

LB of Barnet Local Plan
IIA Signposting Technical Paper
January 2023

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1. Introduction

1.1 On Day 1 (Tuesday 20th September) at the EIP hearing session's, consideration of Matter 1 – Legal Compliance and the Duty to Co-operate, Inspector Wildgoose requested Barnet to produce a Sustainability Appraisal Technical Paper concerning, among other things:

- Signposting and setting out the location of evidence and the role of that evidence within the Sustainability Appraisal. For example: schedule 2 SEA regulations, cumulative impacts (economic, social and environmental); mitigation measures; risks; and, climate change.
- A summary of the approach taken to reasonable alternatives, including the chosen methodology, the relationship with the London Plan, and the provision of further narrative relating to the process undertaken.

This Technical Paper signposts to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) within the IIA documents. SA is a legally required process to be followed that seeks to ensure that the significant effects of an emerging draft plan (and any reasonable alternatives) are systematically considered and addressed. It is a requirement that SA is undertaken in accordance with the procedures prescribed by the Environment Assessment of Plans and Programmes Regulations 2004. A standalone Non Technical Summary (NTS) has been prepared alongside this Technical Paper.

1.2 This report was prepared as part of the examination into the London Borough of Barnet Local Plan (LBBLP) and summarises the findings of the IIA prepared for the submission of the LBBLP. It refers to information contained within:

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

a. [Updated HRA Screening Report 2022](#)

1.3 This IIA Technical Paper focusing on SA / SEA is accompanied by a Habitats Regulations Assessment Technical Note, [Exam 39](#). The IIA, including the SA element of it, was discussed at the first day of the examination hearing sessions held on 20th September 2022. This Technical Paper clarifies and amplifies aspects of the SA process discussed at that examination hearing session.

1.4 This document signposts the location of evidence within the IIA documents and the role that evidence had in the preparation of the development of the London Borough of Barnet Local Plan (LBBLP) leading up to and including the Regulation 19 and subsequent submission version of the LBBLP. It includes consideration of:

- a) Assessments required under Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations);
- b) Cumulative impacts (economic, social and environmental);
- c) Mitigation measures;
- d) Risks; and
- e) Climate Change.

1.5 This Technical Paper also provides a summary of the approach taken to reasonable alternatives, including:

- the chosen methodology;
- the relationship with the London Plan; and
- further narrative relating to the process undertaken.

1.6 Therefore, the documentation referenced above when taken and read together provides a methodological framework for appraisal. It includes information required to be prepared within the 'environmental report' produced in support of the LBBLP that was published at Regulation 19 and then subsequently submitted for examination. The PPG SEA checklist sets out the requirements in preparing the environmental report, as transposed from the SEA Directive into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations')¹. Following Brexit, these requirements may in future be amended or changed, but currently they still apply as retained EU law².

1.7 It should be noted that the Council is now proposing a number of changes to the submitted LBBLP as a result of representations received at the Regulation 19 stage, updates to the evidence base, and discussions and advice given by the Inspectors at the examination hearing sessions. The environmental impact of these changes will also need to be considered through the SA process. Any further conclusions that are reached will be published for comment when the Council issues main modifications to the LBBLP for public consultation. This is in order to determine whether any of the proposed changes significantly

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> Paragraph: 001 Reference ID: 11-001-20190722 Revision date: 22 07 2019

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

affect the SA findings set out in the iteration of the IIA (Core_Gen_02 and Core_Gen_28³) submitted for examination alongside the LBBLP.

³ <https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-review/submission>

2. Assessments required in relation to Strategic Environmental Assessment

2.1 Sustainability appraisals incorporate the requirements of the SEA Regulations.

Regulation 12 of the SEA Regulations sets out the matters which an environmental report must contain. Regulation 12(3) provides that an environmental report must include such of the information referred to in Schedule 2 to the Regulations as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, the stage of the plan or programme in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. Schedule 2(10) further requires an environmental report to include a non-technical summary (NTS) of the information included in the environmental report.

2.2 The table below sets out the requirements of the regulations, including Schedule 2, and signposts to where those requirements are addressed in the IIA documentation for the LBBLP. The table includes references to the HRA documentation included within the IIA, as it forms part of the IIA as presented, relates to the environmental impacts and provides additional support for the assessments made.

2.3 The Council has prepared an updated NTS to sit alongside this IIA SA/SEA Signposting Paper and the HRA Technical Paper ([EXAM 39](#)).

