

# **Integrated Impact Assessment for Barnet's Draft Local Plan (Reg 19) May 2021**

# Part one – Integrated Impact Assessment- Introduction to the IIA

## Contents

	Page No.
<b>IIA PART ONE</b>	
<b>Chapter 1</b>	
Non-Technical Summary	3
Key findings of the IIA	6
Next Steps	10
<b>Chapter 2</b>	
Introduction to IIA	10
Assessment Stages (stages A – D)	10
Summary of stage A	18
<b>Chapter 3</b>	
Summary of stage B & C	40
Local Plan vision and objectives	40
Development of Local Plan options and Alternatives	47
Summary of stage B3 – B5	50
<b>IIA PART TWO</b>	
Thematic Assessment of local plan policies	1
Site assessments	43
Site assessment scoring Matrix	579
<b>IIA PART THREE</b>	
Habitats regulations screening assessment	4
Health Impact Assessment (HIA)	26
Equalities Impact Assessment (EqIA)	65
Policy Review	96
Alternative options	133

## 1. Non-Technical Summary

### Introduction

1. The Local Plan provides a framework that will guide growth and development within the London Borough of Barnet up to the period 2036. The Non-Technical Summary (NTS) identifies the component assessments undertaken for the Local Plan Integrated Impact Assessment (IIA) to ensure that sustainability has been incorporated throughout. These assessments are presented in full within the Integrated Impact Assessment report. The NTS also describes the key findings of the IIA process and outlines the following:
  - An overview of the draft Local Plan;
  - Describes the approach used to undertake the IIA of the draft Local Plan
  - Summarise the key findings of the IIA
  - Sets out next steps in the IIA and Local Plan process.

### Overview of the Draft Local Plan

1.1 Once adopted, the draft Local Plan will replace the 2012 Local Plan (comprising the Core Strategy and Development Management Policies documents). The new Local Plan will set out a vision for the Borough, along with key objectives, strategic priorities and a planning policy framework to guide development up to 2036. The Local Plan will be in line with planning policy requirements set out in the National Planning Policy guidance (NPPF) and the London Plan.

1.2 In order to deliver the vision, the Local Plan proposes a series of objectives to guide policies. These are:

- To respond and recover from the impact of COVID19
- To deliver growth to meet housing aspirations and needs
- To improve the quality and types of housing across the Borough in response to resident needs and demographic change
- To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery
- To improve orbital connectivity and sustainable travel options including cycling and walking
- To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs
- To support strong and cohesive family friendly communities
- To promote healthy living and wellbeing
- To meet social infrastructure needs
- To deliver an environmentally sustainable Borough and build resilience to climate change
- To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and other green and blue infrastructure.
- To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime

1.3 The Draft Local Plan establishes planning policies for the following topics:

- Growth and Spatial Strategy

- Housing
- Character, Design and Heritage
- Town Centres
- Community Uses, Health and Well-being
- Economy
- Environment and Climate Change
- Transport and Communications

1.4 Each topic includes a set of policies that set out key principles for growth and development. The draft plan is the Council's preferred policy approach but where it is considered that reasonable alternatives exist, these are also considered along with justification for the preferred approach.

### **The Integrated Impact Assessment**

1.5 The IIA process has drawn together environmental, equality and health assessments to help ensure that policies contained within the Local Plan meet the overarching objectives set out in national planning policy and helps to maximise the benefits of policy implementation. It also aims to promote sustainable development through better integration of sustainability considerations into plan preparation and adoption.

1.6 The IIA has incorporated the following assessments:

- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) – Considers the potential for significant economic, social and environmental effects;
- Habitats Regulations Assessment (HRA) - Under the Habitats Regulations, a HRA is required to assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be likely significant effects on any European sites;
- Health Impact Assessment (HIA) - ensures that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community; and
- Equalities Impact Assessment (EqIA) – helps ensure that the Council has considered its duties under the Equality Act 2010 and the Public-Sector Equality Duty, which requires bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different groups of people when carrying out their activities. An EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council.

### **Approach used to undertake the IIA to date**

1.7 The IIA has been an iterative process that will run alongside the production of the Local Plan. To support the appraisal of the Draft Local Plan to date, an IIA framework was developed. This contains specific sustainability objectives reflective of both the current socio-economic and environmental issues which may affect (or be affected) the draft

Local Plan. These objectives align with other plans, programmes and strategies considered to be relevant to the SA and the Local Plan and are accompanied by a set of guide questions and criteria that have been used to assess preferred options and proposed sites being put forward. A total of 13 objectives were identified for inclusion within the IIA framework and are shown in Table 1.

Table 1: SA objectives developed for the IIA framework

No.	SA objective
1.	To reduce poverty and promote equality of opportunity
2.	Ensure efficient use of land and infrastructure
3.	Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment
4.	Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles
5.	Ensure that all residents have access to good quality, well-located, affordable housing
6.	Improve the health and well-being of the population and reduce inequalities
7.	Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes
8.	Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking
9.	Protect and enhance open spaces that are high quality, networked, accessible and multi-functional
10.	Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity
11.	Reduce contribution to climate change and enhance community resilience to climate change impacts
12.	Maximise protection and enhancement of natural resources including water and air, and minimise waste
13.	Minimise and manage the risk of flooding.

## SA Policy assessment

1.8 Policies contained within the draft Local Plan were appraised on a thematic basis against each of the SA objectives. The themes match those within the Local Plan and include:

- Growth and Spatial Strategy
- Housing
- Character, Design and Heritage
- Town Centres
- Community Uses, health and well-being
- Economy
- Environment and Climate Change
- Transport and Communications

1.9 The thematic review identified where policies could have a positive or negative effect. It also identified where synergies exist between policies and themes within the draft Local Plan (for example, synergies exist between transport and environmental policies. Improvements in public transport infrastructure and promotion of active travel may reduce the use of private car travel and in turn improve air quality.

## SA Site assessments

1.10 Proposed sites being put forward for inclusion in the Local Plan were appraised using matrices to identify the likely significant effects on the SA objectives. A number of sub criteria for each objective was developed and assessed against a qualitative scoring system which is set out in Table 2. The sub criteria can be found in **Appendix 3** (part 2 of IIA report).

Table 2. Scoring system for the proposed sites SA.

Score	Description	Symbol
Significant Positive	The proposed site contributes significantly to the achievement of the objective.	++
Minor positive	The proposed site contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed site does not have any effect on the achievement of the objective.	O
Minor negative	The proposed site detracts from the achievement of the objective but not significantly. MUSK OINK	-
Major negative	The proposed site detracts significantly from the achievement of the objective.	--
Unknown	The effect of the proposed site cannot be known or insufficient information make it too unpredictable to assign a conclusive score	?
Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria. IGHT BLU	-/+
Not applicable	This is applied to objectives that will not be affected by the proposed site that is being assessed.	N/A

1.11 As part of the IIA, the draft local plan was also assessed using other methodologies associated with the HRA, HIA and the EqIA. These approaches are discussed in Section 2 of the main IIA report and accompanying appendices.

## Key findings from the IIA

### The Sustainability Appraisal (SA)

1.12 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 polices were particularly beneficial for housing delivery, the built environment, public realm and economic growth. The draft local Plan also places an emphasis on a healthy and inclusive borough and the provision of open spaces were also considered to be positive.

- 1.13 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. A summary of the assessment findings is shown in Section 2 and the full thematic assessment is presented in **Appendix 1** (part 2 of IIA report).
- 1.14 In total, 65 sites have been put forward for inclusion within the Local Plan Schedule of Proposals. The sites were derived from the following sources:
- Nominated through the Call for Sites process by owners and developers seeking to realise development potential. These include public-sector partners such as Transport for London, Middlesex University, NHS, Ministry of Defence, as well as the Council. The sites have been assessed as suitable for development;
  - Previously identified in the 2006 Unitary Development Plan but not yet developed;
  - Allocated in other planning documents adopted by the Council, including Supplementary Planning Documents, Town Centre Frameworks and Planning Briefs.
- 1.15 These sites have been appraised using tailored criteria to assess the sustainability of each site. The site appraisal criteria and matrices used for each site assessment is outlined in Section 2 of this report.
- 1.16 The findings of this appraisal are presented in Table 1. The table shows that the majority of proposed sites would either have positive or neutral effects on most of the SA objectives, with the exception of SA objective 3 '*conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment*', 5 '*Ensure that all residents have access to good quality, well-located, affordable housing*' 8 '*Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking*' and 13 '*To minimise and manage the risk of flooding*'.
- 1.17 The scores assigned to each site at this stage of the appraisal are pre-mitigation and therefore have the potential for a significant effect. Whether or not this effect will happen, or the severity of the effect, will be dependent on many factors including site design and the mix of uses agreed.
- 1.18 Sites which have been assessed as having a potential negative effect are largely due to a site's proximity to heritage assets, being located within a designated flood risk area or having a PTAL score below 2. Any proposals that come forward will need to demonstrate that they are consistent with policies contained within the Local Plan and that appropriate mitigation measures are in place to deal with potentially adverse impacts.
- 1.19 The table below summarises the main social, economic and environmental findings from the appraisal of proposed sites. The scoring matrix used to assess sites can be found in **Appendix 3** (part 2 of IIA report).



Table 3: Summary of site assessment appraisal

### Habitats Regulation Assessment

1.20 The HRA screening assessment was undertaken and is presented in **Appendix 4** (part 2 of IIA report). The report assessed the potential for the plan to affect four European sites within 15km radius of Barnet: Lee Valley; Richmond Park, Epping Forest and Wimbledon Common. The HRA concluded that the draft Local Plan would not have any significant effects (either alone or in combination) on any designated European Sites.

### Health Impact Assessment

1.21 For the HIA, policies within the Local Plan were assessed against the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Matrix and the current Joint Health and Wellbeing Strategy (JHWS) priorities. The full assessment is presented in **Appendix 5** (part 2 of IIA report). The HIA concluded that the draft Local Plan has potential to contribute positively to the improvement of health and well-being in the borough as well as the delivery of the JHWS. Positive impacts relate to residents leading a more active and healthier lifestyle, housing, creating healthy environments and transport and mobility.

### Equalities Impact Assessment

1.22 The Draft Local Plan, once adopted, has the potential to impact on all of those who live, work and visit the borough. To assess this, an EqIA was carried out and the results are outlined in **Appendix 6** (part 2 of IIA report). There are policies contained within the draft plan which could have significant effects on those individuals who share one or

more of the nine protected characteristics identified under the Equalities Act 2010. These include policies related to housing, transport, employment, environment and inclusive design. The EqIA identified that many of the policies would have a positive effect across equalities groups particularly those which relate to housing (e.g. the provision of affordable housing and specialist housing), high quality design (e.g. emphasis on inclusive design will be beneficial to disabled people), employment and training and improvements within the built environment to make it more inclusive. However, the EqIA did note that there is potential for conflict protecting heritage assets and making alterations to improve disabled access, e.g. ramps / lifts may not be considered appropriate in some listed buildings.

## Next steps

1.23 The IIA report is being issued for consultation alongside the Draft Local Plan. Public consultation on the draft Local Plan (formally known as Reg 19). Following engagement on this stage, the Council will submit it to a Government Planning Inspector for Independent Examination. Details of the Reg 19 Local Plan consultation are set out at <https://engage.barnet.gov.uk/>

Part one – Integrated Impact Assessment  
Introduction  
May 2021

## 2. Introduction to IIA

### Background

2.1 The London Borough of Barnet has undertaken an Integrated Impact Assessment (IIA) for the emerging Local Plan. This IIA incorporates a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA) Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). This report presents the findings from the IIA and accompanies 'Barnet Draft Local Plan (Reg 19)'.

2.2 The first stage of this IIA process was the scoping report, which was consulted on over January and February 2019. The scoping report provides the framework for undertaking the IIA and sets out the following:

- The relevant environmental, social and economic baseline information.
- Identifies the relationship between the Local Plan and any relevant plans, policies, programmes and initiatives.
- Identifies key sustainability issues within the Borough.

