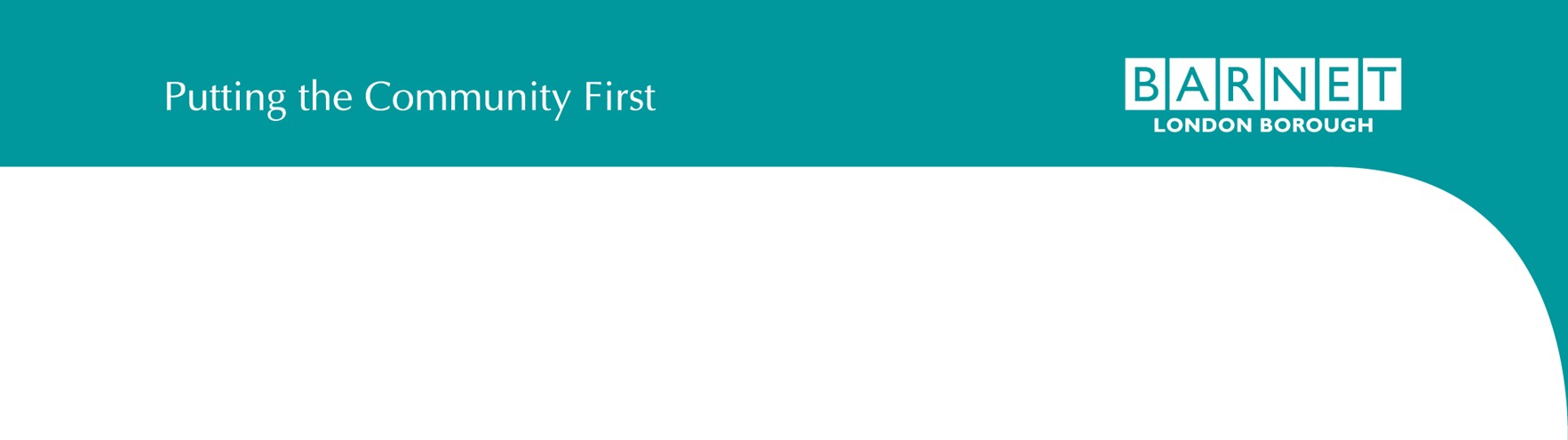
**London Borough of Barnet Local Plan**

**Integrated Impact Assessment:**

**Habitats Regulations Screening Assessment Update**

**Main Modifications April 2024**

## Introduction

1. This report provides an update to the information contained in documentation previously produced in support of the Habitats Regulations Assessment (HRA) screening of the submission London Borough of Barnet Local Plan. Specifically, this update has been produced to give consideration to the Council’s Local Plan Main Modifications (MMs) that have been published for consultation. This update report, which should be read alongside earlier HRA related documentation produced in support of the draft Barnet Local Plan[[1]](#footnote-1), comprises:

* a brief explanation of the HRA work undertaken to date and the background to the proposed MMs;
* an explanation of the Council’s approach to the HRA of proposed MMs, including the initial screening for likely significant effects;
* the screening of the proposed MMs for likely significant effects; and
* conclusions arising from this latest HRA screening, including confirmation of whether any of the proposed MMs are required to be taken forward for appropriate assessment.

1. The HRA screening has been undertaken as part of the Draft Barnet Local Plan’s Integrated Impact Assessment (IIA) which *inter alia* includes the Sustainability Appraisal (SA). The IIA with respect to both HRA and SA is a parallel process with each version to be read together as a whole and baseline data for the IIA process available to inform the HRA. However, the HRA and SA assessments are conducted separately as the assessment processes have different aims, emphasis and levels of detail. Therefore, the HRA and SA remain ongoing and iterative processes providing any necessary updates to the Integrated Impact Assessment (IIA). This further HRA screening update only relates to the additional HRA work arising from the consideration of the proposed Local Plan MMs, the current consultation for which this report forms part of.
2. The examining Inspectors’ detailed findings with respect to the HRA, (as contained in the IIA and taking account of documents EXAM 8 (HRA July 2022 update) and EXAM 39 (HRA November 2022 Technical Note) together with this latest update), will be provided in their final report.

