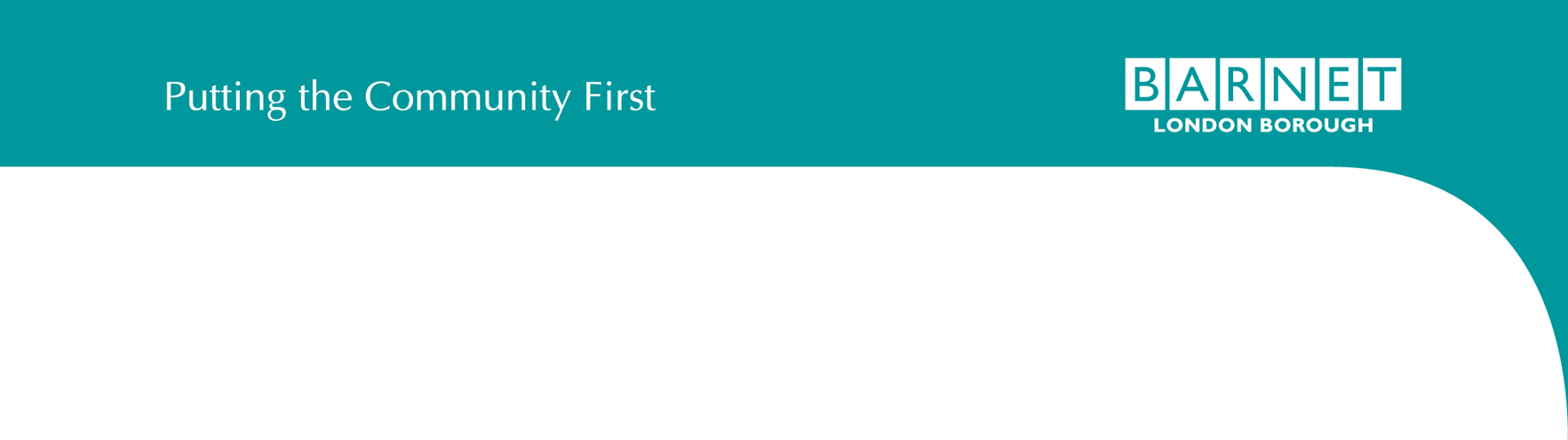
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**Health Impact Assessment**

**Barnet Draft Local Plan**

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**Main Modifications Stage Update April 2024**

Introduction

1. This report provides an update to the information contained in documentation previously produced in support of the Health Impact Assessment (HIA) screening of the submission London Borough of Barnet Local Plan. Specifically, this update has been produced to assess the Council’s Local Plan Main Modifications (MMs). This update report, which should be read alongside earlier HIA related documentation produced in support of the draft Barnet Local Plan[[1]](#footnote-1), comprises:

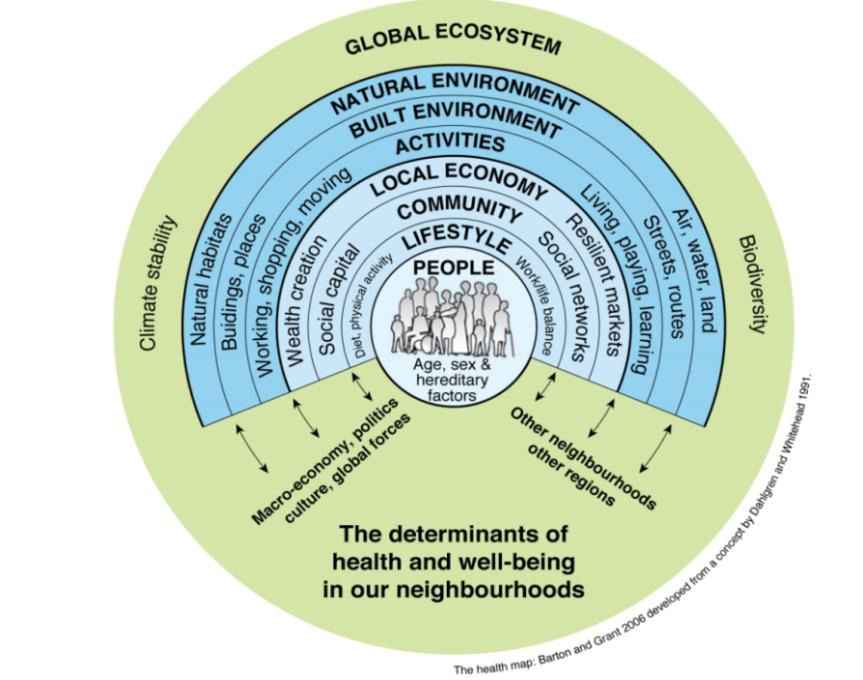
* a brief explanation of HIA work undertaken to date and the background to the proposed MMs;
* an explanation of the Council’s approach to the HIA of proposed MMs,
* conclusions arising from this latest HIA screening.

The HIA has been undertaken as part of the Local Plan’s Integrated Impact Assessment (IIA) which *inter alia* includes the Sustainability Appraisal (SA). Health Impact Assessments (HIA) assess the potential impacts (positive and negative) of a proposed plan, programme or policy on the health and wellbeing of the population and the distribution of these impacts within the population. The approach is considered good practice for policy development as the impacts of living environments on population health and wellbeing are increasingly recognised. The aim of the HIA is to maximise positive health impacts while minimising the negative health impacts of the proposed policy and address inequalities.

1. As part of the Examination in Public the Inspector as part of Matter 1 (Legal Compliance and the Duty to Co-operate) asked the Council whether the Plan had been prepared with due regard to the appropriate procedures and regulations and asked is there any evidence that the Plan would have significant effects on equalities that have not been identified in the IIA. The Council responded that it had in addition to the EqIA, produced a Health Impact Assessment (HIA) to assess the potential impacts (positive and negative) of the draft Local Plan on health and wellbeing. The approach is considered good practice for policy development as the impacts of living environments on population health and wellbeing are increasingly recognised. The aim of the HIA is to maximise positive health impacts while minimising the negative health impacts of the proposed policy and address inequalities. The HIA concluded that the Draft Local Plan has the potential to make a positive net contribution to the improvement of health and wellbeing as well as the delivery of the Barnet Health and Wellbeing Strategy.
2. The examining Inspectors’ findings with respect to the HIA and the EQIA will be provided in their final report.
3. The National Planning Policy Framework states that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. There is an important link between how places are planned and developed, and the health and wellbeing of the communities who live in them.

Background

1. The built and natural environment are key environmental determinants of health and wellbeing. Researchers have consistently shown that the majority of our health outcomes are explained by factors other than healthcare[[2]](#footnote-2). The World Health Organisation (WHO) estimates that 23% of global deaths are due to modifiable environmental factors[[3]](#footnote-3). The role of the built and natural environment in shaping social, economic and environmental circumstances is increasingly recognised and understood[[4]](#footnote-4).
2. The Health Map, devised by Barton and Grant, describes the importance of the natural and built environment for improving people’s health and wellbeing. It aims to aid understanding of the relationship between health and the built and natural environment, highlighting the role of planners and developers in promoting population health.



1. There are five aspects of the built and natural environment that can be influenced by local planning policy to improve population health and wellbeing[[5]](#footnote-5). These are:

* Neighbourhood design
* Housing
* Healthier food environment
* Natural and sustainable environment
* Transport

## **Neighbourhood design**

1. Neighbourhoods are places where people live, work, play and have a sense of belonging. A complete and compact neighbourhood, which has high residential density, good walkability, connectivity and mixed land use can maximise opportunities for social engagement and active travel. Neighbourhood design can also impact the ability of vulnerable people, such as those living with dementia, to remain independent and well. This is particularly important for Barnet as the proportion of older people is projected to increase considerably in the next 15 years. Neighbourhood design can influence our day-to-day decisions and therefore have a significant role in shaping our health behaviours. The HUDU Rapid Health Impact Assessment tool address this aspect through the following matrix:

* Access to healthcare services and other social infrastructure
* Crime reduction and community safety
* Access to work and training
* Social cohesion and lifetime neighbourhoods

## **Housing**

1. Housing is a basic human right and the quality of houses influence the health status of residents. It is estimated that 20% of the UK’s housing stock does not meet decent home standards and that the cost to the NHS of poor quality housing is £2.5 billion per annum (BRE, 2010)[[6]](#footnote-6). Living in good quality and affordable housing is associated with numerous positive health outcomes for the general population and those from vulnerable groups. The HUDU Rapid Health Impact Assessment tool address this aspect through the ‘housing quality and design’ matrix.

## **Healthier food environment**

1. The food environment, such as proximity to food retail and the types of food available, plays an important role in promoting a healthy diet. Proliferation and overconcentration of unhealthy food can negatively impact on people’s choices for a healthy diet. Vulnerable groups, including those on a low income, are less likely to achieve a healthy and balanced diet. Evidence indicates that making healthier foods more accessible and enhancing food infrastructure can promote a healthier diet. The HUDU Rapid Health Impact Assessment tool address this aspect through the ‘access to healthy food’ matrix

## **Natural and sustainable environment**

1. Access to and engagement with the natural environment including parks and open spaces improves the physical health and mental wellbeing of residents. Reducing environmental hazards such as noise and air pollution is crucial in protecting population health. In addition, adapting to climate change and protecting the natural environment is critical to sustainable growth. The HUDU Rapid Health Impact Assessment tool addresses this aspect through the following matrix:

* Access to open space and nature
* Air quality, noise and neighbourhood amenity
* Minimising the use of resources
* Climate change

## **Transport**

1. Active travel (cycling, walking and use of public transport) can increase physical activity levels and improve physical and mental wellbeing. Prioritisation of active travel can also reduce over reliance on motorised transport, contributing to improved air quality and a reduction in road injuries. In addition, accessibility has a significant impact on vulnerable people’s ability to remain independent and well. TfL’s Healthy Streets Approach outlines the 10 elements of an inclusive environment for all residents to walk, cycle and access public transport addresses. The HUDU Rapid Health Impact Assessment tool addresses this aspect through the ‘accessibility and active travel’ matrix

Methodology

1. Different approaches to HIAs, including the Department of Health guidelines for ‘Health impact assessments of government policy’ and examples from other areas were reviewed in order to identify the best approach for this HIA in Barnet. One of the HIA methods considered was a co-operative approach where stakeholders’ views inform an assessment of impact as part of an iterative process of policy development. However, the method deemed most appropriate for the current context was the rapid desktop approach. This assesses each policy within the draft local plan against the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Matrix and the current Joint Health and Wellbeing Strategy (JHWS) priorities. The HUDU Rapid Health Impact Assessment Tool identifies eleven broad themes for healthier spatial planning:
   * Housing quality and design
   * Access to healthcare services and other social infrastructure
   * Access to open space and nature
   * Air quality, noise and neighbourhood amenity
   * Accessibility and active travel
   * Crime reduction and community safety
   * Access to healthy food
   * Access to work and training
   * Social cohesion and lifetime neighbourhoods
   * Minimising the use of resources
   * Climate change
2. All policies (including Main Modifications to policies described in the draft Barnet Local Plan have been cross-analysed against these themes and the JHWS priorities. Available evidence and best practice from PHE evidence reviews and elsewhere were used to identify where policies could be strengthened, ensuring that the Local Plan addresses all determinants of health (gap analysis).
3. The process for this HIA was led by the Council’s Public Health team in consultation with the Planning department.