Requirements of the Regulations ⁴⁵	Relevant IIA sections and evidence documents
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the Plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the or programme (regulation 12(2)). The report Plan shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the Plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)).</p> <p>Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation</p>	<p>Core Gen 28: (IIA) Integrated Impact Assessment Scoping Report (2021) Scoping Report 2019</p> <p>Core Gen 25: Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020 part 1 Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020 part 2 Reg 18 (IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA and EQIA) - 2020-part 3</p> <p>Core Gen 02:</p>

⁴ The Environmental Assessment of Plans and Programmes Regulations 2004

<https://www.legislation.gov.uk/uksi/2004/1633/regulation/16/made>

⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

Requirements of the Regulations ⁴⁵	Relevant IIA sections and evidence documents
(regulation 12 (4)). When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.	<p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 1</p> <p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 2</p> <p>(IIA) Integrated Impact Assessment (Technical Summary, Sustainability Appraisal, HRA, EQIA) – 2021-part 3</p> <p>EXAM 08</p> <p>Updated HRA Screening Report 2022</p>
The information referred to in Schedule 2 is: a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	<p>Introductory sections of each iteration of the IIA set out the contents and main objectives of the plans. The Regulation 19 documentation reflects changes made to the plan following the Regulation 18 consultation, updated evidence base and discussions with statutory consultees.</p> <p>The relationship to other plans and programmes is considered in both Scoping Reports.</p> <p>Outline of Barnet Local Plan and context:</p> <ul style="list-style-type: none"> • IIA Regulation 18 Introduction • IIA Regulation 19 Introduction <p>Other plans and programmes:</p> <ul style="list-style-type: none"> • SA Scoping 2019, Table 3 • SA Scoping 2019, Appendix 2 Policy Review • SA Scoping 2021, Table 3 • SA Scoping 2021, Appendix 2 Policy Review <p>Updated HRA Screening Report July 2022 – Appendix 2</p>
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<p>The Scoping reports set out and update the environmental characteristics of areas likely to be affected and consider the potential for significant impacts.</p> <p>The HRA sections of the IIA consider the potential for designated sites to be significantly affected.</p> <p>Baseline information:</p> <ul style="list-style-type: none"> • Chapter 3, SA Scoping 2019 and Chapter 3, SA Scoping 2021 • IIA Regulation 18 Table 6

Requirements of the Regulations ⁴⁵	Relevant IIA sections and evidence documents
	<ul style="list-style-type: none"> • IIA Regulation 19, paragraph 2.32 <p>Updated HRA Screening Report July 2022 – Table 3</p>
c) The environment characteristics of areas likely to be significantly affected.	<ul style="list-style-type: none"> • Chapters 3 and 4, SA Scoping 2019 • Chapters 3 and 4, SA Scoping 2021 • IIA Reg 18 Section 3 – Appendix 4, HRA, Table 2 • IIA Reg 19 Section 3 – Appendix 4, HRA, Table 2 <p>Updated HRA Screening Report, Table 2 and Table 3</p>
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	<ul style="list-style-type: none"> • Chapter 4, SA Scoping 2019 • Chapter 4, SA Scoping 2021 • IIA Reg 18 Section 3 – Appendix 4, HRA, Table 2 • IIA Reg 19 Section 3 – Appendix 4, HRA, Table 2 <p>Updated HRA Screening Report, Table 3</p>
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	<p>Description of relevant wider objectives:</p> <ul style="list-style-type: none"> • Scoping Report 2019 Appendix 2 • Scoping Report 2019 paragraph 116 onwards • Scoping Report 2021 Appendix 2 • Scoping Report 2021 paragraph 127 onwards <p>Objectives in relation to designated sites are set out in Table 2 and Table 3 of the updated HRA Screening Report July 2022.</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors.</p> <p>These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>Framework:</p> <ul style="list-style-type: none"> • Table 7, IIA Reg 18 and Reg 19 • IIA Reg 18 Part 2 – Site Scoring Matrix • IIA Reg 19 Part 2 – Site Scoring Matrix <p>Assessment tables and commentary:</p> <ul style="list-style-type: none"> • IIA Reg 18 Part 2 – Appendix 1, Thematic Review and Appendix 2 Site Assessments • IIA Reg 19 Part 2 - Appendix 1, Thematic Review and Appendix 2 Site Assessments <p>HRA Screening Report July 2022.</p> <p>Further assessment in Appendix 4 of this document.</p>