2.3 This report builds on the initial IIA scoping report; however, further iterations of this assessment report will be produced as the plan progresses from Regulation 19 stage through to adoption.

### Barnet Local Plan review

2.4 The Council's existing Local Plan (Core Strategy and Development Management Policies Document) was adopted in 2012 and has supported sustainable growth throughout the Borough. The NPPF recommends that policies in Local Plans should be reviewed at least once every 5 years in order to take into account changing circumstances locally and revisions to national policy. Barnet's Local Plan therefore requires updating.

2.5 The new Local Plan sets out a vision and objectives, strategic priorities and a planning policy framework to guide development in the borough up until 2036. It provides a positive strategy for delivering sustainable development and delivering the Council's priorities of new housing, employment growth and transport infrastructure.

2.6 Whilst facilitating this change, the Local Plan will also maintain and enhance Barnet's assets such as open spaces and parks, heritage assets and neighbourhood character. The Local Plan will be in conformity with planning policy requirements set by government nationally and the Greater London Authority (GLA). It will also have regard for the plans (adopted and emerging) of neighbouring local authorities, in line with the Council's duty to cooperate.

2.7 The Council's vision is set out in chapter 3 of the Draft Local Plan. In reflection of the values of the vision, there are five cross-cutting themes:

- A growing borough;

- A connected borough
- An entrepreneurial borough
- A borough of thriving town centres, and
- A great borough to live in and visit.

2.8 In order to deliver the vision, the draft Local Plan proposes a series of objectives to guide policies. These are set out in more detail in section three of this report.

### **Policy context**

2.9 Key documents that set the policy context for the IIA are briefly discussed below. The focus is on policy and legislation that defines sustainable development and / or set the planning requirements both nationally and at a regional level.

### **National policy and legislation context**

#### *National Planning Policy Framework*

2.10 The National Planning Policy Framework (NPPF) (2019) sets out government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions. It states that in order to be considered sound a Local Plan should be consistent with national planning policy.

2.11 The NPPF sets out (paragraph 15 - 23) that Local Authorities should have an up-to-date plan that provides a vision for the future of each area to include strategic policies that set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- Housing, employment, retail and leisure and other commercial development
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy;
- Community facilities (such as health, education and cultural facilities); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaption (NPPF, Para 20).

### **The NPPF and sustainable development**

2.12 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7). The overarching objectives of the NPPF are formed based on the three pillars of sustainability: economic, social and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways.

2.13 So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11). For plan-making this means that:

- a.) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b.) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - a. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - b. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

### **Planning Practice Guidance**

2.14 National Planning Practice Guidance (PPG) outlines the role of plans to set a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – in addition to conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

2.15 The PPG states that Local Plans must be informed and accompanied by a Sustainability Appraisal, as this allows the potential environmental, economic and social impacts of proposals to be thoroughly taken into account. It also states that SAs should incorporate a Strategic Environmental Assessment to fulfill statutory requirements.

2.16 The PPG also outlines the requirement of a Habitats Regulations Assessment (HRA) when it is considered to have significant impact on habitat sites in compliance with the Conservation of Habitats and Species Regulations 2017.

### **London Plan 2021**

2.17 The London Plan adopted in March 2021 sets out policies that will guide future development in London up to 2041. The plan has set a housing target for Barnet to deliver 35,460 new homes, equating to 2,364 new homes a year. The other key strategic elements to be considered in the London Plan include:

- Making the best use of land by focussing growth and new development within identified Opportunity Areas, as well as within and around town centres, particularly major and district centres;
- Directing new investment to Strategic Areas for Regeneration, and other local areas for regeneration;
- Optimising the use of land by ensuring a design led approach that considers the most appropriate forms and land use, context and capacity for growth, infrastructure and public transport
- Protecting and enhancing London’s network of green infrastructure, including waterways and open spaces; and
- The priority given to conserving and enhancing heritage assets and their setting

## **What is an Integrated Impact Assessment?**

2.18 An Integrated Impact Assessment (IIA) fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by a local, regional, or national authority. The IIA approach incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations. An IIA also fulfils requirements for Health Impact Assessment, Equalities Impact Assessment, and Habitats Regulations Assessment. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work, particularly as the various types of impact assessment deal with many of the same issues. IIAs aim to provide a more effective assessment of Local Plans in order to provide a cross-cutting approach and in doing so provide a single, comprehensive assessment of the Plan.

### **IIA Purpose and Scope**

2.19 The purpose of the IIA is to promote sustainable development. It does this through encouraging the improved integration of sustainability, environmental, health and equality considerations into the plan-making process. The IIA is an iterative process that will run alongside the production of the Local Plan. It makes recommendations on how to enhance potential positive outcomes and minimise the negative impacts of a policy/proposal.

2.20 The Integrated Impact Assessment incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). Each of these is discussed in turn below.

### **Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

2.21 An SA derives from the EU directive 2001/42/EC and is an iterative process that must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development, appraising the likely significant economic, social and environmental impacts of the Plan. It seeks to ensure better integration of sustainability considerations into Local Plans. SAs consider the implications of the Local Plan from a social, economic and environmental perspective. They require the assessment of policies against the available baseline data and sustainability objectives. SAs also assess how the plan will contribute to the achievement of sustainable development.

2.22 Section 19 of the Planning and Compulsory Purchase Act 2004 places a requirement to carry out a SA for new or revised Development Plan Documents

2.23 As advised in the Planning Practice Guidance (PPG), SAs should incorporate a Strategic Environmental Assessment<sup>1</sup> (SEA). A SEA assesses the effects of policies, plans and programmes to ensure that significant environmental impacts that may arise are identified. It is also a requirement of the SEA process that public consultation is provided.

---

<sup>1</sup> This is a European Directive 2001/42/EC requirement was transposed directly into UK law through the the 'Strategic Environmental Assessment Regulations'

## Habitats Regulation Assessment (HRA)

2.24 Under Article 6 of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), Plans must include a HRA. Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the habitats Regulations) also requires that competent authorities (including the Borough Council) assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be likely significant effects (LSE) on any European sites<sup>2</sup>. Whilst the HRA is a stand-alone assessment and report, its findings will be included within the SA/SEA Report, particularly with regard to the appraisal of effects on biodiversity. The HRA is presented in **Appendix 4** (part 2 of IIA report).

## Health Impact Assessment screening (HIA)

2.25 Although there is no statutory requirement for a HIA, undertaking the assessment helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community. Within the context of the Local Plan, the aim is to identify the main health and wellbeing impacts in order to identify any opportunities for the emerging planning policies to maximise the benefits and avoid any potential adverse impacts. The main themes that the Plan is assessed against include housing quality, access to open space, social cohesion, healthy food and climate change. The HIA is presented at **Appendix 5** (part 2 of IIA report).

## Equalities Impact Assessment screening (EqIA)

2.26 An EqIA is not a statutory requirement but helps the Council consider its duties under the Equalities Act 2010 and Public Sector Equality Duty, which requires bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different groups of people when carrying out their activities. An EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA considers the potential for effects on these.

2.27 The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

## Assessment Stages

2.28 The stages required for an effective IIA process are set out in table 2 below along with the associated stage of the plan preparation. The tasks are taken from the [National Guidance on Sustainability Appraisal](#).

---

<sup>2</sup> Under European Directive 92/43/EEC, 'European Sites' comprise of Special Areas of Conservation (SAC) and Special Protected Areas (SPA).



2.29 Stage A1 – A5 have already been completed via the IIA scoping report, which was consulted on between January and February 2019. A summary of these stages is outlined below, however the full scoping report can be viewed here: ([IIA scoping report](#))

Table 4: Stages in the IIA process

Required stages	Output
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.</b>	
A1- Identify other relevant policies, plans, programmes, and sustainability objectives.	Pre-production / Evidence Gathering IIA Scoping report
A2 – Collect baseline information	
A3 - Identify sustainability issues and problems	
A4 – Develop the sustainability appraisal framework	
A5 – Consult the consultation bodies on the scope of the sustainability appraisal report	
<b>Stage B: Developing and refining alternatives and assessing effects</b>	
B1 – Test the Local Plan objectives against the sustainability appraisal framework	Local Plan Production IIA Production
B2 – Develop the Local Plan options including reasonable alternatives	
B3 – Evaluate the likely effects of the Local Plan and alternatives	
B4 – Consider ways of mitigating adverse effects and maximising beneficial effects	
B5 - Propose measures to monitor the significant effects of implementing the Local Plan	
<b>Stage C: Prepare the Sustainability Appraisal Report</b>	
Stage D: Seek representations on the SA	IIA Report Local Plan / IIA Consultation & Examination
<b>Stage E: Post adoption reporting and monitoring</b>	
E1 – Prepare and publish post-adoption statement	Local Plan Adoption and monitoring IIA Report (Adoption)
E2 – Monitor significant effects of implementing the Local Plan	
E3 – Respond to adverse effects	

## Summary of key stages

## A1 - Review of plans and programmes

2.30 The Scoping Report considered relevant plans, policies and programmes at a national regional and local level. Due to its length, this review is produced in Appendix seven of the report.

2.31 The policy framework is constantly evolving, however, this review helped identify a number of common objectives and issues which helped inform the development of the objectives that have been used for the SA assessment. These include:

- Plan for and meet the challenges of population growth
- Ensuring infrastructure provision that matches level of development taking place within the borough and further afield
- Improve the quality of life for all residents, reduce deprivation and create a more fair, equal society that promotes equal opportunities
- Facilitate the development of a wide range of housing tenures, sizes and affordability level that caters for all needs within the population, including specialist housing
- Protect human health and reduce health inequalities, through the provision of adequate health facilities and influencing the wider determinates of health
- Improve safety and security for all, and promote community cohesion
- Improve access to community facilities
- Increase accessible open spaces that of a high quality, are well connected and include spaces for all
- Promote accessible, safe and sustainable transport and reduce transport related contributions to climate change
- Improve air quality
- Support the vitality of diverse, inclusive and secure town centres and neighbourhoods
- Protect, conserve and enhance the historic environment, heritage assets and cultural heritage.

Table 5: Summary of policy review

<b>International</b>
<ul style="list-style-type: none"><li>▪ European Directive 2001/42/EC</li><li>▪ The Habitats Directive: European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats</li><li>▪ Johannesburg Declaration on Sustainable Development (Earth Summit 2002)</li><li>▪ European Directive: Environmental Noise Directive 2002/49/EC</li><li>▪ EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (Habitats Directive - 92/43/EEC and 97/62/EC</li><li>▪ EU Directive on Ambient Air Quality and Management EU Directive 2008/50/EC</li><li>▪ Water Framework Directive 2000/60/EC</li><li>▪ Waste Framework Directive 2008/98/EC</li><li>▪ Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC</li><li>▪ European Convention on the Protection of the Archaeological Heritage (revised), 1992</li><li>▪ European Landscape Convention 2000</li><li>▪ Health for Growth 2014 – 2020, European Commission, 2011</li><li>▪ The Paris Climate Agreement (2015)</li></ul>
<b>National</b>

- Town and Country Planning Act 1990 (as amended)
- Equality Act
- Localism Act 2011
- Growth and Infrastructure Act 2013
- Infrastructure Act 2015
- Housing and Planning Act 2016
- National Planning Policy Framework (NPPF), 2019
- National Planning Practice Guidance, MHCLG, 2018
- Securing the Future – delivering UK sustainable development strategy, DEFRA, 2005
- The Community Infrastructure Levy Regulations 2010 (as amended), HM Government
- Industrial Strategy – Building a Britain fit for the Future, Dept. for Business, Energy & Industrial Strategy, 2018
- The Culture White Paper, DCMS, 2016
- Index of Multiple Deprivation, ONS, 2015
- Education Act 2011
- DfE strategy 2015 to 2020: world-class education and care, DoE, 2016
- National Infrastructure Delivery Plan 2016 – 2021, Infrastructure and Projects Authority, 2016
- Planning Policy for Traveller Sites, DCLG, August 2015
- Housing White Paper; fixing our Broken Housing Market, DCLG, 2017
- Estate Regeneration National Strategy, 2016, DCLG
- Planning for Sport Aims and Objectives, July 2017, Sport England
- Global Health Strategy 2014 – 2019, Public Health, 2014
- Future Water: The Government's Water Strategy for England, DEFRA, 2011
- UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011

