

LB of Barnet Local Plan
Integrated Impact Assessment
Updated Non-Technical Summary,
(Incorporating additional explanatory
text included within the Examination
Technical Notes)

January 2023

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1. Introduction

1.1 This Non-Technical Summary (NTS) has been prepared by the London Borough of Barnet (LBB) as part of the Integrated Impact Assessment (IIA) for the London Borough of Barnet Local Plan (LBBLP), incorporating Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). It updates, and therefore replaces, the version of the NTS produced within part 1 of the IIA (Core_Gen_02) produced in support of the submitted Draft Local Plan. (Core_01) Any reference to IIA within this document should be taken to refer to the full suite of assessments undertaken, including the technical notes prepared as part of the Examination into the LBB Local Plan.

1.2 This report has been prepared during and to support the examination in public stage of the LBBLP and summarises the findings of the IIA prepared for the submission of the LBBLP. It refers to and should be read alongside information contained within the following documents in the LBBLP examination library:

1. Core Gen 28:
 - a. [\(IIA\) Integrated Impact Assessment Scoping Report](#) (2021)
 - b. [Scoping Report 2019](#)
2. Core Gen 25:
 - a. [Reg 18 \(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA and EQIA\) - 2020 part 1](#)
 - b. [Reg 18 \(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA and EQIA\) - 2020 part 2](#)
 - c. [Reg 18 \(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA and EQIA\) - 2020 part 3](#)
3. Core Gen 02:
 - a. [\(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA, EQIA\) – 2021 part 1](#)
 - b. [\(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA, EQIA\) – 2021 part 2](#)
 - c. [\(IIA\) Integrated Impact Assessment \(Technical Summary, Sustainability Appraisal, HRA, EQIA\) – 2021 part 3](#)
4. EXAM 08
 - a. [Updated HRA Screening Report 2022](#)

1.3 A Non-Technical Summary (NTS) is a requirement of Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004¹ and the structure of this document incorporates those requirements, and the stages of IIA. IIA is an iterative process and the documents have been updated and revised in response to new evidence throughout the plan making process.

1.4 The NTS was prepared alongside the Sustainability Appraisal Technical Note and the Habitat Regulation Assessment Technical Note (EXAM 39)².

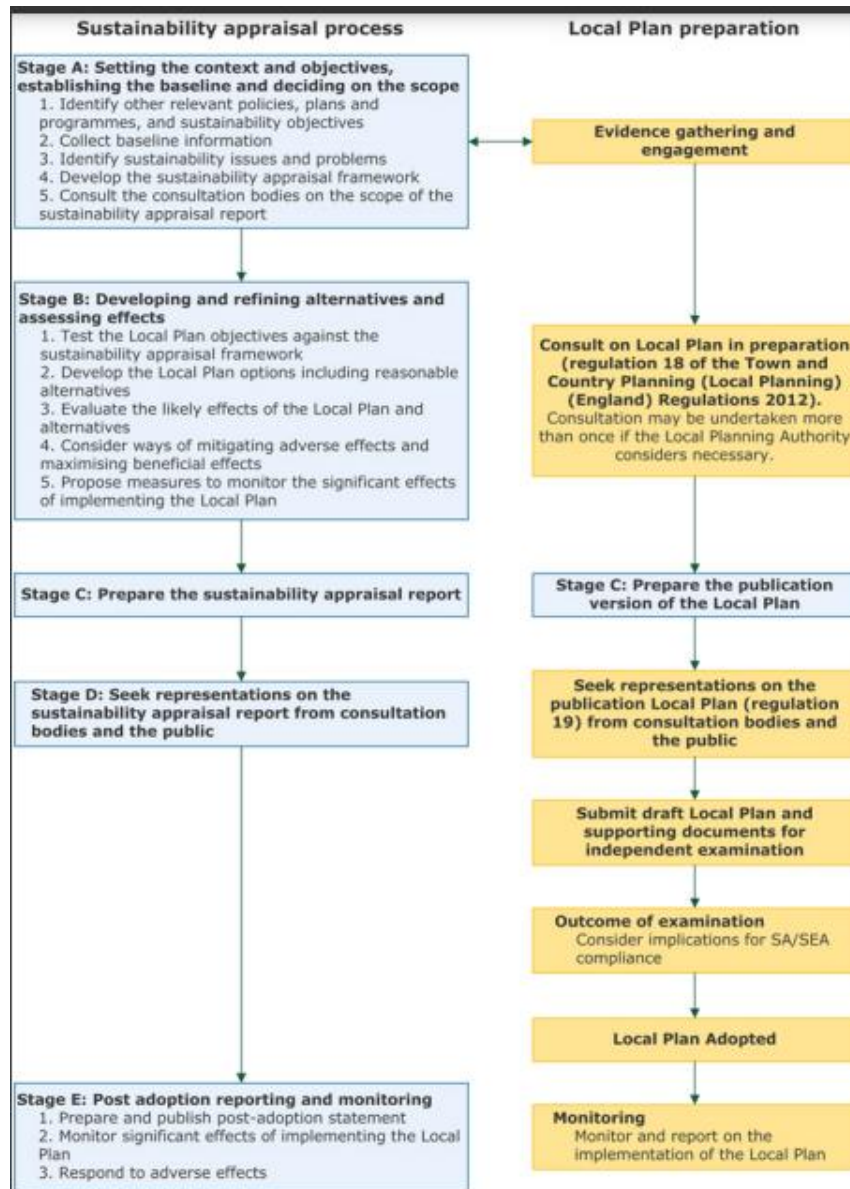
¹ Environmental Assessment of Plans and Programmes Regulations 2004
<https://www.legislation.gov.uk/uksi/2004/1633/contents>

² <https://www.barnet.gov.uk/sites/default/files/EXAM%2039%20-%20LBB%20Note%20-%20Technical%20Note%20on%20HRA.pdf>

2. Relationship between the London Borough of Barnet Local Plan and the IIA, including the requirement for Strategic Environmental Assessment

2.1 Figure 1 below sets out the key stages in preparing the IAA in relation to a Local Plan from Government Guidance on preparing Strategic Environmental Assessment and Sustainability Appraisal³. Figure 2 sets out the stages of plan preparation and IIA in relation to the requirements to undertake a Strategic Environmental Assessment, from the Government SEA checklist⁴.

Figure 1 Local Plan and SA Stages



3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580027/sea1_013.pdf

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

Figure 2: Requirement for Strategic Environmental Assessment

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)). The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)).</p> <p>Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)). When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>Core Gen 28:</p> <p>(IIA) Integrated Impact Assessment Scoping Report (2021) Scoping Report 2019</p> <p>Core Gen 25:</p> <p>Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020 part 1</p> <p>Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020 part 2</p> <p>Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020-part 3</p> <p>Core Gen 02:</p> <p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 1</p> <p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 2</p> <p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 3</p> <p>EXAM 08</p>

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 <https://www.legislation.gov.uk/uksi/2004/1633/regulation/16/made>

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
	Updated HRA Screening Report 2022
The information referred to in Schedule 2 is: a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	<p>Introductory sections of each iteration of the IIA set out the contents and main objectives of the plans. The Regulation 19 documentation reflects changes made to the plan following the Regulation 18 consultation, updated evidence base and discussions with statutory consultees.</p> <p>The relationship to other plans and programmes is considered in both Scoping Reports.</p> <p>Outline of Barnet Local Plan and context:</p> <ul style="list-style-type: none"> • IIA Regulation 18 Introduction • IIA Regulation 19 Introduction <p>Other plans and programmes:</p> <ul style="list-style-type: none"> • SA Scoping 2019, Table 3 • SA Scoping 2019, Appendix 2 Policy Review • SA Scoping 2021, Table 3 • SA Scoping 2021, Appendix 2 Policy Review <p>Updated HRA Screening Report July 2022 – Appendix 2</p>
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<p>The Scoping reports set out and update the environmental characteristics of areas likely to be affected and consider the potential for significant impacts.</p> <p>The HRA sections of the IIA consider the potential for designated sites to be significantly affected.</p> <p>Baseline information:</p> <ul style="list-style-type: none"> • Chapter 3, SA Scoping 2019 and Chapter 3, SA Scoping 2021

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
	<ul style="list-style-type: none"> • IIA Regulation 18 Table 6 • IIA Regulation 19, paragraph 2.32 <p>Updated HRA Screening Report July 2022 – Table 3</p>
c) The environment characteristics of areas likely to be significantly affected.	<ul style="list-style-type: none"> • Chapters 3 and 4, SA Scoping 2019 • Chapters 3 and 4, SA Scoping 2021 • IIA Reg 18 Section 3 – Appendix 4, HRA, Table 2 • IIA Reg 19 Section 3 – Appendix 4, HRA, Table 2 <p>Updated HRA Screening Report, Table 2 and Table 3</p>
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	<ul style="list-style-type: none"> • Chapter 4, SA Scoping 2019 • Chapter 4, SA Scoping 2021 • IIA Reg 18 Section 3 – Appendix 4, HRA, Table 2 • IIA Reg 19 Section 3 – Appendix 4, HRA, Table 2 <p>Updated HRA Screening Report, Table 3</p>
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	<p>Description of relevant wider objectives:</p> <ul style="list-style-type: none"> • Scoping Report 2019 Appendix 2 • Scoping Report 2019 paragraph 116 onwards • Scoping Report 2021 Appendix 2 • Scoping Report 2021 paragraph 127 onwards <p>Objectives in relation to designated sites are set out in Table 2 and Table 3 of the updated HRA Screening Report July 2022.</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors.	<p>Framework:</p> <ul style="list-style-type: none"> • Table 7, IIA Reg 18 and Reg 19 • IIA Reg 18 Part 2 – Site Scoring Matrix • IIA Reg 19 Part 2 – Site Scoring Matrix

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
<p>These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>Assessment tables and commentary:</p> <ul style="list-style-type: none"> • IIA Reg 18 Part 2 – Appendix 1, Thematic Review and Appendix 2 Site Assessments • IIA Reg 19 Part 2 - Appendix 1, Thematic Review and Appendix 2 Site Assessments <p>HRA Screening Report July 2022.</p> <p>Further assessment in Appendix 4 of this document.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<ul style="list-style-type: none"> • Mitigation measures within the IIA are considered in IIA Reg 18 Part 2 and IIA Reg 19 Part 2. • No mitigation was required in relation to Habitats Regulations as referred to in Updated HRA Screening Report paragraph 7.
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<ul style="list-style-type: none"> • Framework for assessment against IIA Objectives is set out in Section 5, SA Scoping 2019 and Section 5, Scoping 2021. • Assessment tables and commentary are contained within IIA Reg 18 Part 2 and IIA Reg 19 Part 2. <p>Alternative Options:</p> <ul style="list-style-type: none"> • IIA Regulation 18 Part 3 – Appendix 8 • IIA Regulation 19 Part 3 – Appendix 8
<p>i) A description of measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>The Monitoring Framework is set out within the LBBLP. Suggested indicators and monitoring are included within Table 7 of the IIA Regulation 18 and Regulation 19 Reports. Any updates to the Monitoring Framework through the examination of the LBBLP will be consulted on. A final monitoring framework will be included in the SEA Post-Adoption Statement.</p> <ul style="list-style-type: none"> • IIA Regulation 18 Part 1- Table 7 • IIA Regulation 19 Part 1- Table 7

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
<p>j) A non-technical summary of the information provided under the above headings.</p>	<p>Each iteration of the IIA contains a Non-Technical Summary section. This standalone NTS has been prepared alongside the Technical Paper.</p> <ul style="list-style-type: none"> • Regulation 18 IIA Part 1 • Regulation 19 IIA Part 1 <p>Updated NTS</p>
<p>Consultation procedures (regulation 13)</p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	<p>Consultation was carried out on the Scoping Reports, Regulation 18 and Regulation 19 IAA, as part of the consultation on the emerging LBBLP. Further consultation will be carried out as and if required through the examination process.</p> <p>Consultation with appropriate environmental bodies is set out in the consultation statements (Core 09)</p>
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures 	<p>This will be provided on the adoption of the LBBLP in the form of the SEA Post-Adoption Statement.</p>

Requirements of the Regulations ⁵⁶	Relevant IIA sections and evidence documents
that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16).	
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>The Monitoring Framework is set out within the LBBLP. Suggested indicators and monitoring are included within Table 7 of the IIA Regulation 18 and Regulation 19 Reports. Any updates to the Monitoring Framework through the examination of the LBBLP will be consulted on. A final monitoring framework will be included in the SEA Post-Adoption Statement.</p>

3. Outline of the contents and main objectives of the Plan and its relationship with other relevant plans and programmes

The London Borough of Barnet Local Plan

3.1 The Introductions within each IIA Report set out the parameters of the LBBLP. The Local Plan covers the Borough of Barnet in North London (Figure 3).

Figure 3: Location of London Borough of Barnet



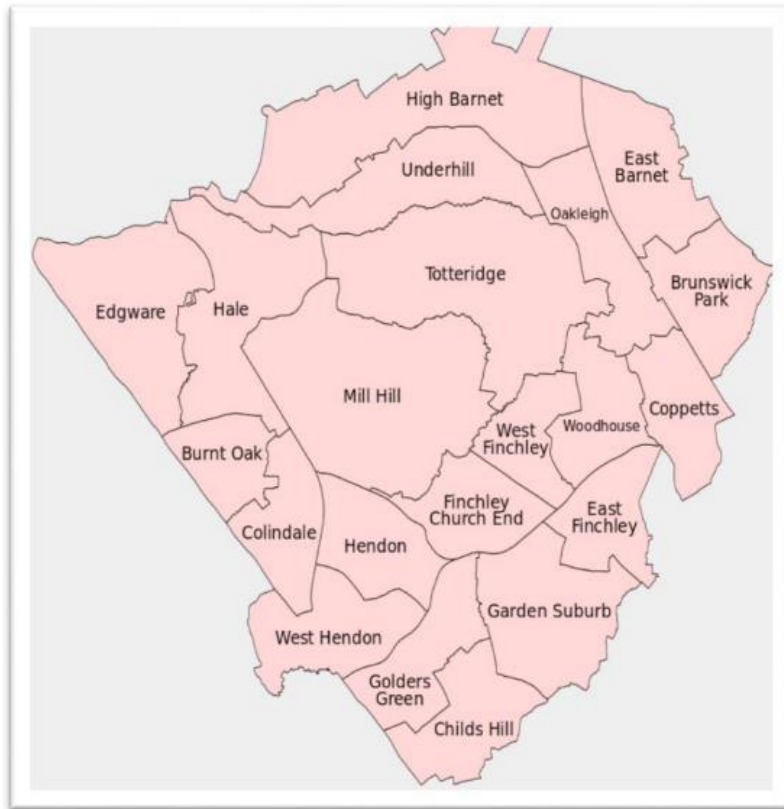


Figure 4: Districts within the London Borough of Barnet

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

3.3 In order to deliver the vision, the Local Plan as proposed to be modified (MM14 and MM15 refer) at para 3.2.2 proposes a series of objectives to guide policies. These are:

- To respond and recover from the impact of COVID19
- To help deliver growth to meet housing aspirations and needs
- To improve the quality and types of housing across the Borough in response to resident needs and demographic change
- To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery
- To improve orbital connectivity and sustainable travel options including cycling and walking
- To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs
- To support strong and cohesive family friendly communities
- To promote healthy living and wellbeing

- To meet social infrastructure needs
- To deliver an environmentally sustainable Borough and build resilience to climate change
- To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and other green and blue infrastructure.
- To ensure well designed, beautiful and safe places where new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime

3.4 The Objectives were updated in later stages of plan preparation to reflect discussions with statutory bodies, evidence, and consultations. Section 10 of this NTS sets out how the Objectives were updated. Para 2.42 of the Regulation 19 IIA lists who in addition to the statutory consultees were consulted and Table 8 records relevant responses from LBB. Substantive comments were received from Historic England and the Environment Agency which were subsequently taken account of by the LBB in proposed updates to the submission Plan.

