

Add Logo

London Borough of Barnet

Local Plan Process Requirements Checklist

PAS Toolkit Part 4

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p>Growth will be directed into the most sustainable locations with good public transport and active travel. These include identified Growth Areas, Opportunity Areas and main town centres, along with places with capacity for change. Barnet's town centres will take a responsive and adaptable approach to recover from the COVID19 pandemic and thrive, providing sustainable locations for business, leisure and cultural activities. Benefits of growth and investment will be accessible and enable all to share in new social and community infrastructure and access a range of housing types and a thriving jobs market, while enjoying a safe, healthy and sustainable Borough.</p>
B	<p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p>	<p>Sustainability underpins the distribution of growth. Directing development to places with high levels of public transport access as well as proximity to existing town centre services, good growth can be achieved while minimising unsustainable transport and movement patterns. The sites and areas identified in the Local Plan are suitable for regeneration and renewal providing the opportunity to make much better use of brownfield land while protecting and enhancing the features such as green space, heritage and the overall family friendly environment that contribute to Barnet's character.</p>
C	<p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p>	<p>The main growth locations include Brent Cross, Colindale, New Southgate and Mill Hill East as well as main town centres at Burnt Oak, Chipping Barnet, Cricklewood, Edgware, Finchley Central, Golders Green and North Finchley.</p> <p><u>Brent Cross Opportunity Area</u> (GSS02) – Barnet's largest area of regeneration, designated as an Opportunity Area in the London Plan and referred to as a Growth Area in Barnet's Local Plan (Core 01). With comprehensive regeneration now underway Brent Cross will be the co-ordinated delivery of three Growth Areas at Brent Cross North, Brent Cross Town and Brent Cross West (Thameslink). Together as part of a comprehensive regeneration these 3 areas will deliver a new Metropolitan Town Centre providing a range of uses including new homes, a new commercial office quarter, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants and hotels supported by an extensive programme of infrastructure investment over the Plan period. Transport infrastructure investment includes a new rail station (Brent Cross West) on Thameslink line will be</p>

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>supported by a public transport interchange, a new bus station north of the North Circular Road as part of the expansion of Brent Cross Shopping Centre, improvements to pedestrian and cycle connections and routes, and a new rail freight facility to replace the existing Strategic Rail Freight Site.</p> <p><u>Colindale Opportunity Area (GSS06)</u> – in addition to new homes delivery the Council expects the following to be delivered: new Colindale Underground station with step-free access and sufficient gate-capacity for the growing population in the area; a new Local Centre at Colindale Gardens including nursery provision and health-care facilities; improvements to open spaces; improvements to key junctions and roads, including pedestrian and cycle linkages, together with an improved public realm, along Colindale Avenue; and ongoing improvements to bus services.</p> <p><u>New Southgate Opportunity Area (GSS01 and GSS09)</u> – the area around this overground rail station has significant potential for intensification which may be supported by, though is not dependent upon, progress of the Crossrail 2 project. The New Southgate area overlaps the neighbouring London boroughs of Enfield and Haringey and the Council will seek close cooperation with these authorities in producing a planning framework for the area.</p> <p><u>Brent Cross West Growth Area (GSS03)</u> – potential for residential led mixed use growth being realised in this corridor of land characterised by retail sheds and car parks, which is framed by the A5 and focused on the new Brent Cross West Thameslink station which is set to open in 2022. Public transport access to Staples Corner Strategic Industrial Location within LB Brent will be transformed by the new station, opening up opportunities for commercial intensification with housing delivery. LB Barnet will work with LB Brent on future planning frameworks for growth.</p> <p><u>Mill Hill East Growth Area (GSS07)</u> - within the context of a green suburban location this area is providing new homes and business opportunities with high quality community facilities, transport and access to open space.</p> <p><u>Cricklewood Growth Area (GSS04)</u> – town centre set to deliver 1,400 new homes, with the potential to increase further upon delivery of the West London Orbital; increased levels of workspace and pursue opportunities for new jobs; and appropriate floorspace for community, retail and commercial uses.</p> <p><u>Edgware Growth Area (GSS05)</u> – town centre where proposals must optimise residential density on suitable sites while delivering improvements to the amenity of the area. There must be improved leisure options such as a new cinema, swimming pool and new eating-out options; appropriate floorspace for community, retail and office uses;</p>

	KEY QUESTIONS	Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> <p>improved public realm, including new public spaces; and transformation of the relationship between the rail and bus stations and the wider town centre to improve the pedestrian experience and reduce congestion.</p> <p><u>Town centres</u> (GSS08) - proposals must optimise residential density within the context of district town centre; demonstrate suitable access to open space; make provision for community infrastructure; support sustainable travel; support active travel modes and the Healthy Streets Approach; and make a positive economic contribution.</p> <p><u>Major Public Transport Infrastructure</u> (GSS09) – proposals for housing, commercial and community growth to benefit from existing and improved public transport access at transport hubs, in particular the delivery of West London Orbital, which is not expected before 2029.</p> <p><u>Estate Renewal and Infill</u> (GSS10) – proposals focused on 6 housing estates, reflecting long term programmes of regeneration to tackle poor quality housing and social isolation, working with residents. Schemes more focused on infill, making better use of underused land and improving amenity, rather than comprehensive renewal.</p> <p><u>Major Thoroughfares</u> (GSS11) – managing growth along the Borough’s main road corridors, helping to revitalise corridors as more pleasant places for living in accordance with the Healthy Streets Approach ensuring that they relate to surrounding context.</p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Local Plan (Core 01) through its vision, themes and 12 key objectives together with policy framework of 52 policies clearly articulates the strategy for managing sustainable growth, setting out where and how development will be delivered. The relationship of key objectives established to deliver the Vision, Local Plan Chapters and most relevant policies is set out in Table 2. It is positively prepared, aiming to meet objectively assessed housing and employment needs. The Plan is well structured, clearly setting out the places where growth will be directed to within a suite of 13 Growth and Spatial Strategy policies. Local Plan policies seek to direct growth to the most sustainable locations in the Borough and to places where there are sites available for a sufficient quantum of delivery. Policy BSS01 introduces the Plan by setting out the Spatial Strategy while Policy GSS01 establishes how Barnet will deliver sustainable growth. The policies to this effect</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>have been assessed throughout the Plan process via the Integrated Impact Assessment, an iterative process, intended to draw out the most sustainable policy outcomes.</p>				
		<p>Implications of taking no further action: The Plan, in its current form, is seen as sound.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: The Plan seeks to positively address the significant challenges and opportunities to provide for good growth and the strategic policies of the London Plan. It focuses development in areas which have or have the potential to have good public transport and currently lower efficiency land use and seeks to intensify them on a scale that provides the potential to create sustainable communities with appropriate levels of supporting infrastructure.</p>				
2.	<p>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The new Local Plan (Core 01) sets out in Growth and Spatial Strategy Chapter where the growth will take place and provides the number of housing units expected. This information is summarised in Table 5, while further detail of how these figures will be achieved is set out in policies GSS01 to GSS12. Annex 1 Schedule of Site Proposals sets out specific sites and details including site requirements and indicative figures for delivery, the calculation methodology for which is also set out in this section.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The assessment of capacity has been largely based on standard methodologies together with information provided by site owners/ developers. Indicative capacities within proposals are high level desk top assessments that will be firmed up by further design and masterplanning work as proposals transition to planning applications.</p>				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	<p>clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	<p>Reason for score: Para 0.0.21 of the London Plan 2021 (Core_Gen_16) sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this para: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies. As stated in para 4.1.11 of the London Plan, in terms of a target beyond 2028/29, boroughs should draw on the 2017 SHLAA (EB_H_02) findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward. Growth and Spatial Strategy Chapter of the new Local Plan (Core_01), section 4.4, details Barnet's housing growth requirements. The evidence for establishing housing growth is presented and assessed. The housing target used is that set out in the London Plan (2021). This approach was endorsed during an Inspector's informal advisory visit and discussion in April 2021. The supply of housing demonstrated through the Local Plan (46,000 homes) provides a sufficient buffer against the requirement of 35,460 new homes.</p>				