## Regional

- The London Plan, GLA, 2016
- Draft London Plan, GLA, 2017
- Culture and night-time economy SPG, GLA, 2017
- Land for Industry and Transport SPG, GLA, 2012
- Social Infrastructure SPG, GLA, 2014
- Housing SPG, GLA, updated August 2017
- Town Centres SPG, GLA, 2014
- Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017
- Play and Informal Recreation SPG, GLA, 2012
- Sustainable Design & Construction SPG, GLA, 2014
- Mayor's Culture Strategy, GLA, 2018
- Cultural Metropolis: Achievements and Next Steps, GLA, 2014
- Mayor's Economic Development Strategy for London, 2017
- A City for All Londoners, GLA, 2016
- London Infrastructure Plan 2050, GLA, 2015
- Accessible London; Achieving an Inclusive Environment, GLA, 2014
- Mayor's Equality, Diversity and Inclusion Strategy, GLA, 2018
- 2017 London Strategic Housing Market Assessment, GLA, 2017
- Planning for Equality & Diversity in London, GLA, 2007
- London Health Inequalities Strategy, GLA, 2018

- Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, 2017
- GLA Topic Paper: Specialist Older Persons Housing, GLA, 2017
- Mayor’s Transport Strategy, GLA, 2018
- Mayor’s Air Quality Strategy, GLA, 2017
- Mayor’s Environment Strategy, GLA, 2018
- All London Green Grid, GLA, 2012
- London Sustainable Drainage Action Plan, 2016

### Local

- Barnet Core Strategy, LBB, 2012
- Barnet Development Management Policies, LBB, 2012
- One Barnet – A Sustainable Community Strategy for Barnet 2010 – 2020, LBB 2010
- Mill Hill East Area Action Plan, LBB, 2009
- Colindale Area Action Plan, LBB, 2010
- North Finchley Town Centre Framework SPD, LBB, 2017
- Grahame Park SPD, LBB, 2016
- Affordable Housing SPD, LBB, 2008
- Green Infrastructure SPD, LBB, 2017
- Delivering Skills, Employment, Enterprise and Training (SEET) from development through S106, LBB, 2014
- Sustainable Design and Construction SPD, LBB, 2016
- Residential Design Guidance, LBB, 2016
- Infrastructure Delivery Plan, London Borough of Barnet, 2011
- Draft North London Waste Plan, 2018
- Barnet Housing Strategy, LBB, 2015
- Barnet Community Safety Strategy 2015 – 2020, LBB, 2015
- Barnet Equality Policy, LBB, 2014
- Barnet Corporate Plan 2015 – 2020, LBB, 2015
- Flood Risk Management Strategy, LBB, 2018
- Barnet Joint Health and Wellbeing Strategy 2015 – 2020, LBB
- Air Quality Action Plan 2017 – 2022, LBB, 2017
- Open Space Strategy 2016, LBB, 2016
- Barnet Children and young People Plan 2016 – 2020, LBB.
- Barnet Accessibility Strategy 2016-2019 for the Inclusion of young people with Special Educational Needs and Disabilities in educational settings, LBB, 2016

## A2 - Baseline information (A2)

2.32 Task A2 of the Scoping Report sets out the baseline conditions in the Borough that were relevant to the Local Plan and IIA. It is important to note that the baseline conditions in Barnet are constantly evolving and will change throughout the course of the Local Plan process, therefore, information provided in this report is based on data available at the time of writing. Changing conditions and improved data capture and analysis mean that the ongoing analysis of available information is necessary as the

Local Plan progresses. The Baseline information is available in the IIA scoping report which can be found [here](#).

### **Key sustainability issues (A3)**

2.33 The key sustainability issues relevant to the Local Plan have been identified through the IIA scoping report, annual monitoring, engagement with statutory stakeholders, and development of the Local Plan evidence base.

2.34 The sustainability issues are set out in the structure of the nine existing Local Plan themes in recognition that the thematic structure of the plan is likely to stay largely the same.

2.35 The emerging Local Plan includes spatial policies (including allocation of sites) and detailed policies for the purposes of development management. As the document advances, further and more detailed sustainability issues will be identified. The broad sustainability issues identified are set out in Table 6 below.

Table 6: Summary of key sustainability issues

Topic	Key sustainability Issues	Implications for Local Plan	Relevant IIA objectives
Growth and Spatial Strategy	<ul style="list-style-type: none"> <li>▪ A growing and changing population – Barnet is now the most populous borough in London, with high population growth anticipated over the plan period.</li> <li>▪ The increasing population will also create changes in the age and ethnicity of residents, with the number of people aged 65+ predicted to increase by 33% by 2036 and BAME populations expected to increase to 42% of the overall population in the same period.</li> <li>▪ The high level of projected growth is likely to exacerbate or increase the significance of other issues identified below.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Additional population will place significant pressure on Barnet’s housing and infrastructure. The Local Plan will need to ensure adequate provision of housing and infrastructure that supports the needs of the current and future population.</li> <li>▪ Significant increases in population will place additional demand on social infrastructure (e.g. parks and open spaces, community facilities and school places).</li> <li>▪ Due to the expected increase in persons aged 65+, the Local Plan should be aware of the ageing population and commensurate increasing demand for specialist housing and adjustments within the built environment.</li> <li>▪ The Local Plan will need to be mindful of the increasingly diverse population and their needs (e.g. ensuring that religious and cultural needs are accommodated for).</li> </ul>	SA objective 1 - 13
Housing	<ul style="list-style-type: none"> <li>▪ Housing affordability - There is a shortage of good quality, genuine affordable homes in Barnet.</li> <li>▪ The high cost of home ownership has led to a tenure shift away from owning a property and towards privately rented accommodation, so that over a quarter of households in the Borough now rent from private landlords. Private rents are also increasing and are higher than local housing</li> </ul>	<ul style="list-style-type: none"> <li>▪ A key challenge for the Local Plan will be to identify sufficient sites to meet the boroughs high housing need and address the issues around affordability</li> <li>▪ The Local Plan will need to secure an appropriate mix and choice of housing to meet needs, in terms of size, tenure and specialist needs.</li> </ul>	SA objective 2, 4 & 5

	<p>allowances, leading to a greater chance of people living in substandard housing.</p> <ul style="list-style-type: none"> <li>▪ High Housing targets – the London Plan sets a minimum housing target of 35,460 new homes by 2036 which will compound the issue of affordability.</li> <li>▪ Appropriate mix of dwellings – findings from the SHMA (2018) identified a need for larger family homes of three or more bedrooms. However, housing supply has been skewed towards flatted development.</li> </ul>		
Character, Design and Heritage	<ul style="list-style-type: none"> <li>▪ Barnet has a wide range of heritage assets, which include 16 conservation areas, 650 entries on the national heritage list, two scheduled monuments, 39 medieval sites and a local heritage list containing over 1200 non-designated heritage assets. In addition there are also five registered parks and gardens of historic importance.. Pressure on the Boroughs historic assets will increase with increased development and population.</li> </ul>	<ul style="list-style-type: none"> <li>▪ A robust and tailored approach to managing growth in such a way that is not detrimental to the existing character and heritage will be required.</li> </ul>	SA objectives 1, 2,3, 4, 6 & 8
Town Centres	<ul style="list-style-type: none"> <li>▪ Town centres have taken a hit in recent years due to the impact of e-tailing (online shopping) and m-tailing (mobile app shopping), a trend that has been accelerated following the Covid-19 pandemic. Barnet needs to improve its leisure offer. There is an increasing demand for out of town floorspace which was having an impact on town centres.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan should seek aim to promote and support vibrant and viable town centres.</li> </ul>	SA objectives 4, 5, 7,
Community Uses, Health and Well-being	<ul style="list-style-type: none"> <li>▪ Health inequality – Barnet is a relatively affluent Borough, however, there are pockets of significant deprivation, particularly in the west of the Borough. These are especially concentrated</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan will need to ensure that there are opportunities for equal access to fitness, sport and recreation both in sports facilities and in informal setting</li> </ul>	SA objectives 1, 4, 6, 8 & 9

	<p>in areas of Burnt Oak, Colindale, Child's Hill and West Hendon. Higher level of deprivation is consistently related to poorer health outcomes and is also reflected in the variation of life expectancy between the most and least deprived wards.</p> <ul style="list-style-type: none"> <li>▪ Mental health - The prevalence of mental health problems for Barnet is higher than the national average. Research indicates that mental health conditions is higher amongst people living in deprived areas and among BAME groups.</li> <li>▪ Active lifestyles - Although obesity rates among Barnet residents are below the London and national average, over half of local residents are either overweight or obese.</li> <li>▪ Whilst overall crime rates have been decreasing in Barnet over the last decade, crime rates are still slightly higher when compared to the Outer London average.</li> </ul>	<p>such as parks and open spaces and through active travel.</p> <ul style="list-style-type: none"> <li>▪ The Local Plan should seek to ensure that new developments have adequate access to community and health facilities.</li> </ul>	
Economy	<ul style="list-style-type: none"> <li>▪ Skills and education - Barnet's resident population is well qualified</li> <li>▪ The Borough is a predominantly small business economy, with a particularly high and growing proportion of self-employment.</li> <li>▪ Employment space - The ELR highlighted that Barnet does not have a particularly strong office market and the stock of office space has been shrinking in recent years, mainly due to losses to residential development. The combination of</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan should seek to provide employment opportunities that meet the current and future needs of the local and regional economy.</li> <li>▪ The Local Plan should consider how it can continue to support local enterprise, including micro-enterprises.</li> <li>▪ There is a need to address the shortfall in office floorspace and ensure sufficient employment land is provided to meet the assessed need.</li> </ul>	SA objective 7



	<p>shrinking stock and low levels of new supply may reduce Barnet’s already marginal role as an office location.</p> <ul style="list-style-type: none"> <li>▪ The Borough is a predominantly small business economy, with a particularly high and growing proportion of self-employment. Over 90% of businesses are classed as ‘micro’ and have fewer than ten employees. The Borough has the third highest business base in London and collects nearly £100m annually through business rates.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan should encourage the provision of affordable employment space.</li> </ul>	
Environment and Climate Change	<ul style="list-style-type: none"> <li>▪ Air quality – Barnet is not meeting national air quality targets for Nitrogen Dioxide (NO2) and Particular Matter (PM10).</li> <li>▪ Emissions from traffic have the most severe and pervasive impact on air quality and account for 64% of air pollutants. This has justified making the whole Borough an Air Quality Management Area (AQMA).</li> <li>▪ Other sources of pollutants come from commercial and domestic gas use, construction related activities and industry.</li> <li>▪ There is already a significant level of growth and regeneration taking place in Barnet which has the potential to either introduce new receptors to areas of poor air quality; or to increase traffic and congestion and result in poorer air quality.</li> <li>▪ Parks and open spaces - Baseline data highlighted that Barnet has a good provision of</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan should seek to improve air quality, which could be achieved through a number of measures including the promotion of renewable energy sources, effective waste management and encouraging a modal shift to public transport and sustainable construction practices.</li> <li>▪ The Local Plan will need to ensure that there are appropriate climate mitigation strategies in place to deal with the effects of climate change.</li> <li>▪ The Local Plan will need to include appropriate policies to safeguard against future loss of open spaces and ensure its protection and extension.</li> <li>▪ Within the Local Plan, circular economy principles and effective waste</li> </ul>	SA objective 8, 9, 10, 11, 12 & 13