Relevant Plans, Policies and Programmes

3.7 Table 3 of the Scoping Report 2021, set out below, identifies the Plans, Policies and Programmes referred to in preparation of the IIA and the LBBLP. Appendix 2 of the Scoping Report 2021 set out the implications for the LBBLP against each document.

Figure 5 Plans, Policies and Programmes

Level	Document
International	<ul style="list-style-type: none"> • European Directive 2001/42/EC • The Habitats Directive: European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats • Johannesburg Declaration on Sustainable Development (Earth Summit 2002) • European Directive: Environmental Noise Directive 2002/49/EC • EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (Habitats Directive - 92/43/EEC and 97/62/EC) • EU Directive on Ambient Air Quality and Management EU Directive 2008/50/EC • Water Framework Directive 2000/60/EC • Waste Framework Directive 2008/98/EC Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC • European Convention on the Protection of the Archaeological Heritage (revised), 1992 • European Landscape Convention 2000 • Health for Growth 2014 – 2020, European Commission, 2011
National	<ul style="list-style-type: none"> • Town and Country Planning Act 1990 (as amended) • Equality Act • Localism Act 2011 • Growth and Infrastructure 2013 • Infrastructure Act 2015 • Housing and Planning Act 2016 • National Planning Policy Framework (NPPF), DCLG, 2018 • National Planning Practice Guidance, DCLG, 2016 • Securing the Future – delivering UK sustainable development strategy, DEFRA, 2005 • The Community Infrastructure Levy Regulations 2010 (as amended), HM Government • Industrial Strategy – Building a Britain fit for the Future, Dept. for Business, Energy • Industrial Strategy, 2018 • The Culture White Paper, DCMS, 2016 • Index of Multiple Deprivation, ONS, 2015 • Education Act 2011 • DfE strategy 2015 to 2020: world-class education and care, DoE, 2016

	<ul style="list-style-type: none"> • National Infrastructure Delivery Plan 2016 – 2021, Infrastructure and Projects Authority, 2016 • Planning Policy for Traveller Sites, DCLG, August 2015 • Housing White Paper; fixing our Broken Housing Market, DCLG, 2017 • Estate Regeneration National Strategy, 2016, DCLG • Planning for Sport Aims and Objectives, July 2017, Sport England • Global Health Strategy 2014 – 2019, Public Health, 2014 • Future Water: The Government’s Water Strategy for England, DEFRA, 2011 • UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011 • 25 Year Environment Plan, Defra, (2018) • Biodiversity 2020, A Strategy for England’s Wildlife and Ecosystem Services, Defra (2011) • ‘Water Stressed Areas – Final Classification’ (2013) • Natural Environment and Rural Communities Act 2006
Regional	<ul style="list-style-type: none"> • The London Plan, GLA, 2016 • Draft London Plan, GLA, 2017 • Culture and night-time economy SPG, GLA, 2017 • Land for Industry and Transport SPG, GLA, 2012 • Social Infrastructure SPG, GLA, 2014 • Housing SPG, GLA, updated August 2017 • Town Centres SPG, GLA, 2014 • Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017 • Play and Informal Recreation SPG, GLA, 2012 • Sustainable Design & Construction SPG, GLA, 2014 • Mayor’s Culture Strategy, GLA, 2018 • Cultural Metropolis: Achievements and Next Steps, GLA, 2014 • Mayor’s Economic Development Strategy for London, 2017 • A City for All Londoners, GLA, 2016 • London Infrastructure Plan 2050, GLA, 2015 • Accessible London; Achieving an Inclusive Environment, GLA, 2014 • Mayor’s Equality, Diversity and Inclusion Strategy, GLA, 2018 • 2017 London Strategic Housing Market Assessment, GLA, 2017 • Planning for Equality & Diversity in London, GLA, 2007 • London Health Inequalities Strategy, GLA, 2018

	<ul style="list-style-type: none"> • Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, 2017 • GLA Topic Paper: Specialist Older Persons Housing, GLA, 2017 • Mayor’s Transport Strategy, GLA, 2018 • Mayor’s Air Quality Strategy, GLA, 2017 • Mayor’s Environment Strategy, GLA, 2018 • All London Green Grid, GLA, 2012 • London Sustainable Drainage Action Plan, 2018 • The West London Strategic Flood Risk Assessment (2018) • Thames Flood Risk Management Plan (2015) • Thames River Basin Management Plan • The Great Britain Invasive Non-native Species Strategy, Defra, (2015) • London Abstraction Licensing Strategy, February 2013. Environment Agency (2013)
Local	<ul style="list-style-type: none"> • Barnet Core Strategy, LBB, 2012 • Barnet Development Management Policies, LBB, 2012 • One Banet – A Sustainable Community Strategy for Barnet 2010 – 2020, LBB 2010 • Mill Hill East Area Action Plan, LBB, 2009 • Colindale Area Action Plan, LBB, 2010 • North Finchley Town Centre Framework SPD, LBB, 2017 • Grahame Park SPD, LBB, 2016 • Affordable Housing SPD, LBB, 2008 • Green Infrastructure SPD, LBB, 2017 • Delivering Skills, Employment, Enterprise and Training (SEET) from development through S106, LBB, 2014 • Sustainable Design and Construction SPD, LBB, 2016 • Residential Design Guidance, LBB, 2016 • Infrastructure Delivery Plan, London Borough of Barnet, 2011 • Draft North London Waste Plan, 2018 • Barnet Housing Strategy, LBB, 2015 • Barnet Community Safety Strategy 2015 – 2020, LBB, 2015 • Barnet Equality Policy, LBB, 2014 • Barnet Corporate Plan 2015 – 2020, LBB, 2015 • Flood Risk Management Strategy, LBB, 2018

	<ul style="list-style-type: none"> • Barnet Joint Health and Wellbeing Strategy 2015 – 2020, LBB • Air Quality Action Plan 2017 – 2022, LBB, 2017 • Open Space Strategy 2016, LBB, 2016 • Barnet Children and young People Pan 2016 – 2020, LBB. • Barnet Accessibility Strategy 2016-2019 for the Inclusion of young people with Special Educational Needs and Disabilities in educational settings, LBB, 2016 • Brent Catchment Management Plan
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3.8 The London Plan sets out the strategic vision for London, and the LBBLP is required to be in ‘general conformity’ with its policies. The London Plan sets key parameters for development within Barnet.

3.9 The updated HSA 2022 (paragraphs 40 and 41, quoted below and at paragraph 3.10) set out the environmental issues considered within assessment of adopted London Plan:

- a. London has seen significant population growth, and current population projections suggest that this is likely to continue with it anticipated that there will be an additional 3 million people in the city by 2050. It is predicted that the population will reach 10.5 million by 2041.
- b. London’s streets are some of the most congested in the world. Lifestyle changes, increased use of internet deliveries, Sunday shopping and the rapidly growing night-time economy has caused changes in travel and congestion patterns in recent years.
- c. At present, 800,000 people commute into work. This is anticipated to increase to more than 1 million by 2041. In addition, it is anticipated that trips made by Londoners will increase from 20 million to 25 million per day between 2011 and 2041.
- d. In 2016, London has a total of 5.7 million workforce jobs; this is projected to grow to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041.
- e. London had a total of 5.7 million workforce jobs, which is set to increase to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041. Provision for employment growth will also lead to additional recreational demand from workers. All of the identified European Sites are popular destinations for visitors from London and from further afield.
- f. Rising levels of freight and private hire traffic in London.
- g. There are 64 waterbodies in London, of these, none are rated as ‘very good.’
- h. Exposure to NO2 in London has been declining, however, it is estimated that by 2020, 500,000 people will still be exposed to NO2 levels above the EU limit value.
- i. The probability of flooding in London is increasing with climate change.

j. The relatively dry nature of the South East combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use on the country but also having one of the highest rates of leakage from the water supply distribution network.

- k. There are six current and anticipated effects of climate change for London: hot summers, more intense rainfall, more frequent and intense heatwaves, changes in seasonality of rainfall, increased urban heat island effect and sea level rise.

3.10 The HRA for the draft London Plan⁷ concluded that “there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on Designated sites either alone or in combination with other plans and projects”.

3.11 The IIA and LBBLP considered the Plans of neighbouring boroughs, namely the Hertsmere Local Plan and the following six neighbouring London Boroughs:

- London Borough of Harrow
- London Borough of Brent
- London Borough of Camden
- London Borough of Haringey
- London Borough of Enfield
- Hertsmere Borough Council

3.12 Although neither authority lies immediately adjacent to the boundary of LBB, the updated HRA Screening 2022 also considered the evidence prepared in support of the Epping Forest District Council and the London Borough of Waltham Forest.

3.13 Officers referred to relevant documents, newly prepared or updated during the preparation of the IIA and the LBBLP. These are noted in the relevant evidence documents within the Examination Library and reflected in updates made to the text of the LBBLP.

3.13 The policy framework is constantly evolving, however, the ‘Plans, Policies and Programmes’⁸ review helped identify a number of common objectives and issues which helped inform the development of the objectives that have been used for the IIA. These included:

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

⁷ As discussed in EXAM 8:

<https://admin.barnet.gov.uk/sites/default/files/Exam%208%20Habitats%20Regulation%20Screening%20Assessment.pdf>

⁸ [Core Gen 28](#): Table 3, Scoping Report 2021; Appendix 2, Scoping Report 2021; [Core Gen 02](#): Table 5 IIA Regulation 19.

- Support the vitality of diverse, inclusive and secure town centres and neighbourhoods
- Protect, conserve and enhance the historic environment, heritage assets and cultural heritage.

4. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme

Baseline information

4.1 Chapter Three within IIA Scoping Report 2021 sets out the Baseline information collected in relation to the LBBLP. Information was collected in relation to the following topics, as set out in Appendix 1 of the SEA Directive and transposed to the Environmental Assessment of Plans and Programmes Regulations 2004⁹:

- a) Biodiversity;
- b) Population;
- c) Human health;
- d) Fauna;
- e) Flora;
- f) Soil;
- g) Water;
- h) Air;
- i) Climatic factors;
- j) Material assets;
- k) Cultural heritage, including architectural and archaeological heritage;
- l) Landscape;
- m) The inter-relationship between the issues referred to above.

4.2 The environmental baseline is considered in the IIA Scoping Report 2021 from paragraph 74 onwards. The Scoping Report 2021 notes at paragraph 75 that Barnet is one of the greenest Boroughs in London with a large area designated as Green Belt and as Metropolitan Open Land. Barnet has good open space provision distributed across the Borough, which contributes towards the character of the area. Larger open spaces tend to be located in the north of the Borough, with smaller parks located further south in the more densely built-up areas.

4.3 Barnet has a wide range of conservation assets (paragraph 80 of the Scoping Report) within its boundary as set out within Table 6 of the Scoping Report 2021, and repeated as Figure 6 below:

Figure 6 Conservation Sites within Barnet

⁹ <https://www.legislation.gov.uk/uksi/2004/1633/schedule/2>

Sites of Special Scientific Interest	
<ul style="list-style-type: none"> Welsh Harp (Brent Reservoir) 	
Sites of Metropolitan Importance	
<ul style="list-style-type: none"> Hampstead Heath Hadley Green Edgware Way Rough Rowley Green Common (<i>Local Nature Reserve</i>) 	<ul style="list-style-type: none"> Mill Hill Substation Pastures Totteridge Fields and Highwood Hill Scratchwood (<i>Local Nature Reserve</i>) Arrandene Open Space & Feather stone Hill
Sites of Borough Importance-Grade I	
<ul style="list-style-type: none"> Coppett's Wood and Scrubland (<i>Local Nature Reserve</i>) Glebe Lane Pastures The Folly Brook and Darlands Lake (<i>Nature Reserve</i>) Glebelands (<i>Local Nature Reserve</i>) Monken Hadley Common The Upper Dollis Brook 	<ul style="list-style-type: none"> Oak Hill Woods (<i>Local Nature Reserve</i>) Totteridge Croft Field (or Dell's Down Acre) Big Wood and Little Wood (<i>Local Nature Reserve</i>) Mill Hill Golf Course
Sites of Borough Importance-Grade II	
<ul style="list-style-type: none"> Sulloniacis Pastures Edgwarebury Brook Deans Brook Mill Hill Old Railway (<i>Nature Reserve</i>) The Silk Stream and Burnt Oak Brook Moat Mount (<i>Local Nature Reserve</i>) and Mote End Farm Bruno's Field Totteridge Common The Mill Field Copthall Railway Walk and Copthall Old Common Drivers Hill Burtonhole Lane and Pasture 	<ul style="list-style-type: none"> Ashley Lane King George's Field Totteridge Green Northern Line Railway Embankment, High Barnet Lower Dollis Brook St Pancras and Islington Cemetery North Middlesex Golf Course Ponds New Southgate Cemetery Pymme's Brook Rowley Lodge Field Arkley Lane and Pastures Arkley South Fields Turners Wood
Sites of Local Importance	
<ul style="list-style-type: none"> Clay Lane Grahame Park Sunny Hill Park Barnet Countryside Centre Bell's Hill Burial Ground Clitterhouse Playing Fields Avenue House Grounds East Finchley Cemetery The Mutton Brook Greenhill Gardens Friary Park 	<ul style="list-style-type: none"> Oakleigh Park Rail Cutting Cherry Tree Wood College Farm Prince's Park Lakeside Nature Reserve Hendon Park & Northern Line Rail Cutting Edgwarebury Park Woodridge School Nature Reserve Barfields Allotments Nature Park Belmont Open Space, Cockfosters Copthall South Fields

4.4 Key points arising from the baseline information considered in the HRA (EXAM 8) include:

- All water bodies within the catchment currently achieve 'moderate' status. The Brent Catchment Partnership has prepared the Brent Catchment River Improvement Plan (2014) which sets out a vision "to improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife".
- Air quality in London has gradually improved over recent years as a result of policies to reduce harmful emissions, however, Barnet's monitoring data indicates that the whole of the LBB till exceeds the annual mean objective for nitrogen dioxide and Barnet should continue to be an Air Quality Management Area (AQMA). The Air Quality Action Plan 2017 – 2022 for Barnet identified that the two main sources of air pollution as transport and construction.

Habitats Screening Assessment

4.5 Table 3 of the updated HSA 2022 considered the condition of relevant designated sites using the assessments prepared by Natural England. The table is repeated below in Section 6.

5. The environmental characteristics of areas likely to be significantly affected.

Baseline information

5.1 Chapters 3 and 4 of the IIA Scoping Reports¹⁰ considered the relevant baseline information for the London Borough of Barnet including the identification of Plans, Policies and Programmes. Table 3 of the Scoping Report 2021 sets out the Plans, Policies and Programmes referred to in preparation of the IIA and the LBBLP. Appendix 2 of the Scoping Report 2021 set out the implications for the LBBLP against each document. The information in the updated Scoping Report, reflects representations made in relation to the Regulation 18 draft LBBLP and updated evidence available to the Council.

Habitats Screening Assessment

5.2 The HSA 2022 concludes at paragraph 44 that the LBBLP has no likely significant effects on the integrity of designated sites, either alone or in combination with other plans or projects..

6. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as designated sites and the designated site network

Habitats Screening Assessment

6.1 Table 3 (Figure 7 below) within the updated HSA 2022 set out identified environmental issues for designated sites that may have pathways of connectivity to the LBB.

Epping Forest ^{11,12}				
Epping Forest is an extensive wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathlands and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands. The site has a significant amount of Oak and Hornbeam trees, an important habitat of Atlantic acidophilous Beech Forest and is home to a rare species of epiphytes (including mosses). The woodland supports many bird species.				
Site	Qualifying Features and Non-qualifying features	Conservation objectives	Current pressures and threats	Condition

¹⁰ Core_Gen_28 https://www.barnet.gov.uk/sites/default/files/barnet_iaa_scoping_report_24.06.21.pdf

¹¹ [Site Improvement Plan: Epping Forest - SIP076 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/sites/default/files/2019/06/20190617_SIP076_Epping_Forest_SIP076.pdf)

¹² [European Site Conservation Objectives for Epping Forest SAC - UK0012720 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/sites/default/files/2019/06/20190617_Epping_Forest_SAC_UK0012720.pdf)

<p>Epping Forest</p>	<p>Epping Forest qualifies as a SAC for both habitats and species.</p> <p>H4010. Northern Atlantic wet heaths with Erica tetralix; Wet heathland with cross-leaved heath</p> <p>H4030. European dry heaths</p> <p>H9120. Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion); Beech forests on acid soils</p> <p>S1083. Lucanus cervus; Stag beetle</p> <p>The mosaics of habitat at this site contribute to site integrity. Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. Many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species.</p> <p>Stag beetles require decaying wood of broadleaved trees for larvae to feed. Trees adjacent to the SAC can help to maintain colonies of stag beetles, where decaying wood is present.</p> <p>Non-qualifying species with importance for wet heath, dry heath as well as native</p>	<p>The conservation objectives and targets are set out in the European Site Conservation Objectives for Epping Forest. The targets are set to maintain the mosaic of heathland and other vegetation, including</p> <ul style="list-style-type: none"> • maintaining wet heath and bare ground • restoring dry heath and supporting species • restoring air quality • maintaining or restoring water quantity and water quality • restoring soil quality • maintaining populations, distribution and supporting habitat for Stag Beetles. 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Air pollution and the risks of atmospheric nitrogen deposition, • Public access and disturbance upon wet heaths, dry heaths and beech forest; • Undergrazing upon wet and dry heaths. • Changes in species distribution, disease and invasive species upon beech forest. • Water quantity changes, water pollution and invasive species upon wet heaths. • Increased recreation pressure. 	<p>Air Pollution: Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</p> <p>Undergrazing: The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species diversity of heathland plant communities.</p> <p>Public Access/Disturbance: Epping Forest is subject to high recreational pressure.</p> <p>Species Distribution: Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature.</p> <p>Water levels: Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.</p> <p>Water pollution: Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity</p>
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	<p>species are listed in the conservation objectives report.</p>			<p>may be affecting wet heath, probably mostly around the edges.</p> <p>Invasive species: Heather beetle has locally impacted on some heathland areas. Potential future impact from Grey Squirrels.</p> <p>Disease: Tree diseases such as Phytophthora present a real threat to Beech trees.</p> <ul style="list-style-type: none"> • 35.48% of the site is in a 'Favourable' condition. This is equivalent to 643.31 hectares of the site. • 48.17% of the site is in an 'Unfavourable recovering' condition. This is equivalent to 861.19 hectares. • 14.53% of the site is in an 'Unfavourable No change' condition. This is equivalent to 259.76 hectares of the site. • 1.83% of the site is in an 'Unfavourable Declining' status. This is equivalent to 32.66 hectares.
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Richmond Park ^{13, 14}

¹³ [UK0030082_RichmondParkSAC_COSA_final advice 31 May 2016 \(1\).pdf](#)

¹⁴ [SIP141211FINALv1.0 Richmond Park.pdf](#)

Richmond Park SAC is a parkland site covering 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. It is significant for its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and an impressive population of veteran trees. These habitats support a rich invertebrate assemblage; in the case of the woodland and veteran trees this relates to saproxylic invertebrates, particularly Stag Beetles, for which the SAC is designated.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Richmond Park	<p>The site is designated as an SAC due to the presence of Annex II species Stag Beetle <i>Lucanus cervus</i>.</p> <p>The combination of historic grazing by deer and geology has had a significant impact, producing a mosaic of habitats including acid grassland, marshy grassland and neutral grassland as well as open parkland and wood pasture. The area of unimproved acid grassland within the park is the largest in Greater London, characterised by native grasses such as brown bent <i>Agrostis canina</i>, sheep's fescue <i>Festuca ovina</i> and wavy hair-grass <i>Deschampsia flexuosa</i>. In marshier grassland, species such as purple moor-grass <i>Molinia caerulea</i> and heath rush <i>Juncus squarrosus</i> occur. Where the ground is permanently waterlogged, rushes <i>Juncus</i> spp., sedges <i>Carex</i> spp. and tufted hair grass <i>Deschampsia cespitosa</i> are prevalent.</p>	<ul style="list-style-type: none"> • Maintain an abundance and constant supply of ancient trees, standing dead trees, fallen trees, stumps and roots in a state of decay. In urban areas ensure larger native trees and man-made timber structures persist as a larval resource. • Maintain a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood. • Ensure the continuity of timber decay and nutrient recycling processes, in particular the continued provision of plentiful decaying stumps and roots. • Maintain or restore the presence of the stag beetle population across its full range within the SAC, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. • Maintain the management measures (either within and/or outside the site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting 	No current issues affecting the Natura 2000 feature(s) have been identified on this site within the latest reports.	100% of this site is in an 'Unfavourable – Recovering' condition.

	The parkland supports many ancient and veteran trees, particularly oak, which host a significant assemblage of invertebrates associated with dead and decaying wood.	processes associated with the stag beetle feature and/or its supporting habitats.		
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Wimbledon Common ^{15, 16}

Wimbledon Common is one of the largest areas of uncultivated land in the conurbation of London and sits in the Thames Valley Natural Character Area. It supports a mosaic of habitats including broadleaved woodland, acid grassland, dry and wet heath, scrub and mire. The underlying soils are mostly sands, gravels and silty clays which give rise to poorly-drained, nutrient poor and acid conditions. The range of habitats supports a wide diversity of plants and animals, including many which are scarce in the London area. The SAC is a particular stronghold for the stag beetle *Lucanus cervus* in the south east of England and is at the heart of the local centre of distribution of the species. The site provides ideal habitat conditions for the stag beetle, such as extensive areas of undisturbed woodland and large quantities of decaying wood. The site is also important in supporting small but important areas of heathland, a very scarce habitat in the London area.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Wimbledon Common	<p>The site qualifies as an SAC site due to the presence of:</p> <ul style="list-style-type: none"> Northern Atlantic wet heaths with <i>Erica tetralix</i> European dry heath. <p>The site is primarily designated for the following Annex II species:</p> <ul style="list-style-type: none"> Stag Beetles <i>Lucanus cervus</i>. <p>Wimbledon Common SAC has a large number of old trees and a great quantity of fallen</p>	<ul style="list-style-type: none"> Maintain or restore an abundance and constant supply of ancient trees, standing dead trees, fallen trees, stumps and roots in a state of decay. In urban areas ensure larger native trees and man-made timber structures are retained wherever possible as a larval food resource. Maintain or restore a well-structured broadleaved woodland habitat, with sheltered, 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> Public Access/ Disturbance Habitat Fragmentation Invasive Species Air Pollution: impact of atmospheric nitrogen deposition. 	<p>Public Access/ Disturbance: High visitor use of the site causes damage to sensitive habitats, and results in adverse impacts such as compaction around the base of mature trees and removal of fallen timber.</p> <p>Habitat Fragmentation: The Stag beetle remains vulnerable to extinction in the UK as a result of habitat loss and fragmentation of populations.</p> <p>Invasive Species: Oak processionary moth is now well-established at Richmond Park and other sites in the London area; this species represents a serious threat to human health. Control is potentially damaging to invertebrate populations and is expensive</p>

¹⁵ [European Site Conservation Objectives for Wimbledon Common SAC - UK0030301 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

¹⁶ [Site Improvement Plan: Wimbledon Common - SIP262 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

	<p>decaying timber which a number of other scarce invertebrate species associated with decaying timber. Trees on adjacent sites may also support Stag Beetles where fallen and decaying timber is found.</p>	<p>sunlit glades and rides containing stumps and other suitable decaying wood.</p> <ul style="list-style-type: none"> • Ensure the continuity of processes of timber decay and nutrient recycling, in particular the continued provision of plentiful decaying stumps and roots. • Maintain or restore the presence of the stag beetle population across its full range within the SAC, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. • Maintain or restore the management measures (either within and/or outside the site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the stag beetle feature and/or its supporting habitats. 		<p>which may result in reduced nature conservation management.</p> <p>Air Pollution: impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds site relevant critical loads. Wimbledon Common is subject to high levels of atmospheric nitrogen oxide and ammonia deposition which is likely to be having deleterious effects on sensitive habitats, particularly the heath and mire vegetation</p> <ul style="list-style-type: none"> • 333.77ha of the site is 'Unfavourable – Recovering' condition. This is equivalent to 94.99% of the site. • 17.62 ha of the site is in 'Unfavourable – No Change' condition. This is equivalent to 5.01% of the site.
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Wormley-Hoddesdonpark Woods SAC ^{17, 18}

Wormley-Hoddesdonpark Woods is one of two outstanding examples in England of a type of oak-hornbeam forest mainly found in central Europe. Sessile and pedunculate oaks are key components of the canopy. Hornbeam is mixed with oaks and other trees in areas of high forest and is also present as almost pure stands of stored coppice, some of which are being brought back into a coppice cycle. Over 95% of the site is ancient woodland. It includes areas of wood-pasture and many veteran pollards and coppice stools. Distinctive features of the ground flora include stands of great wood-rush and an unusual moss community more typical of continental Europe.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Wormley-Hoddesdonpark Woods	<p>The site qualifies as an SAC site due to the presence of:</p> <p>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli</p> <p>The site also contains</p> <ul style="list-style-type: none"> • <i>Sessile oak Quercus petraea</i> • <i>Bluebell Hyacinthoides non-scripta</i> • <i>Great wood-rush Luzula sylvatica</i>. <p><i>Mosses:</i></p> <ul style="list-style-type: none"> • <i>Dicranum majus and Leucobryum glaucum</i>. • <i>Dicranum montanum</i>, • <i>D. flagellare</i> 	<p>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli:</p> <ul style="list-style-type: none"> • Maintain extent, distribution and configuration of feature. • Maintain or restore <i>Quercus robur</i> – <i>Pteridium aquilinum</i> – <i>Rubus fruticosus</i> Woodland characteristics. • Maintain range of age classes, canopy cover and presence of ancient and veteran trees. • Maintain temporary and restore permanent open space. 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Disease • Invasive Species • Air Pollution: impact of atmospheric nitrogen deposition • Public Access/ Disturbance • Deer • Forestry and Woodland Management • Illicit vehicles. 	<p>Disease: Acute Oak Decline (AOD) is present in at least two parts of the site and affects both native oak species, which are key components of this woodland type. Oaks can be killed by AOD within 5 years of symptoms appearing. Research is underway on the causal agents and spread of the disease. Based on current knowledge AOD has the potential in the long-term to cause high oak mortality right across the site.</p> <p>Invasive Species: Several tree and shrub species not native to the site are present. Where they are not being actively controlled, they are gradually spreading. The more invasive of these include sycamore, turkey oak, rhododendron and snowberry</p> <p>Air Pollution: impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features</p>

¹⁷ [Site Improvement Plan: Wormley Hoddesdonpark Woods - SIP265 \(naturalengland.org.uk\)](https://naturalengland.org.uk/sites/default/files/2019-03/Wormley-Hoddesdonpark-Woods-SIP265.pdf)

¹⁸ [European Site Conservation Objectives for Wormley-Hoddesdonpark Woods SAC - UK0013696 \(naturalengland.org.uk\)](https://naturalengland.org.uk/sites/default/files/2019-03/Wormley-Hoddesdonpark-Woods-SAC-UK0013696.pdf)

	<ul style="list-style-type: none"> • <i>D. tauricum</i>. <p>The largest part of the site is oak-bracken-bramble woodland, dominated by sessile oak <i>Quercus petraea</i> and hornbeam <i>Carpinus betulus</i>, with areas of pedunculate oak <i>Quercus robur</i> and hornbeam. Further there are large stands of almost pure hornbeam (former coppice). There are also marshy areas with alder <i>Alnus glutinosa</i>, pendulous sedge <i>Carex pendula</i> and yellow pimpernel <i>Lysimachia nemorum</i> as well as areas with higher proportions of ash <i>Fraxinus excelsior</i>, Dogs Mercury <i>Mercurialis perennis</i> and Yellow Archangel <i>Lamium galeobdolon</i> on the chalky boulder clay. Areas dominated by bluebell <i>Hyacinthoides non-scripta</i> do occur, but elsewhere there are stands of great wood-rush <i>Luzula sylvatica</i> with carpets of the mosses <i>Dicranum majus</i> and <i>Leucobryum glaucum</i>. Locally, a bryophyte community more</p>	<ul style="list-style-type: none"> • Maintain vegetation structure – old wood, dead wood, shrubs, woodland edge, site native trees. • Maintain low level grazing and allow for regeneration with saplings. • Maintain soil types and structure. • Maintain wider connections in the functional landscape. • Restore as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site. • Maintain hydrological function. • Limit impacts of artificial light. 		<p>are currently considered to be in favourable condition on the site.</p> <p>Public Access/ Disturbance: The site is a large, attractive area of ancient woodland with extensive public access and close to large urban centres, so it is heavily used by the public for recreational purposes. Sensitive management of access points and routes by the site’s main owners has been largely successful in mitigating the potential adverse effects of this high level of use. However, visitor numbers continue to increase, the types of use can change unpredictably and less obvious adverse effects on important flora and fauna could be missed during routine, ‘general purpose’ monitoring.</p> <p>Deer: Browsing and grazing by deer can reduce tree regeneration (from seedlings or coppice stools) and damage the woodland understorey and ground flora. At this site, deer damage levels are currently only moderate and do not appear to be affecting tree regeneration, habitat structure or species composition greatly. However, subtle damaging effects can be difficult to identify and monitor, and deer populations can increase rapidly.</p> <p>Forestry and Woodland Management: The larger woodland units with public access are under appropriate management but some of the smaller, privately-owned units are not. Though it is quite acceptable for a significant proportion of the site to be left as ‘minimum intervention’ high forest, in some circumstances a lack of active management can lead to adverse ef-</p>
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	<p>typical of continental Europe occurs, including the mosses <i>Dicranum montanum</i>, <i>D. flagellare</i> and <i>D. tauricum</i>. Nationally the woods are regarded as the best remaining example of the south eastern sessile oak hornbeam woods. Understorey species may include: hawthorn, blackthorn, crab apple, field maple, hazel, willow.</p>			<p>fects. These include a reduction in structural and species diversity (particularly in previously coppiced areas), the loss of temporary and permanent open space, the over-shading and deterioration of veteran pollards, and the spread of invasive species.</p> <p>Illicit vehicles: Illegal use of restricted byways and bridleways by off-road vehicles causes localised but sometimes severe rutting and soil compaction, damaging the woodland ground flora, shrubs and trees. Fly-tipping damages the ground flora directly and can introduce toxins and alien species.</p> <ul style="list-style-type: none"> • The qualifying features are mostly in favourable or unfavourable-recovering condition (140ha). • Areas in unfavourable condition, including grassland, amount to less than 7ha. • The NE management plan for this site, produced in 2015, states that the qualifying features are mostly in favourable condition.
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Lee Valley ^{19, 20}

Lee Valley - The Lee Valley Regional Park includes 450ha of protected open water and wetland vegetation carefully managed to support a diversity of plant and animal species. The reservoirs also support nationally and regionally important. The area is also very popular for recreational activities and is designated a Regional Park. The Lee Valley Park Authority is responsible for managing the important balance between nature conservation and recreational activity on the site. Special Protection Areas within Lee Valley Regional Park include Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoirs SSSIs. All habitats within the SPA are manmade.