		<p>Implications of taking no further action: The new Local Plan is required to demonstrate how the Council will meet its housing target requirements.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The Council is confident that the policy framework within the Local Plan will help it exceed its housing requirement as set out in the London Plan and plan for good growth.</p>				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The new Local Plan (Core_01) is supported by a Green Belt and Metropolitan Open Land Study (EB_GI_16Pt1 & EB_GI_16Pt2). The Study assessed existing Green Belt land in relation to the five purposes of the Green Belt designation set out in the National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG), with a view to identifying pockets of land which perform relatively poorly in Green Belt terms. The openness of MOL, with a view to identifying pockets of land which have a lack of openness. The accuracy and robustness of the existing Green Belt and MOL boundaries, as they appear on the Council's local data layer, recommending appropriate minor realignments along alternative permanent and readily recognisable physical features. The potential for the designation of new areas of Green Belt and MOL. The potential to build on the work of the GLA's All London Green Grid and related work within the Borough to enhance Barnet's Green Belt and MOL.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>The Study concluded that the vast majority of the Green Belt within Barnet continues to serve its purposes very well, safeguarding the identity of Barnet and Greater London by maintaining the openness of the Green Belt. However, there are several pockets of Green Belt adjacent to the existing urban edges which make a weak or relatively weak contribution to the majority of the Green Belt purposes.</p> <p>There are also several potential minor boundary adjustments which could be made to the existing Green Belt boundary GIS data layer to correct digitisation errors and realign boundaries along more permanent readily recognisable features. Similarly the Study found that the vast majority of MOL within Barnet is open, helping to maintain and protect the functions, Green Links and features they contain, as well as the physical structure of London. A significant proportion of the MOL within the Borough contains buildings and structures which compromise openness to varying degrees. However, the majority are of a relatively small scale and have a use which supports the use of the MOL as open space. As with Green Belt there are several potential minor boundary adjustments which could be made to the existing MOL boundary GIS data layer, to correct digitisation errors and realign boundaries along more permanent readily recognisable features. These minor adjustments to Green Belt and MOL boundaries are reflected in the Changes to the Policies Map (Core_05). The Plan does not require the release any Green Belt to meet its growth needs during the Plan Period.</p>				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		<p>Reviewer Comments: One of the purposes of the Barnet Green Belt Study (EB_GI_16 Pt1 & EB_GI_16 Pt2) was to identify mapping irregularities with regard to land designated as Green Belt / MOL. This helps create strong defensible boundaries and ensures consistency with NPPF guidance on defining boundaries. Minor adjustments have been made to Green Belt and MOL boundaries where inconsistencies and errors have been identified. The majority of these are mapping errors and historical anomalies where the boundary did not match existing property or road boundaries.</p>				
5.	<p>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Annex 1 Schedule of Site Proposals (Core_01) sets out specific sites and provides details of the site selection process. This included an extensive period of information gathering through four rounds of calls for sites, and a process of filtering on the basis of planning policy and environmental restrictions. Sites yet to be delivered, but are distinctly deliverable in planning terms, from previous planning frameworks including area action plans, SPDs and</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		town centre frameworks. The London Plan SHLAA 2017 (EB_H_02) went through a rigorous Call for Sites process, which identified sites in collaboration with the boroughs, landowners, and stakeholders using a consistent approach. Barnet took part in the London-wide strategic housing land availability assessment in 2017. Sites excluded during the process are set out and explained in the Local Plan Site Selection Background Document (2019) (Core_Gen_07). All sites selected were subject to sustainability appraisal which forms part of the Integrated Impact Assessment (Core_Gen_25_Pt1 Core_Gen_25_Pt2 & Core_Gen_25_Pt3) The Local Plan Viability Assessment (Core_Gen_01) has found policies to be viable. In exceptional circumstances where site-specific issues come up, further viability assessments at application stage may allow for flexibility on policy requirements.				
		Implications of taking no further action: The Schedule of Site Proposals supports and demonstrates delivery of the new Local Plan's growth requirements. Justification for inclusion of each site is provided within the Schedule.				
		Mitigation / Action required (if necessary) to move scale to right: Provide a full justification for the inclusion of sites during the examination process.				
		Reviewer Comments: The Council intended to produce a Sites Allocations DPD following the adoption of the Core Strategy and Development Management Policies documents in 2012. Information gathering for the Sites Allocations DPD included three rounds of calls for sites in 2009, 2010 and 2015. This information together with the extensive round of call for sites in 2017/18 has helped identify new site proposals. The Sustainability Appraisal of the sites, contained in the IIA (Core_Gen_02_pt1 Core_Gen_02_pt2 & Core_Gen_02_pt3), shows a consistent and justified approach to allocation.				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Barnet has only one designated neighbourhood area (West Finchley, recently adopted in 2021) (Core_Gen_30); it does not have a designated housing requirement. No other designated Neighbourhood Forums exist in the Borough. The Council considers that strategic borough wide policies provide a sufficient positive framework for ensuring that neighbourhood areas support the delivery of homes.				
		Implications of taking no further action: The approach is considered proportionate.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The West Finchley Neighbourhood Plan has not sought to increase nor limit housing delivery.				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Each site proposal (outlined in Annex 1 of the Plan (Core_01)) sets out - existing use; proposed use; indicative capacity; timeframe for delivery; site address; ward, size; site description and context; site source; ownership; 2019 and 2031 PTAL; planning considerations; relevant planning applications; planning designations; applicable Local Plan policies; site requirements and development guidelines as well as justification. Combined, these sections provide some flexibility along with prescriptive detail on what the Council would like to see delivered. The design principles and planning considerations helps prospective developers understand which matters require specific attention on site. The proposed use, indicative capacity, site requirements, development guidelines and delivery timeframes outline what is required to bring the site forward sustainably. Where the proposal forms part of a Growth Area, Town Centre, Major Thoroughfare, Transport Infrastructure, Estate Renewal or SPD area this is clearly indicated.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Proposals vary in scale and delivery timetable. For some of the larger, more long-term ones, the broad principles are set out, providing a platform for masterplanning with design solutions that respond in greater detail to the site.				
D	What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period? List these targets and the evidence source for this 'need' target?	A key objective of the Local Plan is to make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery. Policy BSS01 sets out non residential growth for an additional 67,000m2 of office floorspace. This is on top of the Brent Cross outline planning consent from 2010 for 395,000 m2 (net) of office space and 56,600m2 (net) retail at the enhanced Brent Cross Shopping Centre which will be integrated into a new Metropolitan Town Centre. Elsewhere in the Borough, up to 67,000m2 of office floorspace will be distributed across Barnet's town centres. This figure is from the 2017 Employment Land Review (EB_E_04). No other floorspace targets are set in the Local Plan. GSS01 sets out that employment growth between 2021 and 2036 will create more than 27,000 new jobs, largely within the Brent Cross Growth Area with the implementation of the 2010 outline consent. This figure of 27,000 new jobs is taken from the Council's Annual Regeneration Report (Core_Gen_22) and breaks down as 25,000 new jobs from Brent Cross and 2,000 from the Colindale and Mill Hill Growth Areas.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: COVID19 has greatly impacted the economy with the full long-term effects upon business and employment, remaining relatively unknown almost 2 years after the outbreak of the pandemic. The Government's response to COVID19 is reflected in changes to the Use Classes Order in 2020 and the General Permitted Development Order in 2021 The introduction of Use Class E for commercial uses as a replacement for A1 retail and B1 office reduces the remit of the Plan to set targets for new retail and office provision. The quantum of development is set out in Policy GSS01 with more detailed policies in Growth and Spatial Strategy Chapter providing further evidence of how growth will be delivered. Barnet has several major regeneration locations. Brent Cross has extant outline permission for a high quantum of housing and will provide the majority of the growth in jobs and office space in the Borough. Colindale and Mill Hill East both have large existing permissions for development. The Schedule of Site Proposals identifies developable sites and provides an indicative figure for potential housing in each location.				
		Implications of taking no further action: Policies and targets have been impacted by the Government's planning reforms.				
