

**Draft Integrated Impact  
Assessment for Barnet's Draft  
Local Plan (Reg 18)  
Part 1**

**January 2020**

## Contents

	Page No.
<b>Chapter 1</b>	
Non-Technical Summary	3
Key findings of the IIA	7
Next Steps	10
<b>Chapter 2</b>	
Introduction to IIA	12
Assessment Stages (stages A – D)	17
Summary of stage A	18
<b>Chapter 3</b>	
Summary of stage B & C	45
Local Plan vision and objectives	45
Development of Local Plan options and Alternatives	48
Summary of stage B3 – B5	48

## 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 borough's current Local Plan (comprising the Core Strategy and Development Management Policies Document). 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 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
- To improve orbital connectivity and sustainable travel options including cycling and walking
- To enhance the distinctive character and identity of Barnet's town centres and suburbs
- To support strong and cohesive communities
- To promote healthy living and wellbeing
- To meet social infrastructure needs
- To deliver an environmentally sustainable Borough
- To improve access to, and enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and 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.	-
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

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 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.

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, 67 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 use 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 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

Site No.	1			2			3				4			5		6					7		8		9	10		11	12	13		
	1a	1b	1c	2a	2b	2c	3a	3b	3c	3d	4a	4b	4c	5a	5b	6a	6b	6c	6d	6e	7a	7b	8a	8b	9a	10a	10b	11a	12a	13a	13b	
1																																
2																																
3																																
4																																
5																																
6																																
7																																
8																																
9																																
10																																
11																																
12																																
13																																
14																																
15																																
16																																
17																																
18																																
19																																
20																																
21																																
22																																
23																																
24																																
25																																
26																																
27																																
28																																
29																																
30																																
31																																
32																																
33																																
34																																
35																																
36																																
36																																
37																																
38																																
39																																
40																																
41																																
42																																
43																																
44																																
45																																
46																																
47																																
48																																
49																																
50																																
51																																
52																																
53																																
54																																
55																																
56																																
57																																
58																																
59																																
60																																
61																																
62																																
63																																
64																																
65																																
66																																
67																																

## Habitats Regulation Assessment

1.20 The HRA screening assessment was undertaken and is presented in **Appendix 4** (part 3 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 3 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. A recommendation arising from the HIA is that the Local Plan could better promote healthier food environments and the preventing the proliferation of activities that have a negative impact on health (e.g. a concentration of A5 uses). These recommendations have been considered and incorporated where it has been deemed appropriate.

## 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 3 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 18) will take place from **Monday 27th January 2020 to Monday 16<sup>th</sup> March 2020**. Following engagement on this stage, we will publish another version of the Local Plan (known as the publication stage) prior to submitting it to a Government Planning Inspector for Independent Examination.

1.24. The draft Local Plan and accompanying documents are available to view at:

- Planning reception at 2 Bristol Avenue, Colindale, London NW9 4EW. (Monday, Wednesday and Friday, 9am– 1pm)
- local libraries (details and opening hours available at <https://www.barnet.gov.uk/libraries/library-opening-times>)
- online at <https://engage.barnet.gov.uk/>

1.25. Any comments (known as representations) should be made using a Representation Form available online at the above locations.

1.26. You can have your say by using the Representation Form clearly stating the nature of your comments and the changes you are seeking. This can be emailed via : [forward.planning@barnet.gov.uk](mailto:forward.planning@barnet.gov.uk) or by completing and returning the form by post to: Planning Policy Team at 2 Bristol Avenue, Colindale, London, NW9 4EW

1.28. Further information is also available from the team on 020 8359 3000

1.29. Representations about the Local Plan must be submitted by one of the methods specified above no later than midnight on **Monday 16th March 2020**.

## 2. Introduction to IIA

## **Background**

2.1 The London Borough of Barnet has undertaken an Integrated Impact Assessment (IIA) for the emerging Local Plan. The IIA will incorporate 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 18)'.

