



Barnet Climate Action Group (BCAG) response to Draft

Local Plan (Reg 19) Publication consultation

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Introduction

Barnet Climate Action Group (BCAG) is made up of concerned residents in the London Borough of Barnet from across faith, cultural, environmental & political organisations, wanting to take action tackling our current climate emergency.

BCAG has met monthly since May 2019 at St Mary's Church Finchley to explore opportunities for reducing greenhouse gas emissions and wider environmental action in the borough of Barnet. Since lockdown meetings have gone online and have been well-attended covering issues such as Decarbonising Transport in the Suburbs, Net Zero Finchley, Nudging Barnet: Behaviour Change and the Climate Emergency, Barnet's Future Waste, and a briefing on the forthcoming COP26. BCAG is currently working on a Climate Action Plan for Barnet. Details of our events and other activities can be found at www.barnetclimate.org.uk

Comments

BCAG welcomes the new Barnet Draft Local Plan as a step forward in addressing climate change and is largely supportive of the proposals set out within the document. BCAG also welcomes the opportunity that has been afforded local residents and stakeholders to input into the Barnet Draft Local Plan, however, **BCAG is concerned over the relatively short period of consultation time given over for response (close to half of which is during holiday-time for many people) on what is a major strategy document for the borough.**

BCAG does not believe that the Barnet Draft Local Plan goes far enough in tackling climate change. The challenge of reducing carbon emissions of new build – and opportunities to use new build to reduce emissions of nearby existing buildings through the use of heat networks/decentralised energy options - across the borough are not fully addressed in the Local Plan.

While the Barnet Draft Local Plan is stronger on adaptation measures, BCAG believe there is more that needs to be done to protect the borough's communities and infrastructure from the impacts of climate change.

Barnet is clearly striving to ensure that its planning policies and approach are in line with the minimum required of it under the London Plan, however it does not go beyond or seek to go beyond the London Plan's requirements and address climate related requirements that are specific to Barnet.

BCAG welcomes the commitment to develop a Sustainable Design Guidance Supplementary Planning Document and hopes that more detail on how developments can reduce carbon emissions and prepare for the impacts of climate change will be provided here. Likewise, BCAG hopes that the Green Infrastructure Supplementary Planning Document will be renewed soon to further emphasise the policy objectives set out in the Barnet Draft Local Plan. **A clear timescale for the production of both of these documents should be set out as soon as possible.**

In addition, there will be a need to rigorously enforce the requirements that are set out in the Barnet Draft Local Plan, so that developers are not able to exploit the 'get-out' clauses that are within the policies set out.

Challenges, Vision and Objectives

In the challenges identified, the Barnet Draft Local Plan does not highlight the key issue of climate change in a detailed manner. It highlights the London Plan's aspirations on zero carbon but does not identify the challenges of reducing carbon emissions from across the borough or the threat that climate changes poses to communities and infrastructure. **BCAG believe that the reason for this is that, unlike the majority of other London boroughs, Barnet has no climate plan in place, and no joined up strategy in relation to reducing carbon emissions across the borough.** This is probably also the reason why the 'Local Plan Key Facts Evidence Paper' has no reference to the impacts of climate change and there was no research commissioned by the council as part of the Local Plan work on the impacts of new development on the borough's carbon emissions.

In a similar vein, the lack of a climate plan for the borough has likely contributed to the fact that climate change is not one of the five cross cutting themes for the Local Plan, which is a lost opportunity to embed climate, sustainability and low carbon across all aspects of the Local Plan.

The key objectives are largely supported, but while resilience and adaptation to climate change is highlighted, reducing carbon emissions again is not.

While the Vision includes getting the best out of our natural environment and improving orbital connectivity in order to improve sustainable transport, it does not speak to reducing carbon emissions or present a vision for a net zero Barnet in 2050. **This is disappointing as it is clear that the Government is making the issue of the UK tackling climate change as a key issue of both national and international leadership and BCAG would expect the council to rise to this challenge in the Local Plan.**

Character, Design and Heritage

BCAG is highly supportive of embedding the Healthy Streets Approach into development as this will help create neighbourhoods that are sustainable, adapted or adaptable to climate change and healthy for residents in the long term. However, on Policy CDH02 (Sustainable and Inclusive Design) the requirement for development proposals to meet BREEAM 'Very good' is a low ambition for design. Other boroughs are already setting BREEAM 'Excellent' as the standard, which will result in far better developments that are less impactful in terms of carbon emissions and we would recommend that this high standard of BREEAM 'Excellent' should be set for development in Barnet.

Environment and Climate Change

Para 10.3.1 states that the Mayor of London has set a target for London to become a zero-carbon city by 2050, and it is positive to see that London Plan's proposals are supported by national Government with MHCLG recently stating "*Most councils are already taking some form of action. Minister Hughes cited innovative work across the country - including in the capital, where the London Plan includes measures to ensure the environmental ambition of major developments is included at the start of the design process¹.*"

¹ [Minister Eddie Hughes thanks councils for efforts in tackling climate change](#), MHCLG Press Release 2 July 2021

Under Policy ECC01 (Mitigating Climate Change), concentrating growth in the identified Growth Areas is supported, as infrastructure is able to be built here to ensure that climate impacts are reduced. However, the policies supporting the Growth Areas (GSS01 through to GSS08) do not specify any requirement around reducing carbon emissions and net zero development.