	<p>open space but there is a deficiency in some areas, particularly in those areas which are more densely populated and have higher levels of deprivation.</p> <ul style="list-style-type: none"> <li>▪ As the population of Barnet grows, the pressure on demand on the Borough's open space will intensify. In addition, accommodation for a proportion of the population growth will be in the form of high density housing with minimal private space, indicating further dependence upon public open space and access to the natural environment and places for recreations.</li> <li>▪ Climate change – Climate change could have significant social, economic and environmental impacts on the Borough if left unaddressed. It will have major implications for the health and well-being of local people. Other effects could include heat-related health issues, flooding damage to buildings and infrastructure. But the indirect impacts in urban areas can be much broader. Climate change will affect air temperature and quality, biodiversity, and the local micro-climate. There is likely to be greater focus on whether infrastructure (including social infrastructure like hospitals and schools) remains fit for purpose and requires adaption or replacement to meet changing conditions. Creating well managed and used green spaces and building efficient community capacity will increase Barnet's resilience and improve quality of life.</li> <li>▪ Waste - The level of development planned for in the borough will generate higher waste levels,</li> </ul>	<p>management will become increasingly important.</p>	
--	---	---	--

	<p>both through construction and on-going occupation of sites.</p> <ul style="list-style-type: none"> <li>Flooding - Barnet has 14kms of streams and brooks and is subject to various types of flood risk including flooding from main rivers, ordinary watercourses, surface water, ground water and sewer flooding. Further development could potentially lead to a greater risk of flooding, particularly in areas that are within flood zones 2 and 3. Climate change may exacerbate this risk.</li> </ul>		
Transport and Communications	<ul style="list-style-type: none"> <li>Sustainable transport - Poor transport accessibility and movement are barriers to growth and sustainable development. As Barnet grows, it will require transport infrastructure that can meet increasing demands. The existing transport network within Barnet do not always meet these needs. As the responsibility for transport is shared between various agencies, including the Council, TfL and DfT, addressing this problem is made more difficult. Increasing demand for transport could have a detrimental impact on the local environment and the public realm, for example, congestion at certain spots in the Borough. The level of vehicle movement on Barnet's roads results in increased congestion and emissions leading to poor air quality and noise pollution.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should seek to promote a modal shift towards sustainable transport modes, in particular, walking and cycling.</li> <li>Opportunities should be sought to direct development to accessible locations and seek to secure investment in transport.</li> </ul>	SA objective 8 & 9

#### How has the Draft Local Plan been appraised? (A4)

2.36 To support the appraisal of the Draft Local Plan, a SA Framework was developed during the previous stage of the IIA process (Stage A4). This initially contained 15 sustainability objectives and guide questions, however, following the first stage of consultation and a review

of available evidence, these objectives have been amended to better reflect current social, economic and environmental issues which may affect (or be affected by) the Local Plan. The updated SA objectives are shown below in Table 5.

2.37 Each of the objectives have a set of monitoring indicators linked to them. Whilst these indicators may be subject to some updates based on the availability of current information and resources, the framework indicators will be largely similar. As part of the Local Plan’s progress, the IIA has appraised policy options and site allocations against these objectives.

2.38 The draft plan also contains 65 site proposals. A set of specific, tailored criteria has been prepared to help in the assessment of these sites against the SA objectives. This criteria can be found in Appendix 3 (part 2 of the IIA report)

Table 7: updated SA objectives

SA objective	Prompt question	Indicators
1. To reduce poverty and promote equality of opportunity	Will the policy: <ul style="list-style-type: none"> <li>• Reduce social exclusion and ensure that everyone has access to the same opportunities?</li> <li>• Promote fairness, social cohesion and integration across all groups of the population?</li> <li>• Support active engagement of the wider community in decisions that affect their area?</li> <li>• Encourage active and connected, strong and cohesive community?</li> <li>• Remove barriers to employment and learning opportunities to help increase the skills of residents?</li> </ul>	<ul style="list-style-type: none"> <li>• Healthy street scores</li> <li>• Relative ranking for indices of multiple deprivations (IMD) – income, employment</li> <li>• Other data concerning infrastructure sufficiency (e.g. school place provision)</li> <li>• Relative ranking for indices of multiple deprivations (IMD) – income, employment</li> <li>• Jobs, employment and activity rates</li> </ul>
2. Ensure efficient use of land and infrastructure	Will the policy:	<ul style="list-style-type: none"> <li>• Percentage of development on previously developed land</li> </ul>

	<ul style="list-style-type: none"> <li>• Optimise use of previously developed land, buildings and existing infrastructure?</li> <li>• Focus development in the most appropriate locations?</li> <li>• Balance competing demands between land uses to provide for the full range of development needs of the area?</li> <li>• Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?</li> <li>• Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs?</li> </ul>	<ul style="list-style-type: none"> <li>• Optimum density levels achieved against London Plan targets</li> <li>• Progress against infrastructure investment programmes</li> </ul>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Barnet?</li> <li>• Encourage management plans to be actively prepared and implemented?</li> <li>• Impact on the delivery of highly sustainable new development?</li> </ul>	<ul style="list-style-type: none"> <li>• Appeals allowed in conservation areas, and for applications affecting listed buildings, schedule ancient monuments, historic parks and gardens and non-designated heritage assets</li> <li>• Number of Grade I and II* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register</li> </ul>
4. Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas and neighbourhood shops.</li> </ul>	<ul style="list-style-type: none"> <li>• Distribution of key facilities and local services across the borough</li> <li>• Floorspace of community facilities/services lost or gained</li> <li>• Town centre health checks</li> <li>• Environmental nuisance levels</li> <li>• Other data concerning infrastructure sufficiency (e.g. school place provision)</li> </ul>

	<ul style="list-style-type: none"> <li>• Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</li> <li>• Improve sustainable travel connections of neighbourhoods with facilities/amenities?</li> <li>• Reduce the impacts of noise, vibration and pollution on the public realm?</li> <li>• Promote development opportunity in areas with high PTALs?</li> <li>• Improve safety and security and reduce crime and fear of crime?</li> </ul>	<ul style="list-style-type: none"> <li>• Local crime statistics and residents' perception survey</li> <li>• Overall crime rates in the borough and fear of crime</li> <li>• Refusals on grounds of schemes falling below minimum space standards (as outlined in Nationally Described Space Standard (NDSS))</li> </ul>
5. Ensure that all residents have access to good quality, well-located, affordable housing	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Ensure all housing is of a good standard, including for energy efficiency?</li> <li>• Increase the supply of affordable housing to meet identified need as far as possible?</li> <li>• Improve the diversity of housing sizes, types, prices and tenures?</li> <li>• Encourage development at an appropriate density, standard, size and mix?</li> <li>• Provide for housing that meets the diverse and changing needs of the population?</li> <li>• Reduce homelessness and people living in temporary accommodation?</li> </ul>	<ul style="list-style-type: none"> <li>• Number new homes completed</li> <li>• Proportion of affordable housing delivered</li> <li>• Income to average house price ratio</li> <li>• Proportion of homes split by different tenures within the census</li> <li>• Proportion of family sized homes (3+ bedrooms)</li> <li>• Level of population churn</li> <li>• Number of HMOs</li> <li>• Homeless households in temporary accommodation</li> </ul>
6. Improve the health and wellbeing of the population and reduce health inequalities	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Improve mental and physical health and wellbeing?</li> <li>• Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents?</li> </ul>	<ul style="list-style-type: none"> <li>• Indicators set out in the Mayor's Health Inequalities Strategy</li> <li>• Proportion of the population participating in 30 minutes of moderate intensity sport</li> </ul>

	<ul style="list-style-type: none"> <li>• Promote physical activity or increase participation in sport and leisure activities, particularly among low participation groups?</li> <li>• Reduce health inequalities?</li> <li>• Promote positive mental health and wellbeing through a safer, more stimulating and pleasant natural and built environment?</li> <li>• Improve air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Healthy street scores</li> <li>• Mortality rate</li> <li>• Number of patients registered at GP surgery</li> <li>• Proportion of the borough deficient in relation to local sports facilities</li> </ul>
7. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Sustain and increase the borough's contribution to the London and national economy?</li> <li>• Support a range of local businesses of different types and sizes?</li> <li>• Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive?</li> <li>• Support growth in key sectors?</li> <li>• Provide opportunities for residents to access employment, particularly those groups experiencing above average worklessness?</li> <li>• Provide a range of employment opportunities?</li> <li>• Provide training and job opportunities for local residents?</li> </ul>	<ul style="list-style-type: none"> <li>• Number and range of businesses operating in the borough, including formation and survival rates</li> <li>• Employment floorspace lost/retained/created</li> <li>• Proportion of residents who are economically inactive</li> <li>• Proportion of 16-18 years old not in education, employment or training</li> <li>• Proportion of residents with no qualification</li> <li>• Number of apprenticeships taken up in construction schemes</li> </ul>
8. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li> <li>• Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li> <li>• Reduce the need to travel, especially by car?</li> <li>• Improve road safety for all, particularly pedestrians and cyclists?</li> <li>• Improve accessibility of the borough's transport network?</li> </ul>	<ul style="list-style-type: none"> <li>• Car ownership (% of households owning one or more car/van)</li> <li>• Travel to work by different modes (bus, train, car, bike, foot)</li> <li>• Emissions level from transport</li> <li>• Proportion of car-free housing</li> <li>• Number of people killed or seriously injured in road accidents</li> </ul>

	<ul style="list-style-type: none"> <li>• Provide facilities that will support sustainable transport options?</li> <li>• Enhance capacity of the transport network?</li> <li>• Reduce harmful emissions from transport?</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Motor traffic flows through the borough</li> <li>• Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more</li> <li>• PTAL</li> <li>• Proportion of underground/ over ground stations with step free access</li> </ul>
9. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Protect existing public and private open spaces?</li> <li>• Contribute to meeting the increasing need for open space?</li> <li>• Link existing open spaces?</li> <li>• Prioritise open space in areas of deficiency?</li> <li>• Improve the quality of open space?</li> <li>• Promote or improve public accessibility of open space now and in the future?</li> <li>• Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits?</li> <li>• Improve inclusive access to a range of open space types to meet local needs?</li> </ul>	<ul style="list-style-type: none"> <li>• Net loss/gain of open space as a result of the grant of planning permission for major development schemes</li> <li>• Net loss/gain of facilities for sport and recreation as a result of the grant of planning permission for major development schemes</li> <li>• Planning obligations received towards open space, sports and recreation</li> </ul>
10. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity.	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Increase protection and improve opportunities for biodiversity?</li> <li>• Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?</li> <li>• Encourage development that implements strategic and connected green infrastructure?</li> <li>• Ensure development does not contribute to increased flood risk?</li> </ul>	<ul style="list-style-type: none"> <li>• Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces</li> <li>• Open space deficiency</li> <li>• Number of tree preservation orders served</li> <li>• Number of new developments incorporating green roofs, landscaping or open space to improve biodiversity</li> </ul>



	<ul style="list-style-type: none"> <li>• Protect existing trees and increase tree planting?</li> <li>• Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?</li> <li>• Impact on access to nature?</li> <li>• Maximise opportunities for engagement with wildlife, including environmental education?</li> </ul>	<ul style="list-style-type: none"> <li>• Development resulting in biodiversity net gain/loss</li> </ul>
11. Reduce contribution to climate change and enhance community resilience to climate change impacts.	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Improve energy efficiency and carbon emissions associated with buildings and transport?</li> <li>• Promote the use of low and zero carbon technologies including decentralised energy networks?</li> <li>• Improve energy security?</li> <li>• Encourage buildings and places designed to respond to changing conditions?</li> <li>• Reduce the impact of climate change, including flooding and urban heat island effect?</li> <li>• Improve the microclimate?</li> <li>• Reduce greenhouse gas emissions?</li> <li>• Reduce fuel poverty?</li> <li>• Provide the necessary infrastructure to support development?</li> <li>• Steer development to the areas at lowest risk of flooding in the borough?</li> </ul>	<ul style="list-style-type: none"> <li>• % of new developments incorporating flood mitigation measures in their design to reduce flood risk e.g. SUDS, evacuation plans, etc</li> <li>• Proportion of developments incorporating low carbon technology and renewable energy solutions</li> <li>• Proportion of buildings incorporating Green Infrastructure and linkages between Green Infrastructure areas and green open spaces</li> </ul>
12. Maximise protection and enhancement of natural resources including water and air and, minimise waste	<p>Will the policy:</p> <ul style="list-style-type: none"> <li>• Minimise air, water, and soil pollution and their negative impacts on human health?</li> <li>• Improve air quality in line with national and international standards?</li> <li>• Protect surface and groundwater quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Annual average concentrations and number of hourly exceedances of Nitrogen dioxide in air</li> <li>• Annual average concentrations and number of daily exceedances of PM10 in air</li> </ul>

	<ul style="list-style-type: none"> <li>• Promote the sustainable use of water resources?</li> <li>• Ensure sustainable use and protection of natural resources, including water?</li> <li>• Ensure the necessary water and sewerage infrastructure to service development?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</li> </ul>
13. To minimise and manage the risk of flooding	<ul style="list-style-type: none"> <li>• Reduce the risk of fluvial or tidal flooding?</li> <li>• Reduce the risk of groundwater flooding and / or surface water flooding?</li> <li>• Avoid locating new homes in areas of flood risk?</li> <li>• Promote the use of SUDS?</li> </ul>	<ul style="list-style-type: none"> <li>• SuDS installed during financial year</li> <li>• Number of developments built within a flood zone area</li> </ul>

### **The compatibility of the SA objectives**

2.39 The compatibility of the SA objectives has been assessed using the framework outlined in Figure 1. This assessment highlighted potential conflicts between objectives. Most of the objectives have been assessed as having a positive or neutral effect. The neutral outcomes occurred where there was no link between the two objectives or where both positive and neutral effects were possible. Some negative potential incompatibility emerged between SA objectives that require development (such as improving transport connectivity and provision of housing) and environmental objectives. Therefore, finding the right balance between these objectives is important for achieving sustainable development.