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 18 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 successfully supported sustainable growth throughout the Borough. It now needs to be reviewed to respond to challenges and pressures facing such as rising population and boosting the economy and infrastructure. It also needs to take advantage of new development opportunities within the boroughs town centres and areas where transport improvements such as the West London Orbital Line and Crossrail 2 are planned. The Plan will also respond to technological change such as electric cars and regulatory measures to reduce environmental pollution to help revitalise major thoroughfares as places to live and work.

2.5 The new Local Plan will set out a vision and objectives, strategic priorities and a planning policy framework to guide development in the borough up until 2036. It will be a positive strategy for delivering sustainable development and delivering the Councils 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 Councils duty to cooperate.

2.7 The Councils vision can be found in chapter 3 of the of the Draft Local Plan Document and paragraph 2.48 of this report. 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:

- To deliver growth to meet housing aspirations
- To improve the quality of housing across the Borough
- To make Barnet a place of economic growth and prosperity
- To improve orbital connectivity and sustainable travel options including cycling and walking
- To enhance and safeguard the distinctive character and identity of Barnet's town centres and suburbs
- To support strong and cohesive communities
- To promote healthy living and well being
- To meet social infrastructure needs
- To deliver an environmentally sustainable Borough
- To improve access to greenspaces and enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and infrastructure
- To ensure new development is high quality, sustainable, and adaptable to meet the needs of residents over their lifetime.

2.9 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.

2.10. Each topic includes Strategic Policies that set out key principles and more detailed policies that relate to specific matters within the topic. 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.

### **Policy context**

2.11 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*

2.12. 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.

2.13. 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 adaptation (NPPF, Para 20).

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

2.14. 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.

2.15. 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**

2.16. 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.

2.17. 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.

2.18. 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 2016 (Consolidated with Alterations since 2011)**

2.19. The London Plan sets out a broad strategy for how London will change and develop up to 2036 and identifies areas which have considerable scope to accommodate growth and development. Barnet's new Local Plan will need to be in conformity and compliance with the London Plan.

2.20. The current plan recognises the pressing need for housing and has set an annual minimum housing target for each borough over the Plan period. Policy 3.3 sets a minimum target for Barnet of 23,489 homes between 2015 – 2025 (2,349 per annum).

### **Draft London Plan 2017**

2.21. The Draft London Plan (DLP) published in December 2017 sets out new and amended policies that will guide future development in London up to 2041. Until the draft Plan is finalised, (anticipated to be 2020) the policies contained within it will be a material consideration. The draft plan has increased Barnet's housing target from 23,489 to 31,340. set equating to 3,134 new homes per year over the Plan period (this represents a 33% increase from the previous target).

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

2.22. 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**

2.23. 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.

2.24. 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):**

2.25. 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.

2.26. 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

2.27. 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.

### **Habitats Regulation Assessment (HRA):**

2.28. Under Article 6 of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), Plans are 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 3 of IIA report).

### **Health Impact Assessment screening (HIA):**

2.29. 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 3 of IIA report).

### **Equalities Impact Assessment screening (EqIA):**

---

<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'

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

2.30. An EqlA 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 EqlA 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 EqlA considers the potential for effects on these.

2.31. 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

2.32. 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](#).

2.33. 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

**Stage C: Prepare the Sustainability Appraisal Report** IIA Report

Stage D: Seek representations on the SA Local Plan / IIA  
Consultation &  
Examination

**Stage E: Post adoption reporting and monitoring**

E1 – Prepare and publish post-adoption statement Local Plan Adoption and  
monitoring

E2 – Monitor significant effects of implementing the Local Plan IIA Report (Adoption)

E3 – Respond to adverse effects

## Summary of stage A

**Setting the context and objectives, establishing the baseline and deciding on the scope.**

### Review of plans and programmes

2.34. The preparation of the IIA Scoping Report' was the first stage of the IIA process for the Barnet Local Plan, which went out to consultation in January/February 2019. Comments received during the consultation period have been reflected within this draft report.

2.35. The Scoping report established key baseline data for the Borough and considered relevant plans and programmes at the national, regional and local level. These plans, programmes and policies have been summarised in table 3 below. The full review is provided in **Appendix 7** (part 3) of this report.