The requirements set out elsewhere in this policy highlight the lack of ambition within the Barnet Draft Local Plan in tackling climate change and reducing carbon emissions. Many of these need strengthening in terms of reducing energy use and reducing carbon emissions in line with the Government's increasing importance for new developments to play their part in not adding to increasing emissions in their local area including:

- The Planning for the future white paper is clear that transition to net zero should be embedded in the planning system.
- From 2025, the Future Homes Standard is to ensure that new homes produce at least 75% less CO₂ emissions than homes built now; and also
- The National Planning Policy Framework (NPPF) sets out how councils should ensure new developments are not vulnerable to climate change.

BCAG recommends that in Policy ECC01:

- Part d) of the policy does not set a proper target for reducing energy use. Meeting Part L of the Building Regulations and London Plan policies SI2 and SI3 is the minimum that is required for any development in London, and the targets set here are already inadequate in terms of meeting the challenges of climate change and reducing carbon emissions. Going 6% beyond Building Regulations for Minor Developments is also an unambitious target for development (and seems likely to fall short of the arrangements set out in the Future Homes Standard). More stringent targets should be introduced to drive better low carbon design.
- Part e) should specify that any Decentralised Energy should be low or zero carbon in nature, otherwise there is the risk that developments will be connected to gas fired energy networks. In addition, the council should commission work on the future role of heat networks across the borough to advise developers on where heat networks should be expected and highlighting opportunities for linking in new district heating to existing potential large heat loads (i.e. existing housing, large heat loads such as hospitals, leisure centres, council buildings, education sites etc).
- Part f) should highlight that schemes are **required** to incorporate renewable energy initiatives into development proposals, where feasible, rather than the current *encouraged*.
- Part h) should strengthen the approach to supporting retrofitting existing buildings, as extensive retrofit of existing housing and commercial premises will be needed to achieve net zero by 2050.
- Part i) should not simply tie the carbon price to whatever is set by the Mayor of London, but should use this as the minimum carbon offset price, giving Barnet to chance to vary the price according to the evolving (and likely increasing) price of carbon and to use this to encourage more net zero development as the need to further reduce emissions increases in urgency throughout the life of the Local Plan. The reference to 'a contribution' should be changed instead to "*Where the Net Zero emissions target for a development cannot be fully achieved, a payment in lieu to achieve the Net Zero standard will be sought...*" In addition, the council needs to be much more transparent to residents about carbon offset funds raised through these payments and how these funds are used: at present the council offers little information (the GLA's Carbon Offset Funds: Monitoring Report 2020 (March 2021)

highlights that Barnet has collected £51,297 out of a total amount secured by legal agreement with developers of £2,158,942). The council ensure that all development is compliant with the London Plan's Net Zero target and that officers ensure the developers make up any shortfall in carbon emissions savings through carbon offset payments.

In addition, there is no mention of stopping the use of natural gas as a fuel source in new development. Building fossil fuelled energy into new development is an approach that locks in carbon emissions for the long term and guarantees that replacement/retrofit will be required in the future.

By not adequately addressing the need to reduce carbon emissions from new buildings in the borough, Barnet will be locking in carbon emissions for the long term where these need to be reduced from today. Retrofitting buildings in the future that are planned today is not an effective approach to ensuring we have a net zero borough by 2050 and is not a cost effective approach either. However, this is what will be required if standards are not adequately set in this version of the Local Plan.

Transport and Communications

Reducing car dependency, encouraging sustainable travel and improving air quality are all supported as part of Policy TRC01 (Sustainable and Active Travel). However, Barnet's ambition of 72% for sustainable modes of transport is far below the Mayor of London's Transport Strategy aim for 80% of all trips in London to be on foot, by cycle or public transport by 2041 and this should be improved.

While the ambition shown in the Barnet Draft Local Plan does not aim to reach 80%, there is also a lack of ambition around electric vehicle charging infrastructure, which will be required if Barnet remains a private vehicle focused borough. Policy TRC02 (Transport Infrastructure) highlights a commitment to provide infrastructure with little to say on what needs to be provided and TRC03 (Parking Management) highlight commitments to reach London Plan standards but not about assessing and addressing the local need for EV charging within that development.

Economy

It is disappointing that throughout the Economy section of the Barnet Draft Local Plan there is no reference to supporting or growing the green economy or supporting and promoting green skills. We feel this is a key omission, as the need for mass retrofit alone will be a huge driver for skills development and economic opportunity, even without the need for green construction skills to build low carbon development within identified Growth Areas. That there is no mention of green skills in Policy ECY03 (Local Jobs, Skills and Training) is a major omission.