Requirements of the Regulations ⁴⁵	Relevant IIA sections and evidence documents
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	<ul style="list-style-type: none"> • Mitigation measures within the IIA are considered in IIA Reg 18 Part 2 and IIA Reg 19 Part 2. • No mitigation was required in relation to Habitats Regulations as referred to in Updated HRA Screening Report paragraph 7.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	<ul style="list-style-type: none"> • Framework for assessment against IIA Objectives is set out in Section 5, SA Scoping 2019 and Section 5, Scoping 2021. • Assessment tables and commentary are contained within IIA Reg 18 Part 2 and IIA Reg 19 Part 2. <p>Alternative Options:</p> <ul style="list-style-type: none"> • IIA Regulation 18 Part 3 – Appendix 8 • IIA Regulation 19 Part 3 – Appendix 8
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	<p>The Monitoring Framework is set out within the LBBLP. Suggested indicators and monitoring are included within Table 7 of the IIA Regulation 18 and Regulation 19 Reports. Any updates to the Monitoring Framework through the examination of the LBBLP will be consulted on. A final monitoring framework will be included in the SEA Post-Adoption Statement.</p> <ul style="list-style-type: none"> • IIA Regulation 18 Part 1- Table 7 • IIA Regulation 19 Part 1- Table 7
j) A non-technical summary of the information provided under the above headings.	<p>Each iteration of the IIA contains a Non-Technical Summary section. A standalone NTS has been prepared alongside this Technical Paper.</p> <ul style="list-style-type: none"> • Regulation 18 IIA Part 1 • Regulation 19 IIA Part 1 <p>Updated NTS</p>
<p>Consultation procedures (regulation 13)</p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	<p>Consultation was carried out on the Scoping Reports, Regulation 18 and Regulation 19 IAA, as part of the consultation on the emerging LBBLP. Further consultation will be carried out as and if required through the examination process.</p> <p>Consultation with appropriate environmental bodies is set out in the consultation statements (Core 09)</p>
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States</p>	<p>This will be provided on the adoption of the LBBLP in the form of the SEA Post-Adoption Statement.</p>

Requirements of the Regulations ⁴⁵	Relevant IIA sections and evidence documents
<p>consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16). 	
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>The Monitoring Framework is set out within the LBBLP. Suggested indicators and monitoring are included within Table 7 of the IIA Regulation 18 and Regulation 19 Reports. Any updates to the Monitoring Framework through the examination of the LBBLP will be consulted on. A final monitoring framework will be included in the SEA Post-Adoption Statement.</p>

3. Cumulative impacts (economic, social and environmental) and mitigation

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

3.2 Figure 1 below sets out the key linkages between the IIA objectives and the SEA environmental factors. Many of the objectives and environmental factors overlap. The IIA assessment considers the relationship between the Objectives, as indicated in paragraph 2.39 and Figure 1 of the Regulation 19 IIA⁶.

⁶ https://www.barnet.gov.uk/sites/default/files/iaa_part_one.pdf

Figure 1 Environmental Factors and the LBBLP IIA Objectives

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

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

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

IIA Objectives	SEA Environmental Factors (key links in bold)
	Population Human Health Fauna Flora Soil Water Air Climatic Factors Material Assets Cultural Heritage Landscape

3.3 The policies within the LBBLP can be split between thematic policies and site allocations. The IIA considered the cumulative impacts of thematic policies within the Regulation 18 and Regulation 19 documents⁷.

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

Figure 2 Cumulative Assessment and Suggested Mitigation

Policy Theme	Cumulative Assessment and Suggested Mitigation
GSS 1 to GSS13	Proposed policies are likely to have overall positive effects (direct or indirect) in relation to the range of IIA objectives including those related to successful inclusive neighbourhoods, accessibility and efficient use of land and infrastructure. They do not preclude the realisation of other policies that more directly address other objectives. Where negative effects have been identified (e.g. through increased construction waste as a result of development) these will be mitigated via other policies contained elsewhere within the plan.
Housing	Proposed housing policies will help create places where people want to live, work and visit, as well as promote community resilience. As such, the overall strategic effect on the IIA objectives when managed through the suite of existing and proposed development plan policies should have a range of positive impacts which include: <ul style="list-style-type: none"> ▪ Investment in the built environment ▪ A boost to the local economy and employment through the construction of new homes ▪ Widening housing choice will benefit a range of socioeconomic outcomes such as health, accessibility to services, educational outcomes and improved employment opportunities. It is also recognised that the scale of development planned for in the Borough is likely to put pressure on social and physical