Site	Qualifying Features	Conservation objectives	Current pressures and threats	Condition
Lee Valley	<p>The site qualifies as a SPA site for the presence of the following Annex I species:</p> <ul style="list-style-type: none"> • Bittern, <i>Botaurus stellaris</i>, • Gadwall, <i>Anas strepera</i> • Northern Shoveler <i>Spatula clypeata</i> • water-milfoil <i>Myriophyllum Verticillatum</i> • water boatman <i>Micronecta minutissima</i>. <p>Walthamstow Reservoir, constructed in the latter</p>	<p>Great Bittern:</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area. • Maintain concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk). • Restore population abundance of the Great Bittern, ensure safe passage. 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Water pollution • Hydrological changes • Public access / disturbance • Inappropriate scrub control • Fisheries: Fish stocking • Invasive Species • Inappropriate cutting/mowing • Air pollution. 	<p>Water pollution: The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources.</p> <p>Hydrological changes: Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.</p> <p>Public access / disturbance: Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.</p> <p>Inappropriate scrub control: The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary to ensure these habitats are maintained.</p>

¹⁹ [European Site Conservation Objectives for Lee Valley SPA - UK9012111 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

²⁰ [Site Improvement Plan: Lee Valley - SIP118 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

	<p>half of the nineteenth century, comprises of ten relatively small and shallow water storage basins. Several of these are fringed by sloping earth banks and together with the presence of wooded islands form distinctive habitat features. Rye Meads SSSI comprises of wet meadows, disused and operational effluent lagoons and Rye House marsh. These three areas provide a variety of different habitats including open water habitats swamp communities, tall fen communities, marshy grassland and scrub. The meadows are the last substantial remnants of ancient floodplain on the rich alluvial soils of the Lee Valley. The site supports one of the largest areas of tall fen vegetation in the county and provides a valuable habitat for birds and locally uncommon plants. Amwell Quarry SSSI is a former gravel pit site in the</p>	<ul style="list-style-type: none"> • Maintain reedbed structure, wet ditches and pools • Minimise human disturbance • Restore the distribution, abundance and availability of key prey items (e.g. eel, rudd, roach, frogs, toads) at preferred prey sizes <p>Gadwall (Non-breeding)</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area • Maintain concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk). • Maintain population • Maintain habitat and depth of water • Minimise human disturbance • Maintain a high cover/abundance of preferred food plants (e.g. sweet-grass <i>Glyceria fluitans</i>, creeping bent <i>Agrostis stolonifera</i>, stoneworts <i>Chara</i>, 		<p>Fish Stocking: Fish population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species.</p> <p>Invasive Species: Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources).</p> <p>Inappropriate cutting/mowing: The reedbed requires rotational management for bittern.</p> <p>Air pollution: Nitrogen deposition exceeds site relevant critical loads</p> <p>Walthamstow Reservoirs</p> <ul style="list-style-type: none"> • 100% of the site is achieving an 'Unfavourable Recovering' condition. This is equivalent to 180 hectares. <p>Turnford and Cheshunt Pits Reservoir</p> <ul style="list-style-type: none"> • 100% of the site is in 'Favourable' condition. This is equivalent to 174 hectares. <p>Rye Meads</p> <ul style="list-style-type: none"> • 23.75 hectares are in 'Favourable' condition. 23.75 hectares are in 'Unfavourable Recovering' condition. <p>Amwell Quarry</p> <ul style="list-style-type: none"> • 100% of the site is in 'Favourable' condition. This is equivalent to 30 hectares.
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	<p>Lee Valley near Ware, which supports nationally important numbers of wintering wildfowl, along with outstanding assemblages of breeding birds and of dragonflies and damselflies. The site includes two large lakes which were excavated between 1973 and 1990, and a variety of associated wetland, grassland and woodland habitats. The Turnford and Cheshunt Pits SSSI include ten former gravel pits ranging in age from North Metropolitan Pit which is among the oldest pits in the Lee Valley to Hooks Marsh Lake which was not excavated until the 1970s, and cover a span of over 40 years. Because of the profusion of pits and islands, several of the pits have extensive shorelines; North Metropolitan Pit alone having an estimated shoreline of about 7.2km. Also included in the site are all the associ-</p>	<p>pondweeds Potamogeton, Ceratophyllum spp., Ruppia). Northern shoveler (Non-breeding):</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area • Maintain concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk). • Restore population abundance of the Shoveler, ensure safe passage • Maintain habitat structures • Minimise human disturbance • Restore high cover/abundance of preferred food plants (e.g. Scirpus, Eleocharis, Carex, Potamogeton, Glyceria, surface plankton). Restore the distribution, abundance and availability of key prey items (e.g. Hydrobia, crustaceans, caddisflies, Diptera, beetles) at preferred prey sizes. 		
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	ated areas of marsh, grassland, ruderal herbs, scrub and woodland; part of the Small River Lee; and a further water body, Hall Marsh Scrape, which was constructed specifically for use by waterfowl. The pits are of national importance for wintering gadwall and shoveler.			
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6.2 In order to consider impacts on the protected site network, the HRA screening document and technical note (EXAM8 and EXAM39) consider the likely ‘pathways’ that will impact on them and The HRA and HSA refer to the pathways identified in the HRA for the London Plan (AECOM 2018 and updated²¹), namely:

- Impacts from urbanisation and recreational activities (including disturbance and abrasion)
- Atmospheric pollution
- Water abstraction
- Water quality.

6.3 The main impacts from the Barnet Plan would be through the quantum of increased development. Policies have been screened for impacts on this basis. The Plan has been reviewed in the context of the level of development already planned for within the adopted London Plan, and wider London strategies. A consideration of the pathways and the potential impact of the Barnet Plan on the designated sites is set out later in this document when considering impacts of individual polices, indirect impacts and in-combination impacts. Paragraphs 23 onwards discuss Zones of Influence in relation to each site and potential pathways.

Figure 8 below (Table 4, HSA 2022) summarises the main impact pathways considered for each site:

²¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

European Site	Recreational Pressure	Air Pollution	Water quantity and impacts on water quantity
Lee Valley	Small area of Lee Valley within ZOI of 7km Potential impact pathway - No likely significant effects due to the distances involved and the small area affected.	Potential impact pathway - No likely significant effects due to the distances involved and the small area affected.	Small area of Lee Valley within ZOI of 7km No likely significant effects due to the distances involved and the small area affected.
Epping Forest	No impact pathway – distance greater than ZOI of 6.2km.	Potential impact pathway - No likely significant effects due to the distances involved.	No impact pathway.
Richmond Park	No impact pathway – distance greater than ZOI of 7km.	No impact pathway.	No impact pathway.
Wimbledon Common	No impact pathway – distance greater than ZOI of 7km.	No impact pathway.	No impact pathway.
Wormley-Hoddesdonpark Woods	No impact pathway – distance greater than ZOI of 7km.	Potential impact pathway - No likely significant effects due to the distances involved.	No impact pathway.

7. The environmental protection objectives, established at international, Community or national²² level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

Baseline Information

7.1 The Scoping Report 2021 sets out the documents referred to within the list of Plans, Policies and Programmes²³. The environmental protection objectives were included in the formulation of the Objectives within the IIA and the wider LBBLP. The IIA considered the proposed policies at each stage against an assessment framework to ensure environmental protection objectives were adequately considered within the plan making process.

7.2 The scoring criteria used within the Regulation 18 and Regulation 19 (Table 1.1) IIA documents is set out below (Figure 9). The assessment framework is set out in Part 2, Appendix 3 of the Regulation 18 and Regulation 19 IIA documents, and included as Appendix 1 of this NTS. A summary of the scoring assessments is included as Appendix 2 of this NTS.

Figure 9 Scoring Criteria

Score	Description	Symbol
Significant Positive	The proposed site contributes significantly to the achievement of the objective	++
Minor Positive	The proposed site contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed site does not have any effect on the achievement of the objective	0
Major Negative	The proposed site detracts significantly from the achievement of the objective	--
Minor Negative	The proposed minor detracts from the achievement of the objective but not significantly	-
Unknown	The effect of the proposed site cannot be known or insufficient information make it too unpredictable to assign a conclusive score	?
NeutralMixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria	-/+

²² Word in Sch. 2 para. 5 substituted (31.12.2020) by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (S.I. 2018/1232), regs. 1(2), 5(8)(b); 2020 c. 1, Sch. 5 para. 1(1)

²³ [Core Gen 28](#): Table 3, Scoping Report 2021; Appendix 2, Scoping Report 2021; [Core Gen 02](#): Table 5 IIA Regulation 19.

Habitats Screening Assessment (HSA)

7.3 Table 5 of the updated HSA 2022 sets out how the draft policies within the LBBLP were screened against the relevant designated sites and their objectives. Policies were also screened for in-combination effects against the objectives, as set out in paragraphs 37-43 of the HSA 2022.

7.4 In summary, the updated HSA 2022 concluded that it is unlikely that the draft LBBLP will have a significant impact on the designated sites due to recreational pressure, impacts on water abstraction and water quality, or impacts on air quality.

8. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects

Indicators and Objectives

8.1 The IIA Objectives are designed to consider the broadest implications of the draft LBBLP and cover topics (a) to (l) above²⁴. The IIA assessment considers the relationship between the Objectives, as indicated in paragraph 2.39 and Figure 1 of the Regulation 19 IIA. The assessment framework acknowledges overlap between the Objectives, particularly in relation to climate change and human health.

8.2 A series of prompt questions were prepared against the Objectives, forming an assessment framework to guide officers assessing draft policies. The prompt questions consider the short and long-term effects of policy, permanent and temporary effects, as well as secondary, cumulative and synergistic effects²⁵.

8.3 The proposed draft Indicators for each IIA Objective²⁶ provide an opportunity to monitor the effects of the policies and the draft LBBLP over time.

Cumulative impacts

8.4 An assessment of cumulative impacts builds on the assessment of individual policies to provide a deeper understanding of the potential impacts of the policies within a local plan. The cumulative impact of policies is not a simple mathematical exercise, adding or subtracting individual policy scores, although these form the basis for any assessment. The cumulative assessment should also consider the wider implications of policy options and identify any potential amendments to policy to minimise environmental impacts.

8.5 Figure 10 below sets out the key linkages between the IIA objectives and the SEA environmental factors. Many of the objectives and environmental factors overlap. The IIA assessment considers the relationship between the Objectives, as indicated in paragraph 2.39 and Figure 1 of the Regulation 19 IIA²⁷.

Figure 10 Environmental Factors and the LBBLP IIA Objectives

²⁴ Para 156 of Scoping Report 2021

²⁵ IIA Scoping Report 2021 (Pages 62 -69) and Appendix 3 of this document

²⁶ Table 7 of the IIA Regulation 18 and Regulation 19 Reports

²⁷ https://www.barnet.gov.uk/sites/default/files/iaa_part_one.pdf

IIA Objectives	SEA Environmental Factors <i>(key links in bold)</i>
1. To reduce poverty and promote equality of opportunity	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
2. Ensure efficient use of land and infrastructure	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
4. Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors

IIA Objectives	SEA Environmental Factors <i>(key links in bold)</i>
	Material Assets Cultural Heritage Landscape
5. Ensure that all residents have access to good quality, well-located, affordable housing	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
6. Improve the health and well-being of the population and reduce inequalities	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
7. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
8. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	Biodiversity Population Human Health Fauna Flora Soil

IIA Objectives	SEA Environmental Factors <i>(key links in bold)</i>
	Water Air Climatic Factors Material Assets Cultural Heritage Landscape
9. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
10. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
11. Reduce contribution to climate change and enhance community resilience to climate change impacts	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
12. Maximise protection and enhancement of natural resources including water and air, and minimise waste	Biodiversity Population Human Health

IIA Objectives	SEA Environmental Factors <i>(key links in bold)</i>
	Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape
13. Minimise and manage the risk of flooding	Biodiversity Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape

8.6 The policies within the LBBLP can be split between thematic policies and site allocations. The IIA considered the cumulative impacts of thematic policies within the Regulation 18 and Regulation 19 documents²⁸.

8.7 The cumulative thematic assessments set out Part 2 of each of the IIA iterations provide a summary assessment and potential for mitigation, where appropriate. Figure 11 below is taken from Part 2 of the Regulation 19 IIA.

²⁸ Appendix 1, Thematic Review https://www.barnet.gov.uk/sites/default/files/part_2_ia_report.pdf, https://www.barnet.gov.uk/sites/default/files/ia_part_two.pdf

Figure 11 Cumulative Assessment and Suggested Mitigation

Policy Theme	Cumulative Assessment and Suggested Mitigation
GSS 1 to GSS13	<p>Proposed policies are likely to have overall positive effects (direct or indirect) in relation to the range of IIA objectives including those related to successful inclusive neighbourhoods, accessibility and efficient use of land and infrastructure. They do not preclude the realisation of other policies that more directly address other objectives. Where negative effects have been identified (e.g. through increased construction waste as a result of development) these will be mitigated via other policies contained elsewhere within the plan.</p>
Housing	<p>Proposed housing policies will help create places where people want to live, work and visit, as well as promote community resilience. As such, the overall strategic effect on the IIA objectives when managed through the suite of existing and proposed development plan policies should have a range of positive impacts which include:</p> <ul style="list-style-type: none"> ▪ Investment in the built environment ▪ A boost to the local economy and employment through the construction of new homes ▪ Widening housing choice will benefit a range of socioeconomic outcomes such as health, accessibility to services, educational outcomes and improved employment opportunities. <p>It is also recognised that the scale of development planned for in the Borough is likely to put pressure on social and physical infrastructure and could have potentially adverse impacts on the local environment. For example, more homes will increase the level of waste generated and such high housing targets could put pressure on release of greenfield sites and green belt, impacting on Barnet's environment/biodiversity.</p>
Character, Design and Heritage	<p>The policies have been assessed as having a positive effect on the overall IIA objectives, particularly those relating to high quality design and sustainable design. It is noted that high levels of development could have potential adverse impacts on the character of certain areas within the Borough and on heritage assets; however, these impacts will be mitigated through policies in this section and elsewhere within the Local Plan.</p>
Town Centres	<p>The policies, as set out, are likely to have a number of positive impacts on the objectives within the IIA framework, particularly those which relate to a high-quality environment, housing and economic growth. The policies enable diversification within town centres which will improve accessibility to key local services and help the Council meet wider regeneration objectives. Residential development will also enable well connected places that encourages sustainable and active travel and improve overall sense of place. Any areas where the policies might be expected to have potential negative effects are safeguarded by other policies within the Local Plan, for example increased development in town centres may lead to greater traffic congestion and pollution; however, sustainable and active travel are promoted alongside provision of mixed use communities to reduce the need to travel.</p>

Policy Theme	Cumulative Assessment and Suggested Mitigation
Community Uses, Health and Wellbeing	The policies have been assessed as having a positive or neutral effect on the overall IIA objectives. The effective implementation of these policies will help the Council contribute towards its wider regeneration agenda and will bring about numerous community benefits such as increased access to communal facilities, education and training opportunities. Policies also promote more active lifestyles that will have health and environment benefits. Any areas where the polices might be expected to have potential negative effects are safeguarded by other policies within the Local Plan.
Economy	The overarching purpose of these policies is to create employment and training opportunities and ensure adequate provision of workspace to support business and enterprise. The majority of policies assessed are likely to have neutral or positive effects (direct or indirect) in relation to the IIA objectives. The provision of affordable workspace will be of particular benefit to SMEs as it will help them to prosper and grow. In addition, increasing access to jobs, skills and training opportunities will help reduce unemployment within the Borough. However, increasing employment and business in the Borough has the potential to generate waste and adversely impact on water and air quality. Any instances where policies might have possible adverse effects will be mitigated by carrying through other Local Plan policies and associated effects. The full assessment of impacts has been summarised below.
Environment and Climate Change	Policies assessed here are likely to have positive effects (direct or indirect) in relation to all IIA objectives. Policies specifically address air and noise pollution, water environment, waste, green infrastructure and biodiversity, all of which are key IIA objectives in themselves; furthermore, they do not preclude the realisation of other policies that more directly address other objectives. Any instances where the proposed requirements might be expected to have possible negative effects in relation to other objectives (e.g. a drive for better air and water quality may add restrictions and/or requirements on some forms of business and hinder economic objectives) are mitigated by the carrying through of established Local Plan policy requirements.
Transport and Communications	The policies promote investment in the strategic transport network and a more sustainable pattern of movement, which is likely to have a positive impact on a number of objectives within the IIA framework, including sustainable travel and reducing dependency on car travel, health and air quality. Policies under this theme do not preclude the achievement of other objectives through implementation of the policies under the thematic headings. Any areas where the polices might be expected to have potential negative effects are mitigated by other policies within the Local Plan, for example, development proposals that result in the reduction of off-street car parking spaces where they meet criteria and have high public transport accessibility to minimise car use.