## **Barnet Joint Health and Wellbeing Strategy**

1. The Health and Wellbeing Board (HWB) was established under the Health and Social Care Act 2012 to act as a forum in which key leaders of health and care system work together to improve health and wellbeing of the local population they serve. It has membership from local councillors, NHS and the local authority. It is a statutory responsibility of each HWB to develop a Joint Health and Wellbeing Strategy (JHWS), which sets out direction and priorities for improvement of health and wellbeing in the local population.
2. Since the first HIA was undertaken in relation to the Local Plan, a new JHWS has been written and approved. This update to the HIA considers the new priorities outlined in the JHWS 2021-2025.
3. Three overarching aims of the Barnet Joint Health and Wellbeing Strategy 2021-2025 are:

* Creating and healthier place and resilient communities
* Starting, living and ageing well
* Ensuring delivery of coordinated holistic care, when we need it

1. Under these overarching aims, eleven priorities are identified:

* Integrate healthier places in all policies
* Create a healthier environment
* Strengthen community capacity and secure investment to deliver healthier place
* Improve children’s life chances
* Promote mental health and wellbeing
* Get everyone moving
* Support a healthier workforce
* Prevent long term conditions
* Support digital transformation of services
* Enable carers’ health and wellbeing
* Deliver population health integrated care

The Council’s reasons for proposing modifications to the Barnet Local Plan policies and site proposals are set out in full in the table of MMs which is the subject of this consultation. Where it is considered relevant and necessary to do so, these reasons (either summarised or in full) have also been incorporated into the HIA screening of the individual MMs. All policy relevant modifications have been considered in this HIA.

# **Assessing Health Impact**

1. Scoring criteria used in this assessment are presented below:

|  |  |
| --- | --- |
| ++ | Likely to benefit a large proportion of Barnet population. The effects are likely to be direct and permanent and the magnitude will be major. |
| + | Positive health impact affecting a small proportion of the Barnet population. The effects can be direct or indirect, temporary or reversible. |
| 0 | Neutral |
| - | Negative health impact affecting a small proportion of the Barnet population. The effects can be direct or indirect, temporary or reversible. |
| -- | Negative health impact affecting a large proportion of the Barnet population. The effects are likely to be direct and permanent and the magnitude will be major. |
| ? | Not sufficient information to make a robust assessment of impact |
| NA | Not applicable for the assessment criteria |

**Local Plan Main Modifications**

1. This Health Impact Assessment (HIA) summarises and assesses the potential impacts of the Main Modifications to Local Plan policies upon health.
2. The Council has proposed a number of revisions to the submitted Local Plan as a result of representations received at the Regulation 19 stage, updates to the evidence base, discussions at the examination hearing sessions held in Autumn 2022 and in response to the Inspectors’ interim findings letter of 17th August 2023.
3. It is necessary to consider the health impacts of these changes through a HIA process and for any further conclusions reached to then be made available for comment.
4. This HIA update report, considering the likely impacts of the main modifications (MMs) proposed to the Local Plan, has been prepared in accordance with the Council’s Joint Health and Wellbeing Strategy. The report is required to ensure that the effects of MMs made to the Local Plan are fully assessed for significant health impacts and reported on as part of the plan making process. Accordingly, this report has been prepared to support the MMs public consultation stage of the Local Plan. This document, available to view on the Local Plan examination website, is also subject to consultation alongside the MMs document itself.
5. Further to the findings of the Integrated Impact Assessment (IIA) prepared at earlier stages of the Local Plan, this additional assessment work specifically considers the implications of the MMs. This is necessary to determine whether any of the MMs proposed would significantly affect the previous HIA findings set out in the IIA.
6. This HIA MMs update report refers to, and therefore should be read alongside, information contained in within the following documents in the Local Plan examination library:

***Core Gen 25:***

Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) – January 2020 part 1

Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) – January 2020 part 2

Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) – January 2020 part 3

***Core Gen 02:***

(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – May 2021 part 1

(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – May 2021 part 2

(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – May 2021 part 3

# **Health Impact of Main Modifications to draft Barnet Local Plan**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Main Modifications to Policy** | **Creating a Healthier Place and Resilient Communities**   * **Integrate healthier places in all policies** * **Create a healthier environment** * **Strengthen community capacity and secure investment to deliver healthier place** | **Starting, living and ageing well**   * **Improve children’s life chances** * **Promote mental health and wellbeing** * **Get everyone moving** * **Support a healthier workforce** * **Prevent long term conditions** | **Ensuring delivery of coordinated holistic care, when we need it**     * **Support digital transformation of services** * **Enable carers’ health and wellbeing** * **Deliver population health integrated care** | **Overall health impact** (including assessment on HUDU HIA Matrix) | **Comments**  *The HUDU HIA Matrix identifies 11 themes that is important for healthier spatial planning. These are considered for each policy MM and comments are provided for relevant aspects.* |
| **Policy BSS01 – Spatial Strategy for Barnet**  MM9 provides further clarification on requirements for new homes, the role of Brent Cross Growth Area in delivering office and retail space together with the role of town centres in delivering main town centre uses (offices, retail and leisure) as well as setting out the approach to intensifying use of employment land. BSS01 as revised better reflects a strategic approach to climate change that is consistent with the NPPF. | + | 0 | 0 | **+** | **Climate change -** Due attention to the climate and biodiversity emergency and carbon targets in line with the London Plan are important steps to take to protect residents’ long term health. Mitigation and adaptation are important.  \_\_\_\_\_\_\_\_\_\_\_  This policy introduces the Plan by setting out the Spatial Strategy and the strategic requirements. The overall distribution of development proposed in the Plan is set out in Policy BSS01 and is based on relevant and up-to-date evidence. This promotes a sustainable pattern and scale of development that is in accordance with national policy and in general conformity with the London Plan.  ***Climate change* –** The policy sets out how the Plan will mitigate climate change and adapt to its effects.  ***Minimising the use of resources –***The policy sets out how the Plan will make effective use of land.  ***Access to healthcare services and other social infrastructure -***  The policy sets out how growth will be supported by delivery of infrastructure.  ***Access to open space and nature*** *–* The policy highlights the new Regional Park and the 3 new sports and recreation hubs.  ***Access to work and training*** *–* The policy sets out expectations of commercial floorspace including offices and retail as well as intensification of use of land for employment. |
| **Policy GSS01 – Delivering Sustainable Growth**  MM13 further clarifies the approach on economic growth including references to the locations and targets for new jobs, new public transport infrastructure; also, the locations for delivery of new homes (including Build to Rent,self-build and custom housebuilding all previously covered in draft policy HOU06 which is now to be deleted) and the importance of the design led approach. Provides clarification on the types of infrastructure that are required to support growth. | + | 0 | 0 | **+** | MM13 provides more detail on the community facilities and infrastructure needs for delivering sustainable growth. Revisions do not alter the original assessment of the impact of the policy on health.  Other changes such as detail of new transport infrastructure and location of new homes does not alter original assessment of the impact of the policy on health.  The supportive approach to Build to Rent in point (D) is an approach which will contribute positively to appropriate housing availability and choice, indirectly contributing positively to affordability. Para 4.8.4C outlines requirement for affordable housing in accordance with London Plan Policy H11. Lack of affordable and/or good quality housing is associated with poor health outcomes and exacerbates health inequalities.  Clarification on jobs expectations does not alter the original assessment of the impact of this policy on health. |