Figure 1: compatibility of the SA objectives

Key	
	Incompatible
	compatible
	Neutral

  

2																				
3																				
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				
13																				
	1	2	3	4	5	6	7	8	9	10	11	12								

## Consulting on the scope of the IIA (A5)

2.42. Task A5 was subject to consultation with Historic England, the Environment Agency and Natural England in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 for a period of five weeks. The Scoping Report was also sent to the Greater London Association (GLA), Hertfordshire County Council and neighbouring London boroughs including Brent, Harrow, Enfield, Haringey and Camden. The consultation ran from Friday 04 January 2019 to Friday 08 February 2019. The Local Plan IIA Scoping Report was sent to consultees by email. A summary of responses can be found in Table 8.

2.43. In addition, further consultation under Regulation 19 took place from Monday 27<sup>th</sup> January 2020 to Monday 16<sup>th</sup> March 2020.

## Response to the Local Plan IIA Scoping Report consultation

2.44. Responses were received from four consultees; these are summarised below.

Table 8: Summary of consultee responses

Respondent	Representation response	Council response	Action
London Borough of Camden	No comments	N/A	Noted
Historic England	Please see guidance published by Historic England on Strategic Environmental Assessments	N/A	Noted
	<p>There are a number of other plans/policies which should be considered in table 3, which include:</p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention</li> <li>• European Landscape Convention</li> <li>• Convention for the Protection and Architectural Heritage of Europe</li> <li>• Planning (Listed Buildings and &amp; Conservation Areas) Act 1990</li> <li>• Ancient Monuments and &amp; Archaeological Areas Act 1979</li> </ul> <p>The Local Level is also important in setting the context which could be drawn from Barnet's Conservation Area Appeals</p>	These policies/ plans where relevant have been included as part of the IIA policy review	Noted
	Heritage England are pleased to see reference to Barnet's heritage assets, local views and Heritage at Risk Register in the IIA, however, a major omission in paragraph 99 is the Battle of Barnet	This asset has now been included within the baseline information.	Noted

	<p>Battlefield, London's only Registered battlefield.</p> <p>The text also makes no reference to non-designated heritage assets, the setting of heritage assets or to Barnet's Archaeological Priority Areas (APAs). The Local Plan has the potential to impact upon all elements of the historic environment, both positively and negatively, and it is therefore important that the IIA process is robust to predict the likely trajectory of local plan implications.</p>	<p>Non-designated heritage assets and APAs form part of the assessment criteria when assessing potential sites to be included within the Local Plan</p>	
<b>London Borough of Harrow</b>	No Comment	N/A	Noted
<b>Environment Agency</b>	<p>The West London Strategic Flood Risk Assessment (2018) is not listed in the Regional section.</p> <p>Under Regional the Thames Flood Risk Management Plan (2015) should be listed. This plan includes measures for managing flood risk in the Thames River Basin district up to 2021.</p> <p>Although the Water Framework Directive is listed under National, the Thames River Basin Management Plan is not listed in the Regional plans. This is the key evidence base document 2 setting out the current state of the water environment and the objectives for protecting and improving the waters so they reach good status by 2027. It also outlines the progress made on achieving good status for all waterbodies in the Thames catchment area since the 2009 plan. It should be used to inform decisions on land-use planning because water and land resources are closely linked. It will be relevant for the waterbodies within Barnet which form part of the Thames river basin district.</p> <p>Barnet's rivers form part of the River Brent catchment. There is a Brent Catchment Management Plan created by the Brent Catchment Partnership which sets out the specific objectives for the watercourses in the Brent Catchment (including the River Brent, Dollis Brook, Silk Stream and the associated tributaries such as Deans Brook, Folly Brook, Burnt Oak Brook, etc). These objectives sit under the themes of</p>	<p>All of the relevant plans/ policies have now been included as part of the IIA policy review</p>	Noted

	<p>reducing pollution, making rivers more natural, tackling invasive non-native species and creating better opportunities for access and recreation. The Brent Catchment Management Plan should be listed either as a local or regional plan relevant to Barnet's Local Plan as it holds key evidence on the condition of the rivers in Barnet and actions to resolve those issues.</p> <p>Invasive species is a particular issue for Barnet's watercourses and apart from the Brent Catchment Partnerships projects there is no over-arching approach to tackling invasive species through development. Defra's strategy "The Great Britain Invasive Non-native Species Strategy" (2015) provides a strategic framework within which the actions of government departments, their related bodies and key stakeholders can be better co-ordinated. We think this should be listed as a national strategy relevant to Barnet.</p> <p>Under National, Defra's '25 Year Environment Plan' (2018) and 'Biodiversity 2020, A Strategy for England's Wildlife and Ecosystem Services' (2011) should be listed. Also, the Natural Environment and Rural Communities Act 2006 should be listed.</p>		
	<p>The Open Space and Biodiversity section pages 33-35, focuses on open space deficiencies and the main biodiversity designations such as SSSIs, SACs, SINCS and Local Nature Reserves. This section misses the role that watercourses have in biodiversity and the fact they suffer from invasive non-native species, for example, Japanese Knotweed is prevalent in the Brent Catchment area. Rivers and their corridors can provide important habitats for a range of water dependant and terrestrial species. If the watercourses are allowed to deteriorate further through redevelopment (and not improved), we will continue to see a local decline in species such as invertebrates, fish, mammals such as otters and water voles and bats. The baseline data that should be included is the Water Framework Directive assessment data for each of the waterbodies in the Brent catchment. This data can be extracted from</p>	<p>Baseline data has been updated to include information on Barnet's watercourses and water quality</p>	<p>Noted</p>

our Catchment Data Explorer tool and explains the current ecological status of each waterbody and the reasons for not achieving good status. The target they must reach by 2027 is good ecological status or potential through reducing pollution, enhancing the ecology, eradicating invasive species and naturalising the rivers. The Dollis Brook/Upper Brent and Silk Stream and Edgware Brook are at 'moderate' status. The Catchment Data Explorer does summarise the issues but you may also find useful information in the Brent Catchment Plan (referenced above).

The Flood Risk and Water Management Chapter is covered on pages 39-42. You set out the roles of the various agencies involved in managing flood risk then paragraph 95 mentions the number of properties at risk according to the National Flood Map for Surface Water. The West London SFRA <http://westlondonsfra.london/> which has mapped the fluvial and surface water flood risk is the baseline data which is missing from this section. This provides a picture across Barnet of functional floodplain areas, the flood zones and surface water flood risk in the 1 in 30 year and 1 in 100 year events. It also includes the flood risk extents including climate change. The flood risk evidence from the West London SFRA should be presented in summary in this section.

We have recently published our Silk Stream fluvial flood model which now includes the climate change allowances (25%, 35% and 70%). This wasn't available for the West London SFRA (2018) which used the 20% climate change scenario from our previous Silk Stream modelling. We recommend obtaining this data from us to inform further flood risk evidence work, and to provide a better picture of climate change for the Silk Stream river catchment area.

In addition, there may be flood risk management schemes identified or planned for Barnet which seek to alleviate surface water or fluvial flood risk. It may be worth speaking to your drainage team to

	<p>find out what projects/schemes are in the pipeline if any.</p> <p>The Flood Risk and Water Management section doesn't look at baseline data in relation to water resources and water quality.</p> <p>Potable water in the North London area is typically supplied by Affinity Water Limited or Thames Water Utilities Limited. These water companies operate in areas which are classified as areas of 'Serious' water stress by the Environment Agency. 'Serious' water stress is identified as an area where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall which is available to meet that demand. Our document 'Water Stressed Areas – final classification' 2013 can be viewed using the link or by visiting GOV.UK.</p> <p>The availability of water for licencing in the London area can be classed as restricted; some catchments are closed to new consumptive abstraction licences. This is detailed within our Abstraction Licensing Strategies which can be viewed using the link or by visiting GOV.UK. For Barnet you'd need to refer to the London Abstraction Licencing Strategy dated February 2013 listed under Kent, South London and East Sussex. This provides a map of the water resource availability, and reveals the areas where there is no water available for further consumptive licenses or there are restrictions on licensing. This provides key evidence to include planning policies that support achieving water efficiency in both residential and commercial developments (see Policy 5.15 'Water use and supplies' of the London Plan' which aligns to the optional water efficiency standard of 110 litres per head per day, as per G2, Part G of the Building Regulations 2010).</p> <p>For water quality the main local baseline data you can use is the WFD status for each of the waterbodies in Barnet. As stated above the Dollis Brook/Upper Brent and Silk Stream and Edgware Brook are at 'moderate' status. The target they must reach by 2027 is good ecological status or potential through reducing pollution,</p>		
--	---	--	--



	<p>enhancing the ecology, eradicating invasive species and naturalising the rivers. The investigations that have led to the classification of waterbodies also focuses on chemical water quality noting the levels of phosphate, nitrates, dissolved oxygen and other chemicals which may come from sewage treatment work discharges, surface water outfalls and urban runoff. This data can be extracted from our Catchment Data Explorer tool. Thames Water may be able to provide further data with regard to the current and future capacity of surface water, foul water and combined sewerage network</p>		
--	---	--	--

## Summary of stage B & C of the IIA

### 3. Summary of Stages B & C of the IIA

- 3.1. This section summarises the findings from the various assessments and should be read in conjunction with the full assessment reports in the accompanying appendices.
- 3.2. Barnet’s draft Local Plan contains the following vision:
 

**By 2036, Barnet has successfully demonstrated the benefits that good, well planned growth can deliver. The Borough continues to be a place that is family friendly**

**Growth has been directed into the most sustainable locations with good public transport and active travel choices. These include Brent Cross, Colindale, New Southgate and Mill Hill East as well as our main town centres at Burnt Oak, Chipping Barnet, Cricklewood, Edgware, Finchley Central, Golders Green and North Finchley. Outside these locations, growth has been supported in places with capacity for change and where local character and distinctiveness are recognised.**

**Getting the best out of our natural environment through expanding and improving access to green and blue infrastructure, delivering biodiversity net gain and restoring the Borough’s rivers to the benefit of people and wildlife whilst protecting our communities from flooding. As a Borough that values its historic environment Barnet continues to be a place where people choose to make their home.**

**Responsive and adaptable, Barnet’s town centres have recovered from the COVID19 pandemic and thrive, with the efficient and sustainable use of their locational opportunities addressing the needs of a growing population: providing innovative business, leisure and cultural activities, at the same time as retaining their individual character.**

