)

– (included as Appendix 7 of the IIA) ([Core\_Gen\_02 pt3](https://www.barnet.gov.uk/sites/default/files/iia_part_three.pdf) ) to assess the potential impacts (positive and negative) of the draft Local Plan ([Core\_01](https://admin.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission_0.pdf)) on health and wellbeing. The approach is considered good practice for policy development as the impacts of living environments on population health and wellbeing are increasingly recognised. The aim of the HIA is to maximise positive health impacts while minimising the negative health impacts of the proposed policy and address inequalities. The HIA concluded that the Draft Local Plan has the potential to make a positive net contribution to the improvement of health and wellbeing as well as the delivery of the Barnet Health and Wellbeing Strategy ([EB\_S\_11](https://www.barnet.gov.uk/sites/default/files/jhws_2021_to_2025.pdf)). This is especially true for the two priorities – ‘Encouraging residents to lead active and healthy lifestyles and maintain their mental wellbeing’ and ‘Creating a healthy environment’. ‘Policy CHW02 has been revised to state that for larger development proposals HIAs will be sought to ensure that health and wellbeing impacts are addressed in an integrated and coordinated way.’

# Local Development Scheme (LDS)

1. To what extent has the production of the Plan followed the LDS and is it in compliance with it? If not, would it be reasonable for the LDS to be updated to reflect the up-to-date position of the Plan and any associated SPDs to which it refers and take account of the Council’s related proposed modifications?

The Plan follows and complies with the LDS. The Local Development Scheme – version 8 ([Core\_02](https://www.barnet.gov.uk/sites/default/files/local_development_scheme_2021.pdf)) was updated in September 2021. This replaced the previous version of the LDS from January 2020. A summary on the evolution of the Draft Local Plan is set out in the Reg 22 Signposting Document ([Core\_12](file:///C:\Users\frances.odikasigbue\Documents\Barnet%20Reg%2022%20Signposting%20Doccument%20July%202022%20Clean%202007.docx)). The Council confirms that the stages of draft Local Plan preparation as set out in both version 7 and 8 have been followed.

# Duty to Co-operate (DtC) and General Conformity with the London Plan 2021

1. Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance, including in terms of housing, employment and infrastructure provision, as required by the DtC and to maximise the effectiveness of the preparation of the Plan?

Yes. The Council has engaged consistently and constructively with neighbouring Boroughs, the GLA, TfL and statutory bodies during the development of the draft Barnet Local Plan ([Core\_01](https://admin.barnet.gov.uk/sites/default/files/local_plan_reg_19_for_submission_0.pdf)). Appendix A of the Duty to Co-operate Statement - ([Core\_Gen\_05](https://www.barnet.gov.uk/sites/default/files/barnet_dtc_statement_reg_19_june_2021.pdf)) sets out meetings with DtC bodies from March 2017 up until submission of the Local Plan. This is reinforced by Barnet’s suite of SOCG.

The strategic matters of relevance addressed in Statements of Common Ground (SOCG) with neighbouring authorities are: housing targets; tall buildings and protected views; Growth and Opportunity Areas; town centres; flood risk and water management; air quality; provision for Gypsies and Travellers; strategic infrastructure; Green Belt and biodiversity Other issues which are being addressed with strategic stakeholders and other relevant organisations include: green and transport infrastructure, climate change, biodiversity, flood risk, and Barnet’s heritage.

These issues have been addressed in the Council’s suite of SOCG documents ([EB\_SOCG](https://admin.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-review/submission#title-9)\_) and supported through cross referencing in the Duty to Cooperate Statement ([Core\_Gen\_05](https://www.barnet.gov.uk/sites/default/files/barnet_dtc_statement_reg_19_june_2021.pdf)). The relevant bodies have been identified and separate statements produced specifically for key strategic partners. The SOCG for neighbouring boroughs and the GLA clearly records the position reached with regards to matters of agreement / disagreement. Each statement states the current position of the organisation, and how the Council is working to address any outstanding areas of disagreement. The Council continues to seek sign-off on a SOCG with the Environment Agency.

1. Are there any inter-relationships with other authorities in terms of housing markets, economic activity, travel to work areas and the market for employment land and premises, which have not been specifically addressed?