## The requirement and purpose for undertaking Habitats Regulations Assessment (HRA)

1. The requirement to undertake HRA of development plans is outlined in the Conservation of Habitats and Species Regulations 2017 (‘the Habitats Regulations’). The provisions in England are contained in Article 6(3) and (4) of the Habitats Directive (92/43/EEC) and sit within a broader system of habitats protection under the Habitats Directive and the Birds Directive (2009/147/EC), which have established an EU-wide Natura 2000 ecological network of protected areas. The regulations were updated by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[[2]](#footnote-2), transferring functions from the European Commission to the appropriate authorities in England and Wales.
2. The Council is mindful that, following Royal Assent of the Levelling Up and Regeneration Act in October 2023, provisions relating to Environmental Outcome Reports (including Schedule 13 so far as it relates to Part 6) came into force on 26th December 2023. A revised version of the NPPF was published on 19 December 2023 and includes transitional arrangements applying in respect of local plans that have already reached examination stage.
3. The purpose of HRA is not only to inform decision-making but also to provide stringent constraints on the decisions that can be taken. If a proposal risks adversely impacting the integrity of a European site and does not meet the derogation tests under Regulations 64 and 68 of the Habitats Regulations, then consent cannot be granted. Mitigation (often in the form of conditions or planning obligations) may be relied upon in an appropriate assessment, (though not at screening stage - paragraph 12 below refers), but to be taken into account it must be certain and therefore secured. The HRA regime is therefore more binary in its application compared with SA/SEA; seen as a complete bar to development rather than simply a procedural requirement to be met.
4. In accordance with the Habitats Regulations, the London Borough of Barnet is legally required to carry out an appropriate assessment on any new plans or projects that may be capable of affecting the integrity of any designated site (formally European site) either alone or in combination with other plans and projects.
5. The updated regulations provide for the legal protection of habitats and species and a network of protected sites, formally referred to as European Sites and the Natura 2000 network. The network is safeguarded against potentially damaging developments and comprises of the following sites:

* + Special Areas of Conservation (SACs) - SACs target particular habitat types
  + Special Protection Areas (SPAs) – SPAs protect birds, designated under the Conservation of Wild Birds Directive (79/409/EEC)
  + Ramsar Site\* – designated under the International Convention on Wetlands of International Importance to protect wetlands.

\* NB Ramsar sites are not included within the definition of sites that were formally European sites but are protected through International Convention. For ease of reference all sites, including Ramsar sites, are referred to in this report as ‘designated sites’ or ‘sites within the designated network’.

1. Broadly stated, the purpose of HRA is to provide strict protection for European sites from the effects of plans and programmes in furtherance of an overarching aim of contributing towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora (see Article 2(1) and 6 of the Habitats Directive). Although the protection afforded by the HRA regime is high, this is limited to protection of the national site network. The HRA process may direct that permission cannot be granted for a development proposal or that a particular plan cannot be adopted.

**HRA Screening / Council’s previously stated position**

1. The purpose of the HRA screening stage is to determine whether any of the policies being considered for the Local Plan are likely to have a significant effect on a Designated Site, either alone or in combination with other plans. The HRA screening report also establishes whether a full Appropriate Assessment under the Habitats Regulations is required, where the potential for likely significant effects cannot be excluded.
2. A HRA screening report was prepared for the emerging Barnet Local Plan which is included as part of the supporting evidence within the Integrated Impact Assessment (IIA). Following the submission of the Barnet Local Plan to the Planning Inspectorate, this HRA Screening assessment report was updated to ensure that the assessment accorded with case law and was based on the most up-to-date information relating to the designated site network, plans and strategy document. The updated HRA screening assessment subsequently produced in May 2022 (EXAM 8) therefore took into account relevant case law findings, most notably:

* People Over Wind and Peter Sweetman v Coillte[[3]](#footnote-3)
* Holohan v. An Bord Pleanála.[[4]](#footnote-4)

1. In People Over Wind v Teoranta [2018] P.T.S.R. 1668, the CJEU found that measures intended to avoid or reduce the harmful effects of a plan or project (i.e. mitigation measures) could not be taken into account at the screening stage but can and should be at the ‘Appropriate Assessment’ stage. Consequently, the HRA screening did not consider mitigation measures intended to avoid or reduce effects on a European site and acknowledged the complex relationship between qualifying and non-qualifying features on the designated site network. However, the overarching conclusions within the HRA screening opinion did not change. The Council considered that the draft Barnet Local Plan, “has no likely significant effects on the integrity of designated sites, either alone or in combination with other plans or projects” (Para 44 of EXAM 8 refers). Accordingly, the Council’s HRA screening conclusion on the draft of the local plan submitted for examination (Core\_01), an opinion supported by Natural England, was that appropriate assessment is not required.