⁷ Appendix 1, Thematic Review https://www.barnet.gov.uk/sites/default/files/part_2_ii_a_report.pdf , https://www.barnet.gov.uk/sites/default/files/ii_a_part_two.pdf

Policy Theme	Cumulative Assessment and Suggested Mitigation
	infrastructure and could have potentially adverse impacts on the local environment. For example, more homes will increase the level of waste generated and such high housing targets could put pressure on release of greenfield sites and green belt, impacting on Barnet's environment/biodiversity.
Character, Design and Heritage	The policies have been assessed as having a positive effect on the overall IIA objectives, particularly those relating to high quality design and sustainable design. It is noted that high levels of development could have potential adverse impacts on the character of certain areas within the Borough and on heritage assets; however, these impacts will be mitigated through policies in this section and elsewhere within the Local Plan.
Town Centres	The policies, as set out, are likely to have a number of positive impacts on the objectives within the IIA framework, particularly those which relate to a high-quality environment, housing and economic growth. The policies enable diversification within town centres which will improve accessibility to key local services and help the Council meet wider regeneration objectives. Residential development will also enable well connected places that encourages sustainable and active travel and improve overall sense of place. Any areas where the policies might be expected to have potential negative effects are safeguarded by other policies within the Local Plan, for example increased development in town centres may lead to greater traffic congestion and pollution; however, sustainable and active travel are promoted alongside provision of mixed use communities to reduce the need to travel.
Community Uses, Health and Wellbeing	The policies have been assessed as having a positive or neutral effect on the overall IIA objectives. The effective implementation of these policies will help the Council contribute towards its wider regeneration agenda and will bring about numerous community benefits such as increased access to communal facilities, education and training opportunities. Policies also promote more active lifestyles that will have health and environment benefits. Any areas where the policies might be expected to have potential negative effects are safeguarded by other policies within the Local Plan.
Economy	The overarching purpose of these policies is to create employment and training opportunities and ensure adequate provision of workspace to support business and enterprise. The majority of policies assessed are likely to have neutral or positive effects (direct or indirect) in relation to the IIA objectives. The provision of affordable workspace will be of particular benefit to SMEs as it will help them to prosper and grow. In addition, increasing access to jobs, skills and training opportunities will help reduce unemployment within the Borough. However, increasing employment and business in the Borough has the potential to generate waste and adversely impact on water and air quality. Any instances where policies might have possible adverse effects will be mitigated by carrying through other Local Plan policies and associated effects. The full assessment of impacts has been summarised below.

Policy Theme	Cumulative Assessment and Suggested Mitigation
Environment and Climate Change	Policies assessed here are likely to have positive effects (direct or indirect) in relation to all IIA objectives. Policies specifically address air and noise pollution, water environment, waste, green infrastructure and biodiversity, all of which are key IIA objectives in themselves; furthermore, they do not preclude the realisation of other policies that more directly address other objectives. Any instances where the proposed requirements might be expected to have possible negative effects in relation to other objectives (e.g. a drive for better air and water quality may add restrictions and/or requirements on some forms of business and hinder economic objectives) are mitigated by the carrying through of established Local Plan policy requirements.
Transport and Communications	The policies promote investment in the strategic transport network and a more sustainable pattern of movement, which is likely to have a positive impact on a number of objectives within the IIA framework, including sustainable travel and reducing dependency on car travel, health and air quality. Policies under this theme do not preclude the achievement of other objectives through implementation of the policies under the thematic headings. Any areas where the policies might be expected to have potential negative effects are mitigated by other policies within the Local Plan, for example, development proposals that result in the reduction of off-street car parking spaces where they meet criteria and have high public transport accessibility to minimise car use.

3.4 The assessment of cumulative impact should also consider

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

Cross-cutting impacts of thematic policies

3.5 The thematic policy cumulative assessments acknowledge the link between themes within the LBBLP. Table 6 of the Regulation 19 IIA, (Core_Gen_02⁸) sets out where thematic policies link with the IIA Objectives and notes that there are multiple interactions.

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

3.7 Local plans should be read “as a whole”. Additional cross-referencing within the LBBLP will help with implementation of the policies by identifying specific instances where policies complement each other or could be in conflict without additional consideration. This should

⁸ <https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-review/submission>

ensure that unintended outcomes are minimized, positive impacts can be maximised and negative impacts decreased.