2.36. It is important to note that the baseline data is constantly evolving and is likely to change throughout the course of the Local Plan process, therefore, information included within this report is based data available at the time. The IIA has been an iterative process that will run alongside the production of the Local Plan and data will be updated where necessary to reflect changes in the current social, economic and environmental climate.

Table 5: Summary of policy review

---

**International**

---

- European Directive 2001/42/EC
- The Habitats Directive: European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats
- Johannesburg Declaration on Sustainable Development (Earth Summit 2002)
- European Directive: Environmental Noise Directive 2002/49/EC
- EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (Habitats Directive - 92/43/EEC and 97/62/EC)
- EU Directive on Ambient Air Quality and Management EU Directive 2008/50/EC
- Water Framework Directive 2000/60/EC
- Waste Framework Directive 2008/98/EC
- Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC
- European Convention on the Protection of the Archaeological Heritage (revised), 1992
- European Landscape Convention 2000
- Health for Growth 2014 – 2020, European Commission, 2011

---

**National**

---

- 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
- 

2.37. From this review, a number of common objectives and issues were identified 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.

### **Baseline information (A2)**

2.38. The scoping report set out the baseline conditions in the borough that were relevant to the Local Plan and IIA. It is important to recognise that the baseline is constantly evolving. Changing economic 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 [\[insert link\]](#).

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

2.39. 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.

2.40. 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.

2.41. It is likely that as the Local Plan progresses, additional and more detailed sustainability issues will be identified

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
<b>Growth and Spatial Strategy</b>	<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>	
<b>Housing</b>	<ul style="list-style-type: none"> <li>▪ Housing affordability - There is a shortage of good quality, genuine affordable homes in Barnet. Since 2014, the average house price in Barnet increased from £391,000 to £545,000 meaning that the Borough has some of the highest house prices in London, and median house prices being 15 times median income of £36,000.</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>	

	<ul style="list-style-type: none"> <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 allowances, leading to a greater chance of people living in substandard housing.</li> <li>▪ High Housing targets - It is anticipated that up to 46,000 additional households will be needed 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>	
<b>Character, Design and Heritage</b>	<ul style="list-style-type: none"> <li>▪ Barnet has a wide range of heritage assets, which include 2,206 listed buildings, 1600 locally listed buildings, 19 Archaeological Priority Areas and 16 Conservation Areas. 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 heritage will be required.</li> </ul>
<b>Town Centres</b>	<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). Vacancy rates within the Boroughs town centres range from 0.8 % to 8.9%. Town Centre Floorspace Needs Assessment 2017 identified that Barnet needed to improve its leisure offer and there was in 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>

<p><b>Community Uses, Health and Well-being</b></p>	<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 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.</li> <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. In addition, in 2016/17, Barnet has the 6<sup>th</sup> highest proportion of adults out of all the London Boroughs who were physically inactive (i.e take part in less than 30 minutes of moderate physical activity per week).</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. In addition, residents reported crime as one of the top concerns in the 2017 resident’s perception survey.</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 such as parks and open spaces and through active travel.</li> <li>▪ The Local Plan should seek to ensure that new developments have adequate access to community and health facilities.</li> </ul>
<p><b>Economy</b></p>	<ul style="list-style-type: none"> <li>▪ Skills and education - Barnet’s resident population is well qualified, with 55% of pupil attaining 8 score GCSES in 2017. Around 54% of</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Local Plan should seek to provide employment opportunities that meet the</li> </ul>

the adult population have a university degree or equivalent. The percentage of working age population in the Bough with no qualifications represents 4% of the population. In addition, latest data shows that 3.6% of 16-18 year olds in Barnet were not in employment, education or training (NEET) (270 people) in 2016. This is an increase of 1.3% from the previous year.

- 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.
- 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 shrinking stock and low levels of new supply may reduce Barnet's already marginal role as an office location. The ELR also highlighted that employment is expected to grow by 22% suggesting a need for office space in of approximately 67,000 – 106,000 m2 up to the period 2036.
- 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

current and future needs of the local and regional economy.

- The Local Plan should consider how it can continue to support local enterprise, including micro-enterprises.
- There is a need to address the shortfall in office floorspace and ensure sufficient employment land is provided to meet the assessed need.
- The Local Plan should encourage the provision of affordable employment space.

fewer than ten employees. The Borough has the third highest business base in London and collects nearly £100m annually through business rates.

