

Barnet Local Plan EIP – Note on Local Plan Mapping

Reason for producing this note

At the hearing session on Day 2 (Wednesday 21st September) during consideration of Matter 2: Spatial Strategy and Strategic Policies, Inspector Wildgoose requested provision of a note concerning the review of policies mapping boundaries and other maps in the Plan. This note was to include:

- Comparison with London Plan – with consideration of boundaries, what has been prepared and the differences on the Proposed Policies Map and maps within the Plan;
- Matters of consistency; and
- Clarification on thoroughfare routes.

Background

With regards to the London Plan the Council emphasises that as the overall strategic plan for London, the London Plan does not, within its suite of policies, seek to set specific boundaries for any designations. The Council has sought to interpret the London Plan in accordance with its understanding of the law. Diagrams within the London Plan (both key and inset) cannot of course be drawn on the “base map”¹ which means that such diagrams can only be indicative as they do not have the level of detail required to precisely delineate boundaries. Specific boundaries are matters for individual boroughs to designate given those local authorities will have the appropriate evidence base to make such decisions.

This Note provides further detail on any mapping requirements of boroughs, as set out in the London Plan.

The Council acknowledges the need for consistency between maps in the Growth and Spatial Strategy Chapter in particular between the Key Diagram and Growth Area maps. The revised maps are attached at Appendix A while the changes made to the maps are highlighted in this Note.

The Council also acknowledges the merits of showing all major thoroughfares in the Borough, as referred to in the supporting text to Policy GSS11 – Major Thoroughfares, on the Key Diagram.

Consideration

London Plan and Opportunity Areas – Following the above, the London Plan contains indicative locations for opportunity areas² only. The Plan at Figure 2.6 depicts New Southgate Opportunity Area as a diamond shape with a pink infill and a demarcated area of blue dots, defined in Figure 2.3 respectively as locations where development is “Maturing”

¹ Regulation 5 of [the Town and Country Planning \(London Spatial Development Strategy\) Regulations 2000](#)

² Areas that the London Plan identifies as being appropriate to “see the most significant change” (para 2.0.4). Planning frameworks are to be brought forward locally for opportunity areas (Policy SD1, para 2.0.4, 2.1.1-4)

and “strategic areas for regeneration”³. The New Southgate diamond sits within a geometrically drawn area known as Crossrail 2 North.

Further detail on the location of New Southgate Opportunity Area is provided in paras 2.1.37 and 2.1.38 which refer to the environmental and accessibility problems faced by the area to the west of the East Coast Main Line and to the south of the A406 North Circular as well as the potential to deck over a small section of the North Circular immediately to the south of New Southgate Station and/or tunnel a section of the North Circular between New Southgate and Green Lanes. The London Plan does not set out the size of the new New Southgate Opportunity Area nor does it set specific boundaries.

London Plan Policy SD1 – Opportunity Areas sets out role of boroughs in delivering Opportunity Areas and what Development Plans should do. There are 11 expectations of Development Plans :

- 1) clearly set out how they will encourage and deliver the growth potential of Opportunity Areas;
- 2) support development creating employment opportunities and housing choice for Londoners;
- 3) plan for and provide necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary ;
- 4) recognise the role of heritage in place-making;
- 5) establish capacity for growth in Opportunity Areas, taking account of indicative capacity for homes and jobs in London Plan Table 2.1;
- 6) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution;
- 7) include ambitious transport mode share targets;
- 8) support wider regeneration and ensure that development proposals integrate into surrounding areas, in accordance with Policy SD10 Strategic and local regeneration;
- 9) ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development;
- 10) work with Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes; and
- 11) take appropriate measures to deal with contamination that may exist.

The London Plan makes no specific reference to mapping expectations of boroughs with regards to Opportunity Areas. The Council therefore considers that the boundaries of an Opportunity Area are therefore a matter for boroughs, working together and with the Mayor.

In terms of other mapping expectations of the London Plan the Council refers to

Policy SD7 Town Centres: development principles and Development Plan Documents which states that in Development Plans, boroughs should define the detailed boundary of town centres in policy maps including the overall extent of the town centre.

³ Strategic areas for regeneration have been identified by reference to the 20 percent most deprived lower super output areas in England (figure 2.19) and under Policy SD10 should be identified by local authorities and have policies developed for them by those local authorities

Policy D9 Tall Buildings states that with regards to locations that tall buildings may be appropriate that any such locations and appropriate tall building heights should be identified on maps in Development Plans.

Policy E5 Strategic Industrial Locations (SIL) states that Boroughs, in their Development Plans, should define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution

Policy E6 Locally Significant Industrial Sites states that in Development Plans, boroughs should designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution.

The Council considers that the Local Plan is consistent with the mapping requirements of the London Plan. It can show this as follows :

- The **Key Diagram** sets out the boundaries for the Opportunity Areas. The London Plan designates Colindale as an Opportunity Area. However it is the Council that sets the boundaries of the Opportunity Area. This has been done through the 2010 Colindale AAP. The boundaries of the Opportunity Area are coterminous with that of the Growth Area.