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| **Main Modifications to Policy** | **Creating a Healthier Place and Resilient Communities**   * **Integrate healthier places in all policies** * **Create a healthier environment** * **Strengthen community capacity and secure investment to deliver healthier place** | **Starting, living and ageing well**   * **Improve children’s life chances** * **Promote mental health and wellbeing** * **Get everyone moving** * **Support a healthier workforce** * **Prevent long term conditions** | **Ensuring delivery of coordinated holistic care, when we need it**     * **Support digital transformation of services** * **Enable carers’ health and wellbeing** * **Deliver population health integrated care** | **Overall health impact** (including assessment on HUDU HIA Matrix) | **Comments**  *The HUDU HIA Matrix identifies 11 themes that is important for healthier spatial planning. These are considered for each policy and comments are provided for relevant aspects.* |
| **Policy GSS02 - Brent Cross Growth Area**  MM15 further clarifies the uses of land in the new Brent Cross Metropolitan Town Centre with greater emphasis on the design led approach. It clarifies how development will be expected to contribute to restoration of the River Brent and improve connections to the Welsh Harp and West Hendon Playing Fields. It also further clarifies transport improvements; how infrastructure will be funded, and how progress of regeneration will be monitored | + | 0 | 0 | **+** | **Access to nature and open space-** Revised wording sets out expectations of developers to contribute to the restoration and enhancement of the River Brent. The planning team should work with the Council’s biodiversity officer and public health officers to develop more detailed guidance for developers on this requirement.  ***Accessibility and active travel*** - The policy sets out transport improvements to support growth promotes the healthy streets approach, including provision of step free access as well as encouraging more people to walk, cycle or use public transport. There is evidence which demonstrates that improved street connectivity promotes active travel and reduces car use, thereby improving air quality.  ***Access to healthcare services and other social infrastructure -*** The policy also identifies potential needs for new infrastructure including education and primary care to accommodate predicted population growth and clarifies how supporting infrastructure will be funded.  **Access to open space and nature** – The policy highlights that growth will contribute to River Brent corridor improvements increasing access to open space and nature.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs. |
| **Policy GSS03 – Brent Cross** **West**  **(Staples Corner) Growth Area**  MM16 clarifies requirement for a new waste management facility and expectations of town centre uses as well as new homes with uplift through design led approach and delivery of West London Orbital (WLO). It also further clarifies support for growth that helps deliver transport improvements including WLO, and how infrastructure will be funded. | 0 | 0 | 0 | **0** | MM16 changes mainly relate to a new waste management facility and support for proposals that facilitate access to West London Orbital. The detailed planning framework should emphasise active travel alongside other transport infrastructure.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs.  ***Accessibility and active travel*** – Supporting sustainable travel and minimising parking provision is likely to impact positively on health through increased physical activity and better air quality via a reduction in car dependency. By considering the impact that a reduction in parking provision will have on those with physical disabilities we can ensure that this policy promotes equity for residents rather than exacerbating existing inequalities.  Proposed growth is in line with the existing transport network and seeks to optimise density, infrastructure and jobs.  The proposed detailed policy framework for this area will add further detail to policies and provide guidance on specific sites. It will address issues such as design and how it will promote the healthy streets approach and healthier food environments. |
| **Policy GSS04 –** **Cricklewood Growth Area**  MM18 clarifies support for optimising capacity through design led approach (London Plan Policy D3). MM18 also requires account to be taken of the relationship with the nearby Railway Terraces Conservation Area and ensuring accordance with Policy CDH08. It also sets out expectations of town centre uses as well as new homes with uplift through design led approach and delivery of West London Orbital (WLO). It also further clarifies support for growth that helps deliver transport improvements including public realm WLO, and how infrastructure will be funded. | + | + | 0 | **+** | MM18 adds clarity to goals of regeneration of Cricklewood Growth area. Incorporation of a design-led approach in more deprived areas of the Borough are in line with the Council’s objectives to address health inequalities.    ***Accessibility and active travel*** – Supporting sustainable travel and minimising parking provision is likely to impact positively on health through increased physical activity and better air quality via a reduction in car dependency.  Requirement to deliver/contribute to new and improved active travel routes to Cricklewood Station, use of Healthy Streets Approach to improve streets and public realm around the station. These are interventions that have potential to increase active travel and reduce car use which can improve physical and mental health and reduce air pollution.  Proposed growth is supported by planned future transport infrastructure and optimising potential for currently under-used sites. The proposed detailed policy framework for this area should add further detail to policies and provide guidance on specific sites. It should address issues such as design and how it will promote the healthy streets approach and healthier food environments.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs. |
| **Policy GSS05 –** **Edgware Growth Area**  MM20 clarifies support for optimising capacity through a design led approach (London Plan Policy D3). When delivering growth and regeneration in Edgware Town Centre, MM20 also requires proposals to take into acco unt the relationship between the site and the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area to ensure accordance with Policy CDH08. It also sets out expectations of town centre uses as well as new homes with uplift through design led approach. Clarifies expected transport and public realm improvements as well as emphasising need for improved flood risk resilience and river restoration. | + | 0 | 0 | **0** | MM20 provides more clarity on requirements for the growth and regeneration of Edgware particularly in terms of community and transport infrastructure.  ***Accessibility and active travel*** – Supporting sustainable travel and minimising parking provision is likely to impact positively on health through increased physical activity and better air quality via a reduction in car dependency. By considering the impact that a reduction in parking provision will have on those with physical disabilities we can ensure that this policy promotes equity for residents rather than exacerbating existing inequalities.  Proposed growth is supported by transport infrastructure improvements and optimising potential for currently under-used sites. The Edgware Growth Area SPD provides further detail to policies and guidance on specific sites including promotion of the healthy streets approach and healthier food environments.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs. |
| **Main Modifications to Policy** | **Creating a Healthier Place and Resilient Communities**   * **Integrate healthier places in all policies** * **Create a healthier environment** * **Strengthen community capacity and secure investment to deliver healthier place** | **Starting, living and ageing well**   * **Improve children’s life chances** * **Promote mental health and wellbeing** * **Get everyone moving** * **Support a healthier workforce** * **Prevent long term conditions** | **Ensuring delivery of coordinated holistic care, when we need it**     * **Support digital transformation of services** * **Enable carers’ health and wellbeing** * **Deliver population health integrated care** | **Overall health impact** (including assessment on HUDU HIA Matrix) | **Comments**  *The HUDU HIA Matrix identifies 11 themes that is important for healthier spatial planning. These are considered for each policy and comments are provided for relevant aspects.* |
| **Policy GSS06 – Colindale Growth Area**  MM22 clarifies support for optimising capacity through taking a design led approach. It further clarifies how future growth will be delivered, actively demonstrating the Healthy Streets Approach. Clarifies expectations of growth to fund improvements to flood risk resilience and biodiversity particularly around Silk Stream Corridor. Highlights upgrade (including step free access) of Colindale Station and the delivery of a new Local Centre in Colindale Gardens. MM22 clarifies that development proposals (in accordance with NPPF and CIL Regulations and/or any equivalent relevant legislation or regulations) will be required through detailed design, planning conditions and/ or contributions secured through planning obligations / legal agreements to deliver or contribute to infrastructure.  When delivering growth and regeneration in the Colindale Growth Area, MM22 also requires proposals to take into account where relevant the relationship between the site and the settings of listed buildings and the Watling Estate Conservation Area, together with the Roe Green Village Conservation Area and the Buck Lane Conservation Area (both located within the neighbouring London Borough of Brent), to ensure accordance with Policy CDH08. | 0 | + | 0 | **+** | MM22 provides clarification on provision Plans for new social infrastructure such as school, nursery and primary health care facility will be essential to meeting the needs of this fast-growing area.  Integration of Healthy Streets Approach also in line with London Plan.  Integration of flood risk mitigation measures are in line with JHWS strategy around resilient communities and healthier place, as well as broader Council priorities around climate change adaptation and mitigation.  Emphasises improved access to nature and greenspaces.  ***Social cohesion and lifetime neighbourhoods, Access to healthcare services and other social infrastructure*** This policy aims to create a complete neighbourhood via improvements to existing infrastructure and development of educational, health and community facilities. It is important to ensure these services have enough capacity to accommodate the growing population and that their location and design does not perpetuate existing area inequalities.  ***Accessibility and active travel*** - This policy promotes the enhancement of pedestrian and cycle routes to create a more active environment as well as provision of step-free access at Colindale station.  ***Access to open space and nature*** - The proposal for improvements to open spaces and biodiversity in the area is likely to have a positive impact on both residents’ mental wellbeing and physical health (via increased opportunity to be physically active).  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs. |
| **Policy GSS07 – Mill Hill East**  MM24 clarifies the importance of growth to support transport improvements and that Mill Hill is not a Growth Area. This policy provides for the quanta of growth envisaged for the range of different uses arising from the residential led development within this area. The MM provides clarification regarding the amount of residential growth (an increase from c1,500 to 2,280new homes to be achieved by optimising capacity through a design-led approach), and that the requisite transport assessment must take account of cumulative impacts from other committed development envisaged. | 0 | 0 | 0 | **0** | New wording in MM26 sets out need for development proposals to include a Transport Assessment to outline public transport improvements and provision of sustainable transport options. |

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| **Policy GSS08 – Barnet’s District Town Centres**  This policy sets out capacity, design and development criteria. MM26 clarifies support for optimising capacity through design led approach. It also clarifies that town centres are prioritised for investment and revitalisation and the capacity for new homes for named District Centres; outlines supporting infrastructure requirements necessary for optimising capacity within Barnet’s town centres through the use of District Town Centre planning frameworks taking a design led approach over the plan period, highlighting importance of public realm and appropriate provision of community infrastructure. The MM clarifies main town centre uses and provision of acceptable floorspace that does not impact on other town centres vitality and viability. | + | + | 0 | **+** | MM26 reflects evidence that dense town centres with nearby amenities (similar to concepts outlined in the 15-minute city) promote physical and mental health by enabling community cohesion and active travel. Integration of Healthy Streets approach also in line with London Plan.  ***Provision of new homes***This policy sets out intention to deliver 5000+ new homes across Barnet’s Town Centres. It is important to ensure these plans offer sufficient affordable housing otherwise existing health inequalities will be exacerbated.  ***Accessibility and active travel*** – Supporting sustainable travel and minimising parking provision is likely to impact positively on health through increased physical activity and better air quality via a reduction in car dependency. By considering the impact that a reduction in parking provision will have on those with physical disabilities we can ensure that this policy promotes equity for residents rather than exacerbating existing inequalities.    **Access to open space and nature** – the policy promote access to open space, positively affecting health.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land  ***Access to work and training*** *–* The policy sets out expectations of economic growth and delivery of new jobs.  Proposed detailed policy frameworks for town centres should provide further detail to policies and provide guidance on specific sites. They should address issues such as design and how to integrate the healthy streets approach and healthier food environments, with input from the Public Health team. |
| **Policy GSS09 – Existing and Major New Transport Infrastructure**  This policy sets out the transport infrastructure needed to deliver growth and regeneration at locations within the Borough. It provides the positive provision of sustainable transport corridors and the provision of public transport infrastructure. MM27 clarifies support for optimising capacity through design led approach and identifies new broad locations for growth at New Southgate potentially supported by Crossrail 2 . It also clarifies level of development and suitability of location-based mix of uses that do not impact on vitality and viability of nearby town centres. The MM provides clarification regarding the potential for delivery of new homes over the plan period (c420) on suitable sites achievable through optimising use of land and capacity through a design led approach. | 0 | + | 0 | **+** | ***Accessibility and active travel*** - Improvement and enhancement of existing transport hubs generally has a positive impact on health by enhancing access to active and sustainable transport as well as providing further opportunities for employment and activities. The policy also promotes a healthy streets approach.  ***Access to open space and nature*** – the policy aims to prevent an unacceptable level of noise and air pollution. |
| **Policy GSS10 – Estate Renewal and Infill**  This policy also provides for a quantum (reduced by the MM from 4,400 to 3,980 new homes) of renewal and infill residential development on housing estates. MM28 clarifies consistency with the London Plan in terms of new affordable accommodation sought. It also improves cross-referencing to other policies within the Local Plan. | 0 | + | 0 | **+** | ***Housing quality and design*** - Good quality, affordable housing is associated with positive health outcomes. This policy considers access to various amenities, embedding active travel and mixed tenure infrastructure into key requirements for redevelopment proposals. These are likely to contribute to positive health promotion. However, regeneration should be delivered with caution so as not to disadvantage existing social tenants and exacerbate existing inequalities. Consideration should be given to social regeneration requirements to help mitigate for these impacts. |
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| **Policy GSS11 – Major Thoroughfares**  This policy also provides for a quantum of growth (slightly increased by MM from 3,350 to 3,530 new homes) and broad locations on sites along major ‘A’ class road thoroughfares to deliver residential and mixed-use development. The increase in the new homes figures arises from the additional certainty provided by the MM of the locations to which the policy applies and the associated inclusion of some sites previously identified in other categories of the housing land supply as submitted.MM29 clarifies support for Healthy Streets Approach and the indicators in the London Plan. The MM highlights consideration to be given to potential opportunities along additional ‘A’ roads (A1, A41 and A406) within the TfL road network. It helps identify future opportunities for A1, A41 and A406 subject to PTAL and Healthy Streets improvements. It also improves cross-referencing to other parts of Local Plan. The deletion of references in the policy to the approach taken to tall buildings is because this matter is now addressed in Policy CDH04 which is cross referenced in this policy. | 0 | 0 | 0 | **0** | This policy sets out level of development that could be accommodated along Major Thoroughfares in Barnet. It emphasises delivery of the Healthy Streets Approach and how this can be measured. Although this policy sets out expectations for developers to avoid unacceptable levels of air and noise pollution, these requirements do not reduce existing levels of air pollution along these Major Thoroughfares. The health impact of locating new homes in areas with the highest levels of air pollution in the Borough cannot be mitigated by promoting a Healthy Streets Approach. |
| **GSS12 – Redevelopment of Car Parks**  MM30 clarifies support for redevelopment of publicly accessible surface level car parks for new homes and main town centre uses subject to compliance with other policies. This includes compliance with car parking policy TRC03. | 0 | 0 | 0 | **0** | ***Accessibility and active travel***- Considering appropriate surplus car parking for redevelopment creates more opportunities for mixed-use neighbourhoods and health enhancing development. Delivered alongside healthy streets infrastructure and appropriate behaviour change initiatives this policy may indirectly encourage active travel. This policy contributes to creating a change of ‘culture’ around car usage in Barnet.  ***Housing quality and design –*** The policy emphasises the importance of the design led approach in optimising capacity and making efficient use of land |
| **GSS13 – Strategic Parks and Recreation**  MM31 highlights the 3 hubs for sport and recreation at Barnet and King George V Playing Fields, Copthall Playing Fields and Sunny Hill Park, and West Hendon Playing Fields. It clarifies that Growth Areas, town centres and local centres are preferred locations for new indoor facilities, unless they are specifically designed to improve utilisation of an open space. Clarifies location of Regional Park in Barnet. | + | + | 0 | **++** | ***Access to healthcare services and other social infrastructure, Access to open space and nature, accessibility and active travel-*** Investing in our parks and recreation facilities so that they are high quality and accessible will enhance health. In particular, the health benefits from open spaces and recreation have only been observed when green infrastructure and amenity is high quality, indicating the need for investment to maximise health outcomes.    The 3 new destination hubs for sport and recreation should emphasise inclusivity and be designed to meet the different physical activity/leisure needs of all Barnet residents. |