The Cumulative Impact of Site Allocations

3.8 At a strategic level, the London Plan 2021 has considered the environmental, social and economic outcomes of the level of development within the London Borough of Barnet. The LBBLP considers the implications at a plan-making level. In order to assess the sites submitted through the various call for sites exercises undertaken and those identified through other local plan documents e.g. AAPs, SPDs and evidence base studies, the Council applied a bespoke methodological site selection approach which sought to identify suitable sites for allocation in the LBBLP⁹¹⁰.

3.9 An analysis was undertaken to ensure that the topics identified in the SA framework were addressed in the site assessment and selection process. Appendix 4 of this document contains all site option assessments within a single table. A version of this table was included as Table 5 in the Regulation 19 IIA. The Site Allocation process is set out within Appendix 1 of the submission LBBLP. The Council has also prepared an updated Site Allocation paper for the Examination in Public¹¹.

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

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

The Plan as a whole

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

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

4. Mitigation

Mitigation within the IIA

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

⁹ https://admin.barnet.gov.uk/sites/default/files/EXAM%204%20-%20Table%20of%20Council%27s%20Proposed%20Modifications%20to%20Barnet%27s%20Draft%20Local%20Plan%20-%20June%2027th%202022%20PDF%20%282.35MB%29_0.pdf

¹⁰ [Exam 1b: https://www.barnet.gov.uk/sites/default/files/EXAM%201B%20-%20Housing%20Technical%20Paper.pdf](https://www.barnet.gov.uk/sites/default/files/EXAM%201B%20-%20Housing%20Technical%20Paper.pdf)

¹¹ [EXAM 9: https://www.barnet.gov.uk/sites/default/files/EXAM%209%20-%20Strategic%20Sites%20Delivery%20Technical%20Paper.pdf](https://www.barnet.gov.uk/sites/default/files/EXAM%209%20-%20Strategic%20Sites%20Delivery%20Technical%20Paper.pdf)

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

Mitigation in relation to HRA

4.2 The HRA within the IIA¹² stops at the Screening Stage and therefore does not consider mitigation further in relation to the LBBLP. The LBBLP Updated HRA Screening report 2022 (EXAM 8) considers that the LBBLP is not likely to have any significant effects on the identified designated sites and consequentially that there are no impacts that require mitigation.

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

4.4 A further consideration of the relationship between the HRA for the London Plan and the Appropriate Assessments carried out for other relevant Local Plans is set out in the HRA technical paper¹³.

5. Risks

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

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

5.2 Objectives were updated in response to information from statutory consultees and policy assessments were subsequently updated within the Regulation 19 IIA. A further stage of Flood Risk Assessment was carried out in response to discussions with the Environment Agency and site allocations have subsequently been amended. The list of Plans, Policies and Programmes was updated within the revised Scoping Report 2021, and within the wider evidence base for the LBBLP. The information required by the assessment criteria was updated in response to changes in the wider planning framework, such as the identification of new criteria from statutory consultees and new information from consultations and evidence preparation, particularly on proposed site allocations. The Council has proposed a modification to update the list of relevant evidence documents referred to ([EXAM 4, MM306](#)).

5.3 The iterative nature of the IIA means that the assessments are made and published at a specific moment in time. There is always new information or evidence likely to subsequently become available as the preparation of a local plan progresses towards adoption.

5.4 The IIA process allows for updated evidence to be considered and for updated recommendations to be made to improve the outcomes of policies within local plans. A temporary line is drawn at the point a local plan is submitted for examination, however there are still opportunities for local plans to take account of material changes to the planning system or material changes to proposed policies within the plan, through the examination process.

¹² Updated HRA Screening Report 2022

¹³ HRA Technical Note November 2022

5.5 The IIA and the wider preparation of the LBBLP sought to minimise the risks in assessment through the identification of relevant Plans, Programmes and Projects. Objectives were updated in light of new evidence and in response to consultation with statutory consultees and others.

5.6 Policies within the LBBLP require further detailed assessment and information to be provided by applicants at the time an application is submitted. This provides an opportunity for both an assessment at a later point in time and for a more detailed assessment of development proposed.

5.7 Assessment at the plan-making stage is at a strategic level. Monitoring of the LBBLP will allow for unanticipated outcomes to be identified. This will allow for further guidance to be produced on implementation of the LBBLP, or for issues to be addressed in a future review.