		Mitigation / Action required (if necessary) to move scale to right: Further evidence on floorspace requirements for Use Class E - Commercial, Business and Service Uses as well as a more robust indication of the impact of e-tailing (online shopping) and m-tailing (mobile app shopping) on Barnet's town centres.				
Reviewer Comments: The evidence base on this matter is mixed in terms of identified needs/ deliverability particularly in response to COVID19 and planning reforms in 2020 and 2021. The Local Plan (Core 01) has responded to the Government's fundamental review of the Use Classes Order in 2020 which introduced Use Class E – Commercial, Business and Service Uses. Use Class E is intended to allow greater flexibility to change between commercial, business and service uses. It will therefore have an impact on the Council's ability to manage and safeguard commercial uses in Barnet's town centres and employment areas. Further planning reforms through the General Permitted Development Order in 2021 have widened permitted development, allowing conversion from Use Class E to residential. The Government's encouragement of permissiveness presents a significant challenge for enabling existing businesses to be resilient and ensure that Barnet remains a great place to start and grow a business. In addition, the impact of the departure from the European Union on Barnet's economy will have to be considered in planning the future of the Borough.						

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Key infrastructure requirements are identified in the Growth and Spatial Strategy Chapter (Core 01). These include Brent Cross West Station with public transport interchange, West London Orbital Rail link and station improvements, Crossrail 2, new Colindale Underground Station and 3 new destination hubs for sport and recreation at Barnet and King George V Playing Fields, Cophall Playing Fields / Sunny Hill Park and West Hendon Playing Fields. An Infrastructure Delivery Plan (IDP) (2021) (Core Gen 19) has been prepared alongside the new Local Plan to support the planned growth. The IDP is a 'living' document that provides information that is necessary to support the growth needs of the Borough. The document provides the current position with regards existing infrastructure and the quantum, type and location of infrastructure provision that needs to be provided in the future in order to accommodate the levels of growth envisaged over the local plan period. A summary table is provided for each relevant infrastructure section detailing the specific projects required, who will be delivering them and when; also, where known, indicative capital costs of the provision of this infrastructure and potential sources of funding, together with identification of any unmet funding gaps. The IDP has identified a need for £1.2 billion of new or improvements to existing infrastructure in Barnet.</p>				
		<p>Implications of taking no further action: The IDP is a living document that records infrastructure need and keeps track on progress and delivery of infrastructure projects.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
<p>Reviewer Comments:</p> <p>The Council is reviewing its CIL Charging Schedule (CS106 02 & CS106 03) in advance of the Local Plan. This will help ensure developments pay an appropriate contribution towards infrastructure through CIL and to secure more funding for infrastructure to deliver the key objectives of the Local Plan. If all of the development set out in the Local Plan is delivered then it is estimated that the new CIL Charging Schedule (CS106 03) will bring in around £0.5 billion against a need for £1.2 billion. This leaves a funding gap requiring other sources of supply. The Council publishes an Infrastructure Funding Statement each year (CS106 04). This sets out for the previous financial year details of CIL and s106 contributions collected and how they are used.</p>						
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
10.	<p>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Infrastructure Delivery Plan (IDP) (2021) (Core Gen 19) has been prepared alongside the new Local Plan (Core 01) and covers a wide range of infrastructure types, categorised as physical, social and green infrastructure. The document provides the current position with regards existing infrastructure and the quantum, type and location of infrastructure provision that needs to be provided in order to accommodate the levels of growth envisaged over the local plan period. A summary table is provided for each relevant infrastructure section detailing the specific projects required, who will be delivering them and when; also, where known, indicative capital costs of the provision of this infrastructure and potential sources of funding, together with identification of any unmet funding gaps.</p> <p>The Barnet Long Term Transport Strategy (EB T 04) provides sets out a vision and objectives for transport in Barnet and a roadmap for achieving this vision. It provides an investment plan for the Borough with suggested projects to support this listed in the Transport Strategy. The Local Plan, Growth Strategy (Core Gen 18) and other council policies / strategies provide the Council with detail to determine the infrastructure required. Contributions will be sought from developers to enhance public transport provision in growth areas. Transport projects that have been identified in the draft Local Plan are: new rail station at Brent Cross West; new bus station at Brent Cross; new underground station and enhanced public transport interchange at Colindale; new passenger rail line - the West London Orbital Line together with upgrades to existing stations on the line; Crossrail 2 at New Southgate; new bus stopping arrangements in North Finchley to allow for redevelopment of the bus station for commercial uses. The Council will also seek additional funding from TfL / Network Rail / Highways England and central government.</p>				
		<p>Implications of taking no further action: In order to unlock and deliver growth in the Borough, transport and other infrastructure is a vital component.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: If all of the development set out in the Local Plan is delivered then it is estimated that the new CIL Charging Schedule (CS106 03) will bring in around £0.5 billion against a need for £1.2 billion. The Council will have to bridge this gap with funding from other infrastructure providers as well as its own income streams.</p>				
Process and Outcomes (see also Toolkit Parts 2 and 3)						

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	<p>The following issues are being addressed in Statements of Common Ground with neighbouring authorities: housing targets; tall buildings and protected views; Growth and Opportunity Areas; town centres; flood risk and water management; air quality; Gypsy and Travellers; strategic infrastructure; Green Belt and biodiversity</p> <p>Other strategic issues which are being addressed with strategic stakeholders are:</p> <ul style="list-style-type: none"> - TfL Spatial Planning (EB_SOCG_): Sustainable Growth and Growth Areas, transport infrastructure, car parking. - TfL Commercial Development (EB_SOCG_): Growth Areas, Town Centres, Tall Buildings, site proposals. - Natural England (EB_SOCG_): climate change, green infrastructure and biodiversity. - Environment Agency (EB_SOCG_): Growth Areas, tall buildings, biodiversity, flood risk, and site proposals. - Historic England (EB_SOCG_): Tall Buildings, Barnet's heritage, climate change mitigation and site proposals. 				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council has engaged consistently with neighbouring Boroughs, the GLA, TfL and statutory bodies during the development of the draft Barnet Local Plan (Core 01). Each of the listed issues has been addressed in our suite of SOCG documents (EB_SOCG_): and supported through cross referencing in the Duty to Cooperate Statement (Core Gen 05). The bodies have been listed, and separate statements produced specifically for key strategic partners. The SOCG for neighbouring boroughs and the GLA clearly lists where agreement/ disagreement is held, and seeks the sign off from signatories to confirm outlined stances. Each statement states the known position of the organisation, and how the Council is working to address this</p>				
		<p>Implications of taking no further action: Inevitably there are still some matters that will require resolution throughout the examination process and beyond. The Council will seek to resolve issues such as flood risk (with Environment Agency) and tall buildings (with Historic England) through Statements of Common Ground</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Sign-off of Statements of Common Ground with neighbouring authorities and strategic stakeholders.</p>				
		<p>Reviewer Comments: The Council has actively engaged with stakeholders and neighbouring boroughs on an on-going basis and for the most part there are no substantive areas on which there are disagreements.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>Following the publication of the Reg 19 in June 2021 for public consultation the revised NPPF was issued in July 2021. The Council will be updating references to the NPPF as proposed minor modifications at EIP stage.</p> <p>The Government published a Ministerial Statement on May 24th 2021 which set out its plans for the delivery of First Homes as an element of affordable housing, defining the product and changes to planning policy. The Council are considering the deliverability and affordability of First Homes for the Borough, taking into account market values, the discount needed to meet national and Mayoral criteria, and local incomes.</p> <p>The Council in Policy ECC02A is seeking Flood Risk Assessments (FRAs) for sites within 1% AEP (Annual Exceedance Probability) plus 70% climate change fluvial flood extent and/or the 0.1% AEP RoFSW (Risk of Flooding from Surface Water) flood extent. This was a flood risk management option proposed by the Level 2 SFRA for Barnet (EB GI 19 pt1 EB GI 19 Pt2 & EB GI 19 pt3). This goes beyond the current requirements of the Environment Agency (EA). However the EA are supportive of this policy intervention as it acknowledges the potential impact that climate change could have on Barnet and would also ensure windfall sites would be subject to FRAs if development was proposed in these areas. Barnet is working with the EA to ensure that Policy ECC02A can be implemented without increasing the workload of the EA.</p>				
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council has received a response from the Mayor of London to the Draft Local Plan Reg 19 consultation that acknowledges that the Plan is in general conformity with the London Plan. As expressed in (EB SOCG XX) TfL agree that LBB's parking standards are in conformity with the London Plan 2021. TfL SP have, however, expressed concerns that some of the accompanying policy text and site allocations need revision to better reflect the London Plan's (Core Gen 16) approach to parking. In particular, references to parking 'requirements' or 'needs' should be further qualified and related only to disabled persons parking and operational parking. Although noting that reliance on assessing orbital travel has been modified slightly, TfL SP still have concerns about using a connectivity measure that could be open to challenge or used inappropriately. TfL SP would like to see the need to measure orbital travel when considering parking requirements removed from the Local Plan.</p>				
		<p>Implications of taking no further action: The Council will continue to liaise with the GLA including TfL Spatial Planning to ensure continued general conformity and good working relationships.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments: The Council welcomes the Mayor's positive response on Barnet's Local Plan and continues to have ongoing dialogue with TfL.				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan (Core_01) will replace the existing Local Plan (the Core Strategy (Core_Gen_14) and Development Management Policies (Core_Gen_15) DPDs). Area Action Plans for Colindale (Core_Gen_11) and Mill Hill East (Core_Gen_10) will remain as will the North London Waste Plan (expected to be adopted in early 2022) (Core_Gen_09). The structure of Barnet's Development Plan is set out in Figure 1 of the Local Plan, while Appendix C sets out the replacement of Local Plan policies.				