**Barnet’s improved orbital connectivity allows for a greater range of places where people can live, work or visit and provides for a greater range of**

**sustainable transport options including cycling and walking for getting around the Borough.**

**The positive benefits of growth and investment are accessible to Barnet residents, removing physical barriers to enable all to share in new social and community infrastructure and access a range of housing types and a thriving jobs market while enjoying living in a safe, healthy and sustainable Borough.**

- 3.3. The vision identifies sustainable locations for growth and development that is supported by infrastructure, but recognises the importance of the Borough's character and distinctiveness. It makes a positive case for growth that realises associated economic and community benefits.
- 3.4. Reflecting the values of the vision there are five cross-cutting themes within the Local plan, which are also set out in Barnet's Growth Strategy 2019 – 2030L
- A growing borough;
  - A connected borough;
  - An entrepreneurial borough;
  - A borough of thriving town centres; and
  - A great borough to live in and visit.
- 3.5. The vision is supported by series of key objectives to guide policies, and include:
- To respond and recover from the impact of COVID19
  - To deliver growth to meet housing aspirations and needs
  - To improve the quality and types of housing across the Borough in response to resident needs and demographic change
  - To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery
  - To improve orbital connectivity and sustainable travel options including cycling and walking
  - To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs
  - To support strong and cohesive family friendly communities
  - To promote healthy living and wellbeing
  - To meet social infrastructure needs
  - To deliver an environmentally sustainable Borough and build resilience to climate change
  - To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,
  - To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime
- 2.40 The draft local plan has established 52 planning policies under the following topics:
- Growth and Spatial Strategy
  - Housing
  - Character, Design and Heritage
  - Town Centres

- Community Uses, Health and Well-being
- Economy
- Environment and Climate Change
- Transport and Communications.

3.6. Table 9 provides a high-level assessment of the local plan objectives and identifies which SA objectives will be supported.

Table 9: High level assessment of local plan objectives.

Key objectives	Implemented through	Local Plan chapters	Local Plan policies	IIA objectives
<b>To respond and recover from the impact of COVID19</b>	<ul style="list-style-type: none"> <li>• Promoting sustainable growth and development in the Borough, which is supported throughout all 52 policies contained within the local plan</li> </ul>	Barnet's Vision and Objectives, Growth and Spatial Strategy, Housing, Town Centres, Economy, Community Uses, Health and Wellbeing	BSS01, GSS01, GSS04, GSS05, GSS08, GSS13, TOW01, TOW02, ECY01, ECY02, CHW02	SA objectives 1 -15
<b>To deliver growth to meet housing aspirations and needs</b>	<ul style="list-style-type: none"> <li>• Directing growth to the most sustainable locations in accordance with the Local Plans suite of strategic policies BSS01 and GSS01 – GSS13.</li> <li>• Delivering a minimum of 35,460 new homes</li> <li>• Promoting high quality design (CDH01, CDH06) and ensuring adequate amenity space (CDH07)</li> <li>• Protecting a range of land uses, including a wide range of employment spaces, retail use and community facilities to support</li> </ul>	Barnet's Vision and Objectives, Growth and Spatial Strategy, Housing, Character, Design and Heritage	BSS01, GSS01, GSS02, GSS03, GSS04, GSS05, GSS06, GSS07, GSS08, CDH04, CDH05, CDH06, CDH07	SA objectives 1, 2,4, 5, 6

	a mixed-use Borough.			
<b>To improve the quality and types of housing across the Borough in response to resident needs and demographic change</b>	<ul style="list-style-type: none"> <li>Ensuring housing contributes to the creation of socially balanced and inclusive communities by offering housing choice that is genuinely affordable and meets other housing needs (HOU01 – HOU07)</li> </ul>	Growth and Spatial Strategy, Housing, Character, Design and Heritage	GSS10, HOU01, HOU02, HOU03, HOU04, HOU05, HOU06, HOU07, CDH01, CDH02	SA objectives 1, 4, 5,
<b>To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery</b>	<ul style="list-style-type: none"> <li>Delivering more than 27,000 new jobs between 2021 – 2036 and adequate provision of employment floorspace</li> <li>Help to reduce skills deficiency between employers and local community by seeking contributions towards training programmes</li> <li></li> </ul>	Growth and Spatial Strategy, Town Centres, Economy	BSS01, GSS01, TOW01, TOW02, TOW04, ECY01, ECY02, ECY03, TRC04	SA objectives 1, 7,
<b>To improve orbital connectivity and sustainable travel options including cycling and walking</b>	<ul style="list-style-type: none"> <li>Supporting transport infrastructure schemes such as the West London Orbital as well as other schemes outlined in policy TRC02.</li> <li>Supporting improved provision to green infrastructure within the Borough and creating more</li> </ul>	Growth and Spatial Strategy, Community Uses, Health and Wellbeing, Transport and Communications	GSS09, GSS11, CDH01, CDH02, CDH03, TRC01, TRC02, TRC03	SA objectives 1, 8, 9, 10, 11, 13

	active environments.			
<b>To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs</b>	<ul style="list-style-type: none"> <li>• Protecting and enhancing the Boroughs natural and heritage assets, which enhance local character and distinctiveness.</li> <li>• Strengthening the role of the Town Centres and small shops and parades outside town centres to ensure that residents have access to services and shops.</li> <li>• Supporting the re-location and expansion of leisure uses within the town centre</li> </ul>	Character, Design and Heritage	CDH01, CDH02, CDH03, CDH04, CDH09, CHW05	SA objective 3, 4
<b>To support strong and cohesive family friendly communities</b>	<ul style="list-style-type: none"> <li>• Ensuring adequate provision of community facilities (CHW01) and protecting community assets such as public houses (CHW04) whilst managing uses within town centres that have the potential to change the character of an area (TOW03)</li> <li>• Ensuring measures are in place to make Barnet safer (CWH03)</li> <li>• Delivering 3 new destination hubs for sport and recreation at: Barnet and King</li> </ul>	Growth and Spatial Strategy, Community Uses, Health and Wellbeing	CHW01, CHW03, CHW04, ECC04, TOW03, ECY03	SA objective 1,3,4,5,6,7,

	<p>George V Playing Fields; Copthall Playing Fields and Sunny Hill Park; and West Hendon Playing Fields as set out in Policy BSS01 and provision of parks and open spaces throughout the Borough (ECC04)</p> <ul style="list-style-type: none"> <li>• Maximising regeneration opportunities that supports inclusive communities and seeking to increase local employment opportunities from development (ECY03)</li> </ul>			
<b>To promote healthy living and wellbeing</b>	<ul style="list-style-type: none"> <li>• Delivering healthy neighbourhoods that promote active and healthy lifestyles and enhances people's overall health and well-being.</li> </ul>	Community Uses, Health and Wellbeing, Town Centres, Environment and Climate Change	CHW01, CHW02, TOW03, TRC01, ECC04	SA objective 6, 8, 13
<b>To meet social infrastructure needs</b>	<ul style="list-style-type: none"> <li>• Securing the timely provision of infrastructure to meet current and future requirements.</li> <li>• Making the most efficient use of land through optimum development density, promotion of mixed-use development that is well connected and providing integrated infrastructure.</li> </ul>	Growth and Spatial Strategy, Community Uses, Health and Wellbeing	BSS01, GSS01, CHW01, CHW02	SA objective 2, 4, 5,6, 8

<p><b>To deliver an environmentally sustainable Borough and build resilience to climate change</b></p>	<ul style="list-style-type: none"> <li>• Seeking to minimise the Boroughs contribution to climate change in accordance with policy ECC01 – ECC04</li> <li>• Ensuring the development is in compliance with the Mayors Energy Hierarchy to reduce carbon emissions and contribute towards zero carbon targets</li> <li>• Improving air quality through a range of solutions through policy and encouraging more active travel that moves away from private car travel. (TRC01 – TRC04)</li> </ul>	<p>Growth and Spatial Strategy, Environment and Climate Change, Transport and Communications</p>	<p>BSS01, GSS01, GSS12, ECC01, ECC02, ECC02A, ECC03, ECC04, TRC01, TRC02, TRC03, TRC04</p>	<p>SA objective 10, 11, 12, 13, 14</p>
<p><b>To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,</b></p>	<ul style="list-style-type: none"> <li>• Delivering 3 new destination hubs for sport and recreation at: Barnet and King George V Playing Fields; Copthall Playing Fields and Sunny Hill Park; and West Hendon Playing Fields as set out in Policy BSS01</li> <li>• Promoting sustainable growth (GSS01) and access to outdoor recreation space (GSS13) parks and open spaces (ECC04)</li> </ul>	<p>Growth and Spatial Strategy, Environment and Climate Change</p>	<p>BSS01, GSS01, GSS13, ECC04, ECC05, ECC06</p>	<p>SA objective 10, 11, 12, 13,14</p>

	<ul style="list-style-type: none"> <li>• Ensuring that development on green belt and MOL is not detrimental (ECC05)</li> <li>• Seeking the retention, enhancement and creation of biodiversity in development proposals where possible (ECC06)</li> </ul>			
<p><b>To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime</b></p>	<ul style="list-style-type: none"> <li>• Requiring developments to conform to the highest standards of design and environmental sustainability, that is inclusive and adaptable (policy HOU 01 – HOU06 and CDH01 - CDH04).</li> <li>• Encouraging the use of high-quality design in suitable locations that meets national residential space standards</li> <li>• Ensuring the appropriate locations for tall buildings across the Borough</li> </ul>	Character, Design and Heritage	HOU01, HOU02, HOU03, HOU04, HOU05, HOU06, CDH01, CDH02, CDH03, CDH04	SA objective 3, 4, 5,

## Development of the Local Plan options including reasonable alternatives (B2)

### Consideration of reasonable alternatives

3.7. The Local Plan must be in conformity with the London Plan (which is underpinned by the principal of ‘good growth’) and provides the starting point for considering the spatial strategy. Giving consideration to this, in addition to the NPPF and the need to seek to address the local housing need, the local plan is limited in its potential to consider reasonable alternatives associated with the scale and location of housing growth within the Borough.



- 3.8. As the London Plan sets Borough level housing targets and identifies locations for future growth along with strategic policies for delivering the identified growth, the SA has been restricted in its consideration of reasonable alternatives. However, the Council has undertaken a rigorous review of land that is available for development, and which is likely to be deliverable and developable within the plan period. The approach to this review is set out in more detail at Local Plan Appendix 1 – Schedule of Site Proposals.
- 3.9. As part of the Draft Local Plan preferred approach (Reg 18), a preferred policy approach was set out. Where reasonable alternatives existed, these were also considered with justification for the preferred approach, or reasons why it was considered that there were no reasonable alternatives. A high level assessment of these options are set out in Appendix 8. Following this consultation, and as policies were refined, the assessment of policies and proposed sites have been updated and are presented in one.
- 3.10. Comments received in relation to the IIA and the SA at the Reg 18 preferred option stage consultation are summarised below in table ten along with a council response.