6. Climate Change

6.1 As requested in 'Exam 12 Actions from Week 1 Hearing Sessions'¹⁴, the Inspector requested additional signposting in relation to Climate Change. The Council's approach to climate change within the LBBLP is set out in its response to [Matter 5](#) Climate Change, Environmental Considerations and Green Belt.

6.2 The IIA considered the impacts of the LBBLP on Climate Change, primarily through assessment of policies against *Objective 11 – Reduce contribution to climate change and enhance community resilience to climate change impacts*. The assessments note the relationship between climate change and other objective topics, such as human health, air quality and water quality.

6.3 The LBBLP takes its lead on climate change from the London Plan 2021 and the NPPF. The IIA Objective provides a framework to consider the policy options within the strategic framework of the London Plan 2021. The LBBLP proposes further SPDs to address detailed requirements for development in relation to climate change. The recommendations within the IIA assessment support the development of detailed policy guidance.

7. Reasonable Alternatives

7.1 The IIA process involves the examination of reasonable alternatives as part of the requirements for Strategic Environmental Assessment. In determining whether an alternative is "reasonable" for SEA purposes, regard clearly must be had to the nature of the plan or programme for which alternatives are sought, its purpose, and its scope.

7.2 Reflecting the wording of the regulations and the guidance, the case law has made clear that any alternatives selected for assessment must be capable of meeting the objectives of the plan or programme in question¹⁵: The requirement to assess 'reasonable' alternatives does not require that every conceivable alternative be assessed. Ouseley J in *Heard v Broadland*¹⁶, noted that as a core strategy proposal had to be 'deliverable' in order to be 'reasonable', the 'reasonable alternative' had to also be deliverable. In other words, a reasonable alternative has to be able to satisfy any tests required for the plan for the policy or proposal.

¹⁴ <https://www.barnet.gov.uk/sites/default/files/EXAM%2012%20-%20Action%20List%20from%20Week%201%20Hearing%20Sessions.pdf>

¹⁵ *R (Buckinghamshire) v Secretary of State for Transport* [2013] EWHC 481 (Admin); *DB Schenker Rail (UK) Ltd v Leeds City Council* [2013] EWHC 2865.

¹⁶ [2012] EWHC 344

7.3 Taking the above into account, the IIA has considered appropriate reasonable alternative options, that have been limited by what is deliverable in the context of the LBBLP. Accordingly, in helping inform the development of the LBBLP, a range of reasonable alternatives have been explored and appraised through the SA process.

7.4 Part 3 of the Regulation 18 and 19 IIA documents¹⁷ set out the assessment of alternative options. The Regulation 18 Plan set out a Preferred Approach for policies within the draft LBBLP, alongside alternative options with outline reasons provided for the selection or rejection of the various alternatives considered. The reasonable alternative options considered are also set out and assessed in Appendix 7 of the Regulation 18 IIA report.

7.5 Alternative options included a 'no option' or 'no plan' option as well as where relevant to do so, retaining the existing plan policy. Other 'reasonable' alternatives were considered in the context of the London Plan, and the consequential limitations on the range of potential development options considered for inclusion within the LBBLP.

7.6 Appendix 3 of this document sets out the assessment of each policy option against the Scoring Matrix.

London Plan and the consideration of options

7.7 As the LBBLP must be in general conformity with the adopted London Plan 2021, this limits the options that can be considered, unless there are clear material considerations and cogent evidence for doing otherwise. The LBBLP does not identify material reasons to diverge from the London Plan, and the IIA process did not make any recommendations to materially diverge from the London Plan.

7.8 The preparation of the LBBLP has been undertaken alongside the preparation and examination of the London Plan. A key change to the London Plan with implications for the LBBLP was in relation to housing numbers. As the draft LBBLP was prepared, the housing targets changed in relation to the London Plan and in relation to housing methodology utilised by national government.

7.9 Over the time period since 2017 that the LBBLP has been in preparation, the housing target for the plan period up to 2036 has ranged from 35,460 to 62,000. The target within the March 2021 adopted London Plan was finally reduced to 35,640, and the target within the published draft LBBLP was set at 46,000, based on the SHMAA and pre-adoption versions of the London Plan. The IIA documents considered the changes in housing figures at the Regulation 18 and Regulation 19 stages. The target within the emerging draft LBBLP was then reduced to 35,460 in the submitted Plan ([Core 01](#)).