		Local Plan is aligned with the aims of the Barnet Plan (Corporate) 2021 (Core_Gen_17). It has also been positively produced in conjunction with a number of other associated evidence base documents produced by other service providers within the Council, such as the Growth Strategy (Core_Gen_18), Long Term Transport Strategy (EB_T_04), Children and Young People's Plan (EB_S_07) and the emerging Sustainability Strategy (EB_GI_20). The relationship of the Local Plan to Council Strategies is set out in Figure 2.				
		The Local Plan provides a strategic framework to guide future neighbourhood plans. Section 1.6 clarifies the position on neighbourhood plans. The Plan makes reference to the West Finchley Neighbourhood Plan (Core_Gen_30) which was adopted in October 2021.				
		Implications of taking no further action: As the spatial expression of corporate strategies it is vital that a positive and continuous relationship is maintained in order for the Plan and planning to inform as well as correctly interpret corporate objectives.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments: From the outset in developing the Council's Local Plan there has been a significant amount of engagement internally within the Council, working together to shape a vision for Barnet and agree the key objectives for delivering it. This includes working closely with the cross-party Local Plan Members Advisory Group which serves as a sounding board for feeding general and specific, locally-based opinions and views from residents' forums, into the preparation of the Local Plan. Five cross-cutting themes reflect the values of the vision. These are: a growing borough; a connected borough; an entrepreneurial borough; a borough of thriving town centres, and a great						

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>borough to live in and visit. These themes are reflected in the Growth Strategy (Core Gen 18) which sets out where the Council will focus its interventions to support delivery of development and regeneration. The Growth Strategy Delivery Plan will be the platform which will set out the key projects where the Council will direct its future investment. Acting as an influencer the Local Plan has helped shape the Long Term Transport Strategy (EB T 04) and emerging Sustainability Strategy (EB GI 20). And the Local Plan has been influenced by strategies such as the Children and Young People's Plan 2019 -2023 (EB S 07) and its vision for Barnet to be 'the most Family Friendly borough in London.</p>				
14.	<p>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: A robust assessment of how the Council has complied with the requirements of the Statement of Community Involvement and its COVID-19 Addendum (Core Gen 03 & Core Gen 04) is set out in the Reg 22 Consultation Statement (Core 09) .</p>				
		<p>Implications of taking no further action: At various stages of its production, the Local Plan has gone beyond the requirements as outlined within the SCI.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
<p>Reviewer Comments: There has been significant engagement on the Local Plan (Core 01). The Local Plan Reg 18 Preferred Approach (Core 07) was subject to extensive public consultation in early 2020, prior to the COVID19 national lockdown. This provided the opportunity for interested parties and statutory consultees to be involved at an early stage. Engagement activities included 30 face to face events reaching an estimated audience of 800 persons. As well as six public events on the Reg 18 a range of groups were reached through presentations to the Health and Wellbeing Board, Safer Communities Partnership and Children and Young People Board as well as Barnet School Governors, Barnet Youth Board, Barnet Age UK, MENCAP Barnet, Barnet Multi-Faith Forum, Federation of Small Businesses, Job Centre Plus, CommUNITY Barnet, Professional and Young Peoples Forum. The Local Plan Reg 19 (Core 01) was subject to extensive public consultation during the summer of 2021. Boroughwide engagement events were held online with regular outputs on social media to publicise the Plan and the opportunity to make comments on it. The Council's 'Engage Barnet' was also used as an engagement tool to help explain how to get involved at the more focused Reg 19 stage consultation. A short animated video explaining the Local Plan was also produced as part of the Reg 19 publicity. Reg 19 consultation generated around 800 representations from 150 individual representors including statutory agencies, neighbouring boroughs, developers and landowners. Both Barnet Labour and Liberal</p>						

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Democrat groups submitted responses. There has been a good response across the Borough from residents' associations, amenity societies, community and environmental groups as well as individual residents.				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This has been addressed within the Integrated Impact Assessment (IIA) (Core Gen 02 pt1 , Core Gen 02 pt2 & Core Gen 02 pt3) which combined Sustainability Assessment (SA), Equalities Impact Assessment and Health Impact Assessment. The Sustainability Appraisal assesses policies and proposals against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. Stage B of the SA looked at developing the Local Plan options including consideration of reasonable alternatives as well as evaluating the likely effects of the Local Plan and Alternatives. As part of the Draft Local Plan preferred approach (Reg 18) (Core 07), a preferred policy approach was set out. Where reasonable alternatives existed, these were also considered with justification for the preferred approach, or reasons why it was considered that there were no reasonable alternatives. All policies at Reg 18 had at least one alternative option presented within the IIA (Core Gen 25 Pt1 , Core Gen 25 Pt2 & Core Gen 25 Pt3).				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Council used realistic alternatives in the Reg 18 Local Plan and set out the justification for the preferred approach. In several policies the only realistic alternative was to have no policy. It was clear that reasonable alternatives were considered. As such it considered that the IIA has been used as a positive tool to shape/ be integrated into the Plan and improve its outcomes.				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The SA is an integral part of the Integrated Impact Assessment (IIA) (Core Gen 02 pt1 , Core Gen 02 pt2 & Core Gen 02 pt3). Each policy and proposal having been addressed against a range of criteria. The established criteria and associated metrics were drawn up in collaboration with stakeholders, including Historic England and the Environment Agency. This has facilitated their effective assessment, enabling the Council to identify the most sustainable policy solutions.				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The SA as part of an iterative process has advised on ways in which any adverse effects from policies or proposals could be avoided, reduced or mitigated, or how any positive effects could be maximised.				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The SA as part of the IIA (Core Gen 02 pt1 Core Gen 02 pt2 & Core Gen 02 pt3) demonstrates how policies have been assessed, and how this has influenced which policies have been chosen for the final document. This is an iterative process, which has been followed throughout the evolution of the Plan, with comments on how the resulting favoured policies have been reached.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: 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 (Core 01) also places an emphasis on a healthy and inclusive Borough and the provision of open spaces were also considered to be positive. 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. Policies and proposals have been revised between Reg 18 and Reg 19 stages to mitigate these impacts.				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The EqIA forms another component of the IIA (Core Gen 02 pt1 Core Gen 02 pt2 & Core Gen 02 pt3) appearing in Part 3. It clearly sets out how each policy has been assessed. EqIA identified that many of the policies would have a positive effect across equalities groups particularly those which relate to housing (e.g. 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				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>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.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: As with the SA, the EqIA is an iterative process followed through the production of the Plan, providing comments as to how the policies have been reached through the consideration of protected characteristics. In terms of potential negative impacts identified by the EqIA revisions have been made to the Local Plan between Reg 18 and Reg 19 stages to mitigate them.