Table 10: Summary of Reg 18 consultation responses that relate to IIA

Representation	Council response
<p><b>Former Mill Hill Neighbourhood Forum</b></p> <p>The drive toward zero carbon needs to be examined carefully. It has to be applied when consideration is being given to planning applications such as Partingdale Lane (19/6641FUL) where the National Grid proposes to use outdated technology in the erection of a 'Peak Power' Station. Extremely pollutive emissions will result. This can be avoided if such power stations adopt techniques that can substantially decarbonise operations. These methods are not even expensive. This type of plant should also be excluded from areas of Green Belt. For the first time judges, in the recent decision on Heathrow Airport expansion, have said that plans for a major infrastructure project are illegal because they breach the UK's commitments to reduce greenhouse gas emissions to tackle the climate crisis. This is a ground-breaking legal decision that could affect future infrastructure developments and puts the UK's commitment to cut emission to net zero by 2050 at the forefront of future policymaking.) There is a legal obligation to deliver net zero carbon by 2050 and meet the criteria of the Paris agreement. We see that Barnet have produced their draft integrated impact assessment for the Plan:  <a href="https://www.barnet.gov.uk/sites/default/files/ia_report_part_1_0.pdf">https://www.barnet.gov.uk/sites/default/files/ia_report_part_1_0.pdf</a>            There is however no mention of the Paris agreement in this document</p>	<p>Policy ECC01 has been revised to make more explicit reference to how measures taken through policies in the Local Plan will help to meet the target of net zero carbon dioxide. The Paris Climate Agreement has since been considered as part of the IIA policy review</p>
<p>Environment Agency (NPPF para 20). NPPF para 149 states that plans should take a proactive approach to mitigating and adapting to climate change taking into account the long-term implications of flood risk and water supply, etc. Also paragraphs 156 and 157 require strategic policies should be informed by a strategic flood risk assessment and inform a sequential risk-based approach to the location of development. Policy SI 5 Water Infrastructure of the London Plan (Intend to Publish version, December 2019) calls for working with Thames Water in relation to</p>	<p>Key findings of the IDP are reflected in BSS01 and an additional/expanded policy included in the Environment and Climate Change Chapter. A Level 2 SFRA has been published alongside the Reg 19 which includes and been used to inform revised site proposals.</p>

<p>local waste water infrastructure requirements and the potential need for Integrated Water Management Strategies for growth locations in areas with insufficient water management capacity or flood risk. We need to see evidence of how the sequential test (and where applicable the exceptions test) has been applied to the spatial strategy and site allocations based on the strategic flood risk assessment mapping including climate change. We recommend the Sequential Test is undertaken in tandem with a Level 2 SFRA. We have reviewed the Site Selection Background Report December 2019. Although flood risk was one of the factors checked, the constraint resolution as part of the site assessment reveals flood risk was only referenced as a limiting factor, as there might be possible ways to mitigate risks or impacts. Whilst we agree flood risk does not necessarily rule out all sites, there are some sites where the severity of the flood risk and the hazard this represents should potentially rule out further consideration. In addition, the constraint resolution principle applied to the Site Selection process on flood risk doesn't fit with the aims of the flood risk Sequential Test for Local Plans (NPPF paras 157 and 158) We will also need to see evidence within the Integrated Impact Assessment, latest IDP and Local Plan (preferably supported by a background paper or Integrated Water Management Strategy) of how water supply and waste water capacity considerations have been taken into account in the planning for this level of growth (46,000 new homes plus office and retail space) and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment. Currently these crucial elements are missing, and we would have to find the Local Plan unsound.</p>	
<p><b>LB Enfield</b> It is noted that a significant amount of new development, particularly housing will be focused in the growth areas and close to the Enfield borough boundary. Whilst we do not have an objection to this approach in principle, we seek reassurance that the cumulative impacts of development continue to be evaluated through the Integrated Impact Assessment and discussed between the agreed working groups to be established between our respective authorities and have been taken into account. This would also ensure opportunities for greater flexibility to plan, appraisal and prioritise schemes locally. We are willing to continue to constructively engage on this matter as part of the Duty to Cooperate arrangements for Barnet's Local Plan. A positive collaboration should in turn facilitate/unlock residential and mixed-use development opportunities offered by planned improvements on the Piccadilly line with Cockfosters, Arnos Grove Southgate and in the longer-term Crossrail 2.</p>	<p>This will be reflected in our Statement of Common Ground with LB Enfield</p>
<p><b>CPRE Site 49</b> This site is situated within the Green Belt and so only the current built footprint should be redeveloped. Non-developed Green Belt within this site must remain undeveloped as outlined in both NPPF and the Local Plan review. <b>IMPORTANT NOTE:</b> There is a discrepancy between the Regulation 18 consultation stating an indicative residential capacity of 219 and the Integrated Impact Assessment which states an indicative residential capacity of 493. If the latter number is larger because the proposal is in fact to develop the whole site (not just the existing built footprint) then we object strongly to that.</p>	<p>Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147. Figure in IIA for site 49 has been revised as has GSS07</p>
<p><b>Geoffrey Silver Site 49</b> Watch Tower House has 85 residential units and three floors. Careful mapping shows that it occupies 10% of the eastern half of site 49, which is landscaped gardens with protected mature trees. This 10% figure excludes the so-called "tennis courts" used permanently as car parks without planning permission. Kingdom Hall occupies 2% of the western half which is a grassy field. Together, the two buildings have a combined footprint of 6% of the whole of site 49. The proposal is for 219 homes (hopefully not 493 as in the Impact Assessment) in 40% of the whole site, community use 10%, and undeveloped Green Belt 50%. Presumably the western half would remain virtually</p>	<p>Figure in IIA for site 49 has been revised as has GSS07</p>

<p>undeveloped, and the eastern half would be filled with housing and community use. This would be a huge further intrusion of building in the eastern half, when the whole site is a conservation area in the Green Belt. The new London Plan states that: “Development proposals that would harm the Green Belt should be refused”, and “Green Belt de-designation will not be supported” (policy G2) “Openness [i.e. lack of buildings] and permanence are essential characteristics of the Green Belt” (section 8.2.2) “Boroughs should support the protection and conservation of priority species and habitats ... and promote opportunities for enhancing them using Biodiversity Action Plans” (policy G6, part B3). Site 49 is enjoyed as a Green Belt habitat and green corridor by many species, including badgers, barn owls and many other birds. This proposal would also very seriously damage the amenity of neighbours with gardens backing on to the Watch Tower House site’s eastern half. The huge leap in development would destroy its Green Belt openness and permanence, and thus render its designation as Green Belt meaningless. Is the Indicative residential capacity 219 or 493? The Barnet Draft Local Plan (Reg 18) states “Indicative residential capacity: 219” where as its ‘Part 2 – Integrated Impact Assessment with Appendices’ states “Indicative residential capacity: 493”.</p>	
<p>Natural England The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites. Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p>	<p>The Local Plan is supported by the London Environment Strategy and the London BAP. The Council intends to commission a Barnet BAP as part of it’s actions for biodiversity enhancement.and looks forward to working with Natural England on it’s production.</p>
<p>Natural England cutting theme. Opportunity mapping work for natural capital and habitat networks could be undertaken to inform the plan and Sustainability Appraisal, supported by baseline and opportunity mapping. We consider that Green Infrastructure and Natural Capital are closely linked and can be delivered side by side. The role of the planning system in recognising the wider benefits from natural capital is highlighted in NPPF para 170. Spatial planning at this scale is an ideal opportunity to assess the existing Natural Capital of the Borough (see NPPF para 171), to plan to conserve those features providing key ecosystem services and address deficits. Natural England recently published the Natural Capital Atlas. As well as providing a baseline against which to measure change, the Natural Capital Atlas can be used to understand which ecosystem services flow from different ecosystem assets across England. The atlas shows where there are both strengths and weaknesses in the quantity and quality of ecosystems. This can inform opportunity mapping of where to enhance existing natural capital and where to target its creation for the provision of multiple benefits.</p>	<p>The Vision and Key Objectives have been revised to integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,</p>

3.11. This proposed Reg 19 version of the IIA report is the second iteration of ‘stage c’ and will be subject to a formal six week consultation along with the Reg 19 draft Local Plan and supporting evidence.

## Summary of stage B3 – B5 of IIA process

### Sustainability Appraisal – thematic policy assessment

- 3.12. Policies contained within the draft Local Plan were appraised on a thematic basis against each of the SA objectives. The themes match those within the Local Plan and include:
- Growth and Spatial Strategy
  - Housing
  - Character, Design and Heritage
  - Town Centres
  - Community Uses, health and well-being
  - Economy
  - Environment and Climate Change
  - Transport and Communications
- 3.13. 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 were particularly beneficial for housing delivery, the built environment, public realm and economic growth. The draft local Plan also places an emphasis on a healthy and inclusive borough and the provision of open spaces were also considered to be positive.
- 3.14. A number of negative effects were identified, and primarily relate to the impacts that growth and development would have on infrastructure, heritage assets, open spaces and natural resources. A summary of the assessment findings are outlined in table 10 and a the full thematic assessment are presented in **Appendix 1** (part 2 of IIA report).

Table 11: Summary of thematic policy review

Theme	Assessment summary
Growth and spatial strategy	Proposed policies are likely to have overall positive effects (direct or indirect) in relation to the range of IIA objectives including those related to successful inclusive neighbourhoods, accessibility and efficient use of land and infrastructure. They do not preclude the realisation of other policies that more directly address other objectives. Where negative effects have been identified these will be mitigated via other policies contained elsewhere within the plan (for example, additional development may lead to increased construction waste, however, this will be mitigated to an extent via policy ECC03).
Housing	Draft housing policies will help create places where people want to live, work and visit, as well as promote

community resilience. As such, the overall strategic effect on the IIA objectives when managed through the suite of existing and proposed development plan policies should have a range positive impacts which include:

- Investment in the built environment
- A boost to the local economy through the construction of new homes
- a wider range of housing choice that will benefit a range of socioeconomic outcomes such as health, accessibility to services, educational outcomes and improved employment opportunities.

However, the scale of development planned for in the Borough is likely to put pressure on social and physical infrastructure and have potentially adverse impacts on the local environment. For example, more homes will likely increase the level of waste generated and such high housing targets could put pressure on release of greenfield sites and Green Belt impacting on Barnet's environment/biodiversity. Mitigation strategies will need to be put in place to deal with any adverse effects.

Character, design and heritage The draft policies have been assessed as having a positive effect overall on the SA objectives, particularly those relating to high quality design and sustainable design. It is noted that high levels of development could have potential adverse impacts on the character of certain areas within the borough and on heritage assets, however, these impacts should be mitigated through polices in this section and elsewhere within the Local Plan (e.g. polices CDH01 – CDH09).

Town Centres The draft policies, as currently set out, are likely to have a number of positive impacts on the objectives within the IIA framework, particularly those which relate to a high-quality environment, housing and economic growth. The policies enable diversification within town centres which will improve accessibility to key local services and help the Council meet wider regeneration objectives. Residential development will also enable well connected places that encourages sustainable travel and improve overall sense of place. Any areas where the draft polices might be expected to have potential negative effects are negated safeguarded by other policies within the Local Plan. For example, increased development in town centres may lead to greater traffic congestion and pollution, however, it will also lead to more compact mixed use communities which promote vitality, liveability

Community uses, health and well-being	and efficient use of land and infrastructure and social cohesion.
Economy	<p>The draft policies have been assessed as having a positive or neutral effect on the overall IIA objectives. The effective implementation of these policies will help the Council contribute towards its wider regeneration agenda and will bring about numerous community benefits such as increased access to communal facilities, education and training opportunities. Policies also promote more active lifestyles which will have health and environment benefits. Any areas where the draft polices might be expected to have potential negative effects will be negated by other policies within the Local Plan. For example, Policy CHW04 seeks to protect public houses, which can be associated with unhealthy behaviour such as alcohol consumption and increased noise and antisocial behaviour; however, negative effects can be mitigated via appropriate design / conditions on development, plus interagency working.</p> <p>The overarching purpose of these policies is to create employment and training opportunities and ensure adequate provision of workspace to support business and enterprise. The majority of draft policies assessed are likely to have neutral or positive effects (direct or indirect) in relation to the SA objectives. The provision of affordable workspace will be of particular benefit to SMEs as it will help them to prosper and grow. In addition, increasing access to jobs, skills and training opportunities will help reduce unemployment within the borough. However, increasing employment and business in the borough has the potential to generate waste and adversely impact on water and air quality. Any instances where policies might have possible adverse effects will be mitigated via other policies within the plan.</p>
Environment and climate change	<p>Policies assessed here are likely to have positive effects (direct or indirect) in relation to all SA objectives. Policies specifically address air and noise pollution, the water environment and management, waste, green infrastructure and biodiversity, all of which are key SA objectives in themselves; they also do not preclude the realisation of other policies that more directly address other objectives. Any instances where the proposed requirements might be expected to have possible negative effects in relation to other objectives (e.g. a drive for better air and water quality may add restrictions and/or requirements on some forms of business and hinder economic objectives), however, any negative impacts could be mitigated via other policies within the</p>

plan and/or the environmental benefits may outweigh potential adverse impacts.