7.10 This reduction in housing numbers is both achievable within the Objectives of the IIA, and is considered likely to improve the environmental outcomes of development by relieving pressure on land for development with the London Borough of Barnet.

7.11 The GLA has confirmed that the LBBLP is in general conformity with the London Plan¹⁸. Further amendments have been proposed to the submission LBBLP to address points raised by the GLA. These amendments will be subject to IIA at a later stage of the examination.

Consideration of reasonable alternative options within the IIA

¹⁷ https://www.barnet.gov.uk/sites/default/files/iaa_part_three.pdf

¹⁸ https://www.barnet.gov.uk/sites/default/files/id055_-_greater_london_authority_gla_-_redacted_0.pdf

7.12 In considering alternatives these should be reasonable, which LBB interprets as being those that have a realistic chance of being delivered over the plan period up until 2036. There is little, or no, value to be derived in utilising resources (both time and money) in assessing alternative policy and site options that do not currently stand a realistic chance of being delivered. For example, in respect of development within the green belt (or on MOL) both the Council and the GLA have taken a firm policy stance to avoid this (paragraph 2.9 of [Exam 1b](#)). The LBBLP has demonstrated that the Council can fully meet its new homes housing target set in the London Plan on previously developed / brownfield land over the plan period and indeed intends to exceed this figure.

Site Options and alternatives

7.13 Page 55 of the Regulation 19 IIA sets out the process in relation to identifying site options. [Exam 1b](#) sets out further detail on the site selection process and Exam 9 provides additional references in relation to the provision of sites within the LBBLP.

7.14 The LBBLP had limited site options within the context of the London Plan. The sites assessed within the IIA comprise the 'reasonable alternative' identified through the plan making process. This is considered further in Section 8 below.

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

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

7.16 To be included in the Schedule (Annex 2 of the LBBLP) a site must be assessed as:

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

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

7.18 As part of the SA, all of these sites were appraised using matrices to identify the likely significant effects on the SA objectives. A number of sub-criteria for each objective was developed and assessed against a qualitative scoring system. The sites scoring matrix can be found in Appendix 1 of this document.

7.19 A further assessment of site allocations and alternative options will take place if sites are proposed for removal or addition to the LBBLP through the examination process.

8. Relationship of assessments with the London Plan

8.1 The London Plan, prepared on behalf of the London Mayor by the Greater London Authority (GLA), sets the strategic framework for local plans across London. Plans prepared by the London Boroughs are required to be in 'general conformity' with policies in the London Plan.

8.2 The London Plan sets numerical targets for housing and other types of development, as well as broad locations for certain types of development. Although the requirements of the London Plan have evolved over the period that the LBBLP has been in preparation, the LBBLP is considered by the GLA to be "in general conformity" with the adopted London Plan 2021([Core Gen 06](#)).

8.3 Additional information about the relationship to the London Plan is set out in relation to option formulation above and in the HRA Technical Note November 2022 (Exam 39).

9. The process undertaken with regards to IIA throughout the Plan Making process

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

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

Health Impact Assessment

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

Habitats Regulations Assessment

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

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

Equalities Impact Assessment

9.6 The LBBLP has the potential to impact on all of those who live, work and visit the Borough. To assess this, an EqIA was carried out and the results are outlined in Appendix 6 (Regulation 19 IIA Part 2). There are policies contained within the draft plan which could have significant effects on those individuals who share one or more of the nine protected characteristics identified under the Equalities Act 2010.

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

9.8 Figure 3 below sets out the stages of IIA in relation to plan making.

Figure 3: Plan making and Sustainability Appraisal

Local Plan Step	SA Stages and Tasks
Step 1: Evidence gathering and engagement	<p>Stage A: Setting the context and objectives, establishing the baseline, and deciding on the scope.</p> <p>1: Identifying other relevant policies, plans and programmes, and sustainability objectives.</p> <p>2: Collecting baseline information.</p> <p>3: Identifying sustainability issues and problems.</p> <p>4: Developing the SA framework.</p> <p>5: Consulting on the scope of the SA.</p>
Step 2: Production of the Local Plan	<p>Stage B: Developing and refining options and assessing effects.</p> <p>1: Testing the Plan objectives against the SA Framework.</p> <p>2: Developing the Plan options.</p> <p>3: Evaluating the effects of the Plan.</p> <p>4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>5: Proposing measures to monitor the significant effects of implementing the Plans.</p>
	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>1: Preparing the SA Report.</p>
	<p>Stage D: Seek representations on the Plan and the Sustainability Appraisal Report.</p> <p>1: Public participation on Plan and the SA Report.</p> <p>2(i): Appraising significant changes.</p>
Step 3: Examination	<p>2(ii): Appraising significant changes resulting from representations.</p> <p>3: Making decisions and providing information.</p>
Steps 4 & 5: Adoption and Monitoring	<p>Stage E: Monitoring the significant effects of implementing the Plan.</p> <p>1: Finalising aims and methods for monitoring.</p> <p>2: Responding to adverse effects.</p>