</p> <p>In addition to the EqIA the Council has produced a Health Impact Assessment (HIA) – (included as Part 3 of the IIA) (Core Gen 02 pt1 Core Gen 02 pt2 & Core Gen 02 pt3) to assess the potential impacts (positive and negative) of the draft Local Plan (Core 01) on the health and wellbeing of the population and the distribution of these impacts within the population. The approach is considered good practice for policy development as the impacts of living environments on population health and wellbeing are increasingly recognised. The aim of the HIA is to maximise positive health impacts while minimising the negative health impacts of the proposed policy and address inequalities. The HIA concluded that the Draft Local Plan has the potential to make a positive net contribution to the improvement of health and wellbeing as well as the delivery of the Barnet Health and Wellbeing Strategy (EB S 11). This is especially true for the two priorities – ‘Encouraging residents to lead active and healthy lifestyles and maintain their mental wellbeing’ and ‘Creating a healthy environment’. In order to maximise health benefits the Local Plan has been revised to require health impact assessments (HIAs) where planning proposals carry a higher risk of contributing to health harms.</p>				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council has carried out a Stage 1 (Screening Report) Habitats Regulations Assessment (HRA) of the Local Plan. The HRA is in Part 3 of the IIA (Core Gen 02 pt1 Core Gen 02 pt2 & Core Gen 02 pt3). The HRA has considered the local plan policies in conjunction with other connected plans/ projects where relevant. The EU Habitats Directive (transposed into English law) provides for the legal protection of habitats and species of European Importance and establishes the EU wide Natura 2000 ecological network of protected sites. Four European Sites at Lee Valley, Epping Forest, Richmond Park and Wimbledon Common are identified within 15km of Barnet’s</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		boundaries None of the European sites are adjacent to or within the Borough with the nearest one located 11km away (Lee Valley Special Protection Area (SPA)) (all are approximately 30+ minutes by car from the centre of the Borough). Natural England were consulted and have confirmed that they are satisfied with the conclusion.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The HRA Screening Report took a precautionary approach in screening potential impacts from the Local Plan. Barnet's population growth could have indirect impacts on the four European sites. These potential indirect impacts are increased recreational demand, increased demand on water resources and decreases in air quality. Impacts have not been considered significant by the HRA and there are a number of alternative, closer by open spaces available to residents.				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Local Plan (Core 01) policies have been screened, and a 'finding of no significant effect report' has been produced. Therefore, there is no requirement for HRA stage 2, appropriate assessment.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The results of the HRA Screening Report are clear. Natural England have confirmed that they are satisfied with the conclusion.				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The HRA concluded that a comprehensive assessment of the plans potential impacts was not required, and therefore did not impact upon the direction of the preferred policies.				
		Implications of taking no further action: N/A				
Mitigation / Action required (if necessary) to move scale to right: N/A						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments: N/A				
Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan (Core 01) housing target was lowered between Reg 18 (Core 07), and Reg 19 (Core 01) from 46,000 new homes (3,060 per annum) by 2036 to 35,460 new homes (2,364 per annum). The 46,000 target (3,060 per annum) in the Reg 18 matched the Full Objectively Assessed Need (OAN) for housing in Barnet as identified by the Barnet SHMA (EB H 05). It also largely reflected the draft London Plan target (Dec. 2017) of 47,000 (3,134 per annum). Following EIP the London Plan housing target was reduced. The London Plan (published in March 2021) (Core Gen 16) sets a target figure for Barnet of 23,640 net housing completions for the ten year period up until 2028/29. The Council identified this as a minimum target in the Reg 19. The policies and proposals in the Reg 18 Local Plan have been carried forward into the Reg 19. There has been no strategic change to the planning framework within the Local Plan. Barnet therefore proposes to meet the London Plan target of 35,460 new homes over the Plan Period up to 2036, while providing a supply of sites for up to 46,000 new homes. Table 5 of the Local Plan sets out new homes delivery, where and when the 46,000 homes will be delivered.				
		Implications of taking no further action for local plan soundness and/or effectiveness: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Para 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this para: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies. As stated in para 4.1.11 of the London Plan, in terms of a target beyond 2028/29, boroughs should draw on the 2017 SHLAA (EB H 02) findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
G	Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.	No, see the Statements of Common Ground with regards to Hertsmere Borough and neighbouring London boroughs.				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No formal requests received.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments: N/A						
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Table 5 of the Local Plan (Core 01), which is supported by the Housing Trajectory (Figure 3), sets out the phasing of new homes delivery in the 15 years of the Local Plan. Phase 1 – 14,250, Phase 2 – 18,600, Phase 3 –13,150. The Trajectory reflects more certainty in the short to medium term due to the sites that are known to be likely to be available, and therefore we can have more confidence in the sites, which can come forward. In the intervening period more sites are likely to be identified before the end of the Plan period due to windfalls, where sites currently in existing alternative uses come forward for variety of reasons.				
Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?						

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The strategy for delivery is clearly articulated within policies BSS01 (which sets out spatial strategy and housing target) and GSS01 (which sets out the locations and sources for housing growth). The importance of the Housing Trajectory is set out in the supporting text for GSS01</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
		<p>Reviewer Comments: The strategy reflects delivery levels that have been consulted upon and have had the input of land owners and developers. A key element of delivery is market appetite. As most development is private sector led or will seek to provide for a significant amount of private sector need, it is highly dependent on the economic cycle and access to finance. If this drops significantly, then there is a risk of delivery being affected, unless the state can intervene to replace the demand/ financial certainty. The Council's approach on improving delivery is set out in the Housing Delivery Action Plan (EB H 10).</p>				
25.	<p>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: a) Specific deliverable sites identified which pertains to a full 5 year housing land supply on adoption of the plan. b) Beyond the initial 5 year period there are additional sites providing significant supply going forward for the remainder of the plan period as identified above. c) In terms of the Housing Delivery Test the Council has been required to produce a Housing Delivery Action Plan rather than a 20% buffer. The Trajectory has a greater than 5% buffer for the first 10 years, which gives greater confidence that sites should be available to deliver, subject to the market being able to support sustained delivery. Implications of taking</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The Council has included a buffer in the Housing Trajectory</p>				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
26.	Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: London Plan (Core Gen 16) figures are based on capacity rather than need. The Council has revised its housing requirement to match that of the adopted London Plan (35,460), but has kept the supply as at present (closer to 46,000). This provides a very healthy supply and much greater flexibility if, for example some sites fail to deliver or deliver more slowly than expected and this would also be advantageous in terms of 5 year housing land supply and the housing delivery target.				
		Implications of taking no further action: There is a need to monitor delivery in the early years of the Plan to gauge delivery above identified sources of capacity in the Local Plan. This may improve identification of development opportunities.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: This approach was advised at the Planning Inspectorate Advisory Visit in April 2021 (Core Gen 26).				
27.	Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Table 5 in the Local Plan (Core 01) shows that the minimum housing target of 35,460 is deliverable. The Council considers that it is less reliant on windfall as the Plan can provide a supply which exceeds the minimum housing target by over 10,000 homes. This provides much greater flexibility.				
		Implications of taking no further action: Delivery may be underestimated in terms of small sites responding positively to introduction of Design Codes.				
		Mitigation / Action required (if necessary) to move scale to right: In order to gauge impact on housing delivery there is a need to monitor the Plan’s approach on small sites including the introduction and implementation of Design Codes through SPD.				