## HRA Screening of proposed Barnet Local Plan Main Modifications (MMs)

1. As noted in paragraph 12 above, the Council has previously concluded that appropriate assessment has not been required. The previous 2022 HRA Screening Report (Exam 8, paragraph 44) having concluded that, on the basis of the information available and the policy wording of the draft LBBLP, it is unlikely that there will be significant effects on the national site network (including formerly Natura 2000 sites). However, as stated in the HRA Technical Note (EXAM 39 para 2.9) “any further modifications to the LBBLP that might come forward would be screened for appropriate assessment at the relevant time”. Accordingly, it is now necessary to undertake screening of the proposed MMs to ascertain whether any of these, either individually or in combination, are likely to give rise to significant effects, and if so necessitate that an appropriate assessment be carried out. A likely significant effect may potentially occur in relation to local plan policies and/or site allocations through proximity and pathways to habitat sites. Although, as noted above, the HRA screening looks at policies prior to any avoidance/reduction/mitigation measures in line with the People Over Wind legal case.
2. The Council’s reasons for proposing main modifications to the Barnet Local Plan policies and site proposals are set out in full in the table of MMs which is the subject of this consultation. Where it is considered relevant and necessary to do so, these reasons (either summarised or in full) have also been incorporated into the HRA screening of the individual MMs.
3. Regarding the concept of “likelihood”, in terms of the likelihood of significant effects; in common parlance, “likely” tends to mean more likely than not, but its meaning in HRA terms is generally considered to have a much lower threshold of likelihood. Whether an impact is likely or significant has been clarified in case law[[5]](#footnote-5):

* An effect should be considered ‘likely’, “if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site.”
* An effect should be considered ‘significant’, “if it undermines the conservation objectives.”
* Where a plan or project has an effect on a site “but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned.”

A plan or project can be allowed to proceed where the impacts or effects could be considered to be “de-minimus” and “…have no appreciable effect on the site”, either alone or in-combination with other plans and projects[[6]](#footnote-6).

Identification of relevant sites

1. Whilst there are no Designated Sites that lie wholly or partially within the London Borough of Barnet, there are several in and around London which are in close enough proximity to warrant consideration as to whether there is the potential for being affected by development in the Borough. As recorded in EXAM 8, (Table 2 and map in appendix 4 refer). Information on the qualifying features for which of these sites are designated, and which must be maintained to preserve the integrity of the site, are presented in Table 3 of EXAM 8 together with the conservation objectives, pressures and threats. This information has informed the analysis of how the draft Local Plan may affect the integrity of sites.

Pathways

1. In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Therefore, to consider impacts on the protected national site network, it is necessary to consider the likely ‘pathways’ that will impact on them, even as in the case of Barnet, locations many kilometres distant. Barnet as a London borough works within the parameters of the London Plan with regards to the housing market area and functional economic area for the London Borough of Barnet. The HRA documents prepared for the London Plan provide a strategic framework. Therefore, the 2022 screening update (EXAM 8) references the pathways identified in the HRA for the London Plan (AECOM 2018 and updated[[7]](#footnote-7)), namely:

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

1. The effects from recreation can be complex with different types of internationally designated sites subject to different types of recreational pressures and having different vulnerabilities. Recreational use of an internationally designated site has potential to:   
   • Cause damage through mechanical/ abrasive damage and nutrient enrichment;   
   • Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl; and   
   • Prevent appropriate management or exacerbate existing management difficulties.
2. Closely linked and related to recreational pressure is urbanisation, as both of these result from increased populations living within proximity to sensitive sites. Urbanisation impacts can be extensive and wide-ranging and include for example the adverse ecological effect of fly tipping with the potential to cause the introduction of invasive non-native species with garden waste. Non-native species can in some situations, lead to negative interactions with habitats or species for which internationally designated sites may be designated. Invasive species can also be spread from seeds attached to clothes and footwear, thus underlining the inter-relatedness between some urbanisation impact pathways and recreational activity. Heathland areas are particularly vulnerable to arson or accidental fires; wildfires can result in the rapid loss of large areas of important habitat, to the detriment of priority species.
3. The Barnet Local Plan (BLP) has been reviewed in the context of the level of development already planned for within the 2021 adopted London Plan, and wider London strategies. The HRA screening for the BLP considers the environmental implications of development in more detail where there is additional certainty in locations of development and the quantum of development proposed in those locations. The main impacts from the BLP would be through the amount of increased development; policies and site proposal allocations were therefore previously screened for impacts on this basis. A consideration of the pathways and the potential impact of the BLP on the designated sites when considering impacts of individual polices, indirect impacts and in-combination impacts is set out in EXAM 8. Paragraphs 23 onwards in that document discuss zones of influence in relation to each site and potential pathways and Table 4 in EXAM 8 summarises the main impact pathways considered for each site. Following screening of the Plan, it was concluded that due to the distances involved, there are no impact pathways present warranting the need for consideration. Whilst not repeated in the table below providing assessment of likely significant effects arising from the Main Modifications, for avoidance of doubt this conclusion applies for each of the policies and site allocations included in the BLP.