No. Barnet as a London borough works within the parameters of the London Plan and these inter-relationships fall largely within the remit of the Mayor of London and the Greater London Authority. In terms of inter-relationships outside of London the Council refers to its Statement of Common Ground ([EB\_SoGC\_17](https://admin.barnet.gov.uk/sites/default/files/EB_SoGC_17%20Hertsmere%20Borough%20%26%20Herts%20CC.pdf)) with Hertsmere and Hertfordshire County Council.

1. Are there any outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC? If so, how has the Council sought to address any issues raised?

No. The Council has actively engaged with neighbouring boroughs and DtC bodies on an on-going basis and whilst there is some updating and finalisation of SOCG the Council is unaware of any substantive areas on which there are disagreements. The Council is close to finalising a SOCG with the Environment Agency.

In particular, the Council confirms that there are no outstanding concerns from the GLA nor neighbouring authorities within and outside London. It has agreed Statements of Common Ground (SoCG) with neighbouring London boroughs ([EB\_SoCG\_01 to EB\_SoCG\_05](https://admin.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-review/submission#title-9)) and the GLA ([EB\_SoCG\_10](https://www.barnet.gov.uk/sites/default/files/EB_SoCG_10%20GLA.pdf)) as well as Hertsmere Borough and Hertfordshire County Council ([EB\_SoCG\_17](https://admin.barnet.gov.uk/sites/default/files/EB_SoGC_17%20Hertsmere%20Borough%20%26%20Herts%20CC.pdf)).

1. In overall terms, is the Plan in general conformity with the spatial development strategy for London (i.e. the London Plan)?

Yes. The Plan is in general conformity with the London Plan. This is demonstrated by the Mayor’s Reg 19 stage response dated 9th August 2021 which confirms general conformity with the London Plan 2021 ([Core\_Gen\_06](https://www.barnet.gov.uk/sites/default/files/id055_-_greater_london_authority_gla_-_redacted_0.pdf)) and para 2.1.2 of the Statement of Common Ground ([EB\_SoCG\_10](https://www.barnet.gov.uk/sites/default/files/EB_SoCG_10%20GLA.pdf)).

# Climate Change

1. Does the Plan accord with s19(1A) of the Planning and Compulsory Purchase Act 2004 by including policies that are designed to secure that the development and use of the land in the London Borough of Barnet contribute to the mitigation of, and adaptation to, climate change?

Yes. The Plan does contain policies that are designed to secure that the development and use of land in Barnet will contribute to the mitigation of, and adaptation to, climate change.

Policy ECC01 explains how the Council will mitigate against climate change by seeking to minimise Barnet’s contribution to climate change. That policy is consistent with the approach in the London Plan ([Core\_Gen\_16](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)) and the objective to make London zero-carbon by 2050. The Mayor in his response to the Reg 18 Local Plan ([Core\_Gen\_27](https://www.barnet.gov.uk/sites/default/files/schedule_of_representations_and_responses_to_the_reg_18_local_plan.pdf)) states that he welcomes Barnet’s aim to minimise its contribution to climate change and improve air quality.

The Council also refers to its specific policy on reducing flood risk. ECC02A on Water Management seeks to ensure that development delivers a positive reduction in flood risk, from all sources, on and off-site, by demonstrably giving sufficient consideration to this issue from the design stage and during the pre-application process.

More generally, climate change was a key consideration in the preparation of the local plan as a whole. This is evidenced by SA Objectives within the IIA ([Core\_Gen\_02](https://www.barnet.gov.uk/sites/default/files/iia_part_one.pdf)). SA Objectives include: reducing the contribution to climate change and enhancing community resilience to climate change impacts; maximising protection and enhancement of natural resources including water and air, and minimising waste; and minimising and managing the risk of flooding.

1. Are the proposed modifications indicating that the Council declared a Climate Emergency in May 2022 necessary for soundness and if so, would this require any consequential changes to the Plan?

No, the Council does not consider that the changes are legally necessary to make the plan sound. However, the changes to the Plan to reflect the declaration of a Climate Emergency by the Council are modifications in that they highlight the priorities of the new administration elected in May 2022. Mitigating Climate Change is not just the responsibility of the Local Plan, other Council strategies in particular the Sustainability Strategy ([EB\_GI\_20](https://www.barnet.gov.uk/sustainability-barnet/barnets-sustainability-strategy)) are setting out in more detail what can be done within Barnet in terms of targets and commitments to reduce carbon emissions. No significant consequential changes to this Local Plan are intended following the Declaration. However, the next review of the Local Plan will be the opportunity to more fully reflect the Declaration and the work the Council is doing to reduce carbon emissions.