Transport and communications The draft policies promote investment in the strategic transport network and a more sustainable pattern of movement, which is likely to have a positive impact on a number of objectives within the IIA framework, including sustainable travel and reducing dependency on car travel, health and air quality; Policies under this theme do not preclude the achievement of other objectives through implementation of the policies under the thematic headings. Any areas where the draft policies might be expected to have potential negative effects are negated by other policies within the Local Plan, for example, development proposals that result in the reduction of off-space street car parking spaces where they meet criteria and have high public transport accessibility.

### **Sustainability Appraisal – Site assessments**

3.15. The Local Plan quantifies the projected level of growth and identifies the supply of sites needed to meet this growth. In total, 65 sites were identified in the Local Plan Schedule of Proposals are were derived from the following sources:

- Nominated through the Call for Sites process by owners and developers seeking to realise development potential. These include public-sector partners such as Transport for London, Middlesex University, NHS, Ministry of Defence, as well as the Council. The sites have been assessed as suitable for development;
- Previously identified in the 2006 Unitary Development Plan but not yet developed;
- Allocated in other planning documents adopted by the Council, including Supplementary Planning Documents, Town Centre Frameworks and Planning Briefs

3.16. To be included in the Schedule sites must be assessed as:

- Deliverable i.e. it should be available now and offer a suitable location for the proposed use(s) and a good prospect that proposal will be delivered within next five years.
- Developable i.e. it should be in a suitable location for the proposed use(s) and there should be a reasonable prospect that it will be available for and could be developed within 15 years.

3.17. This extensive period of information gathering enabled the development of a suite of sites following a robust assessment of those nominated.

3.18. As part of the SA, all of these sites were appraised using matrices to identify the likely significant effects on the SA objectives. A number of sub criteria for each objective was developed and assessed against a qualitative scoring system which is set out in table 2. The sub criteria can be found in **Appendix 3** (part 2 of IIA report).

Table 12: Scoring system for the proposed sites SA.

Score	Description	Symbol
Significant Positive	The proposed site contributes significantly to the achievement of the objective	++
Minor positive	The proposed site contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed site does not have any effect on the achievement of the objective	O
Minor negative	The proposed minor detracts from the achievement of the objective but not significantly.	-
Major negative	The proposed site detracts significantly from the achievement of the objective.	--
Unknown	The effect of the proposed site cannot be known or insufficient information make it too unpredictable to assign a conclusive score	?
Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria.	-/+
Not applicable	This is applied to objectives that will not be affected by the proposed site that is being assessed.	N/A

### SA Sites Appraisal Summary

3.19. In total, 66 sites have been put forward for inclusion within the draft local plan. These sites have been appraised using tailored criteria to assess the sustainability of each site. The site appraisal criteria and matrices use for each site assessment is included in **Appendix 3** (part 2 of IIA report).

3.20. The summary of the findings from this appraisal are presented in table 1. The table shows that the majority of proposed sites would either have positive or neutral effects on most of the SA objectives, with the exception of SA objective

- ‘conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment’,
- 5 ‘Ensure that all residents have access to good quality, well-located, affordable housing’
- 8 ‘Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking’ and 13 ‘To minimise and manage the risk of flooding’.



- 3.21. The scores assigned to each site at this stage of the appraisal are pre-mitigation and therefore have the potential for a significant effect. Whether or not this effect will happen, or the severity of the effect, will be dependent on many factors including site design and the mix of uses agreed.
- 3.22. Sites which have been assessed as having a potential negative effect are largely due to the site's proximity to heritage assets, being located within a designated flood risk area or having a PTAL below 2. Any proposals that come forward will need to demonstrate that they are consistent with policies contained within the Local Plan and that appropriate mitigations are in place to deal with potentially adverse impacts.
- 3.23. The section below summarises the main social, economic and environmental findings from the appraisal of proposed sites.

### **Social (SA objective 1, 2, 4, 5, 6 and 8)**

- 3.24. SA objective 1 considers whether the proposed sites would reduce poverty and promote equality of opportunity. The sub criteria looks at sites that would involve development within areas that have a high level of multiple deprivation as well as their proximity to employment land and education. As such, these objectives seek to prioritise sites which would concentrate investment in deprived areas and promote regeneration.
- 3.25. The majority of proposed sites (42) are located within the 50% most deprived Lower Super Output Areas (LSOAS) across the borough and a further site located within the 10% most deprived, meaning that these sites score positively against this objective. The sites that are located within the 50% least deprived have received a neutral score as they as it could be argued that the effects of development will be less noticeable and would not significantly contribute towards regeneration.
- 3.26. All of the proposed sites are also located within close proximity to employment land and local schools and have therefore scored positively in relation to sub criteria 1.b and 1.c. Sites which are located further than 2000 metres from employment land or 1200m from a school have received a neutral score.
- 3.27. SA objectives 2 and 4 considers whether the proposed sites would contribute towards efficient land use and promote safe liveable neighbourhoods that have access to local services and social infrastructure. All of the proposed sites, with the exception of sites 31 and 45, are either located on existing brownfield or vacant land or have existing buildings which would be redeveloped as part of site proposals. Therefore, these sites score positively against SA objective. In addition, the majority of sites are located within or in close proximity to town centres which means that they are likely to have access to local services, community facilities and public transport which will help contribute positively towards social SA objectives. Nine sites which are located more than 1000m from a town centre have received a negative score under this sub-criterion.
- 3.28. SA objective 5 considers whether the proposed site would contribute towards the Borough's housing need over the plan period. Sub criteria 5a uses a threshold of 500

net new residential units to differentiate between predicted minor or major positive effects on this objective.

- 3.29. All of the proposed sites, with the exception of site 29, include housing allocations meaning that these sites will contribute positively to SA objective 5 through the provision of new residential units. Seven of the proposed sites have the potential to deliver over 500 residential units and in total, proposed sites have an indicative capacity to deliver up to 16,362 new units. There is only one site which is only capable of delivering less than 10 dwellings and therefore have received a negative score as they do not meet the affordable housing threshold.
- 3.30. SA objective 6 considers how sites would affect health and wellbeing of the local population. This objective includes a number of sub-criteria which are thought to be important detriments to health and wellbeing. These include access to open space, walking and cycling, health facilities and leisure centres as well as air quality. All sites are within 1200m of a parks and open space and health facilities and have therefore scored positively on this front. In total, 22 sites are located in an area with poor air quality and have received a negative score as it is thought that additional development would compound this issue further. However, these impacts would likely be mitigated to some extent through the application of environmental policies. In addition, 28 sites are within 2000 metres of a leisure centre, which will have a positive impact on SA objective 6 as it will mean that people have access to facilities that help promote healthy active lifestyles.
- 3.31. SA objective 8 considers accessibility and sustainable travel based on the Public Transport Accessibility Level (PTAL) ratings assigned by Transport for London for each site. The PTAL rating provides a relative measure of proximity to public transport services. In total, 9 sites are located in areas with the highest PTAL ratings (5 and 6) and a further 36 sites are located in areas with a PTAL rating of 3 and 4 and therefore score highly. 23 sites are located in areas with a low PTAL rating (2 or below) and have received a negative score. Regardless of PTAL, all development proposals will need to accord with the relevant transport policies contained within the Local Plan.

### **Environmental (SA objectives 3,9,10, 11.12 & 13)**

- 3.32. SA objective 3 considers the relationship between the proposed sites and designated heritage assets, as well as their impact on locally important views. Sub criteria 3a, 3c and 3d have focused on the proximity to listed buildings, conservation areas and Archaeological Priority Areas. The appraisal has highlighted that 15 sites have scored a minor negative as they are within 100m of a listed building and/or conservation area. A total of 28 sites have scored a minor negative as they are located within Archaeological Priority Areas. However, at this early stage of assessment, it is not possible to understand the full extent of any potential negative effects or provide possible mitigation measures due to a lack of detailed information. Any proposal that comes forward will need to demonstrate that they are consistent with general policies in the Local Plan in relation to design and heritage.

- 3.33. SA Objective 9 considers proposed sites access to open space. Proposed sites were assessed using the London Plan Public open space hierarchy and therefore looked at a site's proximity to parks and open spaces within a 1200m radius<sup>3</sup>.
- 3.34. Sites that are located in an area that have a provision of parks and open spaces above the borough average and also are within 1200m to a district park and or 400m of a local park/ open space received a positive score. In total 24 sites received a positive score. Sites that are within 1200m to a district park and or 400m of a local park/ open space but are located in an area where the provision of parks are below the borough average received a mixed score. In total 44 sites received a mixed score in relation to this sub-criterion. It should be noted that all sites will be required to be in line with the relevant local plan policies, including those that set minimum standards for the quantity and quality of open space provision.
- 3.35. SA objective 10 considers the proximity of proposed sites to designated sites for reasons of biodiversity or ecological protection. No sites designated at a national or international level for reasons of biodiversity conservation are within 500m of the proposed sites as been assessed as having a neutral effect. However, there are 13 sites that located within 100m of a locally designated site (primarily Sites of Importance for Nature Conservation) and therefore could have a potential negative effect on this objective in the absence of appropriate mitigation. The draft Local Plan includes policies ECC02 Environmental Considerations and ECC06 Biodiversity that will help ensure that adequate avoidance and mitigation are put in place. The remaining sites are not located within 100m to locally designated sites have been assessed as having a neutral effect on SA objective 10.
- 3.36. SA objective 11 considers how the sites will contribute towards climate change reduction and mitigation. At this early stage, all of the proposed sites have been assessed as having a neutral effect due to external factors (e.g. the requirements for development management policies and the lack of available detailed information at this stage regarding climate change on a site by site basis). It is thought that it would be more appropriate to consider detailed requirements to address SA objective 11 within site specific development frameworks and/or planning applications.
- 3.37. SA objective 12 considers natural resources, however, this has not been appraised as an evaluation of any effects requires a level of detail absent at this stage of appraisal and assessment.
- 3.38. SA objective 13 considers existing flood risk affecting each of the proposed sites. The objective does not take account of proposed uses of potential flood risk alleviation measures required through draft policy ECC02A. Instead it identifies the level of existing flood risk and therefore indicates sites that are likely to require a flood risk assessment (including consideration of NPPF sequential and exception tests) to be completed and if required, flood risk mitigation measures to be incorporated within development proposals. Only five of the proposed sites are located within flood risk areas (either flood zone 2 or 3) and have therefore received a major negative score against this objective. Flood risks affecting proposed sites are primarily associated with fluvial flooding. The remaining sites are located within flood zone 1 and therefore have scored positively in relation to SA objective 13.

---

<sup>3</sup> Barnet does not contain any Metropolitan or regional parks and therefore the 3.2km radius did not apply to this assessment.

- 3.39. In addition, this objective also looks at sites that are within a Critical Drainage Area<sup>4</sup> (CDA). In total, two of the proposed sites are within CDA and will therefore require appropriate mitigation measure to manage surface water flood risk and the management of flood risk.

### **Economic**

- 3.40. SA objective 7 considers whether proposed sites would support the increase or result in the loss of employment uses. It also considers whether the site falls within an area that has potential for night time economy uses.
- 3.41. The majority of proposed sites are likely to have a neutral effect on this objective as they will not lead to an increase in employment floorspace. Two sites would have a negative effect as they would lead to a loss of employment floor space for residential use, however, any loss would need to be in line with draft policy ECY01. Eight sites would have a positive effect as they would likely lead to an increase in employment floor space and the remaining sites have been assessed as having a neutral effect as they will neither lead to a loss or increase.

---

<sup>4</sup> Critical Drainage Area is defined in the Town and Country Planning (General Development Procedure) (Amendment) (No. 2) (England) Order 2006 a Critical Drainage Area is “an area within Flood Zone 1 which has critical drainage problems and which has been notified... [to]...the local planning authority by the Environment Agency”.