Neighbouring and nearby Local Plans

1. Although the Barnet Local Plan has been screened out because its individual contribution is inconsequential, it is necessary to give consideration to the possibility of any in combination impacts. Therefore, with regards nearby plans and projects relating to the additional housing and commercial/industrial development proposed, the HRA within the Regulation 18 and Regulation 19 IIA documents considered the Local Plans of adjacent London Boroughs, Hertsmere Borough within Hertfordshire and Epping Forest District Council in Essex. Figures 1 and 2 in EXAM 39 reviewed the relevant Local Plans of these authorities, including an assessment of the HRA Screening documents and Appropriate Assessments where those had been carried out. Appendix A of this screening report provides the current position for relevant development plans.

HRA Screening Findings and Conclusions

1. An HRA screening assessment has been carried out in respect of all of the MMs to identify the potential for each of the draft Local Plan policies and site proposals to have a likely significant effect on sites in the national site network. The findings are summarised are in Table 1 below which includes:

* the MM reference;
* a brief description of the policy and location of site allocations;
* a brief description of the MM and its purpose; and
* an assessment, taking as the starting point the previous HRA screening conclusion whether, in light of the MM, this alters the previous conclusion reached; and if so whether it is considered necessary to be taken forward for appropriate assessment.

All of the MMs have been considered in separate tables below, covering respectively policies (Table 1) and site allocations (Table 2). Table 1 records sequentially the MMs in respect of the Local Plan policies starting with BSS01 and outlines in summary the purpose of the policy (column 2) and an assessment of the potential for likely significant effects arising from MMs(column 3). The principal MMs consultation document should be referenced to see the actual MM revisions in respect of individual policies together with any consequential changes made to the supporting text in the Plan. Table 2 covers site allocations indicating in column 2 the location of site proposal, and in column 3 an assessment of the potential for likely significant effects arising from MMs with additions shown underlined and deletions shown as strikethrough. There are also a number of MMs included in the BLP that relate to other matters, for example MMs relating to maps, diagrams and tables and MMs 1 to 8 in respect of modifications proposed to matters covered in the first two chapters of the BLP prior to the first policy. Again, the principal MMs consultation document should be referenced to view these MM revisions. However, the Council is satisfied that none of these MMs relating to other matters give rise to likely significant effects on the national site network and as such do not alter the original HRA screening conclusion.

1. In summary, none of the MMs, (to either individual policies or site allocation in the draft Plan), are considered likely to result in significant effects on any of the sites that fall within the scope of the HRA report. Policies promoting development are within limits set by higher level plans, including the London Plan. Significant effects are considered unlikely as many of the policies will not result directly in development; rather they set out development management criteria and / or refer to policies in the Mayor’s London Plan which have been screened separately for their potential to affect sites in the national site network. Policies within the draft Plan have been reviewed ‘as drafted’ and have not been amended in anticipation of effects on the national site network.
2. In the main, the MMs now being consulted on are required for reasons of soundness and general conformity with the London Plan 2021 and national planning policy. As such, they serve to provide clarification regarding the intent of individual policies and are thereby aimed at ensuring effective and consistent implementation. In terms of site allocations, the MMs delete a small number of these either because the allocation is not now considered deliverable or developable due to site constraints, or a site is being removed as full planning permission has been obtained and / or construction on site is underway / completed. MMs relating to the majority of site allocations remaining variously update and revise indicative site capacity figures, density matrix classifications, the mix of uses, as well as in a number of cases also revising the five-year development timeframe envisaged. No new sites have been added to the schedule through the examination process and the MMs now being consulted upon. Taking account of the MMs the housing supply position calculation has been revised; in terms of the housing supply to be delivered over the plan period, there has been an overall reduction from 46,000 to just under 44,000. However, this reflects a reduction in only the margin of housing supply available to deliver the housing requirement of a minimum of 35,460 new homes set out in Policy BSS01. The housing requirement is unchanged from the submission version. The reduction in the available housing supply reflects Inspector findings on deliverability and developability which has reduced the indicative density capacities on site proposals, deducted windfalls in town centres and also removed the general indicative capacities around the West London Orbital Line due to an absence of identified opportunities to deliver growth in those areas beyond those identified in the Plan. It follows that the reduction in overall housing supply identified in the Plan reflects a more realistic proposition of what is likely to come forward in the Plan period and therefore, will not necessarily of itself result in the delivery of less housing growth in Barnet. The housing land supply position is set out in detail in the separate document issued supporting the MMs consultation titled Barnet Local Plan EIP – Note on the Housing Supply Position which includes a revised Local Plan Housing Trajectory (replacing EXAM 87) as well as a 15 year breakdown of housing covering 15 years from 2022/23.
3. Regulation 5 of the Habitats Regulations stipulates that the HRA requires engagement with Natural England as the statutory nature conservation body in order to agree the process, outcomes and mitigation proposals, if proposed. Natural England were consulted through the production of the original IIA, and again in terms of the updated screening opinion. A copy of their correspondence is included as Appendix 5 to the 2022 Updated HRA Screening Report (EXAM 8). It is now necessary to re-consult Natural England as part of this MMs consultation. In a letter received dated 11th January (Appendix C) it is stated: “Natural England are content that the local plan will be not have an adverse impact on the natural environment or designated sites and have no comments.”
4. The Updated HRA Screening Report (Exam 8, paragraph 44) concluded that, based on the information available and the policy wording of the draft LBBLP, it is unlikely that there will be significant effects on the designated site network. Following the screening assessment of the MMs to the LBBLP, it can be concluded that they will not lead to likely significant effects on the national site network and as such do not alter the original HRA screening conclusion. The Council is therefore satisfied that this conclusion remains valid and accordingly that an appropriate assessment is not required.

