

Barnet Local Plan EIP – Note on Policy CHW03 – Making Barnet a Safer Place

Reason for producing this note

At the hearing session on Day 11 (3rd November 2022) during consideration of Matter 9 Local Plan EIP - Matter 9 - Parks and Open Spaces, Community Uses, Health and Wellbeing, Inspector Philpott requested provision of a Note on policy CHW03. This Note was to include:

- Consider separating out Council commitments and developer requirements
- Parts (b), (c), (f) and (g); and parts (a), (b), (d) and (e) – how they fit together, avoid overlap and duplication
- Secured by Design – cover circumstances where consultation will apply / be required. Reflect on relationship between CHW03 and pre-app
- Building Safety Act 2022, Fire Safety Act 2021, Fire Safety (England) Regulations 2022, London Plan Policy D12 – consider wording for each

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.

Background

This Note sets out explanations for aspects of the wording of the policy and supporting text for Policy CHW03 – Making Barnet a Safer Place in the draft Barnet Local Plan, further proposed modifications seeking to ensure clarity and consistency with the London Plan and the NPPF.

Consideration

- **Consider separating out Council commitments and developer requirements**

During the EIP hearing session, it was highlighted that the Council considers separating out commitments and developer requirements as this would make the policy more positively worded and effective. The Council has reflected upon this and acknowledges the merits in reducing duplication between criteria. It has therefore proposed a number of modifications as set out below.

- **Parts (b), (c), (f) and (g); and parts (a), (b), (d) and (e) – how they fit together, avoid overlap and duplication**

Concerns were also raised around the effectiveness of criteria (b), (c), (f) and (g); and parts (a), (b), (d) and (e) in their current form due to an overlapping criteria. The Council has reflected on the matter and subsequently amended the policy to avoid duplication. It is agreed there are areas of overlapping particularly around parts (f) and (g). Parts (f) and (g) have been removed as the Council consider parts (b) and (c) to adequately cover the

requirement that developments take appropriate safety measures. The proposed modification is set out below.

- **Secured by Design – cover circumstances where consultation will apply / be required. Reflect on relationship between CHW03 and pre-app**

The Council encourages applicants to engage in early pre-application discussions where possible; and to meet the standards and objectives of the Secured by Design (SBD) initiative. SBD is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit. The Council works in partnership with the Metropolitan Police to ensure that 'Secured by Design' is embedded in all design. It will normally expect applicants with major proposals to engage with the Metropolitan Police at an early stage. There may also be some forms of minor development where consultation with the Metropolitan Police's Secured by Design Officers is necessary because of concerns about community safety. The Council proposes to add this sentence to para 8.20.4 after reference to Secured by Design Award.

The Council will normally expect applicants with major proposals to engage with the Metropolitan Police at an early stage, however there may be some forms of minor development where consultation with the Metropolitan Police's Secured by Design Officers is necessary because of concerns about community safety.

- **Building Safety Act 2022, Fire Safety Act 2021, Fire Safety (England) Regulations 2022, London Plan Policy D12 – consider wording for each**

During the hearing session, it was suggested wording to be provided to incorporate each of the above legislation as well as London Plan Policy D12 – Fire Safety. The Council considers it necessary to highlight these legal and policy requirements in the supporting text as para 8.20A. This will clarify that the requirements of Policy CHW03 do not affect existing obligations to comply with other legislation and planning requirements such as the Building Safety Act 2022, Fire Safety Act 2021, Fire Safety (England) Regulations 2022 and London Plan Policy D12.

Proposed Modification – para 8.20A

The requirements of Policy CHW03 do not affect existing obligations to comply with other legislation and planning requirements such as the Building Safety Act 2022, Fire Safety Act 2021, Fire Safety (England) Regulations 2022 and London Plan Policy D12 – Fire Safety.

Proposed Modification – CHW03

Proposed modification to Policy CHW03 is as follows-

In order to make Barnet a safer place to live in, work in and visit the Council will :

“a. work with partners including the Metropolitan Police (and London Ambulance and London Fire and Emergency Planning Authority) to tackle risks of terrorism, crime, fear of crime and anti-social behaviour

aa. work with Neighbourhood Policing Teams to make neighbourhoods safer;

b. require development proposals to reflect 'Secured By Design' (see with regard to Policy CDH01) and consult work with the Metropolitan Police's Secured by Design Officers;

c. expect measures to design out crime together with appropriate fire safety solutions to be integral to development proposals. These The Council encourages developers to engage in

pre-application discussions to ensure these measures should be are considered early in the design process

~~d. work with the Metropolitan Police, London Ambulance and London Fire and Emergency Planning Authority to provide effective and responsive emergency services in Barnet;~~

~~e. support the work of neighbourhood policing teams to make neighbourhoods in the Borough safer places to live in, work in and visit;~~

~~f. encourage appropriate security and community safety measures in buildings, spaces and the transport system;~~

~~g. require developers to demonstrate that they have incorporated design principles which limits the opportunities for crime and anti-social behaviour and thereby contributes to community safety and security in all new development;~~

h. ensure that through the town centre strategy programme safer and more secure town centre environments are promoted;

and

i. promote safer streets and public areas including open spaces (~~see~~ with regard to Policy CDH03).

Conclusion

The Council invites the Inspectors to consider and recommend that the Council makes the additional further modifications set out in this paper recognising that those considered to be Main Modifications will need to be formally consulted upon following the examination hearing sessions.