		Reviewer Comments: Housing delivery will be furthered as a consequence of the new planning policy framework provided by the Local Plan. Policies such as HOU06 - Meeting Other Housing Needs provides clarification on the Council’s approach to Build to Rent, a housing product that helps to widen housing choice and development opportunities in the Borough. Another example of a new policy that will boost windfall development is GSS12 –				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Redevelopment of Car Parks. This policy provides an opportunity for surface level car parks to be more efficiently and sustainably utilised while still serving a car parking function.				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There are specific policies on Affordable Housing (HOU01), Housing Mix (HOU02), Specialist Housing – Housing choice for people with social care and health support needs, Houses in Multiple Occupation, Student Accommodation and Purpose Built Shared Living Accommodation (HOU04) and Gypsies, Travellers and Travelling Showpeople (HOU07). Build to Rent and Self Build is covered by HOU06 – Meeting Other Housing Needs. As part of Barnet being the most family friendly place in London the Council, through policy on Residential Conversions and Redevelopment of Larger Homes (HOU03) the Council is seeking to manage the existing stock of family accommodation and conversions / redevelopment of larger homes does not have a detrimental impact on character and amenity. Through HOU05 it is also seeking to make Efficient Use of the Barnet’s Housing Stock protect homes from being lost to other uses without good reason and set out what is being done to bring vacant properties back into use as well as manage conversions to short-stay accommodation.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Council has sought to address these needs as best as it can, recognising that in some cases the planning mechanisms for delivery are subject to change/limited certainty, such as older peoples or specialised housing, or are at an early stage in their development, e.g. build to rent.				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan (Core 01) has a range of policies which seek to meet the specific needs of different communities within Barnet. This includes policy HOU04 which lists requirements for accommodation for people with support needs and other shared facilities or additional support. HOU04 seeks to deliver greater specialist housing and				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>provide choice for older people, people with disabilities and vulnerable people. Supporting healthy and independent lives while reducing the oversupply of residential care. HOU04 will deliver older persons housing and meet the associated London Plan target of 275 new specialist older persons homes per annum. The Council has responded to the growth of multi-adult households in Barnet. As well as HMOs this also includes the conventional housing stock through single people living together as a group and defined as a single household, and individuals with lodgers.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: The Council has sought to address these needs as best as it can, recognising that in some cases the mechanisms for delivery are subject to change/limited certainty, such as older peoples or specialised housing, or are at an early stage in their development, e.g. build to rent. The Plan seeks to provide opportunities to meet the housing needs of groups identified above where possible, but in some cases allows flexibility to not deliver where this would otherwise slow down delivery or render a development unviable.</p>				
30.	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Affordable Housing policy is applicable boroughwide with no variations. The London Plan (Core Gen 16) sets the strategic context for affordable housing for London Boroughs and allows for boroughs to address local circumstances. Barnet's Local Plan (Core 01) provides policies to cover these issues. Therefore the discretionary 40% for affordable housing tenure, as to be decided by London boroughs, has been split 60 /40 between low cost rent products including affordable rent and Intermediate products including London Living Rent and London Shared Ownership allocated to this. These requirements are set out within policy HOU01. Its ability to be provided along with other policy requirements within the plan has been drawn out within the viability assessment. The need for affordable housing in Barnet and across London is substantial. It is not feasible to meet this requirement over the plan period. National policy requires that affordable housing requirements be realistic, with particular regard to viability. In accordance with the new London Plan (Core Gen 16), and the Barnet Local Plan Viability Assessment (Core Gen 01), the final proposed requirements have been arrived at. This strikes a balance between ensuring viability and therefore delivery, and enabling a significant proportion of our affordable housing need to be met.</p>				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The response of the Council is considered proportionate, related to evidenced needs and viability impacts.				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
31.		<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p> <p>Reason for score: Barnet as part of the West London Alliance commissioned ORS consultants to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in 2018 (EB H 06) in accordance with the Government's Planning Policy for Traveller Sites (PPTS). The GTAA identifies no gypsies, travellers and travelling show people in Barnet and therefore no demand for pitches. Barnet have re-examined this evidence and identified incidences of unauthorised encampments as part of a GTAA update in 2021 (EB H 11). With this new evidence there still remains no known need for providing accommodation within Barnet. This conclusion is supported by ORS consultants.</p> <p>Implications of taking no further action: If proposals do come forward for accommodation there is a set of criteria to consider. These are set out in Policy HOU07.</p> <p>Mitigation / Action required (if necessary) to move scale to right: Identification of objectively assessed need</p> <p>Reviewer Comments: Policy HOU07 states that the Council can demonstrate no objectively assessed need for pitches and plots. The 2018 assessment has been carried out by ORS who are experienced consultants on gypsies and travellers. ORS advised the Council on the 2021 Update to the GTAA.</p> <p>Statements of common ground are live documents that can be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication. The cross-boundary strategic issue of Gypsies and Travellers is set out in Statements of Common Ground with neighbouring boroughs. Through such platforms requests from neighbouring boroughs, to help address their accommodation needs for gypsies, travellers and travelling showpeople, can be made.</p>				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No gypsies, travellers and travelling showpeople sites in Barnet have been identified by the GTAA 2018 (EB H 06) and GTAA Update (EB H 11).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: There are no travellers and travelling showpeople sites in Barnet. As part of meeting Duty to Co-operate requirements the Council will consider requests from neighbouring boroughs to help address their accommodation needs for gypsies, travellers and travelling showpeople.				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	N/A				
Justified approaches to plan policy and content						
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan (Core_01) includes a number of policies which include thresholds which trigger policy requirements. These are based on evidence and have been tested within the Viability Assessment (Core Gen 01). - HOU01 Affordable Housing - requirement triggered after 10 units. - ECY02 Affordable Workspace – Major commercial or mixed use schemes required to provide 10% Affordable Workspace or cash in lieu for offsite provision. There are a series of Tables within the draft Local Plan which provide details of the expectation for Major and Minor development including : Table 10 – Internal Layout; Table 11 – Outdoor Amenity Space; Table 16 – Energy Use; Table 17 – Air Quality; Table 18 – Noise; Table 19- Flood Risk, sustainable urban drainage requirements; Table 20 – Water Efficiency; and Table 21 – Biodiversity.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: Without sufficient justification these policies will lose their weight and be open to abuse from developers who do not wish to comply with these policies. Different thresholds allow for the acknowledgement that quantity of development has varied impacts have on the Borough.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The policies are considered appropriate, reflecting the need for developments to consider a wider range of needs, but offering the flexibility should developers show that despite best endeavours their site cannot accommodate these needs, development will be able to continue.				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan (Core 01) clearly references within policies the potential for more detailed documents such as area planning frameworks and SPDs which will be required to embellish and supplement policy. The title of the Building Heights SPD has been changed in the 2021 Local Development Scheme (Core 02). It is now known as Designing for Density SPD. It does not defer detail on strategic matters to other documents, except the London Plan (Core Gen 16) where this document is clearly setting the Mayor's strategic direction. The Plan does refer to forthcoming documents such as SPDs which aim to provide detail on matters which would be inappropriate to include within the Plan itself. References to the London Plan and SPDs are considered appropriate.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Council's programme for SPD production is set out in the Local Development Scheme (LDS) (Core 02) published on 30 th September 2021. The LDS sets out the Council's intention to review the Brent Cross Cricklewood Growth Area Planning Development Framework (Core Gen 12) before 2024. The Council has also prioritised the production of a new planning document within the timeframe of the LDS to support the continued implementation of the Colindale Area Action Plan (Core Gen 11), helping establish future priorities for healthy and connected places as well as place-based initiatives in the Colindale and Burnt Oak area. Going beyond the 3 year life of the LDS the Council intends to produce area planning frameworks with neighbouring boroughs with regard to Brent Cross West and New Southgate. Without detail on the scope, funding and timetable for such documents it is not appropriate to list them in the LDS. When details become clearer they will be featured in a future revision of the LDS.				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
35.	<p>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan (Core 01) sets out clear hierarchies for: heritage assets in Table 12; town centres in Table 13 and SINC's in Table 22. Relevant policies for these areas make any distinctions clear where this is necessary and appropriate. There is no hierarchy of policies within the draft Plan as it is expected that the policies will be considered in the round. The approach is consistent with National Policy.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Council identifies Main Town Centres (Burnt Oak, Chipping Barnet, Finchley Central, Golders Green and North Finchley) within the Local Plan Vision and Policy GSS08. These Main Town Centres do not change the Town Centre Hierarchy outlined in Table 13. These are locations that will form the Council's priorities for investment and revitalisation, supporting local businesses and delivering mixed use development in accordance with the place making policies of the Local Plan.				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Town Centre Policy TOW02 seeks to safeguard retail functions as part of commercial, business and service uses within the primary frontages of Major and District Town Centres, together with Local Centres and Parades. It also seeks to maintain active frontages at ground floor level in areas of primary frontage. This approach has been justified within the text as sufficiently flexible, and being evidenced by the Town Centre Floorspace Needs Assessment (EB E 02). Policy TOW03 limits the proliferation of a range of Sui Generis uses in Barnet's Town Centres including: betting shops, pawnbrokers, payday loan shops, takeaways, shisha cafes, and adult gaming centres. This is particularly supported by the Barnet Shisha Bars Report (EB S 12) and Barnet Hot Food Takeaways Review (EB S 13). Policy ECY01 seeks to maintain employment uses in the identified industrial areas and town centres this is justified by the following evidence Barnet Employment Land Review (BELR) (EB E 04), London Office Policy Review (LOPR) (EB E 05), London Industrial Demand Study (LILDS) (EB E 06) and the West London Employment Land Review (EB E 09).				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: The evidence base on this matter is mixed in terms of identified needs/ deliverability following the Government's changes to the Use Classes Order in 2020 and 2021.				