## Table 1: Screening of Local Plan Policies Site Allocations for Potential Significant Effects

| **MM** | **Purpose of policy /** .  **Summary of MM** | **Assessment of potential for likely significant effects arising from MMs with for sites additions shown underlined and ~~deletions shown as strikethrough~~** | | | **Need for AA?** |
| --- | --- | --- | --- | --- | --- |
| **Growth and spatial strategy** | | | | | | | | |  |
| MM9  BSS01 – Spatial Strategy for  Barnet | Reflecting the vision and objectives, this policy provides an overarching spatial strategy for Barnet over the Plan period up until 2036. In addition to setting a minimum requirement figure for new homes, the policy sets out quantum for other aspects of growth to be delivered.  MM9 provides clarification on a number of matters including requirements for new homes and office space, the role of the Brent Cross Growth Area in delivering main town centre uses (office, retail and leisure space) as well as setting out the approach to intensifying use of employment land and the role of town centres in the rest of the Borough. The MM also clarifies the intended approach of not setting a specific requirement for new retail or leisure development in the Plan and better reflects a strategic approach to climate change that is consistent with the NPPF of mitigating and adapting to climate change. Clarification on how a decision maker should react to development proposals in other locations where growth is intended to be supported where there is, amongst other things, identified capacity. | No Likely Significant Effects.  This policy with the focus on Brent Cross and other identified growth areas, identifies a quantum of new homes (set as a minimum), office floorspace and employment land to be provided during the Plan period. The minimum number of new homes reflects the expectations set out in the London Plan 2021 and for which, in the context of HRA considerations, likely significant effects were thoroughly investigated - see [Report Habitat Regulations Assessment 2020-12-01 (london.gov.uk)](https://www.london.gov.uk/sites/default/files/london_plan_hra_addendum_december_2020.pdf)  Changes in the MM in terms of increasing the range of office space and providing an approach to intensification of employment, and an approach to retail focussed on Barnet’s town centres are not considered to alter the findings of the previous HRA screening.  This policy contains the positive provision of the requirement for the infrastructure needed to support the level of growth envisaged including specific reference made to the establishment of three hubs for sports and recreation and a new regional park.  The net effect of the MM in respect of this policy is likely to increase the attraction and therefore propensity for activity (live, work, shop and leisure) within Barnet and thereby reduce the likelihood of travel to sites forming part of national site network lying outside of the Borough. | | | No |
| MM13  GSS01 – Delivering Sustainable Growth | This policy aims to create conditions for sustainable growth and direct growth to the most sustainable locations within the Borough.  MM13 further clarifies the approach on economic growth including locations and targets for new jobs, new public transport infrastructure, locations for delivery of new homes (including Build to Rent) and the importance of the design led approach. Provides clarification on the types of infrastructure that are required to support growth. | No Likely Significant Effects.  Similar to BSS01, this policy also sets out the quantum of growth but provides more detail on the amounts and locations, including for residential development. As a result of the MM this policy now provides the policy approach to proposals for build to rent, self-build and custom housebuilding. As such, it incorporates draft policy HOU06 which is consequentially to be deleted. Whilst it is possible that increased population and growth within the Borough could lead to an increase in recreational visits at identified designated sites, Barnet has a large number of its own open spaces and the sites are located far enough away so as to not have a significant effect. Furthermore, the MM lowers the overall supply of housing identified in Policy GSS01 and provides clearer expectations of the infrastructure improvements required to improve accessibility within London to ensure Barnet residents’ needs can be met locally. | | | No |
| MM15  GSS02 – Brent Cross Growth Area | This policy supports comprehensive regeneration of the Brent Cross Growth Area and promotes a mix of uses, detailed development proposals and provides for the creation of a new Metropolitan Town Centre. It also sets out the raft of transport improvements proposed and makes reference to indicators to monitor progress on regeneration of this Growth Area.  MM15 further clarifies the uses of land in the new Metropolitan Town Centre with greater emphasis on the design led approach. It clarifies how development will be expected to contribute to restoration of the River Brent and improve connections to the Welsh Harp and West Hendon Playing Fields. It also further clarifies transport improvements; how infrastructure will be funded, and how progress of regeneration will be monitored. | No Likely Significant Effects.  This policy sets out details for the comprehensive regeneration within this Growth Area including the quantum of new homes. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the designated sites within the scope of the study due to their distance from the Borough’s boundary.  There is a reduction (from 9,500 to 7,480) in the minimum new homes figure. It is possible that increased population and growth, both within this area and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites. However, the MM lowers the supply of housing identified in Policy GSS02. Also, Barnet has a large number of its own open spaces which provide alternatives and limit the need and likelihood of a significant increase in recreational visits to the designated sites located in more distant locations outside of the Borough and therefore far enough away so as to not have a significant effect. | | | No |