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| **Policy HOU01 – Affordable Housing**  MM33 clarifies that the Council is seeking to maximise delivery of affordable housing in accordance with London Plan. It also clarifies that assessment of site capacity is on basis of ensuring that development is optimised, provide certainty that off-site provision or off-site contributions are only sought in circumstances set out in London Plan. Policy re-focussed on optimising use of land and facilitating delivery of housing to meet needs of each affordable housing tenure. Provides clarification on approach to First Homes. | 0 | + | 0 | **+** | ***Housing quality and design*** – 35% affordable housing from all new major developments is in line with London’ Plan and exceeds the minimum needs identified within SHMA. Good quality, affordable housing generally has positive impacts on health and is an important determinant of health. On-site affordable housing increases diversity of the community and improves perceptions of safety, particularly amongst low income groups. Unaffordable housing can be a source of self-reported stress, and can affect families’ ability to pay for other essentials, such as fuel and food. |
| **Policy HOU02- Housing Mix**  This policy relates to the mix and type of housing to be provided. MM34 clarifies requirement to deliver mixed and inclusive neighbourhoods, and that proposals will be supported where they provide a mix of dwelling types and sizes to help meet current and future housing needs. MM re-wording to reflect purpose of Table 6 in setting out the Council’s dwelling size priorities, and that all housing proposals are expected to reflect these priorities unless it can be demonstrated that a variation to the preferred mix is justified based on criteria in Policy HOU02. Adds site optimisation and provision of Build to Rent and viability as further material considerations on mix. Clarification provided that flexibility for specialist housing schemes supported by Policy HOU04 will necessarily be applied. | + | + | 0 | **+** | ***Social Cohesion and Lifetime Neighbourhoods-*** neighbourhoods which are mixed and inclusive can contribute to social cohesion and reduce isolation and loneliness, including for older people.  ***Housing quality and design-*** By setting out dwelling size priorities this policy can help reduce the likelihood of overcrowding for families. Overcrowded conditions in childhood are associated with increased risk of respiratory illness and meningitis and damp and mould. Furthermore, setting out dwelling size standards for all new homes will positively contribute to residents’ mental wellbeing. Exemption for specialist accommodation from dwelling mix requirements will help deliver targets as set out in HOU04. |
| **Policy HOU03- Residential Conversions and Redevelopment**  This development management policy aimed at optimising the potential for housing delivery arising from residential conversions and the redevelopment of larger homes. The MM updates and clarifies the implementation of the policy criteria to be applied when assessing proposals and ensures closer alignment / general conformity with the London Plan. MM35 clarifies prioritisation of delivery of family homes and to address the needs identified in Table 6 of the Plan. | 0 | 0 | 0 | **0** | ***Housing quality and design-***. This policy seeks to strike a balance between conversions of existing housing stock - losing larger units while providing more protection for provision of family homes. This could contribute positively to appropriate housing availability but could also reduce existing housing stock for large families. |
| * 1. **Policy HOU04 – Specialist Housing**   This development management policy outlines the provision of specialist types of housing provision within the Borough. The MM updates and clarifies the implementation of the policy criteria to be applied when assessing proposals and ensures closer alignment / general conformity with the London Plan. MM36 details re-structuring of the policy to split into sections relating to older persons housing (with cross reference to requirements of London Plan) and wider housing choice for people with social care and health support needs. Rewording in terms of support for proposals for people with social care and health support needs, as well as highlighting suitability of locations with PTAL 3 or more and accessible to local shops, as well as social infrastructure and health care. With Houses in Multiple Occupation (HMOs), proposals should demonstrate that they meet an identified need and avoid an overconcentration. Protection of living conditions for residents and occupiers of neighbouring properties may be sought through an HMO management plan. Clarification that existing HMO of a reasonable standard is protected unless no need demonstrated. Re-wording that student proposals demonstrate how they meet an identified housing need, provide a management plan so no unacceptable impact on living conditions of occupiers of neighbouring properties. All specialist housing proposals expected to achieve highest standards of accessible and inclusive design in accordance with London Plan Policies D5 and D7. | 0 | + | 0 | **+** | ***Social cohesion and lifetime neighbourhoods –*** ensuring a mix of types of location for different housing types helps provide choice in addressing housing needs.  ***Housing quality and design*** - While Houses in Multiple Occupation (HMO) provide affordable options for residents, poorly maintained HMOs may increase the risk of ill mental health. Good property management can lessen the potential harmful effects of living in HMOs. Barnet Council operates a compulsory HMO licencing scheme.  Student accommodation may offer more affordable options for higher education, improving life opportunities. Good management is an important requirement.  Housing choice for older people is reflective of projected demographic shifts and support for their independence. Restructuring of policy makes policy more effective, particularly in terms of people with disability and younger vulnerable adults.  ***Accessibility and Active Trave/ Climate Change***:  This policy seeks to ensure that new care housing and care homes, new HMOs and student accommodation are located within walking distance to local shops or with good public transport access. This policy will encourage active travel and use of public transport over car usage and contributes to a change in culture around car use in Barnet. |
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| **Policy HOU05 – Efficient use of Barnet Housing Stock**  MM35 re-wording provides positive approach in setting out the specific limited circumstances where a net loss of housing will be supported. Expressed support for provision of social, physical or green infrastructure where local needs are clearly demonstrated.  Requires proposed use not to be detrimental to amenity of existing residents. Clarification about ‘short-stay holiday rental accommodation to be used for more than 90 days a year’. Supports temporary (meanwhile) uses subject to no unacceptable impact on the amenity of existing residents and that they would not prevent sites from being redeveloped.  The policy promotes the efficient use of Barnet’s housing stock to meet identified needs. The MM provides clarification regarding assessing proposals that would result in a net loss of residential accommodation, protecting permanent conversion to short term holiday rental and the provision of temporary meanwhile accommodation. | 0 | 0 | 0 | **0** | ***Housing quality and design*** - While this policy seeks to maximise the use of existing housing stock, it is important that long-term vacant homes and holiday lets are identified and/or monitored. An increase in short-term holiday lets will not only reduce housing availability in the Borough, but it is also likely to have a negative impact on community cohesion, which is a determinant of health.    Meanwhile uses of land for additional temporary accommodation should not compromise the quality of housing provided to residents. There should be no exception in meeting space standards in meanwhile spaces. This will provide better-quality homes for families who are in need of housing and ensure positive health outcomes are maximised. |
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| **Policy HOU6 – Meeting Other Housing Needs**  MM38 shows that this policy is to be deleted as proposals for build to rent and self-build are now addressed within the MM to Policy GSS01 above which adds a policy approach to proposals for build to rent and self-build and custom housebuilding as part of the strategic approach to delivering sustainable growth.  Matters previously covered by this draft policy HOU06 are now alternatively covered in Policy GSS01 (as modified) and the MM SA assessment in respect of build to rent and self build and custom housebuilding is now therefore provided within the assessment for policy GSS01. | 0 | 0 | 0 | **0** | When high quality Build to Rent properties are created they may positively contribute to a healthy environment. However, these contributions are unlikely to positively or negatively impact on the health of vulnerable residents. |
| **Policy HOU07 – Gypsies, Travellers and Travelling Show people**  MM39 clarifies that the Council have identified no objectively assessed need for provision of pitches and plots for Gypsies and Travellers and Travelling Showpeople households. Proposals for accommodation will be supported if they meet the listed criteria. MM rewording include in respect of requirements of development in terms of unacceptable impacts on character and amenity. Clarification on flood risk and the approach to negotiated stopping as part of the management of unauthorised encampments, and a commitment that the preparation and publication of findings of a London-wide Gypsy and Traveller accommodation needs assessment, will as necessary help to inform an early review of the LBBLP.  MM revisions provide certainty that in the event that proposals for Gypsies and Travellers, and Travelling Showpeople accommodation come forward they will be supported provided that they meet the listed criteria.  The MM updates and clarifies the implementation of the policy criteria to be applied when assessing relevant proposals and ensures closer alignment / general conformity with the London Plan and national policy guidance. It is noted that the Mayor of London is currently undertaking a London Gypsy and Traveller Accommodation Needs Assessment (GTANA), the results of which will be used to inform the next iteration of the London Plan. Also, the proposed inclusion of this policy as a strategic policy within the LBBLP (MM8 refers) and therefore, within the scope of the early review of the Plan should help to ensure that if unmet needs are identified in the future they can be addressed. | 0 | 0 | 0 | **0** | ***Access to healthcare services and other social infrastructure-*** Gypsies and Travellers have some of the poorest health outcomes and are identified as a vulnerable population in England. Policy is more positive about support for proposals that meet the location based criteria. Reference now added to ensuring healthy lifestyles of residents of new sites. Policy is consistent with national policy and outlines importance of access to shops, schools and healthcare and also that there is equivalence in how Local Plan standards are applied. |
| * 1. **Policy CDH01 – Promoting High Quality Design**   MM41 re-wording to reflect the purpose and role of associated SPD. Revisions for soundness, general conformity with London Plan including policies D3 and T2 in respect of design-led approach to development. Clarification on provision of safe environments, and that proposals should design out crime with secured by design principles. Clarifies that development may affect amenity of occupiers of property beyond those immediately adjacent and refers to threshold for acceptability of amenity impacts that is consistent with other policies in the Plan. Broadens scope to address pollution impacts. In supporting text adds reference to the Healthy Streets Approach, Secured by Design as well as references to relevant fire safety legislation.  The MM provides clarification on the detailed design related matters that proposals will be expected to address where it is relevant to do so. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy in respect of national legislation and guidance and ensures closer alignment / general conformity with the London Plan. | = | + | 0 | **+** | ***Social cohesion and lifetime neighbourhoods, Crime reduction and community safety*** - This policy protects and enhances the quality of Barnet’s character by promoting high quality design, safe and secure environments and landscaping. This policy could be strengthened by a more explicit directive to create spaces for social engagement.  ***Housing quality and design***: this policy gives due consideration to ventilation and overheating which may reduce incidence of damp and mould in Barnet’s housing stock.  ***Accessibility and active travel:*** Improved public realm can encourage more people to walk and cycle, |
| **Policy CDH02 – Sustainable and Inclusive Design**    MM44 rewording for soundness general conformity with London Plan. Clarifications in respect of climate change and that BREEAM applied to development proposals for non-residential buildings. Inclusive Design Statements required within Design and Access Statements to ensure alignment with London Plan Policy D5. This development management policy relating to sustainable and inclusive design includes requirements for development proposals leading to the delivery of higher quality and sustainable design. The MM provides clarification on the detailed design related matters that proposals will be expected to address where it is relevant to do so. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy in respect of national legislation and guidance and ensures closer alignment / general conformity with the London Plan | + | 0 | 0 | **+** | ***Climate change, minimising the use of resources-***  More effective wording on requirements of design in respect of climate change, and emphasis on mitigation/adaptation through good design.  ***Housing quality and design/Accessibility:***  More effective wording with cross referencing to London Plan on requirements of design in respect of accessible housing and inclusive design |
| **Policy CDH03 – Public Realm**  MM revisions for soundness, general conformity with London Plan. Emphasises that development required to contribute positively to the public realm. Clarification on Healthy Streets Approach and rewording on safety and security issues for crowds. Highlight that due regard be given to the Council’s town centre strategies as well as TfL’s Streets Toolkit.  The MM provides clarification on the detailed public realm related matters that proposals will be expected to address where it is relevant and to do so. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy to ensure closer alignment / general conformity with the London Plan and related guidance. | +/- | 0 | 0 | **+/-** | ***Social cohesion and lifetime neighbourhoods, accessibility and active travel-*** This policy will actively contribute to social cohesion by encouraging more people to interact with public realm. Reference to family friendly and young people friendly helps promote cohesion  Though this policy makes reference to London Plan policies on provision of public water fountains and public toilets, this policy could be strengthened by going further than ‘enabling access to …public toilets’ and making public toilets and water fountains a requirement in town centres. Provision of public toilets will encourage more vulnerable residents including older people to interact with public realm. It also contributes to good hygiene and cleanliness of the town centre and decreases frequency of public urination. |
| **Policy CDH04 - Tall Buildings**  Whilst this policy does not prescribe either a quantum or specific type of development, the MM clarifies locations where tall buildings may be appropriate and influences site considerations as well as decision making and outcomes.  MM revisions for soundness provide revised wording to ensure closer alignment / general conformity with the London Plan and clarification on the roles and status of current and proposed future SPDs. Changes include setting no upper storey or metre height limit; and clarifying that locations for tall buildings are evidence based. As the setting of a height limit was not justified, reference to this in the policy is therefore necessarily being removed thereby allowing assessment of the suitability of each proposal in the context of its surroundings. Clarification that locally important views identified on Map 4 are a relevant consideration for applications. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy in respect of national legislation with reference added to the Building Safety Act 2022. Clarification provided on how visual impact will be addressed in line with London Plan Policy D9(C). The policy stipulates the areas within Barnet where construction of tall buildings (defined as 8 storeys or 26m and above) may be appropriate. | 0 | +/- | 0 | **+/-** | There is some evidence to suggest a negative association between tall buildings and mental health ranging from impact on views to an association with suicide. Guidance to be provided as part of the Design for Density SPDs to highlight design solutions for suicide prevention particularly from buildings of height. Cross reference to Building Safety Act helps address concerns about fire safety following Grenfell Tower. Concerns about microclimate around tall buildings.  On the positive side when tall buildings remain a part of the larger housing offer, and are built to required quality standards including provision of amenity space there is likely to be no negative impacts on health. |
| * 1. **Policy CDH05 – Extensions**   MM revisions for soundness to ensure closer alignment / general conformity with London Plan. Clarification on roles and status of current and proposed future SPDs. To ensure effective implementation, the MM adds cross references to other relevant policies included within the Barnet Local Plan including retention of satisfactory amenity space in accordance with Policy CDH07. | 0 | 0 | 0 | **0** | This policy is unlikely to have an impact on health. Revised wording in MM48 does not alter the health impact of this policy either negatively or positively. |
| **Policy CDH06 – Basements**  This development management policy relates to subterranean, basement and other forms of below ground development. The policy ensures that regard is had to local geological conditions, thus ensuring that new development will not impact upon subterranean hydrological systems. Changes include policy renamed as also applicable to different forms of below ground development.  The MM provides revised wording to ensure closer alignment / general conformity with the London Plan, clarification on the roles and status of supporting guidance to ensure effective implementation also adds cross references to other relevant policies included within the Barnet Local Plan. Part h) is replaced with a requirement that the proposal is in compliance with flood risk requirements of national policy.   * 1. . | 0 | 0 | 0 | **0** | This policy is unlikely to have an impact on health. Revised wording in MM49 does not alter the health impact of this policy either negatively or positively. |
| **Policy CDH07– Amenity Space and Landscaping**  MM revisions for soundness, to ensure closer alignment / general conformity with London Plan and clarifications to ensure the effective and consistent implementation of the policy. These include clarification about amenity space standards set out in the Plan and provision of playspaces in line with London Plan; clarification on elements regarding amenity, access and parking areas, reference to the amenity of both existing and future occupiers of property. Also, clarification that landscaping should be designed to provide biodiversity benefits. | +/- | 0 | 0 | **+/-** | ***Social cohesion and lifetime neighbourhoods, Minimising the use of resources, climate change*** - There is evidence that the mental and physical health benefits of amenity space and landscaping varies with the quality of these spaces. Not all play space is equal. Size, infrastructure, amenities and quality of landscaping and amenity space affect the health benefits that are gained from spending time in these spaces.  This policy could be strengthened significantly by requiring, not encouraging, creation of wildlife habitats and provision of biodiversity benefits.  There is evidence that the density of tree cover affects mental health. Greater density yields greater health benefits. This policy seeks to retain existing trees of value wherever possible. Mature trees have greater biodiversity benefits than new saplings and should be afforded greater protection. |
| **Policy CDH08 – Barnet’s Heritage**  This is a development management policy used to assess development proposals in respect of designated and non-designated heritage assets. MM revisions for soundness are required to ensure closer alignment with legislation and national policy as set out in NPPF and NPPG, and to ensure general conformity with the London Plan. In addition, the MM provides for a number of clarifications to ensure the effective and consistent implementation of the policy. The redrafting to align with the NPPF / NPPG relates to setting out clear procedures for designated and non-designated heritage assets, including consideration of potential impact of a proposed development on significance of designated heritage assets and the approaches where a proposal would result in substantial or less than substantial harm. | 0 | 0 | 0 | **0** | ***Social cohesion and lifetime neighbourhoods*** – The changes in MM51 do not affect health materially. However, planning officers should consider specific populations (health inequalities, equalities generally) affected by any loss or damage to historical buildings. |
| **CDH09 – Advertisements**    MM revisions for soundness, closer alignment / general conformity with London Plan and to ensure effective and consistent policy implementation. MM revisions provides clarity on the relevant requirements under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Clarification that advertisements subject to control in the interests of amenity and public safety only. Clarification on light pollution and illumination, physical or visual obstruction, and visual clutter. | 0 | 0 | 0 | **0** | ***Social cohesion and lifetime neighbourhoods-*** Clarification that advertisements are subject to control in the interests of amenity and public safety only. There are also controls on light pollution and illumination, physical or visual obstruction, and visual clutter.  **Air quality, noise and neighbourhood amenity / Climate change** Amended wording seeks to resist advertisements that contribute to excessive light pollution. As light pollution is known to be harmful to both human and animal health this policy may have a protective effect. |
| **Policy TOW1 – Vibrant Town centres**  This policy relates to Barnet’s Town Centre Hierarchy and ensuring that, in respect of main town centre uses, development proposals contribute positively to the vitality and viability of the Borough’s town centres. MM revisions are needed for soundness and to ensure closer alignment / general conformity with the London Plan.  MM53 emphasises: i) support for redevelopment within the Brent Cross Growth Area and provides clarification on the strong retail offer, together with a wider mix of main town centre uses including residential as part of the creation of a new Metropolitan Town Centre(GSS02); ii) clarification on the approach in Edgware Major Town Centre (GSS05), and Cricklewood Town Centre (GSS04); iii) clarifies the approach to other District Town Centres (GSS08); iv) provides clarification on definition of ‘local level of retail’ and that residential-led mixed use development should be proportionate; v) clarification on what is considered to be ‘Lower PTAL’ in terms of the support for relocation of leisure uses; vi) revised wording to clarify the support for expansion of leisure uses in town centre locations where opportunities of suitable scale arise and vii) clarification regarding the circumstances requiring provision of an impact assessments on proposals for over 500 sq.m of retail or leisure uses | + | 0 | 0 | **+** | ***Social cohesion and lifetime neighbourhoods*** - This policy promotes town centre development focusing on existing town centre locations to prevent expenditure leakage and protect small businesses and local parades. The policy also identifies the need for a new local centre in Colindale as the residential capacity in the area grows. Section 6.5.1 sets out key priorities for Barnet town centres, which includes oversaturation of unhealthy uses such as shisha bars, betting shops and money lenders, and promoting the healthy streets approach for all town centre developments.  Overall, this policy’s focus on creating mixed-use, thriving town centres should contribute to increased opportunities for active travel and social interaction. |
| **Policy TOW02 – Development Principles in Barnet’s Town Centres, Local Centres and Parades**  This policy outlines development principles and criteria for proposals within Barnet’s Town and Local Centres and parades.  MM revisions are needed for soundness, updates to ensure the policy fully takes into account use class changes, (notably introduction of the new use class E introduced in 2020), and to ensure closer alignment / general conformity with London Plan. These revisions include ensuring consistent terminology for Local and Neighbourhood Centres; clarifications on significance of reduction of retail facilities; properties expected to retain active frontages at ground floor level; consideration of attracting visitors, and periods of continuous marketing. Restructuring of the policy to show requirements for alternative uses at ground floor level; provide clarification on the suitability of utilising upper floors for alternative uses; and to make clear that development with significant adverse effect on living conditions of occupiers of neighbouring properties will be resisted in accordance with Agent of Change. In addition, revisions clarifying the supportive approach to meanwhile uses of vacant sites and buildings that make a positive contribution; explanation of changes to Use Classes Order and related permitted development rights, including those which apply to Class E and Class MA and requirements relating to continuous marketing periods. | + | 0 | 0 | **+** | ***Social cohesion and lifetime neighbourhoods*** – this policy promotes vitality and viability of town centres from Majors down to Local Centres and Parades. The policy also promotes meanwhile uses of vacant properties which will benefit communities and third sector organisations in the Borough and may contribute to increased perception of safety.  The policy acknowledges changing town centre and high street patterns of usage and is monitoring and researching town centre uses.  Changes in the wording to this policy emphasise the need to reducing vehicular traffic to improve the public realm. This may contribute to increasing active travel and enjoyment of the public realm, both of which are associated with health and wellbeing. |
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| **Policy TOW03 – Managing Hot Food Takeaways, Adult Gaming Centres, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars**  This is a development management policy relating to managing and controlling potential harmful impacts arising from proposals relating to the uses named in the policy title. MM revisions for soundness, closer alignment / general conformity with London Plan and to ensure effective and consistent policy implementation.  Ensures approach to hot food takeaways is positively prepared, indicating circumstances and locations where proposals would be supported whilst preserving viability and vitality by avoiding over-concentrations of such a use. Revised policy now sets out criteria requirements rather than restrictions. MM revisions provide clarifications regarding no unacceptable impact on living environment for nearby residents and compliance with the Council’s Healthy Catering Commitment. New criteria added to ensure that details of suitable drainage facilities provided for hot food takeaways. Re-wording of part B of the policy to ensure the approach to stated uses is positively prepared, indicating circumstances and locations where proposals will be supported whilst preserving viability and vitality by avoiding over-concentrations of such uses. Clarification on intention to address health inequalities and text revisions to criteria expressing as requirements rather than restrictions. Removal of requirement that betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars be located more than 400m from the boundary of an existing school or youth centre as this is not justified by supporting evidence of its necessity to avoid demonstrable harm. Additional reference clarifying the circumstances where the Council will expect Health Impact Assessments to accompany the related proposals. | + | 0 | 0 | **+** | ***Social cohesion and lifetime neighbourhoods, Access to healthy food*** - Hot food takeaways generally sell cheap, energy-dense and nutrient-poor foods. This policy aims to manage the clustering of these outlets, however, two non sui generis/hot food takeaway units between the proposed and existing sui generis/hot food takeaway units could still lead to oversaturation. London Plan Policy E9D states that “where development proposals involving hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard”.  Betting shops, money lenders and shisha bars have negative impacts on health and wellbeing in the community. These shops also tend to cluster in areas with higher deprivation. The policy aims to resist proliferation of these units. By requiring proposals for all uses in this policy to submit HIAs as part of their proposal (in line with Barnet’s HIA policy), this will allow a greater understanding of potential health harms and identify strategies to mitigate them. |
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| **Policy TOW04 – Night-time Economy**  MM revisions for soundness, to ensure closer alignment / general conformity with London Plan, and effective and consistent policy implementation. Cross-reference added to the requirement to accord with London Plan Policy HC6. Revisions to policy wording clarifying that the policy is also relevant to evening economy uses; to emphasise that scale and type of use should reflect the role and function of the town centre, and positively contribute to viability and vitality by preserving or enhancing existing night-time economy activities or creating new ones. Revisions also to ensure proposals would not result in unacceptable impacts upon highway safety or the living environment of adjoining or adjacent residential and non-residential uses, in terms of noise, disturbance, odours and anti-social behaviour. Clarifications on unacceptable impacts arising from cumulative effect with the number, capacity and location of other night-time economy uses in the surrounding area and the regard needing to be had to the impact of proposals on the historic environment / heritage assets. | 0 | 0 | 0 | **0** | The policy aims to prevent negative impacts on the adjacent residential area, therefore there are no likely impacts on health.  The changes in wording to this policy do not affect health materially. |
| **Policy CHW01 – Community Infrastructure**  MM revisions for soundness, general conformity with London Plan and to provide clarification on a number of matters including, that the policy applies to outdoor sports facilities including playing fields and pitches; ‘multi-purpose community facilities’ are preferred in locations in Growth Areas, town centres, local centres including the public sector estate; Council’s preference for large scale development to provide community facilities or land for such facilities on site to meet the needs generated by development; the inclusion within community infrastructure of outdoor sports facilities, including playing fields and pitches. Deletion of nomination of Assets of Community Value as a potential planning consideration, as no evidence that nominations will necessarily lead to the formal designation of such assets. Deletion also of criteria that limit locations where new community infrastructure is supported, and of the requirement for all proposals to be subject to legal agreements as these would not be required or proportionate for all new community infrastructure. | + | 0 | 0 | **0** | ***Access to healthcare services and other social infrastructure*** - This policy improves access to multi-purpose community facilities by co-locating or maximising the use of existing facilities. It seeks to ensure services, facilities and infrastructure continue to meet the diverse and changing needs of Barnet’s population. This policy also protects existing community facilities. For the proposal for new community facilities, it considers the impact on neighbouring amenities and accessibility by public transport, walking or cycling, helping reduce inequalities in access.  The changes in wording to this policy do not affect health materially. |
| **Policy CHW02 – Promoting health and wellbeing**  This is a development management policy relating to the promotion of health and wellbeing of residents, use of HIAs for major development proposals and the provision of related essential facilities and services. MM revisions provide clarification on a number of matters addressed and referenced in the policy. These include clarification that HIA is required for major development proposals; cross reference to London Plan Policy T2 in respect of the Healthy Streets Approach; clarifications to ensure consistency with other Plan policies. | + | + | 0 | **+** | Amended policy wording no longer requires developers to adopt Sport England’s Active Design principles, and now only requires developers to have ‘due regard’ to these principles. In terms of health promotion, closer adherence to Sport England’s Active Design principles is preferable.  Amended policy wording now requires developers to improve air quality rather than only mitigating impact of air pollutants. This signals a more explicit and proactive approach to improving air quality.  Amended wording makes more explicit reference to reducing car dependency. This policy will encourage active travel and use of public transport over car usage and contributes to a change in culture around car use in Barnet. |
| **Policy CHW03 – Making Barnet a Safer Place**  This policy relating to making Barnet a safer place outlines and promotes the range of measures that the Council will pursue, and the partners it will work with, in meeting this policy objective. MM revisions provide consolidation and clarification on a number of matters addressed in the policy and add cross referencing to other relevant policies in this emerging Barnet Local Plan as well as the London Plan.  MM clarifications include distinguishing between Council commitments and the parts of the policy that set out criteria for development proposals to comply with, and support for development proposals that reflect Secured by Design principles’ or similar. Deletion of specific requirement for all development proposals to work with Secured by Design Officers is not justified. In the supporting text revisions to para 8.20.4 to make clear that Secured by Design principles and consultation with the Metropolitan Police Secured by Design Officers are encouraged, and signposting at para 8.20 to Policy D12 of the London Plan in respect of fire safety. | 0 | 0 | 0 | **0** | ***Crime reduction and community safety*** – Amended wording places more emphasis on town centre strategies for ensuring inclusion, safety and accessibility.  Amended wording does not materially affect health. |
| **Policy CHW05 – Protecting Public Houses**  This development management policy seeks to protect existing public houses in Barnet and the preferred location (within Growth Areas and Town Centres) for new pubs. It sets out criteria to be applied to any proposals involving the loss of a public house. MM revisions provide clarification on a number of matters addressed in the policy and add cross referencing to relevant policies in this emerging Barnet Local Plan as well as the London Plan. MM provides clarification on the protection of public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres. Deletion of support only for public houses that come forward as mixed-use development, as this is considered to be unduly restrictive and therefore not justified. Cross reference to London Plan Policy HC7 added as there is no substantive local evidence that a vacancy test is required.  Clarification that where London Plan Policy HC7 is satisfied, proposals for other community uses will be supported, and alternative uses will be permitted where the relevant criteria of Policy CHW01 that relate to proposals involving the loss or replacement of existing community facilities are met. Criteria of Policy CHW01 added for clarity. Deletion of nomination of ACV as a potential planning consideration. | 0 | 0 | 0 | **0** | ***Social cohesion and lifetime neighbourhoods*** - Whilst well managed public houses can be important community assets for social interaction and social cohesion, alcohol overuse has negative impacts on health.  As this policy relates to protecting public houses, especially where they have heritage, economic, social or cultural value, this policy will not have any significant impact on health. |
| **Policy ECY01 – A Vibrant Local Economy**  This development management policy relates to ensuring the maintenance of a vibrant local economy affording a range of employment opportunities. MM revisions are necessary for soundness, closer alignment / general conformity with London Plan policies and in order to provide clarification on a number of detailed matters. These include stating the locations where the Council will prioritise promoting new employment opportunities; the Council’s approach to safeguarding offices as a main town centre use in the context of Class E and the required period of active marketing for proposals seeking redevelopment of office uses outside of Town Centres and edge of centre locations. Also, clarification regarding proposals in other locations that are not in an existing town centre (i.e. application of the sequential test for main town uses). Clarification with LSIS identified in Table 14 and that proposals for office uses in these locations should be ancillary to main employment use of premises or land. Clarification that proposals for co-location to support delivery of residential or other uses, such as social infrastructure, should only occur as part of intensification of a LSIS with no net-loss of employment floorspace and are supported by a coordinated master planning process. Clarification at Part C that as such uses fall within Use Class E (alongside main town centre uses proposals for development or change of use where permission is required involving the loss of employment accommodation in those areas will not be supported. Support for new employment space is subject to site not being allocated in Plan for an alternative use. Clarification that travel plans, transport statements or transport assessments are required to be provided in accordance with national policy, London Plan Policy T4 and are consistent with any related MMs to Policy TRC01. | + | 0 | 0 | **+** | ***Access to work and training*** - Protecting and developing new office spaces contributes to job opportunities for residents and the local economy. These sites should be supported by improvements to walking, cycling and public transport access in order to promote health and reduce air pollution. The policy does not reference childcare. The provision of affordable and accessible childcare is a key factor for Barnet residents to take advantage of the employment opportunities and could be encouraged within regeneration and development schemes. |
| **Policy ECY02 – Affordable Workspace**  This is a development management policy relating to the provision of affordable workspace. MM revisions are necessary to provide clarification on a number of detailed matters including revisions clarifying that the policy applies to proposals for new employment floorspace in designated employment areas, together with the Brent Cross GA, Brent Cross West GA, Edgware GA, New Southgate Opportunity Area, and Barnet’s District Town Centres, to sustain a mix of business uses which contribute to the character of an area. Clarification, to ensure consistency with national policy and general conformity with the London Plan, that a minimum of 10% of affordable workspace, or equivalent contribution to off-site provision, is typically sought unless a viability assessment says this is not viable. Revision in Part C to ensure the provision of units that are suitable for sub-division provide fully customisable spaces for end user requirements. In addition, clarification is provided in the supporting text that the policy applies to major developments for new employment floorspace and/ or which would provide net additional floorspace as extension(s) to existing employment premises. | 0 | 0 | 0 | **0** | ***Access to work and training*** - Promoting affordable, flexible office spaces for small, community or creative businesses reflects changes in the way residents are working and is adaptable for future changes |
| **Policy ECY03 – Local Jobs, Skills and Training**  This policy outlines measures that the Council will take to increase employment opportunities arising from developments for local people. MM revisions are needed to improve the effectiveness of policy implementation and to ensure closer alignment with the London Plan.These include clarifications to provide certainty on qualifying development where the Council seeks increased employment opportunities in the Borough, i.e. major developments where 20 or more full-time equivalent (FTE) jobs would be created; and revision to require proposals to outline the skills, employment and training opportunities to be delivered alongside deletion of the requirement for a Local Employment Agreement (so as to align with London Plan Policy E11). Rewording in Part C is necessary to reflect the status of SPDs, clarifying that decision makers should have regard to any relevant SPD guidance intended to be provided with respect to jobs, skills and training. Revisions in the policy supporting text provide clarification regarding how FTE job creation will be calculated in terms of permanent jobs arising from development, and where temporary jobs are created during construction; also, to encourage developers to liaise with the Council at early stage to identify opportunities associated with proposed developments. | + | 0 | 0 | **+** | ***Access to work and training*** - The policy improves training and employment opportunities for Barnet residents. Unemployment is associated with negative health outcomes and unemployment rates are highest amongst those with no or few qualifications and skills. This policy could be referenced within regeneration policies in areas with existing deprivation, such as GSS04,05,06 so that it is demonstrated that social regeneration and inequalities have been considered as part of redevelopment. |