**Environment and Climate Change**

- Air quality – Barnet is not meeting national air quality targets for Nitrogen Dioxide (NO2) and Particulate Matter (PM10).
  - 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).
  - Other sources of pollutants come from commercial and domestic gas use, construction related activities and industry.
  - 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.
  - Parks and open spaces - Baseline data highlighted that Barnet has a good provision of 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.
  - 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
- 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.
  - The Local Plan will need to ensure that there are appropriate climate mitigation strategies in place to deal with the effects of climate change.
  - The Local Plan will need to include appropriate policies to safeguard against future loss of open spaces and ensure its protection and extension.
  - Within the Local Plan, circular economy principles and effective waste management will become increasingly important.

space, indicating further dependence upon public open space and access to the natural environment and places for recreations.

- 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.
- Waste - The level of development planned for in the borough will generate higher waste levels, both through construction and on-going occupation of sites.

**Transport and Communications**

- 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,
- The Local Plan should seek to promote a modal shift towards sustainable transport modes, in particular, walking and cycling.
- Opportunities should be sought to direct development to accessible locations and seek to secure investment in transport.

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.

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

- 2.42. 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 14 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.
- 2.43. 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 the Local Plan progresses, the IIA will appraise policy options and site allocations against these objectives.

Table 7: updated SA objectives

SA objective	Prompt question	Indicators
1. To reduce poverty and promote equality of opportunity	<p>Will the policy:</p> <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> </ul>	<ul style="list-style-type: none"> <li>Healthy street scores</li> <li>Relative ranking for indices of multiple deprivations (IMD) – income, employment</li> </ul>

- Encourage active and connected, strong and cohesive community?
- Remove barriers to employment and learning opportunities to help increase the skills of residents?

- Other data concerning infrastructure sufficiency (e.g. school place provision)
- Relative ranking for indices of multiple deprivations (IMD) – income, employment
- Jobs, employment and activity rates

## 2. Ensure efficient use of land and infrastructure

Will the policy:

- Optimise use of previously developed land, buildings and existing infrastructure?
- Focus development in the most appropriate locations?
- Balance competing demands between land uses to provide for the full range of development needs of the area?
- Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?
- Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs?

- Percentage of development on previously developed land
- Optimum density levels achieved against London Plan targets
- Progress against infrastructure investment programmes

## 3. Conserve and enhance the significance of heritage assets and their settings,

Will the policy:

- Appeals allowed in conservation areas, and for applications

and the wider historic and cultural environment.

- Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Barnet?
- Encourage management plans to be actively prepared and implemented?
- Impact on the delivery of highly sustainable new development?

affecting listed buildings, schedule ancient monuments, historic parks and gardens and non-designated heritage assets

- Number of Grade I and II\* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register
- Distribution of key facilities and local services across the borough
- Floorspace of community facilities/services lost or gained
- Town centre health checks
- Environmental nuisance levels
- Other data concerning infrastructure sufficiency (e.g. school place provision)
- Local crime statistics and residents' perception survey
- Overall crime rates in the borough and fear of crime
- Refusals on grounds of schemes falling below minimum space standards (as outlined in Nationally

4. Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles

Will the policy:

- 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.
- Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?
- Improve sustainable travel connections of neighbourhoods with facilities/amenities?
- Reduce the impacts of noise, vibration and pollution on the public realm?
- Promote development opportunity in areas with high PTALs?

<p>5. Ensure that all residents have access to good quality, well-located, affordable housing</p>	<ul style="list-style-type: none"> <li>• Improve safety and security and reduce crime and fear of crime?</li> </ul> <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>	<p>Described Space Standard (NDSS))</p> <ul style="list-style-type: none"> <li>•</li> <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>
<p>6. Improve the health and wellbeing of the population and reduce health inequalities</p>	<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>

- Promote physical activity or increase participation in sport and leisure activities, particularly among low participation groups?
- Reduce health inequalities?
- Promote positive mental health and wellbeing through a safer, more stimulating and pleasant natural and built environment?
- Improve air quality?