| MM16  GSS03 – Brent Cross  West (Staples Corner) Growth Area | This policy promotes growth and regeneration at Brent Cross West / Staples Corner which optimises density, infrastructure and jobs. Development will be directed away from major road infrastructure, particularly the A406 North Circular Road. Since this type of development will be within the Borough’s boundaries and not in proximity to any national network sites, the policy is not likely to have significant effects on these sites. It is possible that increased population and growth within the Borough may lead to an increase in recreational visits at identified network sites, however, Barnet has a number of its own open spaces and the sites are located far enough away so as to not have a significant effect.  MM16 clarifies requirement for new waste management facility and expectations of town centre uses as well as new homes with uplift through design led approach and delivery of West London Orbital (WLO). It also further clarifies support for growth that helps deliver transport improvements including WLO, and how infrastructure will be funded. | NoLikely Significant Effects.  This policy provides for the quanta of growth envisaged for the range of different uses arising from the comprehensive redevelopment of this area.  The MM provides clarification regarding the support necessary for delivery of the growth envisaged over the plan period. The MM does not alter the number of new homes expected from this growth area location. Whilst it is possible that increased population and growth across the Borough more generally may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open space. These provide alternatives and are located far enough away from the designated sites to limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such, the development of Brent Cross West is not considered to have a likely significant effect. | | | No |
| MM18  GSS04 – Cricklewood Growth Area | This policy supports regeneration and intensification in and around the Cricklewood Growth Area supported by high existing PTAL levels and planned transport infrastructure improvement and under used sites. Residential density and delivering improvements to amenity will also be supported. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the national network sites within the scope of the study due to their distance from the Borough’s boundary.  MM18 clarifies support for optimising capacity through design led approach (London Plan Policy D3). MM18 also requires account to be taken of the relationship with the nearby Railway Terraces Conservation Area and ensuring accordance with Policy CDH08. It also sets out expectations of town centre uses as well as new homes with uplift through design led approach and delivery of West London Orbital (WLO). It also further clarifies support for growth that helps deliver transport improvements including public realm WLO, and how infrastructure will be funded. | NoLikely Significant Effects.  This policy provides for the quanta of growth envisaged for the range of different uses arising from the comprehensive redevelopment of this area.  The MM provides clarification regarding the support necessary for delivery of the growth envisaged over the plan period and lowers the number of new homes expected from this growth area location. In that regard, whilst it is possible that increased population and growth, both within this area and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open spaces to provide alternatives. These sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development in Cricklewood Growth Area is not considered to have a likely significant effect. | | | No |
| MM20  GSS05 – Edgware Growth Area | This policy promotes regeneration and intensification in and around the Edgware Town Centre and is supported by high existing PTAL levels. Residential density and delivering improvements to amenity will also be supported. Since this type of development will be within the Borough’s boundaries and not in proximity to any national network sites, the policy is not likely to have significant effects on designated sites. It is possible that increased population and growth within the Borough may lead to an increase in recreational visits at identified national network sites, however, Barnet has a number of its own open spaces and the sites are located far enough away so as to not have a significant effect.  MM20 clarifies support for optimising capacity through a design led approach (London Plan Policy D3). When delivering growth and regeneration in Edgware Town Centre, MM20 also requires proposals to take into account the relationship between the site and the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area to ensure accordance with Policy CDH08. It also sets out expectations of town centre uses as well as new homes with uplift through design led approach. Clarifies expected transport and public realm improvements as well as emphasising need for improved flood risk resilience and river restoration. | No Likely Significant Effects.  This policy provides for the quanta of growth envisaged for the range of different uses arising from the regeneration and intensification of this area.  The MM provides clarification regarding the amount of residential growth (lowering the number of new homes expected from this location from c5,000 to c4,740 new homes), other main town centre uses and related infrastructure support necessary for delivery of the growth envisaged over the plan period.  Whilst it is possible that increased population and growth, both within this area and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open spaces to provide alternatives. These sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such, the development in Edgware Growth Area is not considered to have a likely significant effect. | | | No |