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| **Policy ECC01 – Mitigating Climate Change**  This is a development management policy relating to design requirements leading to low carbon, reduced energy consumption and increased levels of renewable energy. MM revisions are focussed on soundness and to ensure closer alignment / general conformity with London Plan and national policy. These revisions include:  Part A) - re-wording to align with Policy BSS01 in terms of locations for growth and para20 of the NPPF in respect of climate change mitigation and adaptation.  Part B) - explanation of ‘promote the highest environmental standards’ and ‘exemplary levels of sustainability’;  Parts C) and D) - clarification on energy matters to reflect London Plan terminology; deletion of reference to Part L of the Building Regs to provide clarity that it is the zero-carbon target that is sought to be achieved by major developmentin accordance with London Plan Policy SI2. Deletion of the reference that minor development proposals should meet Council’s carbon reduction target of at least 6% beyond Part L of the Building Regs is required as there is insufficient evidence to justify imposition of this target as a requirement in all circumstances.  Part E - requirements relating to decentralised energy deleted and instead alignment with Policy SI3 of the London Plan.  Part H - wording relating to harm to the significance of heritage is replaced with a reference to Policy CH08 to ensure consistency; also, additions included to ensure that the policy wording is consistent with the Council’s support of the retrofitting, reuse and adaptation of existing buildings at paragraph 10.6.3. | 0 | + | **0** | **+** | **Air quality, noise and neighbourhood amenity, Climate change, minimising the use of resources**- The World Health Organisation recognises climate change as the largest threat to population health of this century. In Barnet, inappropriate ventilation and insulated homes contribute to poorer health outcomes; in the winter due to high heating costs and in the summer due to overheating. This policy expects developers to design buildings which are more energy efficient and are able to cope with warmer summers and colder winters preventing associated ill-health.  Amended policy wording seeks to promote the highest environmental standards for development to mitigate and adapt to climate change.  The more detailed guidance on these topics (Detailed Sustainable Design and Development Guidance and the SPD on Green Infrastructure) should be reviewed with input from Public Health and offer more detailed directives to developers in order to address the ever more important and dynamic challenges to health presented by climate change. |