- Healthy street scores
- Mortality rate
- Number of patients registered at GP surgery
- Proportion of the borough deficient in relation to local sports facilities

7. Foster sustainable economic growth and increase employment

opportunities across a range of sectors and business sizes

Will the policy:

- Sustain and increase the borough's contribution to the London and national economy?
- Support a range of local businesses of different types and sizes?
- Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive?
- Support growth in key sectors?
- Provide opportunities for residents to access employment, particularly those groups experiencing above average worklessness?
- Provide a range of employment opportunities?
- Provide training and job opportunities for local residents?

- Number and range of businesses operating in the borough, including formation and survival rates
- Employment floorspace lost/retained/created
- Proportion of residents who are economically inactive
- Proportion of 16-18 years old not in education, employment or training
- Proportion of residents with no qualification
- Number of apprenticeships taken up in construction schemes

8. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking

Will the policy:

- Improve connectivity both within the borough and to neighbouring boroughs and wider London?
- Encourage a shift to more sustainable forms of travel and away from private vehicle use?
- Reduce the need to travel, especially by car?
- Improve road safety for all, particularly pedestrians and cyclists?
- Improve accessibility of the borough's transport network?
- Provide facilities that will support sustainable transport options?
- Enhance capacity of the transport network?
- Reduce harmful emissions from transport?
- 

- Car ownership (% of households owning one or more car/van)
- Travel to work by different modes (bus, train, car, bike, foot)
- Emissions level from transport
- Proportion of car-free housing
- Number of people killed or seriously injured in road accidents
- Motor traffic flows through the borough
- Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more
- PTAL levels
- Proportion of underground/ over ground stations with step free access

9. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional

Will the policy:

- Protect existing public and private open spaces?
- Contribute to meeting the increasing need for open space?
- Link existing open spaces?
- Prioritise open space in areas of deficiency?

- Net loss/gain of open space as a result of the grant of planning permission for major development schemes
- Net loss/gain of facilities for sport and recreation as a result of the grant of planning permission for major development schemes

- Improve the quality of open space?
- Promote or improve public accessibility of open space now and in the future?
- Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits?
- Improve inclusive access to a range of open space types to meet local needs?

10. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity.

Will the policy:

- Increase protection and improve opportunities for biodiversity?
- Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?
- Encourage development that implements strategic and connected green infrastructure?
- Ensure development does not contribute to increased flood risk?
- Protect existing trees and increase tree planting?
- Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?
- Impact on access to nature?
- Maximise opportunities for engagement with wildlife, including environmental education?

- Planning obligations received towards open space, sports and recreation

- Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces
- Open space deficiency
- Number of tree preservation orders served
- Number of new developments incorporating green roofs, landscaping or open space to improve biodiversity
- Development resulting in biodiversity net gain/loss

11. Reduce contribution to climate change and enhance community resilience to climate change impacts.

Will the policy:

- Improve energy efficiency and carbon emissions associated with buildings and transport?
- Promote the use of low and zero carbon technologies including decentralised energy networks?
- Improve energy security?
- Encourage buildings and places designed to respond to changing conditions?
- Reduce the impact of climate change, including flooding and urban heat island effect?
- Improve the microclimate?
- Reduce greenhouse gas emissions?
- Reduce fuel poverty?
- Provide the necessary infrastructure to support development?
- Steer development to the areas at lowest risk of flooding in the borough?

- % of / number of new developments incorporating flood mitigation measures in their design to reduce flood risk e.g. SUDS, evacuation plans, etc
- Proportion of developments incorporating low carbon technology and renewable energy solutions
- Proportion of buildings incorporating Green Infrastructure and linkages between Green Infrastructure areas and green open spaces

13. Maximise protection and enhancement of natural resources including water and air and, minimise waste

Will the policy:

- Minimise air, water, and soil pollution and their negative impacts on human health?
- Improve air quality in line with national and international standards?