| MM22  GSS06 – Colindale Growth Area | This policy supports growth in Colindale, particularly at Colindale Station, Grahame Park Estate and the former Peel Estate. Growth will be supported by new community facilities, a new underground station, improvements to open space and public realm, in addition to new pedestrian and cycle routes. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the national network sites within the scope of the study due to their distance from the Borough’s boundary. It is possible that increased population and growth within the Borough may lead to an increase in recreational visits at identified designated sites, however, Barnet has a number of its own open spaces and the sites are located far enough away so as to not have a significant effect.  MM22 clarifies support for optimising capacity through design led approach. It further clarifies how future growth will be delivered, actively demonstrating the Healthy Streets Approach. Clarifies expectations of growth to fund improvements to flood risk resilience and biodiversity particularly around Silk Silk Stream Corridor. Highlights upgrade (including step free access) of Colindale Station and the delivery of a new Local Centre in Colindale Gardens. MM22 clarifies that development proposals (in accordance with NPPF and CIL Regulations and/or any equivalent relevant legislation or regulations) will be required through detailed design, planning conditions and/ or contributions secured through planning obligations / legal agreements to deliver or contribute to infrastructure.  When delivering growth and regeneration in the Colindale Growth Area, MM22 also requires proposals to take into account where relevant the relationship between the site and the settings of listed buildings and the Watling Estate Conservation Area, together with the Roe Green Village Conservation Area and the Buck Lane Conservation Area (both located within the neighbouring London Borough of Brent), to ensure accordance with Policy CDH08. | NoLikely Significant Effects.  This policy provides for the quanta of growth envisaged for the range of different uses arising from the comprehensive redevelopment of this area.  The MM provides clarification regarding the amount of residential growth (an increase from c4,100 to c5,190 new homes achieved by optimising capacity through a design-led approach), establishment of a new local centre at Colindale Gardens and related infrastructure support necessary – notably the reconstruction and upgrading of Colindale underground station - for delivery of the growth envisaged over the plan period.  The MM increases the number of new homes expected from this growth area location, as it takes account of existing commitments beyond the proposed allocations. In that regard, whilst it is possible that increased population and growth, both within this area and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open spaces to provide alternatives. These sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development in Colindale Growth Area is not considered to have a likely significant effect. | | | No |
| MM24  GSS07 – Mill Hill East | This policy seeks to deliver new housing in Mill Hill East, whilst also giving consideration to the Mill Hill Conservation Area and the green belt but it is not likely to have impact on any national network sites. It is possible that increased population and growth within the Borough may lead to an increase in recreational visits at identified designated sites, however, Barnet has a number of its own open spaces and the sites are located far enough away so as to not have a significant effect.  MM24 clarifies the importance of growth to support transport improvements and that Mill Hill is not a Growth Area. | No Likely Significant Effects.  This policy provides for the quanta of growth envisaged for the range of different uses arising from the residential led development within this area. The MM provides clarification regarding the amount of residential growth (an increase from c1,500 to c2,280 new homes to be achieved by optimising capacity through a design-led approach), and that the requisite transport assessment must take account of cumulative impacts from other committed development envisaged. The MM increases the number of new homes expected from this location, as it takes account of existing commitments beyond the proposed allocations. In that regard, it is possible that increased population and growth, both within this area and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites. However, Barnet has a large number of its own open spaces to provide alternatives and the sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development in Mill Hill East is not considered to have a likely significant effect. | | | No |
| MM26  GSS08 – Barnet’s Town Centres | This policy sets Barnet capacity for town centre development, including high level design requirements and development criteria. Since this type of development will be within the Borough’s boundaries and not in proximity to designated sites, the policy is not likely to have significant effects on designated sites.  MM26 clarifies support for optimising capacity through design led approach. It also clarifies town centres that are prioritised for investment and revitalisation. Clarifies main town centre uses and provision of acceptable floorspace that does not impact on other town centres vitality and viability. Clarifies consideration of development proposals and infrastructure requirements, highlighting importance of public realm and appropriate provision of community infrastructure. | NoLikely Significant Effects.  This policy sets out capacity, design and development criteria – including provision of suitable and where appropriate, improved access to open space - for development within Barnet’s town centres. The MM provides clarification regarding the capacity for new homes for named District Centres and outlines supporting infrastructure requirements necessary for optimising capacity within Barnet’s town centres through the use of District Town Centre planning frameworks taking a design led approach over the plan period. The MM reduces the overall number of new homes expected to be provided from District Town Centres. Whilst it is possible that increased population and growth, both within the listed areas and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open spaces to provide alternatives. These sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development within Barnet’s District Town Centres are not considered to have a likely significant effect. | | | No |