		Mitigation / Action required (if necessary) to move scale to right: Further evidence on floorspace requirements for Use Class E - Commercial, Business and Service Uses as well as a more robust indication of the impact of e-tailing (online shopping) and m-tailing (mobile app shopping) on Barnet's town centres.				
		Reviewer Comments: This would score a +2 if it were not for the Government's fundamental review of the Use Classes Order in 2020 which introduced Use Class E – Commercial, Business and Service Uses. Use Class E is intended to allow greater flexibility to change between commercial, business and service uses. It will therefore have an impact on the Council's ability to manage and safeguard commercial uses in Barnet's town centres and employment areas.				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	<p>Reason for score: The Council applies a number of design and environmental compliance standards including space standards, internal layout and design as well as outdoor amenity space requirements that are set out and justified through the London Plan (Core Gen 16). Policy ECC04 seeks to increase the provision of public open space in areas of deficiency in accordance with standards identified in the Open Spaces, Sports and Recreational Facilities Needs Assessment (EB GI 01). The application of these requirements has been supported by the Local Plan Viability Assessment (Core Gen 01), with assumed densities leaving sufficient space for this to be met effectively. Policies CDH02 and ECC01 seek to increase the sustainability of buildings and reduce their overall carbon footprint. This is done by requiring an energy statement, demonstrating that everything that can be done, has been done. All major non-residential developments will be required to meet a BREEAM standard of Very Good. Local Plan standards are all consistent with National Policy.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: The standards are considered appropriate and supported by the evidence base, both in terms of need and impact on viability.</p>				
Deliverability		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan Viability Assessment was produced by BNP Paribas Real Estate (Core Gen 01) who considered the impact of all proposed policies cumulatively on the viability of delivery. This includes impact of affordable housing, London Plan (Core Gen 16) policies and implications of Mayoral and Barnet CIL. This report tests the ability of developments in the Borough to accommodate emerging policies in the draft Local Plan, alongside other plan policies in the London Plan and rates of CIL in the Council's Draft Charging Schedule (CS106 03). The study takes account of the impact of the Council's planning requirements, in line with the NPPF and NPPG requirements as well as the Local Housing Delivery Group guidance 'Viability Testing Local Plans: Advice for planning practitioners'				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: BNP Paribas Real Estate previously undertook a review of development viability in Barnet in December 2019 to inform the potential for revisions to the Council's CIL Charging Schedule (CS106 02)				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council is considering the recommendations outlined within the Viability Assessment with regard to affordable housing, electric vehicle charging, biodiversity net gain, affordable workspace and policies on climate change.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: The Council will consider the recommendations of the Viability Assessment and propose modifications at EIP if appropriate.				
Reviewer Comments: The housing and commercial property markets are inherently cyclical and through the Viability Assessment published in May 2021 the Council is testing the viability of its draft policies at a time when both commercial and residential markets have experienced a period of turmoil resulting from the impact of COVID-19.						
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Section 12.9, Table 24 (Monitoring Indicators) of the Local Plan (Core 01) lists matters to be monitored and which key indicators will be used. A set of key indicators and targets have been developed so that the effectiveness of policies in achieving Local Plan objectives can be assessed. These metrics are measurable and will be captured within the London DataHub for extraction and inclusion within the Council's Authorities Monitoring Report.				
		Implications of taking no further action: Monitoring is an important part of the continuous planning process.				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: The monitoring framework proposed is considered proportionate and effective in measuring the delivery of Local Plan policies.				
41.	Does the local plan policies update and monitoring framework identify a clear framework for plan review? Where triggers for plan review and/or update are identified are they justified and proportionate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: National policy as set out in NPPF (para 33) expects Local Plans to be subject to a review within 5 years of adoption. Corporate priorities for growth are set out in the LDS (Core 02). The Council intends to review the Brent Cross Cricklewood Growth Area Planning Development Framework (Core Gen 12) before 2024. The Council has also prioritised the production of a new planning document within the timeframe of the LDS to support the continued implementation of the Colindale Area Action Plan (Core Gen 11), helping establish future priorities for healthy and connected places as well as place-based initiatives in the Colindale and Burnt Oak area.				
		Going beyond the 3 year life of the LDS the Council intends to produce area planning frameworks with neighbouring boroughs with regard to Brent Cross West and New Southgate. Without detail on the scope, funding and timetable for such documents it is not appropriate to list them in the LDS.				
		The Local Plan (Core 01) indicates that with further progress of West London Orbital or Crossrail 2 (although not expected to be delivered within lifetime of the Plan) it may bring forward a partial review focused on GSS09 to further comprehensive regeneration. The Local Plan also highlights that a partial review focused on GSS02 with regard to the Brent Cross Growth Area may be necessary to further comprehensive regeneration. Appropriate milestones for measuring the delivery of Brent Cross and Brent Cross West including transport infrastructure associated with West London Orbital.				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: The Council is required to review the Local Plan within 5 years of adoption.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Plan effectiveness (and associated policy clarity)		Reviewer Comments: As evidenced by the publication of the 8 th version of the LDS the Council has a good track record of ensuring that the review of plans is clear and up to date as part of a rolling 3 year programme.				