- Annual average concentrations and number of hourly exceedances of Nitrogen dioxide in air

- |                                                        |                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                        | <ul style="list-style-type: none"> <li>• Protect surface and groundwater quality?</li> <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>• Annual average concentrations and number of daily exceedances of PM10 in air</li> <li>• Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</li> </ul> |
| <p>13. To minimise and manage the risk of flooding</p> | <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

2.44. 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)

2.45. Task A5 requires consultation on the scope of the IIA. The Environmental Assessment of Plans and Programmes Regulations 2004 require that Historic England, the Environment Agency and Natural England be consulted 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.

## Response to the Local Plan IIA Scoping Report consultation

2.46. Responses were received from four consultees, these are summarised below.

Table 8: Summary of consultee responses

Respondent	Representation response	Council response	Action
<b>London Borough of Camden</b>	No comments	N/A	Noted
<b>Historic England</b>	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 Battlefield, London's only Registered battlefield.	<p>This asset has now been included within the baseline information.</p> <p>Non-designated heritage assets</p>	Noted

	<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>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 reducing pollution, making rivers more natural, tackling invasive non-native species and creating better opportunities</p>	<p>All of the relevant plans/ policies have now been included as part of the IIA policy review</p>	Noted

	<p>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 our Catchment Data Explorer tool and explains the current ecological status of each waterbody and the reasons for not</p>	<p>Baseline data has been updated to include information on Barnet's watercourses and water quality</p>	<p>Noted</p>

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 find out what projects/schemes are in the pipeline if any.

	<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, enhancing the ecology, eradicating invasive species and naturalising the rivers. The investigations that have led to the</p>		
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

	<p>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>		
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

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

#### Introduction

- 3.42. This section summarises the findings from the various assessments and should be read in conjunction with the full assessment reports in the accompanying appendices.

#### Local Plan Vision and objectives (B1)

- 3.43. Barnet’s draft Local Plan contains the following vision:

*“By 2036 Barnet has successfully demonstrated the benefits that well planned growth can deliver. 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 green and open spaces Barnet continues to be a place where people choose to make their home. Responsive and adaptable, Barnet’s town centres 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 reach all Barnet residents, enabling them 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”.*

- 3.44. 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.
- 3.45. The vision is supported by series of key objectives which are outlined in section 2 of this IIA report and a spatial strategy under policy GSS01. Table 9 outlines a high-level assessment of the Local Plan objectives and specifically identifies those IIA objectives that will be supported.

Table 9: Local Plan Objectives assessment

Theme and objectives	Implemented through:	Supports the following IIA objectives
<p><b>A Growing Borough</b></p> <ul style="list-style-type: none"> <li>• A growing borough;</li> <li>• To meet social infrastructure needs</li> <li>• To deliver an environmentally sustainable Borough</li> </ul>	<ul style="list-style-type: none"> <li>• Delivering a minimum of 46,000 new homes and ensuring housing contributes to the creation of socially balanced and inclusive communities by offering housing choice that is genuinely affordable and</li> </ul>	<p>SA objectives 1, 2, 4, 5, 7,8, 9</p>

	<p>meets other housing needs (policy HOU01 – HOU07).</p> <ul style="list-style-type: none"> <li>• Directing growth to the most sustainable locations in accordance with the Local Plans suite of strategic policies GSS01 – GSS13.</li> <li>• Securing the timely provision of infrastructure to meet current and future requirements.</li> <li>• Protecting a range of land uses, including a wide range of employment spaces, retail use and community facilities to support a mixed-use Borough.</li> <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 GSS13</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> <li>• Ensuring the appropriate locations for tall buildings across the Borough</li> </ul>	
<p><b>A connected Borough</b></p> <ul style="list-style-type: none"> <li>• To improve orbital connectivity and sustainable travel options including cycling and walking</li> <li>• To improve access to, and enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting transport infrastructure schemes such as the West London Orbital and Crossrail 2 at New Southgate Station as well as schemes outlined in policy TRC02.</li> <li>• Supporting improved provision to green infrastructure within the Borough and creating more active environments.</li> </ul>	<p>SA objectives 2, 4, 8, &amp; 9</p>