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| **Policy ECC02 – Environment**  **-al considerations**  This is a development management policy relating to seeking opportunities to improve air quality, noise levels, light pollution and mitigate pollutants. MM revisions are focussed on soundness and to ensure closer alignment / general conformity with the London Plan and national policy, notably alignment with approaches to air quality at NPPF para 192 and London Plan Policy SI1. Clarification on air quality and noise assessments and status of relevant current and potential future SPDs. Clarification that demolition and construction management plans may be conditioned where necessary. New parts F and G added on light pollution and odour criterion. Cross references to the Tables in the supporting policy text for setting out requirements on light pollution and consistent references to both noise and vibration. | + | 0 | 0 | **+** | ***Air quality, noise and neighbourhood amenity*** – this policy minimises the exposure to noise and poor air quality caused by development through impact assessments as part of the planning process. A health inequalities lens should be applied to this policy –developments in areas of deprivation or poor air quality should aspire to go beyond ‘air quality neutral’ to ensure that air quality and noise levels do not further exacerbate health inequalities in these areas.  New wording around limiting adverse impacts from artificial light may have a protective benefit for health.  ***Access to open space and nature*** - The policy improves access to river corridors. Improved access and engagement with the natural environment improves physical activities and mental wellbeing. |
| **Policy ECC02A – Water Management**  This development management policy provides for enhanced water use efficiency, thus reducing the need for water abstraction. The policy aims to improve water quality and reduce runoff and ensure that development does not lead to deterioration to the quality or stability of a watercourse and refers to the Water Framework Directive. It also ensures that the public sewerage network has sufficient capacity to serve existing and new development, and that provision of new infrastructure is in place prior to occupation, thereby preventing a reduction in water quality.  MM revisions for soundness, closer alignment / general conformity with the London Plan.  These include in Part A in relation to flood risk:  i) At Aa) specific reference to the Council seeking to ensure that development is located in areas at lowest risk of flooding assessed through applying, as appropriate, the sequential test.  ii) At Ab) additional reference made to the need for development to ensure that flood risk is not increased elsewhere.  iii) At Ac) clarifications that improvements to flood defences may be needed and be maintained in perpetuity, having regard to climate change that defended areas should be protected; also reference added in respect of land adjacent to flood defences needing to be protected to provide space for flood water in the event of breach; for clarity of intent, references also added to needing to consider future improvement, the introduction of natural flood management techniques, public amenity ‘space’ together with biodiversity ‘enhancements’.  iv) At Ad) clarifications added in outlining the circumstances when a site-specific flood risk assessment should be undertaken.  In Part B with regards surface water management, clarifications provided with respect to sustainable drainage run-off expectation, and that where it is necessary that management and maintenance plan arrangements are in place, the need as relevant for these to be secured through planning conditions or obligations.  In Part C clarification that major development proposals will be required to demonstrate how appropriate solutions to water capacity issues will be delivered in appropriate timeframes.  In Part D clarification in respect of water courses of the expectation that proposals adjacent to a river corridor ensure a buffer zone of at least 10 metres. Also, additional reference made to encouragement for naturalisation of river corridors with clarification of the requirement where necessary for contributions towards river restoration and de-culverting.  Additional criterion (Part Dc) requiring that all applications for sites adjacent to a river corridor provide an assessment of impacts (including cumulative impacts) of the development on the riverine environment and other matters. | + | + | 0 | **+** | **Climate Change, Housing quality and design** amended wording clarifies expectations for developers and development to be located in areas of lowest risk of flooding, and that flood defenses are appropriate for future challenges of climate change. This policy should minimise risk of harm due to flooding which may protect both mental and physical health. |
| **Policy ECC03 – Dealing with Waste**  This is a development management policy relating to waste management. MM revisions are necessary for soundness, closer alignment / general conformity with London Plan and to update / ensure accordance with the adopted North London Waste Plan (NLWP). Clarification that Council encourages sustainable waste management in accordance with Policy SI 7 of the London Plan and the NLWP. Improved referencing to NLWP in respect of Scratchwood Quarry (Site No 29). | 0 | 0 | 0 | **0** | No likely impact on health. The North London Waste Plan considers health within the plan, with all impact assessments being completed alongside in order to maximise positive health impacts and minimise negative impacts. |