		Plan effectiveness (and associated policy clarity)				
		-2	-1	0	+1	+2
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan (Core 01) policies are set out for the full plan period to 2036; this is shown in Chapter 3 through the Vision, Objectives, Policy BSS01 Spatial Strategy for Barnet, and the Key Diagram. As a London Borough, strategic matters are generally deferred to the Mayor through the London Plan (Core Gen 16). Table 3 sets out Strategic and Non-Strategic Policies. Chapter 4 – Growth and Spatial Strategy provides more detail on the quantum and location of growth over the 15 year plan period. The Vision is long-term approach to growth in the Borough, for example seeking a sustainable recovery from the COVID19 pandemic, and through delivering biodiversity net gain and restoring the Borough’s rivers to benefit people and wildlife whilst protecting communities from flooding. While the degree to which different components of the evidence base can reasonably look forward over the plan period will vary, the Council has sought to undertake studies that are well-based and long-term looking ahead to 2036. An example of this is the Strategic Flood Risk Assessment Level 2 (EB Gl 19 pt1 EB Gl 19 Pt2 & EB Gl 19 pt3) that takes into account long-term assessments of Climate Change impact.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: NPPF (para 22) states that strategic policies should look ahead over at least a 15 year period from adoption. The Council started a full review of the Local Plan in 2016 with the intention of planning for at least 20 years ahead, seeking to at least identify potential significant site proposals, directions of travel for the future of Barnet. This would ensure that in the longer term sustained delivery of housing and supporting infrastructure would be more achievable. The evidence base was commissioned on this basis. In March 2020, the Government set a deadline of December 2023 for all authorities to have up-to-date Local Plans in place.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>The Council are progressing an updated full review local plan produced and adopted before the December 2023 deadline. The Council has made good progress in achieving this end 2023 timescale and in doing so has been able to take account of, and therefore be in general conformity with, the most recently adopted (March 2021) version of the London Plan (Core Gen 16). The policies in the draft Local Plan (Core 01) are based on relevant, proportionate and timely produced supporting evidence.</p> <p>The Council recognises the requirement (NPPF para 33) to review and update plans regularly and in any event formally review within 5 years of adoption (so by 2028 assuming a 2023 adoption of the current draft plan). In any event it is likely that the Council would want to undertake an early partial review to reflect upon longer term implications of COVID 19 and more fully respond to changes to the Use Classes Order and GPDO in 2020 and 2021.</p> <p>The Local Plan covers a 15 year period – 2021 to 2036. The Council acknowledges that at the point of adoption (most likely to be during first half of 2023) the strategic policies will not then have the minimum 15 year period shelf life that NPPF (para 22) suggests that they should. The Council further acknowledges the requirement to review within 5 years. Having the plan adopted in 2023 should entail that the Council will be well placed to move quickly to produce a new plan – if required to do so – that also accords with the Government’s long awaited planning reforms once these have been announced and in due course enacted.</p> <p>Long term planning as well as continuous changes to the planning system, as evidenced by legislation and regulation, reduces the accuracy and value of evidence beyond the initial plan period. Given this context the Council will take a realistic and proportionate approach to reviewing evidence base documents following adoption of the Local Plan. It will also be receptive to considering the option of a partial review of the Local Plan.</p>				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: This clearly set out in Appendix C - Replacement of Local Plan Policies. All 34 policies in the 2012 Core Strategy (Core Gen 14) and Development Management Policies (Core Gen 15) documents and their replacements are listed. Area Action Plans for Colindale (Core Gen 11) and Mill Hill East (Core Gen 10) will remain as will the North London Waste Plan (expected to be adopted in early 2022) (Core Gen 09). The structure of Barnet’s Development Plan is set out in Figure 1 of the Local Plan (Core 01).</p>				
		<p>Implications of taking no further action: None</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Local Plan consists of a framework of 52 policies. In comparison to the 34 policies in the 2012 Local Plan. The additional policies reflect a more detailed approach on growth and spatial strategy. Outside of these areas of growth Appendix C also sets out 5 new areas of policy.				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Key objectives are set out in Chapter 3, Section 3.2. The relationship of Local Plan key objectives established to deliver the Vision, Local Plan Chapters and most relevant policies is set out in Table 2. From the outset in developing the Council's Local Plan there has been a significant amount of engagement internally within the Council, working together to shape a vision for Barnet and agree the key objectives for delivering it. This includes working with the Local Plan Members Advisory Group (MAG), a cross-party group of councillors which serves as a sounding board for feeding general and specific, locally-based opinions and views from residents' forums, into the preparation of the Local Plan. The Group has met twelve times to discuss Local Plan evidence, policies and site proposals. In April 2021 the Group signed off the Reg 19 version as the basis for consultation and the future framework for decision making on planning. Policy wording has been carefully developed to ensure they are suitable for decision-making and have undergone extensive internal consultation with colleagues in the Development Management team, as well as through statutory public consultations. With regard to the 65 site proposals in Annex 1 of the Local Plan (Core 01). These are clearly set out in a Summary Table and shown on the Borough Sites Map. Further detail on individual sites including aerial and site level images is set out in the Schedule in Annex 1.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: Through the main modifications process up to adoption opportunities will continue to be taken to improve clarity of policies and proposals				
		Reviewer Comments: The key objectives are clear, the policies can be easily used and understood for decision making. The Council has utilised feedback from the Reg 18 consultation (Core 08) to revise and improve policies and proposals. The Plan and its policies have sought to be succinct and not duplicate higher tier policies. Policy and proposal wording can always be improved upon as considered necessary through the EIP process in order to make the Plan more easily understood.				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
45.	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan (Core 01) includes a series of maps to illustrate its spatial strategy and show the strategic locations for growth. In addition to the Key Diagram which shows strategic locations for growth as well as Green Belt / MOL and existing transport infrastructure there is a Borough Sites Map which clearly identifies the locations of site proposals. The document Changes to the Policies Map (Core 05) sets out revisions since the 2012 Local Plan. Key graphics include the Housing Trajectory and the diagram setting out the structure of Barnet's Development Plan. The Council considers that the maps and diagrams included are clear and legible and suitable to support decision-making.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Recognising that the Plan is subject to further revision the Council has sought to be presented in the best way possible to assist with legibility. Following adoption graphic designers will be engaged to produce the final Local Plan document. An interactive policies map will also be published to accompany Local Plan adoption.				
46.	<p>Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council considers that the updated policies are written and presented clearly and positively throughout the Plan.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Plan has (Core 01) sought to positively address growth and development within the borough. As such its policies seek to encourage positive outcomes, rather than focussing on what should not occur.				
47.	<p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A number of policies set out different guidance for different scales, uses or locations. An example is Policy CDH07 Amenity Space and Landscaping where off-site contributions are set out for proposals that do meet				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<p>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	<p>minimum standards for amenity space and play space. Policy CHW01 – Community Infrastructure supports new provision within Growth Areas or in Town Centres as long as they are outside the primary frontage. Policy ECY02 – Affordable Workspace seeks affordable workspace in specific locations. Policy TOW03 – Managing Uses in Town Centres sets out how the proliferation and over concentration of certain uses will be managed.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: It is considered that the policies relate to an appropriate scale of development and are clear in outlining when it is expected that they will apply.</p>				
I	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>There are 52 policies within the new Local Plan (Core 01).</p> <p>To be clear and coherent the Local Plan does make references to the NPPF, the London Plan (Core Gen 16), makes and cross-references other policies within the Plan. These references are, however, kept to a minimum to prevent repetition and redundancy. Within Chapter 1, for example the NPPF is referenced to set out the key requirements for the Local Plan. Policy BSS01 Spatial Strategy for Barnet provides cross-references to other key aspects of the Plan, allowing this succinct policy to tie together the overarching aspects of the Plan.</p>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: With 52 policies and 65 site proposals the Plan (Core 01) has sought to be as concise as possible, balancing conciseness with the need to address a range of audiences. Getting the message across sometimes requires cross-referencing to London Plan (Core Gen 16) policies as this document forms part of the Development Plan for Barnet.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments: Opportunities for editing the Local Plan further will be explored at EIP. The Local Plan is a statutory document, serving as a platform for planning decision making over a period of up to 15 years. It is providing a planning framework to replace policies adopted in the 2012 Local Plan as well as set out a new suite of site proposals. The last Borough Plan to set out site proposals was the Unitary Development Plan adopted in 2006.				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Local Plan (Core 01) seeks to signpost rather than duplicate other regulatory regulations such as the Building Regulations, Control of Advertisements, Contaminated Land, Flood Risk and Community Infrastructure Levy. In some instances further context is required in order to assist the reader in understanding the requirements for development. An example of this is in Policy ECC01 – Mitigating Climate Change, where Part L of the Building Regulations is referenced. Another example is the supporting text explaining requirements for Biodiversity Net Gain.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Council considers that it has taken a proportionate approach.				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council considers that the Plan (Core 01) policies are clear and unambiguous. They provide sufficient direction and detail for decision-making. Where terms such as ‘appropriate’ are used, they are qualified with further description that helps to clarify the way in which the planning proposal is to be assessed.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: Policy wording can be improved in response to well-considered comments on alternative policy wording that improves clarity and ability to implement.				
		Reviewer Comments: The policies are considered to be sufficiently clear to serve as a planning decision making framework for managing growth.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>

Date of assessment:	November 17 th 2021
Assessed by:	Rita Brar
Checked by:	Nick Lynch
Overall Score:	86
Comments:	The appraisal is considered to provide a fair assessment of where the Plan is at proposed submission stage. There are still some issues to address with strategic partners, such as the Environment Agency with regards to flood risk and Historic England with regards to tall buildings. This will be done through Statements of Common Ground