8.8 The assessment of cumulative impact should also consider

- The cross-cutting impacts of the thematic policies.
- The cumulative impact of site allocations.
- The plan as a whole.

Cross-cutting impacts of thematic policies

8.9 The thematic policy cumulative assessments acknowledge the link between themes within the LBBLP. Table 6 of the Regulation 19 IIA, (Core_Gen_02²⁹) summarises where thematic policies link with the IIA Objectives and notes that there are multiple interactions.

8.10 In assessing cross-cutting cumulative impacts, the outcomes become less certain. The IIA makes suggestions for additional policy wording in relation to mitigating the impacts of individual policies, as well as the policy themes, as set out in Figure 2 above, for example in relation to housing policies. In incorporating those suggestions, as well as in response to additional evidence, the Council has proposed a series of modifications to the LBBLP, including additional cross-referencing within the plan (EXAM 4). For example, the Council is proposing a further table in relation to carbon-offsetting, cross-referenced with the appropriate environmental policies.

8.11 Local plans should be read “as a whole”. Additional cross-referencing within the LBBLP will help with implementation of the policies by identifying specific instances where policies complement each other or could be in conflict without additional consideration. This should ensure that unintended outcomes are minimized, positive impacts can be maximised and negative impacts decreased.

The Cumulative Impact of Site Allocations

8.12 At a strategic level, the London Plan 2021 has considered the environmental, social and economic outcomes of the level of development within the London Borough of Barnet. The LBBLP considers the implications at a plan-making level. In order to assess the sites submitted through the various call for sites exercises undertaken and those identified through other local plan documents e.g. AAPs, SPDs and evidence base studies, the Council applied a bespoke methodological site selection approach which sought to identify suitable sites for allocation in the LBBLP^{30,31}.

8.13 An analysis was undertaken to ensure that the topics identified in the SA framework were addressed in the site assessment and selection process. The Site Allocation process is set out within Appendix 1 of the submission LBBLP. The Council has also prepared an updated Site Allocation paper for the Examination in Public³². Appendix 4 of this document contains all site option assessments within a single table. A version of this table was included as Table 5 in the Regulation 19 IIA.

²⁹ <https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-review/submission>

³⁰ https://admin.barnet.gov.uk/sites/default/files/EXAM%204%20-%20Table%20of%20Council%27s%20Proposed%20Modifications%20to%20Barnet%27s%20Draft%20Local%20Plan%20-%20June%2027th%202022%20PDF%20%282.35MB%29_0.pdf

³¹ Exam 1b: <https://www.barnet.gov.uk/sites/default/files/EXAM%201B%20-%20Housing%20Technical%20Paper.pdf>

³² EXAM 9: <https://www.barnet.gov.uk/sites/default/files/EXAM%209%20-%20Strategic%20Sites%20Delivery%20Technical%20Paper.pdf>

8.13 The cumulative impact of the site allocations in relation to the IIA objectives was considered in the Regulation 19 IIA in paragraphs 3.19 to 3.41. Consideration of the site selection process is given in [Exam 1b](#).

8.14 Each site allocation is subject to development criteria to harness and mitigate detailed impacts. The IIA of any proposed modifications to the LBBLP will consider the cumulative impacts of the final set of proposed site allocations, in the context of the finalised policy wording.

The Plan as a whole

8.15 The IIA documents acknowledge that the policies within the LBBLP are interlinked³³. The IIA has individually assessed each proposed policy option and site allocation and made recommendations from the Scoping stage through to Regulation 19. These recommendations have improved the LBBLP against the IIA Objectives and, although some outcomes remain uncertain, the overall sustainability scoring of the LBBLP has increased.

8.16 Appendix 3 of this document sets out the policy options for the submitted draft LBBLP. Proposed modifications will be screened and assessed as necessary.

9. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Mitigation within the IIA

9.1 The commentary on assessments within each iteration of the IIA made suggestions for policy to mitigate potential environmental impacts, alongside social and economic impacts.

9.2 The LBBLP policies set out requirements for additional information and assessments to be provided when a planning application is submitted. These criteria provide further opportunities for mitigation of impacts of development through the plan period.

Mitigation in relation to HRA

9.3 The relevant steps for HRA are set out in government guidance³⁴. The HRA within the IIA stops at the Screening Stage and therefore does not consider mitigation further in relation to the LBBLP. The LBBLP Updated HRA Screening report 2022 (EXAM 8³⁵) considers that the LBBLP is not likely to have any significant effects on the identified designated sites and consequentially that there are no impacts that require mitigation.

9.4 The HRA does, however, build on information from the preparation of the HRA into the London Plan (Core Gen 16) and other relevant local plans. The London Plan is therefore considered to form part of the baseline.

9.5 A further consideration of the relationship between the HRA for the London Plan and the Appropriate Assessments carried out for other relevant Local Plans is set out in the HRA technical paper. A further consideration of the relationship between the HRA for the London Plan and the

³³ IIA Reg 18 and Reg 19, Part 2 – Appendix 1, Thematic Review and Appendix 2 Site Assessments

³⁴ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

³⁵

<https://admin.barnet.gov.uk/sites/default/files/Exam%208%20Habitats%20Regulation%20Screening%20Assessment.pdf>

Appropriate Assessments carried out for other relevant Local Plans is set out in the HRA technical paper ³⁶.

10. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

London Plan

10.1 The London Plan sets Borough level housing targets and identifies locations for future growth along with strategic policies for delivering the identified growth for London Boroughs. The LBBLP is limited in options it can consider in order to ensure it will be in 'general conformity' with the London Plan. The IIA has therefore been restricted in its consideration of reasonable alternatives.

10.2 However, the LBB has undertaken a rigorous review of land that is available for development, and which is likely to be deliverable and developable within the plan period. The approach to this review is set out in more detail within LBBLP Appendix 1 – Schedule of Site Proposals. Further detail on the Site Allocations is provided in the Housing Technical Paper (EXAM 1b³⁷).

Selection of options and alternatives

10.3 The LBB set out a Preferred Approach as part of the Regulation 18 consultation. Appendix 8 of the Regulation 18 IIA sets out the options considered, including reasonable alternative options, where they existed. Policies were refined between the Regulation 18 and Regulation 19 consultations, incorporating recommendations from the IIA, updated evidence and information received through consultations. Scoring of the reasonable alternatives for each policy is set out within the IIA Technical Note, and in Appendix 5 of this document.

10.4 Each topic within the LBBLP includes a set of policies that set out key principles for growth and development. The submission LBBLP is the Council's preferred policy approach. Reasonable alternative options were considered at earlier stages of the plan making process and are set out in IIA Regulation 18, Section 3 and Appendix 8.

10.5 Reasonable Alternatives to policy were updated at Regulation 19 stage, in Appendix 8. Any further policy iterations will be subject to IIA including assessment against previous policy options.

10.6 As set out in Planning Policy Guidance on Sustainability Appraisal and Strategic Environmental Assessment³⁸, "The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan". The Assessment of alternatives should be proportionate to the plan making process.

Appraisal methodology

10.6 An Integrated Impact Assessment (IIA) fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by a local, regional, or national authority. The IIA approach incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations.

³⁶ <https://www.barnet.gov.uk/sites/default/files/EXAM%2039%20-%20LBB%20Note%20-%20Technical%20Note%20on%20HRA.pdf>

³⁷ <https://www.barnet.gov.uk/sites/default/files/EXAM%201B%20-%20Housing%20Technical%20Paper.pdf>

³⁸ Paragraph: 009 Reference ID: 11-009-20140306, Revision date: 06 03 2014

10.7 An IIA can also fulfil the requirements for Health Impact Assessment, Equalities Impact Assessment, and Habitats Regulations Assessment. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work, particularly as the various types of impact assessment deal with many of the same issues. IIAs aim to provide a more effective assessment of Local Plans taking a cross-cutting approach and in doing so provide a single, comprehensive assessment of the Plan.

10.8 The assessment framework is set out in Appendix 3³⁹. The Site Matrix is set out in Appendix 4⁴⁰.

Health Impact Assessment

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

Habitats Regulations Assessment

10.9 The HRA screening assessment was updated in August 2022 (Exam 8) and the further detail of the HRA process is set out in the HRA Technical Note, November 2022, (EXAM 39). The HRA concluded that the draft Local Plan would not have any significant effects (either alone or in combination) on any designated European Sites.

10.10 The IIA references to mitigation outside of the HRA Screening Update do not refer to mitigation in relation to designated sites or the designated site network.

Equalities Impact Assessment

10.11 The LBBLP has the potential to impact on all of those who live, work and visit the Borough. To assess this, an EqIA was carried out and the results are outlined in Appendix 6 (Regulation 19 IIA Part 2, paragraph 1.22). There are policies contained within the draft plan which could have significant effects on those individuals who share one or more of the nine protected characteristics identified under the Equalities Act 2010⁴¹.

10.12 These include policies related to housing, transport, employment, environment and inclusive design. The EqIA identified that many of the policies would have a positive effect across equalities groups particularly those which relate to housing (e.g. the provision of affordable housing and specialist housing), high quality design (e.g. emphasis on inclusive design will be beneficial to disabled people), employment and training and improvements within the built environment to make it more inclusive.

10.13 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.

³⁹ Appendix 2 of the IIA Technical Note, taken from the IIA Scoping Report 2021

⁴⁰ Appendix 3 of the IIA Technical Note and within Part 2 of the Regulation 18 IIA Assessment

⁴¹ Regulation 19 IIA Part 2, paragraph 1.22

Stages of IIA

10.14 Figure 1 of this document, sets out the stages of IIA in relation to plan making. The IIA took the following steps in relation to the London Borough of Barnet Local Plan.

Step 1: Evidence gathering and engagement

10.15 The Council prepared a Scoping Report in 2020 and updated the Scoping Report in 2021 in response to the consultation on the Regulation 18 draft LBBLP and related IIA.

10.16 The IIA Scoping Reports considered the relevant baseline information for the London Borough of Barnet including the identification of Plans, Policies and Programmes. Table 3 of the Scoping Report 2021 sets out the Plans, Policies and Programmes referred to in preparation of the IIA and the LBBLP. Appendix 2 of the Scoping Report 2021 set out the implications for the LBBLP against each document. The information in the updated Scoping Report, reflects representations made in relation to the Regulation 18 draft LBBLP and updated evidence available to the Council.

10.17 The Scoping report outlined a set of initial Objectives and a series of prompt questions for assessment of the draft local plan policy options. The Objectives and assessment questions were updated following the Regulation 18 Consultation, and additional assessment questions were developed to provide more detailed assessment in relation to the proposed site allocations. The final set of Objectives are set out under 'Step 2' below.

Step 2: Production of the Local Plan

10.18 The Council prepared a Regulation 18 IIA document alongside the production of the Regulation 18 Plan. The IIA considered an initial set of IIA Objectives and the preferred options alongside any other identified 'reasonable alternative' options. The assessment commentary provided suggestions for amendments and mitigation to be included in future draft policies.

10.19 The Regulation 19 IIA documents considered updated Objectives, amended through discussions with statutory consultees and in response to the consultation on the Regulation 18 draft LBBLP, and accompanying IIA documents. The IIA reviewed amended policy wording and updated site allocations against the updated IIA Objectives and previous policy iterations.

10.20 An updated HRA Screening Report was prepared in July 2022 (EXAM 8) to provide further detail to the original assessment. Further detail on the HRA process is contained in the HRA technical note (EXAM 39). The appraisal methodology considered the draft local plan policies against the Objective, and revised Objectives where appropriate. The Assessment Framework provided a series of prompt questions and criteria to assess the policy options against.

Difficulties in carrying out assessments

10.21 The IIA is an iterative process. Over the period the IIA documents were prepared, new evidence required updates to:

- 1) The IIA Objectives;
- 2) The list of relevant Plans, Policies and Programmes; and
- 3) The Assessment Criteria

10.22 Objectives were updated in response to information from statutory consultees and policy assessments were subsequently updated within the Regulation 19 IIA. A further stage of Flood Risk Assessment was carried out in response to discussions with the Environment Agency and site

allocations have been amended. The list of Plans, Policies and Programmes was updated within the revised Scoping Report 2021, and within the wider evidence base for the LBBLP. The information required by the assessment criteria was updated in response to changes in the wider planning framework, such as the identification of new criteria from statutory consultees and new information from consultations and evidence preparation, particularly on proposed site allocations.

10.23 There are no sites with a national designation within the London Borough of Barnet. The HRA Screening Report (Regulation 19 IIA, Part 3) utilised information gathered to assess the London Plan, and good practice guidance from Natural England, to understand which sites within the designated site network had potential to be affected by the LBBLP. The London Plan and other Local Plans have all been subject to revision within the preparation period of the LBBLP. The IIA, as with other evidence documents, has had to consider the implications of the updated Local Plan documents, as part of the iterative process of assessment.

10.24 Having identified the designated sites, the LBB assessed the potential pathways to or from potential development in Barnet. The assessment referenced the Conservation Objectives and Site Improvement Plans for each designated site to understand the environmental sensitivities and improvement plans in place for each part of the designated site network. This required an element of judgment and the conclusions within the HRA were discussed with Natural England. The HRA Screening Report was updated in 2022 to ensure the LBBLP had been assessed against the most up-to-date evidence available, and explicitly addressed relevant legal judgments.

10.25 Although there is little to no connectivity between potential development in Barnet and the designated site network, the HRA considered the implications for air quality, recreational impact, water quality and water management, in more detail. These issues are addressed in detail within the updated HSA 2022.

10.26 The evidence is still evolving, particularly in relation to air quality, and the IIA presents the evidence available at the time it was prepared. Future iterations of the IIA may be necessary if there are fundamental changes to the wider environmental evidence or if material changes are made to proposed policies in the submission version of the LBBLP.