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| **Policy ECC04 – Parks and Open Spaces**  This policy relating to Barnet’s parks and open spaces, provides for the retention, extension and enhancement of green infrastructure. MM revisions are required for soundness to ensure closer alignment / general conformity with London Plan policies. Clarifications provided relate to adding reference to the sports hubs identified in Policy GSS13; making clear that the Council intends to protect and enhance existing open spaces; also, on where developers will be expected to make provision for new and/or improvements to existing parks and open spaces. This includes the circumstances where contributions towards offsite provision rather than direct provision may be appropriate; also addition setting out management and maintenance expectations. Inclusion of standards for sports pitches as identified in Open Space, Sports and Recreational Facilities Assessment and reference added to London Plan Policy S4 in respect of play provision. Clarification is also provided on what is meant by ‘natural green spaces’; and playing fields as a form of open space. Revisions in the policy supporting text explain the Council’s approach for identifying and targeting areas of open space deficiency and deprivation.  In addition to these clarificatory revisions, the MM deletes the part of the policy (part e) that included criteria allowing for the possibility to develop areas of open space deemed to be of low quality and low value. This deletion is to reconcile with the Council’s strategy to address deficiencies in and improve access to parks and open spaces, and to reflect that evidence does not justify a policy approach that permits release of existing open space for development. | + | + | NA | **+** | ***Access to open space and nature*** - The amended policy wording seeks to protect and enhance existing open spaces. Parks and open spaces provide opportunities for physical activity and enhance mental wellbeing. The policy also specifically addresses deficiencies in access to open / green spaces. Consideration should be made to how existing access is unequally distributed across the Borough emphasis should be given to reducing inequalities in access. In order to address health inequalities, particular attention should be paid to ensuring no loss of greenspace in areas of deprivation.  ***Access to healthy food*** – supporting text to the policy recognises benefit of land use for food production and encourages food growing in new development. This aspect of the policy could be enhanced by developing specific guidance on including food growing in new developments and by working with Public Health and Greenspaces team to create more specific guidance around increasing local food production. |
| **Policy ECC05 – Green Belt and Metropolitan Open Land**  This is a development management policy that provides for the protection of the Green Belt and Local Green Space. The policy sets out criteria for development on the Green Belt and also seeks to protect MOL from inappropriate development.  The MMrevision is necessary for soundness to ensure accordance with national policy in the NPPF and closer alignment / general conformity with the London Plan; it relates to the deletion of the criterion stating that development outside Green Belt affects its openness in the terms of its definition in the NPPF and, as a consequence, conflicts with the Framework’s approach to assessing openness. Instead, in respect of development proposed adjacent to Green Belt / MOL, a sentence is added to the policy supporting text strongly advocating a design led approach cross referencing to policy CDH01 and highlighting a focus on landscape and local character where necessary. | + | 0 | 0 | **+** | ***Access to open space and nature*** - The policy protects public access to green spaces. Access and engagement with the natural environment is associated with improved physical activity and mental wellbeing. |
| **Policy ECC06 – Biodiversity**  This development management policy with regards to biodiversity relates to the protection of habitats and improving biodiversity.  MMrevisions for soundness to ensure closer alignment / general conformity with the London Plan and the provisions of the Environment Act 2021.  Clarifications include that the current and proposed future Green Infrastructure SPDs constitute guidance only; contributions may be sought towards the opportunities of the Green Grid Areas relevant to Barnet in respect of biodiversity; confirmation that, at a minimum, biodiversity net gain (BNG) should be provided in accordance with national policy / legislation; compliance with the Table in the policy supporting text is required, unless legislation indicates otherwise. Clarifies that development proposals at application stage should be supported by sufficient evidence to demonstrate to a decision maker that the BNG requirement will be capable of being achieved. Clarification that proposals meet the Urban Greening Factor target scores set out by Policy G5 of the London Plan and provide SuDs schemes that maximise biodiversity benefits. Also, clarification that where necessary monitoring of biodiversity net gain may need to be secured by planning conditions or obligations as appropriate. Update text on implications of the Environment Act 2021 and associated regulations in respect of biodiversity net gain and Local Nature Recovery Strategies. | + | 0 | 0 | **+** | Climate change and biodiversity collapse is the largest risk to health of the 21st century. Protecting biodiversity is essential to will help minimise the impacts of climate change and therefore, indirectly contribute to positive health outcomes for residents. |
| **Policy TDC01 – Sustainable and Active Travel**  Promoting active travel this policy provides the positive provision of sustainable transport modes, provision of infrastructure and improvements to the existing transport network; the policy encourages modal shift away from the car towards cycling, walking and use of public transport that have the potential to reduce atmospheric pollution contributions.  MMrevisions for soundness are required to ensure closer alignment / general conformity with the London Plan. Clarifications include: i) that development proposals are required to demonstrate that adequate provision is made for necessary transport infrastructure, and that development does not compromise implementation of necessary transport infrastructure projects; ii) seeking contributions to orbital connectivity and public transport enhancements; iii) that the documents referred to in the policy are required where there would be construction vehicle / servicing or delivery issues. Revision needed to clearly set out the requirements for all developments generating significant amounts of movements to provide travel plans and transport assessments/statements. Also, clarification provided in the supporting text that mitigation of highway safety and road network impacts may be sought through planning obligations or agreements under Section 278 of the Highways Act 1980. | 0 | + | 0 | **+** | ***Accessibility and active travel*** -Amended policy wording slightly strengthens approach to enabling active travel.  Opportunities to promote active travel have health and wellbeing benefits as well as benefits for the climate and for reducing air pollution. |