The London Plan also designates Brent Cross Cricklewood as an Opportunity Area. The boundaries of this extensive Opportunity Area were originally set through the 2006 Unitary Development Plan. The Opportunity Area in 2006 included at that time, the West Hendon Estate. This was removed in 2012 through the Local Plan Core Strategy as the regeneration of West Hendon Estate was commencing and as a priority housing estate it was in marked contrast to the mixed used led nature of Brent Cross and Cricklewood. West Hendon was not referenced as part of the 324 ha Cricklewood Brent Cross Opportunity Area in the 2015 London Plan (Consolidated with Alterations since 2011). The Key Diagram shows that within the Brent Cross Cricklewood Opportunity Area there are 3 Growth Areas: Brent Cross, Brent Cross West (Staples Corner) and Cricklewood. These are the focus of growth within the Opportunity Area. Areas within the Opportunity Area but outside of the Growth Areas are not subject to specific Growth Area policies GSS02, GSS03 and GSS04.

New Southgate Opportunity Area. The Council does not consider that the London Plan through Figure 2.6 defines the boundaries of the Opportunity Area. Proposed Modification MM05 highlights that the boundaries of the Opportunity Area have not yet been defined and will be established through a planning framework produced jointly between the Council, LB Enfield and LB Haringey with the GLA. The Council considers that following this initial establishment a future Local Plan will define the boundaries of the Opportunity Area.

- **Town Centres** – Boundaries for all Major and District Town Centres were established through the 2012 Local Plan Development Management Policies document. These boundaries remain unchanged.
- **Tall Buildings** – Locations that may be appropriate for tall buildings consist of Growth Areas and proposal sites (as well as New Southgate Opportunity Area subject to the production of a planning framework). The Council refers to Proposed Modification (MM162) which clarifies that tall buildings would only be supported on Major Thoroughfares, and within the town centres of Finchley Central and North Finchley, in proposal sites that are allocated in Annex 1. This change helps to better define and differentiate these locations (which are not Growth Areas).

- **Strategic Industrial Locations** – There are no Strategic Industrial Locations in Barnet.
- **Locally Significant Industrial Sites** - The Council protects employment locations classified as Locally Significant Industrial Sites (LSIS). There are 22 sites designated as LSIS and these are shown on the Policies Map.

Matters of Consistency and Clarification

Key Diagram – including Major Thoroughfares

The Council proposes further revisions to Proposed Modification MM23 in particular the boundary of the Opportunity Area at Brent Cross- Cricklewood which, by including the West Hendon Estate, is inconsistent with the 2012 Local Plan.

Further amendments include

- Clarification that Mill Hill East area is not a Growth Area
- Removal of western area of Edgware Growth Area that falls within LB Harrow.

The Council has also revised the Key Diagram to include
A406 North Circular;
A1 Great North Way/ Watford Way;
A41 Edgware Way / Watford Way / Hendon Way.

Growth Areas and Mill Hill East Area

Map 3 – Brent Cross Growth Area

The Council proposes further revisions to Proposed Modification MM52 to more accurately reflect the boundary of Brent Cross (Thameslink).

Map 3A - Brent Cross West Growth Area

The Council proposes further revisions to Proposed Modification MM72 to ensure consistency with the boundary of Brent Cross (Thameslink). This includes removing the areas around Brent Cross Thameslink Station including Fellows Square, Wilkinson Close and the Esso filling station.

Map 3B Cricklewood Growth Area

The Council proposes further revisions to Proposed Modification MM79 to provide a more accurate representation of the Growth Area with regards to the Railway Terraces Conservation Area. This includes removing the allotments from the Growth Area.

Map 3C - Edgware Growth Area

The Council proposes further revisions to Proposed Modification MM82 to provide a more accurate representation of the Growth Area within LB Barnet, excluding the western part of the growth area which lays within the London Brough of Harrow.

Map 3D - Colindale Growth Area

The Council proposes further revisions to Proposed Modification MM87 to ensure consistency with the boundaries of the Opportunity Area as reflected in the Colindale AAP. This includes addition of land around Woodcroft Park and surrounding streets

to the north. Proposal site 9 for Colindeep Lane has been removed to reflect Proposed Modification

Map 3E Mill Hill East Area

The Council proposes further revisions to Proposed Modification MM94 to ensure consistency with the boundaries of the Area as reflected in the Mill Hill East AAP and accurate representation of Site Proposal 47 – Mill Hill East Station.

Conclusion

The Council considers that it has set out the requirements of the London Plan with regards to maps with particular reference to setting the boundaries of Opportunity Areas.

The Council has made a number of revisions to the Key Diagram with regards to the Brent Cross Cricklewood Opportunity Area, Edgware Growth Area and Mill Hill East Area. It has also added additional Major Throughfares to ensure consistency with the supporting text for Policy GSS10.

The Council has also clarified and set out a number of revisions to Growth and Spatial Strategy maps for the Growth Areas and the Mill Hill East Area.