11. A description of the measures envisaged concerning monitoring

Monitoring against the IIA Baseline

11.1 Suggested indicators and monitoring are included within Table 7 of the IIA Regulation 18 and Regulation 19 Reports. These indicators will need to be reviewed prior to adoption of the LBBLP to accurately reflect the adopted policies, and any new relevant information that may be available.

Monitoring within the LBBLP

11.2 Table 24 of the Submission LBBLP sets out a monitoring framework in relation to each policy. The monitoring indicators will need to be reviewed prior to adoption of the LBBLP to accurately reflect the adopted policies, and any new relevant information that may be available.

Further work

11.3 The Monitoring Framework within the LBBLP will be updated in response to the Examination. A final monitoring framework will be included in the adopted LBBLP. The SEA Post-Adoption Statement will set out how the monitoring framework has been prepared and the relationship between the final monitoring framework and the requirements relating to Strategic Environmental Assessment.

Appendix 1

Assessment Framework

This is the framework set out in the Regulation 19 IIA document (Part 2 -Appendix 3). The Objectives within the IIA were updated between the Scoping Stage and Regulation 19 stage in response to comments made by statutory consultees.

Objective	Significant positive	Minor positive	Neutral	Unknown	Mixed	Minor negative	Significant negative
1. To reduce poverty and promote equality of opportunity							
LSOA	++Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities	+Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	0 Site is within 50% least deprived LSOAs in the Borough	N/A		N/A (the score against this objective is only positive to identify development that contributes to addressing deprivation)	N/A (the score against this objective is only positive to identify development that contributes to addressing deprivation)
Proximity to employment land	++Site is within 1000m of employment land	+Site is within 2000m of employment land	0 site is more than 2000m from employment land	N/A		N/A	N/A
Proximity to stage schools	++ site is 1,000m of a secondary school And 500m of a primary school	+ Within 500m of a primary school and more than 1,000m from a secondary school	N/A	N/A		-More than 500m from a primary school and within 2,000m of a secondary school	--More than 500m from a primary school and more than 2,000m from a secondary school
2. Ensure efficient use of land and infrastructure							
Density range	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes		N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes
Existing mix of uses	N/A – this metric is used for	N/A – this metric is used	N/A – this metric is used	N/A – this metric is used		N/A – this metric is used	N/A – this metric is used for

	qualitative analysis purposes	for qualitative analysis purposes	for qualitative analysis purposes	for qualitative analysis purposes		for qualitative analysis purposes	qualitative analysis purposes
Proximity to town centre	++site is located within town centre	+site is located within 1000m of town centre	0 – Site is further than 100m from a town centre	N/A		-site is located more than 1000m from town centre	-- site is located more than 2000m from town centre
Proximity to Growth area	++ site is located within growth area	+ site is located within 500m of growth area	0 – site is more than 500m from a growth area	N/A		Not used (the score against this objective is only positive to identify development that takes place within or in proximity to growth area)	Not used (the score against this objective is only positive to identify development that takes place within or in proximity to growth area)
Use of brownfield / derelict land	++ Site involves the re-use of previously developed land and buildings (5ha or more).	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	0 – site is not brownfield / derelict land	N/A		-Site involves the loss of undeveloped land (less than 5ha).	-- Site involves the loss of undeveloped land (5ha or more).
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.							
Proximity to listed building	++Potential for a Listed Building to be brought back into beneficial use.	+ Potential for a locally listed building to be brought back into use.	0 used if none of the other assessment criteria applies	? Score uncertain if site is within 500m of a Conservation area or designated site.		-Site includes or is within 100m of a heritage feature of regional importance	--site includes a heritage feature of national importance
Impact on locally important views							
Proximity to conservation area							

Area of Archaeological Significance						(including Conservation Area and Archaeological Priority Area) or site is within a valued local view	
4. Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles							
Proximity to community facilities	++ Site includes community facilities. Could be safeguarding existing facilities and/or providing news ones. (please note that education and health facilities area not included as part of the this IIA objective and are assessed separately under obj.1 and 6)	+ site is within 500 – 1000m to community facilities located within town centres or elsewhere	0 Development with no new community facilities provided.	Uncertain if facilities will be provided.		N/A	-- Development would lead to a loss of community facility and/or infrastructure
Proximity to town centres	++site is located within town centre	+site is located within 1000m of town centre	N/A	N/A		-site is located more than 1000m from town centre	-- site is located more than 2000m from town centre
Crime	++ Area is within an area associated with high crime (i.e over the borough	N/A	0 Area is within an area associated with low levels of crime	N/A		N/A	N/A
	average or within the top 10 wards for crime levels)						
5. Ensure that all residents have access to good quality, well-located, affordable housing							
Application of Local Plan affordable housing threshold	++ development would lead to a significant level of the provision of affordable housing (i.e. sites with indicative capacity for 500+ homes)	+ development would lead to the provision of affordable housing (i.e. sites with indicative capacity for 10 - 499 homes)	0 9 or fewer homes gained or lost/potentially displaced	? Impact on housing is uncertain.		-10-99homes lost/ potentially displaced	--100 or more homes lost/displaced
PTAL	++ PTAL 6a/6a and 5	+ PTAL 4 and 3	N/A	N/A		-PTAL 2	--PTAL 1 and 1a
6. Improve the health and well-being of the population and reduce inequalities.							
Access to open space	++site includes provision for open space	+site is within 1200m of open space	N/A	N/A		- site is more than 1200m from open space	N/A
Access to walking / cycling	++ site has been assessed as having excellent cycling / walking routes	+site has been assessed as having good - moderate cycling / walking routes		Cycling / walking routes within the vicinity of the site are unknown		-site has been assessed as having poor cycling / walking routes	N/A
Air quality	N/A	N/A	0 site below EU limit values and not within 50m of	N/A		-site exceeds EU limit value or is within 50m of A road motorway, railway line or industrial area	-- site exceeds EU limit value and is also within 50m of A road motorway, railway line or industrial area

						railway line or industrial area	railway line or industrial area
Access to health facility	++Site includes provision of a new health facility that will serve the wider community or is within 500m of a health facility	+site within 1200m of a healthcare facility	N/A	N/A		-Site is more than 1200m from a healthcare facility	N/A
Access to leisure centre	++ site is within 2000m of a leisure centre	N/A	0 site is more than 2000m from a leisure centre	N/A		N/A	N/A
7. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes							
Net increase in commercial floorspace	N/A	+ development would result in employment related development	O development would not result in any net loss of employment space	? effects on this objective area unknown		-Development would result in the loss of employment space	N/A
Night time economy	N/A	+ site is located in an area which supports night time economy	O site is located outside a night time economy area	N/A		N/A	N/A
8. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking							
PTAL	++ PTAL 6a/6b or 5	+ PTAL 4 and 3	N/A	N/A		-PTAL 2	PTAL 1 and 1a
No of car parking spaces	N/A	N/A	N/A	N/A		-Development would result in a loss in car parking spaces	N/A
9. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional							
Access to public open space	++ site includes provision for open space	+Site is within an area that has a provision of parks and open spaces above the borough average and is also within 1200m to a district park and or 400m of a local park/ open space	N/A	N/A	- / + site is within 1200m to a district park and/or 400m of a local park/ open space but are located in an area where the provision of parks is below the borough average or vice versa	- site is more than 1200m from open space and is within an area that where the provision of parks are below the borough average	-- site would result in the loss of designated open space
10. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity							
Site within 500m of nationally / internationally significant site	N/A (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	N/A (evaluation of any positive effects require a level of detail absent at this stage of site appraisal and assessment).	O site is more than 100m from a SINC And/ or Site is more than 500m away from nationally / intl. significant site	? Impact on biodiversity is uncertain		- site is within 100m of locally designated site	--site is within 500m of nationally / internationally significant site
Proximity to SINC							
11. Reduce contribution to climate change and enhance community resilience to climate change impacts							
Existing use of sustainable design and construction practices	N/A	N/A	O at this stage of the assessment, sites are considered to	N/A		N/A	N/A

			be neutral. There is no information available on what measures existing development incorporates to mitigate against climate change and all new development will have to comply with environmental standards set out within local plan policies and be in accordance with the Mayors energy hierarchy				
12. Maximise protection and enhancement of natural resources including water, air and minimise waste							
	N/A (evaluation of any positive effects require a level of detail absent at this stage of site appraisal	N/A	N/A	? Impact is uncertain.		N/A (evaluation of any negative effects requires a level of detail absent at this stage of site	N/A
	and assessment).					appraisal and assessment).	
13. Flood risk reduction and management: To minimise and manage the risk of flooding							
Flood zone	++ Site is wholly within flood zone 1	+ Majority of site is within flood zone 1, with remainder in flood zone 2	N/A	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone, it will be scored against the highest risk area		-Majority of site is within flood zone 2, with remainder in flood zone 1	--Site is partially or wholly within flood zone 3 a or 3b
Site within Critical Drainage Area (CDA)	N/A	N/A	O site is located outside CDA	N/A		-Site is partially or wholly within a CDA	N/A

Appendix 3: Prompt Questions for IIA Objectives

IIA Scoping Report 2021 (Pages 62 -69)

IIA objective	Prompt question	Indicators
1. Promote a high quality, inclusive and safe built environment	<p>Will the policy:</p> <ul style="list-style-type: none"> • Secure high-quality architecture and urban design that enhances local character and distinctiveness? • Promote location sensitive density and design? • Create robust and adaptable buildings that can respond to change over their life? • Make the built environment safer and more inclusive? • Encourage measures to reduce crime and fear of crime including anti-social behaviour? 	<ul style="list-style-type: none"> • Amount of new public space and pedestrian routes created by new development • Proportion of new developments and public spaces designed to be inclusive • Number of developments with BREEAM scores of very good or excellent • Healthy street scores • Percentage of developments incorporating secure by design principles (including passive surveillance and defensible space) • Overall crime rates in the Borough and fear of crime
2. Ensure efficient use of land and infrastructure	<p>Will the policy:</p> <ul style="list-style-type: none"> • Optimise use of previously developed land and existing infrastructure? • Focus development in the most appropriate locations? • Balance competing demands between land uses to provide for the full range of development needs of the area? • Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc? • Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs 	<ul style="list-style-type: none"> • Percentage of development on previously developed land • Density levels achieved against London Plan targets • Progress against infrastructure investment programmes

<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Barnet? • Ensure Barnet's historic environment contributes to social and cultural life in the Borough? • Encourage management plans to be actively prepared and implemented? 	<ul style="list-style-type: none"> • Number of new heritage assets identified and appropriately conserved • Number of heritage assets at risk • Number of applications permitted developments that infringe strategic or local protected views • Change in the number of protected landmarks • Progress on updating and implementing management plans
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, Council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas and neighbourhood shops. • Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population? • Improve connections of neighbourhoods with facilities/amenities? • Encourage a vibrant social environment that attracts visitors to the Borough while respecting the needs of residents? • Reduce the impacts of noise, vibration and pollution on the public realm? 	<ul style="list-style-type: none"> • Distribution of key facilities and local services across the Borough • Floorspace of facilities/services lost or gained • Town centre health checks • Environmental nuisance levels • Provision of multipurpose facilities • Number of registered patients per Full Time Equivalent GP • Other data concerning infrastructure sufficiency (e.g. school place provision)
<p>5. Ensure that all residents have access to good quality,</p>	<p>Will the policy:</p>	<ul style="list-style-type: none"> • Number new homes completed

<p>well-located, affordable housing</p>	<ul style="list-style-type: none"> • Ensure all housing is of a good standard, including for energy efficiency? • Increase the supply of affordable housing to meet identified need as far as possible? • Improve the diversity of housing sizes, types, prices and tenures? • Encourage development at an appropriate density, standard, size and mix? • Provide for housing that meets the diverse and changing needs of the population? • Reduce homelessness people living in temporary accommodation? 	<ul style="list-style-type: none"> • Proportion of affordable housing delivered • Income to average house price ratio • Housing quality • Proportion of homes split by different tenures within the census • Proportion of family sized homes (3+ bedrooms) • Level of population churn • Homeless households in temporary accommodation •
<p>6. Promote social inclusion, equality, diversity and community cohesion</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Reduce inequality and the negative consequences of relative poverty? • Reduce social exclusion and ensure that everyone has access to the same opportunities? • Promote fairness, social cohesion and integration? • Promote equity between population groups and those with protected characteristics? • Support active engagement of the wider community in decisions that affect their area? • Encourage active and connected, strong and cohesive community? • Remove barriers to employment and increase the skills of residents? • Improve opportunities and facilities for formal, informal and vocational learning for all ages? 	<ul style="list-style-type: none"> • Relative ranking for indices of multiple deprivations (IMD) – income, employment • Relative ranking for income deprivation affecting children index (IDACI) and income deprivation affecting older people index (IDAOPI) • Number of households in fuel poverty • % public buildings fully accessible • Jobs, employment and activity rates

<p>7. Improve the health and wellbeing of the population and reduce health inequalities</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Improve mental and physical health and wellbeing? • Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents? • Reduce death rates? • Promote physical activity or increase participation in sport and leisure activities, particularly among low participation groups? • Reduce health inequalities? • Promote positive mental health and wellbeing through a safer, more stimulating and pleasant natural and built environment? • Reduce the proliferation of activities with negative health externalities? • Improve air quality? 	<ul style="list-style-type: none"> • Indicators set out in the Mayor's Health Inequalities Strategy • Percentage of the population participating in 30 minutes of moderate intensity sport • Healthy street scores • Mortality rate • Number of patients registered at GP surgery • Proportion of the Borough deficient in relation to local sports facilities
<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Sustain and increase the Borough's contribution to the London and national economy? • Support a range of local businesses of different types and sizes? • Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive? • Support growth in key sectors? • Widen the opportunities for residents to access employment, particularly those groups experiencing above average worklessness? • Provide a range of employment opportunities? • Tackle barriers to employment, such as affordable childcare and skill levels? • Provide training and job opportunities for local residents? 	<ul style="list-style-type: none"> • Number and range of businesses operating in the Borough, including formation and survival rates • Number of local employers paying at least the London Living Wage • Employment floorspace lost/retained/created • Proportion of residents who are economically inactive • Proportion of 16-18years old not in education, employment or training • Proportion of residents with no qualification • Number of apprenticeships taken up in construction schemes

<p>9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Improve connectivity both within the Borough and to neighbouring Boroughs and wider London? • Encourage a shift to more sustainable forms of travel and away from private vehicle use? • Reduce the need to travel, especially by car? • Improve road safety for all, particularly pedestrians and cyclists? • Improve accessibility of the Borough's transport network? • Provide facilities that will support sustainable transport options? • Enhance capacity of the transport network? • Reduce harmful emissions from transport? • Reduce the negative impacts of servicing and freight? 	<ul style="list-style-type: none"> • Enhance mode split in favour of active transport, and secondly public transport • Emissions level from transport • Location of major transport generating demand developments • Distribution of local services across the Borough • Proportion of car-free housing • Number of people killed or seriously injured in road accidents • Motor traffic flows through the Borough • Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more • PTAL levels • Proportion of underground/ over ground stations with step free access
<p>10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</p>	<p>Will the policy:</p> <ul style="list-style-type: none"> • Protect existing public and private open spaces? • Contribute to meeting the increasing need for open space? • Link existing open spaces? • Prioritise open space in areas of deficiency? • Improve the quality of open space? • Promote or improve public accessibility of open space now and in the future? • Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits? 	<ul style="list-style-type: none"> • Open spaces and Green Infrastructure linkages lost/gained/improved • Open space deficiency • Access to public open space • Number of sports/playing fields and outdoor recreation spaces