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| **Policy TRC02 – Transport infrastructure**  This policy encourages modal shift away from the car towards cycling, walking and use of public transport. MM revisions are necessary to provide updates to transport infrastructure proposals and to explain how the Council will work with key partners to deliver capacity improvements. MM revisions delete reference to policies GSS09 and GSS11 as the transport infrastructure referred to within Policy TRC02 has wider application than for land relevant to those policies. Clarifications include that: i) Council will facilitate and support contributions to delivery of specified transport infrastructure, and ii) Brent Cross North bus station may be replaced, remodelled or improved. Updates provided include i) references to the current status of Colindale Station and the West London Orbital; ii) that land at Oakleigh Road South is safeguarded for Crossrail 2; iii) Council will work with TfL and Network Rail to bring forward capacity improvements identified in the Strategic Transport Assessment, and iv) the role of the IDP in relation to transport infrastructure monitoring. Also, explanation is given in the supporting text regarding the roles of, and signposting to, relevant elements of the Long Term Transport Strategy 2020-2041, Strategic Transport Assessment and IDP that relate to the requirements of Policy TRC02. | + | + | 0 | **+** | ***Accessibility and active travel*** - This policy identifies priority sites for transport infrastructure upgrades. Major developments are planned around these areas. This leads to compact and complete neighbourhoods, which are associated with increased physical activity and social networking. They are also considered integral to age-friendly community design and are supportive of dementia-friendly communities.  This policy seeks improvements of the bus network, particularly orbital routes. Improved access to public transport contributes significantly to a reduction in healthy inequalities, as it reducing improves employment, educational opportunities and access to other services. |
| **Policy TRC03 – Parking Management**  The policy sets out parking standard requirements for development within the Borough. MMrevisions are required for soundness to ensure closer alignment / general conformity with the London Plan.  MM provides clarification that parking should be limited in accordance with London Plan standards. Parking permits may be issued for development in CPZs in line with maximum provision level in Table 23, taking account of any on-site provision and subject to any capacity for additional on-street parking.  Clarification on where new CPZs or alterations to existing CPZs are deemed necessary to make development acceptable, and contributions for implementation and monitoring may be required.Deletion of requirement for CPZs to be in place before development. Clarification on ‘car free development’ by making certain that ‘where no parking would be provided within a development site, residential parking permits will be made available to Blue Badge Holders. Re-wording at Part D to reflect London Plan relevant policies regarding the reprovision of parking and not providing at previous levels where this would exceed standards. Updated references to electric vehicle charging to refer to Part S of the Building Regulations. Clarification that car club parking spaces with active charging facilities are encouraged as alternative to private parking for residents.  Additional text in the policy stating that the Council will require a Parking Design and Management Plan for all applications which include car parking. | 0 | + | 0 | **0** | ***Accessibility and active travel*** - The policy ensures improvements for cycling facilities in new residential and non-residential development. This will support active travel. Requiring developers to provide detailed cycle storage plans within planning applications will help ensure this requirement is useful for future residents.  Amended policy wording around limiting parking, as well as allocation of spaces for low emission vehicles, car clubs, cycle hire as well as charging points for electric vehicles may contribute to a culture change around car use in Barnet and indirectly encourage more active travel. |
| **Policy TRC04 – Digital communication and connectivity**  This is a development management policy relating to the delivery of digital communication infrastructure. The policy requires development to have demonstrated sufficient appropriate infrastructure capacity to support the development, or that such capacity will be delivered by the proposed development.  MM provides clarification on the Council’s support for delivering digital connectivity infrastructure with a particular focus on areas with gaps in connectivity and barriers to digital access. Clarification is also provided in the supporting text in respect of the Council’s aims in respect of CCTV provision. The MM clarifies how the use of s106 and CIL can be used to support the delivery of infrastructure in accordance with legislation and London Plan requirements. The MM also provides improved cross referencing to other Local Plan policies. | 0 | 0 | 0 | **0** | Although digital connectivity can decrease the risk of social isolation, this policy is not about digital inclusion and there is therefore no direct impact on health. |

# Conclusion and Recommendations

**Outcome of the Health Impact Assessment on the Main Modifications**

1. The Local Plan states that improving health and wellbeing is a cross-cutting theme for the Plan. There are a number of references to creating supportive and healthier environments for all population groups throughout the Plan, with particular references made to the Healthy Streets approach.
2. Overall, it is clear that through the Main Modifications the Local Plan has the potential to make a positive net contribution to the improvement of health and wellbeing as well as the delivery of the Joint Health and Wellbeing Strategy. This is especially true for the priority –‘Creating a healthier place’ . However, there are some policies that could be strengthened to maximise health benefits, as outlined in this health impact assessment. In particular, policies which relate to the quality of landscaping, open space and biodiversity for new developments and open spaces could set out clearer directives, rather than using language which recommends or suggests. The Public Health team could support the Planning Team to develop specific guidance notes for these areas in relation to the health and wellbeing benefits of biodiversity and green infrastructure. In addition, it is important to consider not only the health impacts of each policy, but also how the policy impacts health inequalities.
3. The Public Health team recommends that the Planning Team work collaboratively with the Public Health team. Examples of types of collaboration are as follows:
   * + - Involvement of Public Health team in the production of Supplementary Planning Documents
       - Public Health team engagement with the process of Design Review Panels.
       - Production of a Barnet Guidance Note on requirements for Health Impact Assessments
       - Public Health and Planning joint working on specific health related evidence and guidance notes.

The creation of the proposed guidance note on health impact assessments (HIAs) will provide a formal opportunity to consider the health impacts of major developments and strengthen collaboration between the Public Health and Planning teams.

1. The HRA Technical Note November 2022 (EXAM 39), the Updated HRA Screening Report 2022 (EXAM 8), the Regulation 18 and Regulation 19 Integrated Impact Assessments (IIA), the Updated IIA Non-Technical Summary, and the IIA Technical Paper. [↑](#footnote-ref-1)
2. M. McGinnis, P. Williams-Russo, J. Knickman. (2002) ‘The Case For More Active Policy Attention To Health Promotion’, *Health Affairs*, 21(2): 78-93. [↑](#footnote-ref-2)
3. WHO. Accessed on 14/01/2019 at <https://www.who.int/gho/phe/en/> [↑](#footnote-ref-3)
4. Public Health England. ‘Spatial planning for health: An evidence resource for planning and designing healthier places’ (2017) [↑](#footnote-ref-4)
5. Public Health England. ‘Spatial planning for health: An evidence resource for planning and designing healthier places’ (2017) [↑](#footnote-ref-5)
6. BRE. (2010). The cost of poor housing to the NHS. Watford: BRE. [↑](#footnote-ref-6)