Step 1: Evidence gathering and engagement

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

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

9.11 The Scoping report outlined a set of initial Objectives and a series of prompt questions for assessment of the draft local plan policy options. The Objectives and assessment

questions were updated following the Regulation 18 Consultation, and additional assessment questions were developed to provide more detailed assessment in relation to the proposed site allocations. The final set of Objectives are set out under 'Step 2' below. The assessment framework is set out in Appendix 2 of this technical note, taken from the IIA Scoping Report 2021. The Site Matrix is set out in Appendix 3 and within Part 2 of the Regulation 18 IIA Assessment.

Step 2: Production of the Local Plan

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

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

9.14 An updated HRA Screening Report was prepared in July 2022 (EXAM 8) to provide further detail to the original assessment. Further detail on the HRA process is contained in the HRA technical note ([EXAM 39](#)).

Step 3: Examination

9.15 The LBBLP is currently at Examination in Public. Any proposed modifications will be subject to IIA and public consultation, and considered for in-combination and cumulative effects, as individual policies and as part of a whole plan assessment.

Step 4: Adoption and monitoring

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

9.17 Table 24 of the Submission LBBLP sets out a monitoring framework in relation to each policy. The monitoring indicators will be reviewed, initially following discussion of monitoring at the relevant examination hearing session, and then again prior to adoption of the LBBLP to accurately reflect the adopted policies, and any new relevant information that may be available.

9.18 The Monitoring Framework within the LBBLP will be updated in response to the discussions held, and consequential actions arising, at the LBBLP Examination. A final monitoring framework will then be included in the adopted LBBLP. The SA/ SEA Post-Adoption Statement will be produced once the plan is adopted. It will set out a final list of monitoring measures together with an explanation as to how the monitoring framework has been prepared and the relationship between the final monitoring framework and the requirements relating to SEA.

Appendix 1 Scoring Matrix
Scoring Matrix

Score	Description	Symbol
Significant Positive	The proposed site contributes significantly to the achievement of the objective	++
Minor positive	The proposed site contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed site does not have any effect on the achievement of the objective	0
Minor negative	The proposed minor detracts from the achievement of the objective but not significantly.	-
Major negative	The proposed site detracts significantly from the achievement of the objective.	--
Unknown	The effect of the proposed site cannot be known or insufficient information make it too unpredictable to assign a conclusive score	?
Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria.	-/+
Not applicable	This is applied to objectives that will not be affected by the proposed site that is being assessed.	N/A

Appendix 2 Prompt questions for IIA Objectives

IIA Scoping Report 2021 (Pages 62 -69)

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

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

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

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

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

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

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

Appendix 3 Site Scoring Matrix

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

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

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

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

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

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

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

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

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

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

Appendix 4 LBBLP Policy Option Assessments

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

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

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

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

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

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

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

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

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

CDH01 - Promoting High Quality Design	No policy	0	0	-1	0	0	-1	0	0	0	0	0	0	0	-2
	Retain existing policies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Include prescriptive standards	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Reg 18 Preferred Option	0	0	1	0	0	0	0	0	0	0	0	0	0	1
	Reg 19 Plan	0	0	1	0	0	0	0	0	0	0	0	0	0	1
CDH02 - Sustainable and Inclusive Design	No policy	-1	-1	0	1	0	0	0	0	0	0	-1	0	0	-2
	Retain existing development standards	+/-	+/-	+/-	1	+/-	+/-	+/-	+/-	+/-	+/-	1	+/-	+/-	2
	Reg 18 Preferred Option	1	1	1	1	1	1	1	1	1	1	1	1	1	13
	Reg 19 Plan	1	1	2	1	1	1	1	1	1	1	2	1	1	15

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

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

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

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

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

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

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

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

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

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

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