	<ul style="list-style-type: none"> • Improve inclusive access to a range of open space types to meet local needs? 	
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	<p>Will the policy:</p> <ul style="list-style-type: none"> • Increase protection and improve opportunities for biodiversity? • Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority? • Encourage development that implements strategic and connected green infrastructure? • Ensure development does not increase flood risk? • Protect existing trees and increase tree planting? • Increase biodiverse green roofs, green walls and soft landscaping? • Maximise opportunities to enhance biodiversity? • Impact on access to nature? • Increase green infrastructure and improve connectivity? • Maximise opportunities for engagement with wildlife, including environmental education? • Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity? 	<ul style="list-style-type: none"> • Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces • Open space deficiency • Number of tree preservation orders served • Number of new developments incorporating green roofs, landscaping or open space to improve biodiversity • Development resulting in biodiversity net gain/loss • Development resulting in increased use of previously unused space for Green Infrastructure
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	<p>Will the policy:</p> <ul style="list-style-type: none"> • Improve energy efficiency and carbon emissions associated with buildings and transport? • Promote the use of low and zero carbon technologies including decentralised energy networks? • Improve energy security? • Encourage buildings and places designed to respond to changing conditions? 	<ul style="list-style-type: none"> • % of / number of new developments incorporating flood mitigation measures in their design to reduce flood risk e.g. SUDS, evacuation plans, etc • Proportion of developments incorporating low carbon technology and renewable energy solutions

	<ul style="list-style-type: none"> • Reduce the impact of climate change, including flooding and urban heat island effect? • Improve the microclimate? • Reduce greenhouse gas emissions? • Reduce fuel poverty? • Provide the necessary infrastructure to support development? • Steer development to the areas at lowest risk of flooding in the Borough? 	<ul style="list-style-type: none"> • Proportion of buildings incorporating Green Infrastructure and linkages between Green Infrastructure areas and green open spaces
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	<p>Will the policy:</p> <ul style="list-style-type: none"> • Use local, sustainable materials and resources? • Promote the use of renewable sustainable energy sources? • Minimise the use of non-renewable resources? • Ensure design is appropriate for lifetime of development? • Minimise the volume of waste produced in Barnet, including construction and deconstruction waste, food and household waste? • Increase the proportion of waste recycled or composted? • Provide the right type of infrastructure to deal with residual waste in the most sustainable way? 	<ul style="list-style-type: none"> • Water use per capita • Residual household recycling rates • Percentage of household waste sent for reuse, recycling and composting • Percentage of municipal waste sent to landfill
14. Maximise protection and enhancement of natural resources including water, land and air	<p>Will the policy:</p> <ul style="list-style-type: none"> • Minimise air, water, and soil pollution and their negative impacts on human health? • Improve air quality in line with national and international standards? • Protect surface and groundwater quality? • Promote the sustainable use of water resources? • Ensure sustainable use and protection of natural resources, including water? 	<ul style="list-style-type: none"> • Annual average concentrations and number of hourly exceedances of Nitrogen dioxide in air • Annual average concentrations and number of daily exceedances of PM10 in air • Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds
	<ul style="list-style-type: none"> • Ensure the necessary water and sewerage infrastructure to service development? 	

Appendix 4: Site Scoring Matrix

This table is set out in the Regulation 19 IIA Part 2 and includes the following abbreviations:

- LSOA – Lower Super Output Area
- PTAL – Public Transport Accessibility Level
- SINC – Sites of Importance for Nature Conservation

Objective	Significant positive	Minor positive	Neutral	Unknown	Mixed	Minor negative	Significant negative
1. To reduce poverty and promote equality of opportunity							
LSOA	++Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities	+Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	0 Site is within 50% least deprived LSOAs in the Borough	N/A		N/A (the score against this objective is only positive to identify development that contributes to addressing deprivation)	N/A (the score against this objective is only positive to identify development that contributes to addressing deprivation)
Proximity to employment land	++Site is within 1000m of employment land	+Site is within 2000m of employment land	0 site is more than 2000m from employment land	N/A		N/A	N/A
Proximity to stage schools	++ site is 1,000m of a secondary school And 500m of a primary school	+ Within 500m of a primary school and more than 1,000m from a secondary school	N/A	N/A		-More than 500m from a primary school and within 2,000m of a secondary school	--More than 500m from a primary school and more than 2,000m from a secondary school
2. Ensure efficient use of land and infrastructure							
Density range	N/A – this metric is used for qualitative	N/A – this metric is used for qualitative	N/A – this metric is used for qualitative	N/A – this metric is used for qualitative		N/A – this metric is used for qualitative	N/A – this metric is used for qualitative

	analysis purposes	analysis purposes	analysis purposes	analysis purposes		analysis purposes	analysis purposes
Existing mix of uses	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes		N/A – this metric is used for qualitative analysis purposes	N/A – this metric is used for qualitative analysis purposes
Proximity to town centre	++site is located within town centre	+site is located within 1000m of town centre	O – Site is further than 100m from a town centre	N/A		-site is located more than 1000m from town centre	-- site is located more than 2000m from town centre
Proximity to Growth area	++ site is located within growth area	+ site is located within 500m of growth area	O – site is more than 500m from a growth area	N/A		Not used (the score against this objective is only positive to identify development that takes place within or in proximity to growth area)	Not used (the score against this objective is only positive to identify development that takes place within or in proximity to growth area)
Use of brownfield / derelict land	++ Site involves the re-use of previously developed land and buildings (5ha or more).	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	O – site is not brownfield / derelict land	N/A		-Site involves the loss of undeveloped land (less than 5ha).	-- Site involves the loss of undeveloped land (5ha or more).
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.							
Proximity to listed building	++Potential for a Listed Building to be brought back into beneficial use.	+ Potential for a locally listed building to be brought back into use.	0 used if none of the other assessment criteria applies	? Score uncertain if site is within 500m of a Conservation		-Site includes or is within 100m of a heritage	--site includes a heritage feature of national importance
Impact on locally important views							

Proximity to conservation area				area or designated site.		feature of regional importance (including Conservation Area and Archaeological Priority Area) or site is within a valued local view	
Area of Archaeological Significance							
4. Promote liveable, safe neighbourhoods which support good quality accessible services and sustainable lifestyles							
Proximity to community facilities	++ Site includes community facilities. Could be safeguarding existing facilities and/or providing news ones. (please note that education and health facilities area not included as part of the this IIA objective and are assessed separately under obj.1 and 6)	+ site is within 500 – 1000m to community facilities located within town centres or elsewhere	0 Development with no new community facilities provided.	Uncertain if facilities will be provided.		N/A	-- Development would lead to a loss of community facility and/or infrastructure
Proximity to town centres	++site is located within town centre	+site is located within 1000m of town centre	N/A	N/A		-site is located more than 1000m from town centre	-- site is located more than 2000m from town centre
Crime	++ Area is within an area	N/A	0 Area is within an area	N/A		N/A	N/A

	associated with high crime (i.e over the borough average or within the top 10 wards for crime levels)		associated with low levels of crime				
5. Ensure that all residents have access to good quality, well-located, affordable housing							
Application of Local Plan affordable housing threshold	++ development would lead to a significant level of the provision of affordable housing (i.e. sites with indicative capacity for 500+ homes)	+ development would lead to the provision of affordable housing (i.e. sites with indicative capacity for 10 - 499 homes)	0 9 or fewer homes gained or lost/potentially displaced	? Impact on housing is uncertain.		-10-99homes lost/ potentially displaced	--100 or more homes lost/displaced
PTAL	++ PTAL 6a/6a and 5	+ PTAL 4 and 3	N/A	N/A		-PTAL 2	--PTAL 1 and 1a
6. Improve the health and well-being of the population and reduce inequalities.							
Access to open space	++site includes provision for open space	+site is within 1200m of open space	N/A	N/A		- site is more than 1200m from open space	N/A
Access to walking / cycling	++ site has been assessed as having excellent cycling / walking routes	+site has been assessed as having good - moderate cycling / walking routes		Cycling / walking routes within the vicinity of the site are unknown		-site has been assessed as having poor cycling / walking routes	N/A
Air quality	N/A	N/A	0 site below EU limit values and not within 50m of	N/A		-site exceeds EU limit value or is within 50m of A road motorway,	-- site exceeds EU limit value and is also within 50m of A road motorway,

						railway line or industrial area	railway line or industrial area
Access to health facility	++Site includes provision of a new health facility that will serve the wider community or is within 500m of a health facility	+site within 1200m of a healthcare facility	N/A	N/A		-Site is more than 1200m from a healthcare facility	N/A
Access to leisure centre	++ site is within 2000m of a leisure centre	N/A	0 site is more than 2000m from a leisure centre	N/A		N/A	N/A
7. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes							
Net increase in commercial floorspace	N/A	+ development would result in employment related development	0 development would not result in any net loss of employment space	? effects on this objective area unknown		-Development would result in the loss of employment space	N/A
Night time economy	N/A	+ site is located in an area which supports night time economy	0 site is located outside a night time economy area	N/A		N/A	N/A
8. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking							
PTAL	++ PTAL 6a/6b or 5	+ PTAL 4 and 3	N/A	N/A		-PTAL 2	PTAL 1 and 1a
No of car parking spaces	N/A	N/A	N/A	N/A		-Development would result in a loss in car parking spaces	N/A

9. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional							
Access to public open space	++ site includes provision for open space	+Site is within an area that has a provision of parks and open spaces above the borough average and is also within 1200m to a district park and or 400m of a local park/ open space	N/A	N/A	- / + site is within 1200m to a district park and/or 400m of a local park/ open space but are located in an area where the provision of parks is below the borough average or vice versa	- site is more than 1200m from open space and is within an area that where the provision of parks are below the borough average	-- site would result in the loss of designated open space
10. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and biodiversity							
Site within 500m of nationally / internationally significant site	N/A (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	N/A (evaluation of any positive effects require a level of detail absent at this stage of site appraisal and assessment).	O site is more than 100m from a SINC	? Impact on biodiversity is uncertain		- site is within 100m of locally designated site	--site is within 500m of nationally / internationally significant site
Proximity to SINC			And/ or				
11. Reduce contribution to climate change and enhance community resilience to climate change impacts							
Existing use of sustainable design and construction practices	N/A	N/A	O at this stage of the assessment, sites are considered to	N/A		N/A	N/A

			be neutral. There is no information available on what measures existing development incorporates to mitigate against climate change and all new development will have to comply with environmental standards set out within local plan policies and be in accordance with the Mayors energy hierarchy				
12. Maximise protection and enhancement of natural resources including water, air and minimise waste							
	N/A (evaluation of any positive effects require a level of detail absent at this stage of site appraisal	N/A	N/A	? Impact is uncertain.		N/A (evaluation of any negative effects requires a level of detail absent at this stage of site	N/A

	and assessment).					appraisal and assessment).	
13. Flood risk reduction and management: To minimise and manage the risk of flooding							
Flood zone	++ Site is wholly within flood zone 1	+ Majority of site is within flood zone 1, with remainder in flood zone 2	N/A	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone, it will be scored against the highest risk area		-Majority of site is within flood zone 2, with remainder in flood zone 1	--Site is partially or wholly within flood zone 3 a or 3b
Site within Critical Drainage Area (CDA)	N/A	N/A	O site is located outside CDA	N/A		-Site is partially or wholly within a CDA	N/A

Appendix 5: LBBLP Policy Option Assessments

Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Reg 18	18	36	18	37	24	26	31	25	27	29	30	27	18	346
Reg 19	21	40	22	41	26	26	36	30	30	30	34	27	20	383

Policy	Policy Option	1	2	3	4	5	6	7	8	9	10	11	12	13	Total	
BSS01 Barnet's Spatial Strategy	No spatial strategy	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	
	Lower housing capacity target	+/-	-1	+/-	-1	-1	+/-	-1	-1	1	1	1	1	0	-1	
	Retain existing spatial vision	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0
	Brownfield/Greenfield capacity based	0	-1	0	1	1	-1	1	+/-	-1	-1	-1	0	0	-2	
	London Plan maximum housing	+/-	-1	+/-	-1	-1	+/-	-1	-1	1	1	1	1	0	-1	
	London Plan housing range	+/-	-1	+/-	-1	-1	+/-	-1	-1	1	1	1	1	0	-1	
	Reg 18 Preferred Option	0	1	0	1	1	1	1	1	1	1	1	1	1	+/-	10
	Reg 19 Plan	0	1	0	1	1	1	1	1	1	1	1	1	1	1	11

GSS01 – Delivering Sustainable Growth		+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0
	No policy														
	Town Centre capacity target	0	-1	0	-1	-1	+/-	-1	-1	1	1	1	1	0	-1
	Brownfield/Green field and GB release	0	-1	0	1	1	-1	1	?	-1	-1	-1	0	0	-2
	Draft London Plan 2017	+/-	-1	+/-	-1	-1	+/-	-1	-1	1	1	1	1	0	-1
	Less than London Plan target	+/-	-1	+/-	-1	-1	+/-	-1	-1	1	1	1	1	0	-1
	Reg 18 Preferred Option	0	1	0	1	1	1	-1	-1	1	1	1	1	1	7
Reg 19 Plan	0	1	0	1	1	1	1	1	1	1	1	1	1	11	
GSS02 – Brent Cross Growth Area		+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0
	No policy														
	Retain adopted Policy	0	-1	0	1	-1	?	-1	-1	1	0	0	1	0	-1
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
Reg 19 Plan	0	1	0	1	1	?	1	1	1	1	1	1	0	9	

GSS03 – Brent Cross West		+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0
	No policy														
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	0	1	0	1	1	?	1	1	1	1	1	1	0	9
GSS04 – Cricklewood Growth Area		+/-	+/-	+/-	-1	+/-	-1	-1	-2	+/-	+/-	+/-	+/-	+/-	-5
	No policy														
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	0	1	0	1	1	?	1	1	1	1	1	1	0	9
GSS05 – Edgware Growth Area		+/-	+/-	+/-	-1	+/-	-1	-1	-2	+/-	+/-	+/-	+/-	+/-	-5
	No policy														
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	1	1	0	1	1	?	1	1	1	1	1	1	0	10

GSS06 – Colindale Growth Area	No policy	+/-	-1	+/-	-1	-1	+/-	-1	-1	+/-	+/-	+/-	+/-	+/-	-5
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	1	1	0	1	1	?	1	1	1	1	1	1	0	10
GSS07 – Mill Hill East	No policy	+/-	-1	+/-	-1	-1	+/-	-1	-1	+/-	+/-	+/-	+/-	+/-	-5
	Existing AAP	0	-1	0	1	-1	?	-1	-1	1	0	0	1	0	-1
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	0	1	0	2	1	?	1	2	1	1	1	1	0	11
GSS08 – Barnet’s District Town Centres	No policy	0	-1	0	-1	0	0	-1	-1	0	0	0	0	0	-4
	Retain existing policy	0	-1	0	1	-1	?	-2	-2	1	0	0	1	0	-3
	Reg 18 Preferred Option	0	1	0	1	1	?	1	1	1	1	1	1	0	9
	Reg 19 Plan	0	1	0	1	1	?	1	1	1	1	1	1	0	9