<p><b>An entrepreneurial borough</b></p> <ul style="list-style-type: none"> <li>To make Barnet a place of economic growth and prosperity</li> </ul>	<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> </ul>	<p>SA objectives 7</p>
<p><b>A borough of thriving town centres</b></p> <ul style="list-style-type: none"> <li>To enhance the distinctive character and identity of Barnet’s town centres and suburbs</li> </ul>	<ul style="list-style-type: none"> <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>	<p>SA objectives 1, 4 &amp; 7</p>
<p><b>A great borough to live in and visit.</b></p> <ul style="list-style-type: none"> <li>To improve the quality and types of housing across the Borough in response to resident needs and demographic change</li> <li>To support strong and cohesive communities</li> <li>To promote healthy living and wellbeing</li> <li>To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime</li> </ul>	<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 CDH01 and CDH02).</li> <li>Encouraging the use of high quality design in suitable locations that meets national residential space standards</li> <li>Protecting and enhancing the Boroughs natural and heritage assets, which enhance local character and distinctiveness.</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 ECC02 and encouraging more active travel that moves away from private car travel.</li> <li>Maximising regeneration opportunities that supports inclusive communities</li> <li>Delivering healthy neighbourhoods that promote active and healthy lifestyles and enhances people’s overall health and well-being.</li> </ul>	<p>SA objectives 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12</p>

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

### Consideration of reasonable alternatives

The Local Plan must be in conformity with the NPPF and London Plan. This limits the potential to consider reasonable alternatives (also known as options) associated with the scale and location of housing and growth within the Borough.

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. It may necessary to consider these matters further down the line as the Local Plan progresses. However, at this stage, the reasonable alternatives considered to key aspects of the plan have been restricted.

Barnet's draft Local Plan (Reg 18) is the councils Preferred Approach with the preferred policy approach set out. Where there are realistic alternatives these are also set out with justification for the preferred approach, or reasons why it is considered that there are no realistic alternatives. These are summarised in **Appendix 8** (part 3 of IIA report).

## Summary of stage B3 – B5 of IIA process

### Sustainability Appraisal – thematic review of Local Plan policies

- 3.46. 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
- 3.47. 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.
- 3.48. A number of negative effects were identified, and primarily relate to the impacts that growth and development would have on infrastructure, Community infrastructure, 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 10: Summary of thematic policy review

Theme	Assessment summary
Growth and spatial strategy	<p>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).</p>
Housing	<p>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:</p> <ul style="list-style-type: none"> <li>▪ Investment in the built environment</li> <li>▪ A boost to the local economy through the construction of new homes</li> <li>▪ Widening housing choice will benefit a range of socioeconomic outcomes such as health, accessibility to services, educational outcomes and improved employment opportunities.</li> </ul> <p>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.</p>
Character, design and heritage	<p>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</p>

have potential adverse impacts on the character of certain areas within the borough and on heritage assets, however, these impacts should be mitigated through policies in this section and elsewhere within the Local Plan (e.g. policies 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 policies 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 and efficient use of land and infrastructure and social cohesion.

#### Community uses, health and well-being

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 policies 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.

#### Economy

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

	<p>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>
<p>Environment and climate change</p>	<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, 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 plan and/or the environmental benefits may outweigh potential adverse impacts.</p>
<p>Transport and communications</p>	<p>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.</p>

## Sustainability Appraisal – Site assessments

3.49. The Local Plan quantifies the projected level of growth and identifies the supply of sites needed to meet this growth. In total, 67 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

3.50. 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 11: Scoring system for the proposed sites.

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

3.51. In total, 67 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).

- 3.52. 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 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*'.
- 3.53. 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.
- 3.54. 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.
- 3.55. 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)**

- 3.56. 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.
- 3.57. 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.
- 3.58. 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.
- 3.59. 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.

- 3.60. 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.
- 3.61. 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.
- 3.62. 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.
- 3.63. 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)**

- 3.64. 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 Sites of Archaeological Significance. 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 sites of Archaeological Significance. 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.

- 3.65. 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>.
- 3.66. 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-criteria. 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.
- 3.67. 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.
- 3.68. 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.
- 3.69. 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.
- 3.70. 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 ECC02. 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

---

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

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.

- 3.71. 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**

- 3.72. 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.
- 3.73. 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”.