GSS09 – Existing and Major New Transport Infrastructure		+/-	+/-	+/-	+/-	+/-	+/-	+/-	-2	+/-	+/-	+/-	+/-	+/-	-2
	No policy														
	Reg 18 Preferred Option	1	1	?	1	1	1	1	1	0	1	1	1	1	11
	Reg 19 Plan	1	1	1	1	1	1	1	2	1	1	1	1	1	14
GSS10 – Estate Renewal		-2	-2	+/-	-2	-2	-2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	-10
	No policy														
	No strategic policy for estate renewal	-1	-1	+/-	-1	-1	-1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	-5
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
Reg 19 Plan	1	1	1	2	2	1	1	1	1	1	1	1	1	15	
GSS11 – Major Thorough-fares		+/-	-2	+/-	+/-	+/-	+/-	+/-	-2	+/-	+/-	+/-	+/-	+/-	-4
	No policy														
	No strategic policy	?	-1	?	-1	-1	?	-1	-1	?	?	?	?	?	-5
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	0	0	11
Reg 19 Plan	1	2	1	1	1	1	1	1	1	1	1	0	0	12	

GSS12 Redevelopment of Car Parks	No strategic policy	?	-1	?	?	?	?	?	-1	?	?	?	?	?	-2
	Reg 18 Preferred Option	0	1	1	1	1	0	1	1	1	1	1	1	1	11
	Reg 19 Plan	0	1	1	1	1	0	1	1	1	1	1	1	1	11
GSS13 Strategic Parks and Recreation	No policy	0	-2	0	-1	0	-2	0	0	-2	0	-2	0	0	-9
	Reg 18 Preferred Option	1	1	1	1	0	1	0	0	1	1	1	0	1	9
	Reg 19 Plan	1	1	1	1	0	1	0	0	1	1	1	0	1	9
HOU01 – Affordable Housing	No policy	+/-	-2	0	+/-	-2	+/-	-1	0	0	0	0	0	0	-5
	Retain existing policy	+/-	-1	0	+/-	-1	+/-	-1	0	0	0	0	0	0	-3
	Target above 35%	+/-	-1	0	+/-	+/-	+/-	-1	0	0	0	0	0	0	-2
	Emphasis on intermediate products	+/-	-1	0	+/-	+/-	+/-	-1	0	0	0	0	0	0	-2
	Higher level by green belt release	+/-	-2	0	+/-	-2	+/-	-1	0	-2	0	0	0	0	-7
	Reg 18 Preferred Option	1	1	0	1	1	1	1	0	1	1	1	1	1	11
	Reg 19 Plan	1	1	0	1	1	1	1	0	1	1	1	1	1	11

HOU02 – Housing mix	No policy	-2	0	-2	+/-	-2	-2	-1	0	0	0	0	0	0	-9
	Only on strategic allocations	-1	0	-1	0	-1	-1	-1	0	0	0	0	0	0	-5
	Retain existing policy	-1	0	-1	0	-1	-1	-1	0	0	0	0	0	0	-5
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	1	1	1	2	1	1	1	1	1	1	1	1	14
HOU03 – Residential Conversions and Redevelopment	No policy	-2	0	-2	0	-2	-2	-1	-1	0	0	0	0	0	-10
	Retain existing policy	-1	0	-1	0	-1	-1	-1	-1	0	0	0	0	0	-6
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	2	1	1	1	1	2	1	1	1	1	1	1	15
HOU04 - Specialist Housing	No policy	+/-	+/-	0	+/-	-2	-2	-1	0	0	0	0	0	0	-5
	Retain existing policy	+/-	+/-	0	+/-	-1	-1	-1	0	0	0	0	0	0	-3
	Reg 18 Preferred Option	2	1	1	1	1	1	1	1	1	1	1	1	1	14
	Reg 19 Plan	2	1	1	1	1	1	1	1	1	1	1	1	1	14

HOU05 – Efficient Use of Barnet’s Housing Stock	No policy	-2	+/-	-2	+/-	-2	-2	-1	0	0	0	0	0	0	-9
	Retain existing policy	-1	0	-1	0	-1	-1	-1	0	0	0	0	0	0	-5
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	2	1	2	1	1	1	1	1	1	1	1	1	15
HOU06 – Meeting Other Housing Needs	No policy	-1	0	-1	0	-1	-1	-1	0	0	0	0	0	0	-5
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	1	1	1	1	1	1	1	1	1	1	1	13	
HOU07 - Gypsies, Travellers and Travelling Show People	No policy	-2	0	0	0	-1	0	0	0	0	0	0	0	0	-3
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	1	1	1	1	1	1	1	1	1	1	1	13	

CDH01 - Promoting High Quality Design		0	0	-1	0	0	-1	0	0	0	0	0	0	0	-2
	No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Retain existing policies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Include prescriptive standards	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Reg 19 Plan	0	0	1	0	0	0	0	0	0	0	0	0	0	1
CDH02 - Sustainable and Inclusive Design		-1	-1	0	1	0	0	0	0	0	0	-1	0	0	-2
	No policy	+/-	+/-	+/-	1	+/-	+/-	+/-	+/-	+/-	+/-	1	+/-	+/-	2
	Retain existing development standards	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	1	2	1	1	1	1	1	1	1	2	1	1	15

CDH03 – Public Realm	No policy	0	0	+/-	+/-	0	0	+/-	0	0	0	0	0	0	0
	Include criteria within Design Policy or Town Centres policy	0	0	+/-	+/-	0	0	+/-	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	0	1	1	0	0	1	0	0	0	0	0	0	3
	Reg 19 Plan	0	0	2	1	0	0	1	0	0	0	0	0	0	4
CDH 04- Tall Buildings	No policy	+/-	+/-	-1	-1	+/-	0	-1	+/-	+/-	0	0	0	0	-3
	Retain existing policy	+/-	+/-	-1	-1	+/-	0	-1	+/-	+/-	0	0	0	0	-3
	Reg 18 Preferred Option	1	1	0	1	1	0	0	0	0	0	0	0	4	
	Reg 19 Plan	1	1	1	1	1	0	0	0	0	0	0	0	5	
CDH05 - Extensions	No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Reg 18 Preferred Option	0	1	0	0	0	0	0	0	0	0	0	0	1	
	Reg 19 Plan	0	1	0	0	0	0	0	0	0	0	0	0	1	
CDH06 – Basements	No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Reg 18 Preferred Option	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Reg 19 Plan	0	0	0	0	0	0	0	0	0	0	0	0	0	

CDH07 - Amenity Space and Landscaping	No policy	0	0	0	+/-	0	+/-	0	0	0	0	+/-	+/-	+/-	0
	Retain existing policy	0	0	0	+/-	0	+/-	0	0	1	0	+/-	+/-	+/-	1
	Reg 18 Preferred Option	0	0	0	1	0	1	0	0	1	1	1	1	1	7
	Reg 19 Plan	0	0	0	1	0	1	0	0	1	1	1	1	1	7
CDH08 – Barnet’s Heritage	No policy	0	0	-1	0	0	0	0	0	0	0	0	0	0	-1
	Retain existing policy	0	0	-1	0	0	0	0	0	0	0	0	0	0	-1
	Reg 18 Preferred Option	0	0	1	0	0	0	0	0	0	0	0	0	0	1
	Reg 19 Plan	0	0	1	0	0	0	0	0	0	0	0	0	0	1
CDH09 - Advertisements	No policy	0	0	+/-	0	0	0	0	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	0	1	0	0	0	0	0	0	0	0	0	0	1
	Reg 19 Plan	0	0	1	0	0	0	0	0	0	0	0	0	0	1

TOW01 - Vibrant Town Centres	No policy	0	+/-	0	+/-	0	0	+/-	+/-	0	0	0	0	0	0
	Retain existing policy	0	+/-	0	+/-	0	0	+/-	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	0	1	0	0	1	1	0	0	0	0	0	4
	Reg 19 Plan	0	1	0	1	0	0	1	1	0	0	0	0	0	4
TOW02 - Development Principles in Barnet's Town Centres, Local Centres and Parades	No policy	+/-	+/-	0	+/-	+/-	0	+/-	+/-	0	0	0	0	0	0
	Retain existing policy	0	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0
	Reduce requirement for A1	0	?	+/-	?	+/-	+/-	?	+/-	+/-	+/-	+/-	+/-	+/-	0
	Reg 18 Preferred Option	0	1	1	1	1	1	1	1	1	1	1	1	1	12
	Reg 19 Plan	0	1	1	1	1	1	2	1	1	1	1	1	1	13

TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars	No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	0	0	0	1	1	0	0	0	0	0	0	0	3
	Reg 19 Plan	0	1	0	0	0	1	1	0	0	0	0	0	0	0	3
TOW04 - Night -Time Economy	No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	0	1	0	1	1	0	0	0	0	0	0	0	4
	Reg 19 Plan	0	1	0	1	0	1	1	0	0	0	0	0	0	0	4
CHW01 – Community Infrastructure	No policy	-1	-1	0	-1	0	0	0	0	0	0	0	0	0	0	-3
	Retain existing policy	+/-	+/-	0	+/-	0	0	0	0	0	0	0	0	0	0	0
	Reg 18 Preferred Option	1	1	0	1	0	0	0	0	0	0	0	0	0	0	3
	Reg 19 Plan	1	1	0	1	0	0	0	0	0	0	0	0	0	0	3

CHW 02 – Promoting health and well being	No policy	-1	0	0	-1	0	-1	0	0	0	0	0	0	0	-3
	Retain existing policy	-1	0	0	-1	0	-1	0	0	0	0	0	0	0	-3
	Reg 18 Preferred Option	1	0	0	1	0	1	0	0	0	0	0	0	0	3
	Reg 19 Plan	1	0	0	1	0	1	0	0	0	0	0	0	0	3
CHW04 - Making Barnet a safer place	No policy	-1	0	0	-1	0	-1	-1	0	0	0	0	0	0	-4
	Retain existing policy	-1	0	0	-1	0	-1	-1	0	0	0	0	0	0	-4
	Reg 18 Preferred Option	1	0	0	1	0	1	1	0	0	0	0	0	0	4
	Reg 19 Plan	1	0	0	1	0	1	1	0	0	0	0	0	0	4
CHW05 – Protecting Public Houses	No policy	0	0	-1	-1	0	0	-1	0	0	0	0	0	0	-3
	Reg 18 Preferred Option	0	0	1	1	0	0	1	0	0	0	0	0	0	3
	Reg 19 Plan	0	0	1	1	0	0	1	0	0	0	0	0	0	3

ECY01 - A Vibrant Local Economy	No policy	0	+/-	0	0	0	0	-1	0	0	0	0	0	0	-1
	Retain existing policy	0	+/-	0	0	0	0	+/-	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	0	1	0	0	1	0	0	0	0	0	0	3
	Reg 19 Plan	0	1	0	1	0	0	1	0	0	0	0	0	0	3
ECY02 - Affordable Workspace	No policy	0	0	0	-1	0	0	-1	-1	0	0	0	0	0	-3
	Reg 18 Preferred Option	0	0	0	1	0	0	1	1	0	0	0	0	0	3
	Reg 19 Plan	0	0	0	1	0	0	1	1	0	0	0	0	0	3

ECY03- Local Jobs, Skills and Training	No policy	-1	0	0	-1	0	0	-1	-1	0	0	0	0	0	-4
	Retain existing policy	+/-	0	0	+/-	0	0	+/-	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	1	0	0	1	0	0	1	1	0	0	0	0	0	4
	Reg 19 Plan	1	0	0	1	0	0	1	1	0	0	0	0	0	4
ECC01 – Mitigating Climate Change	No policy	0	0	0	0	0	-1	0	0	0	-1	-1	0	0	-3
	Retain existing policy	0	0	0	0	0	+/-	0	0	0	+/-	+/-	+/-	+/-	0
	Reg 18 Preferred Option	0	0	0	1	1	1	0	0	0	1	1	1	1	7
	Reg 19 Plan	0	0	0	1	1	1	0	0	0	1	2	1	1	8
ECC02 - Environmental Considerations	No policy	0	-1	0	0	0	0	0	0	-1	-1	0	-1	-1	-5
	Retain existing policy	0	-1	0	0	0	0	0	0	-1	-1	0	-1	+/-	-4
	Reg 18 Preferred Option	0	0	0	0	0	1	0	0	1	1	1	1	1	6
	Reg 19 Plan	0	0	0	0	0	1	0	0	1	1	1	1	1	6

ECC02A -Water Management		0	+/-	0	0	0	0	0	0	0	0	0	+/-	0	+/-	0	
	No policy																-5
	Reg 19 Plan	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3	
ECC03 – Dealing with Waste		0	-1	0	0	0	-1	-1	0	0	0	0	-1	-1	0		
	No policy																-5
	Retain existing	0	+/-	0	0	0	+/-	+/-	0	0	0	0	+/-	+/-	0		0
	Reg 18 Preferred Option	0	1	0	0	0	1	1	0	0	0	0	1	1	0		5
	Reg 19 Plan	0	1	0	0	0	1	1	0	0	0	1	1	0		5	
ECC04 – Barnet’s Parks and Open Spaces		0	-1	-1	0	0	+/-	0	0	-1	+/-	+/-	0	0			
	No policy																-3
	Retain existing	0	+/-	+/-	0	0	+/-	0	0	+/-	+/-	+/-	0	0			0
	Reg 18 Preferred Option	0	1	1	0	0	1	0	0	1	1	1	0	0			6
	Reg 19 Plan	0	1	1	0	0	1	0	0	2	1	1	0	0		7	

ECC05 - Green Belt and Metropolitan Open Land	No policy	0	-1	0	0	0	0	0	0	0	-1	0	0	0	0	-2
	Retain existing policies	0	+/-	0	0	0	0	0	0	+/-	0	0	0	0	0	0
	Alter Green Belt/MOL boundaries	0	+/-	0	0	0	0	0	0	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	0	0	0	0	0	0	1	1	1	1	1	1	6
	Reg 19 Plan	0	1	0	0	0	0	0	0	2	1	1	1	1	1	7
ECC06 - Biodiversity	No policy	0	+/-	0	0	0	+/-	0	0	+/-	-1	-1	0	0	0	-2
	Retain existing policies	0	+/-	0	0	0	+/-	0	0	+/-	+/-	+/-	0	0	0	0
	Reg 18 Preferred Option	0	1	0	0	0	1	0	0	1	1	1	1	0	0	6
	Reg 19 Plan	0	1	0	0	0	1	0	0	1	2	2	1	0	0	8

TRC01 – Sustainable and Active Travel	No policy	0	0	0	+/-	0	+/-	0	+/-	0	0	0	0	0	0
	Retain existing policies	0	0	0	+/-	0	+/-	0	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	0	0	0	1	0	1	0	1	0	0	0	0	0	3
	Reg 19 Plan	0	0	0	1	0	1	0	1	0	0	0	0	0	3
TRC02 – Transport Infrastructure	No policy	0	0	0	0	0	0	0	-1	0	0	0	0	0	-1
	Reg 18 Preferred Option	0	1	0	0	0	0	1	1	0	0	0	0	0	3
	Reg 19 Plan	0	1	0	0	0	0	1	1	0	0	0	0	0	3
TRC03 – Parking Management	No policy	+/-	0	0	0	0	0	0	+/-	0	0	0	0	0	0
	Retain existing	+/-	0	0	0	0	0	0	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	1	0	0	0	0	0	0	1	0	0	0	0	0	2
	Reg 19 Plan	1	0	0	0	0	0	0	1	0	0	0	0	0	2

TRC04 – Digital Communication and Connectivity	No policy	0	+/-	-1	+/-	0	0	+/-	+/-	0	0	0	0	0	-1
	Retain existing	0	+/-	+/-	+/-	0	0	+/-	+/-	0	0	0	0	0	0
	Reg 18 Preferred Option	0	1	+/-	1	0	0	1	1	0	0	0	0	0	4
	Reg 19 Plan	0	1	+/-	1	0	0	1	1	0	0	0	0	0	4