| MM27  GSS09 – Existing and  Major New Public Transport  infrastructure | This policy sets out public transport infrastructure needed to deliver growth and regeneration within the Borough and will not have any likely impact on any national network sites.  MM27 clarifies support for optimising capacity through design led approach and identifies a broad location for growth at New Southgate potentially supported by Crossrail 2. It also clarifies level of development and suitability of location-based mix of uses that do not impact on vitality and viability of nearby town centres. | No Likely Significant Effects.  This policy sets out the public transport infrastructure needed to deliver growth and regeneration at locations within the Borough.  It provides the positive provision of sustainable transport corridors (which by definition would not result in a likely significant effect), and the provision of public transport infrastructure. The MM provides clarification regarding the potential for delivery of new homes over the plan period (c420) on suitable sites achievable through optimising use of land and capacity through a design led approach. The MM significantly reduces the overall number of new homes expected arising from Existing and Major New Public Transport Infrastructure. Whilst it is possible that increased population and growth, both within the listed areas and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites, Barnet has a large number of its own open spaces to provide alternatives. These sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development associated with Barnet's existing and major new public transport infrastructure are not considered to have a likely significant effect. | | | No |
| MM28  GSS10 – Estate Renewaland Infill | This policy aims to improve the quality of housing estates in the Borough and sets out a range of development criteria including adequate provision of amenity and open spaces, and the promotion of active travel. These measures may have indirect environmental benefits although they are not likely to impact the national network sites within the scope of the study due to their distance from the Borough’s boundary.  MM28 clarifies consistency with London Plan in terms of new affordable accommodation sought. It also improves cross-referencing to other parts of Local Plan. | NoLikely Significant Effects.  This policy also provides for a quantum (reduced by the MM from 4,400 to 3,980 new homes) of renewal and infill residential development on housing estates. Whilst the MM reduces the number of new homes expected from Estate Renewal and Infill, it is possible that increased population and growth, both within the listed areas and across the Borough more generally, may lead to an increase in recreational visits at identified designated sites. However, Barnet has a large number of its own open spaces to provide alternatives and the sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the development associated with Estate Renewal and Infill are not considered to have a likely significant effect. | | | No |
| MM29  GSS11 –  Major  Thoroughfares | This policy sets criteria for development along identified major ‘A’ road thoroughfares. It identifies the capacity for delivering new homes and promotes sustainable development through the provision of walking and cycling modes, high quality design, access to open access to open spaces and optimisation of building density. These measures may have indirect environmental benefits although they are not likely to impact the European sites within the scope of the study due to their distance from the Borough’s boundary.  MM29 clarifies support for Health Streets Approach and the indicators in the London Plan. It helps identify future opportunities for A1, A41 and A406 subject to PTAL and Healthy Streets improvements. It also improves cross-referencing to other parts of Local Plan. | NoLikely Significant Effects.  This policy also provides for a quantum (slightly increased by MM from 3,350 to 3,530 new homes) and broad locations on sites along major A class road thoroughfares to deliver residential and mixed-use development. The MM highlights consideration to be given to potential opportunities along additional A roads (A1, A41 and A406) within the TfL road network. The MM increases the number of new homes expected from Major Thoroughfares and it is possible that increased population and growth, both within the areas listed in the policy and across the Borough more generally, may lead to an increase in recreational visits at identified national network sites. However, Barnet has a large number of its own open spaces to provide alternatives and the sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such the adjacent development associated with major throughfares are not considered to have a likely significant effect. | | | No |
| MM30  GSS12 Redevelopment of Car Parks | This policy sets criteria for the development of surface level public car parks for residential and other suitable uses, with the concentration of development in existing urban areas.  MM30 clarifies support for redevelopment of publicly accessible surface level car parks for new homes and main town centre uses subject to compliance with other policies. This includes compliance with car parking policy TRC03. | No Likely Significant Effects.  Policy relates to the development of surface level car parks for residential and other uses. Whilst the MM provides a supporting approach to redevelopment of car parks it does not require a specific quantum of development to come forward. It is possible that increased population and growth may arise from the policy and could potentially lead to an increase in recreational visits at identified national network sites. However, Barnet has a large number of its own open spaces to provide alternatives and the sites are located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such any development associated with redevelopment of car parks are not considered to have a likely significant effect. | | | No |
| MM31  Policy GSS13 Strategic Parks and Recreation | This policy aims to promote a new Regional Park within designated Green Belt or Metropolitan Open Land in the Brent Valley and Barnet Plateau. Development will be within the Borough’s boundaries and thus directed away from designated sites.  MM31 highlights the 3 hubs for sport and recreation at Barnet and King George V Playing Fields, Copthall Playing Fields and Sunny Hill Park, and West Hendon Playing Fields. It clarifies that Growth Areas, town centres and local centres are preferred locations for new indoor facilities, unless they are specifically designed to improve utilisation of an open space. Clarifies location of a Regional Park in Barnet. | NoLikely Significant Effects.  The provision of additional and improved sports, recreation and open space provision within the Borough and therefore in much closer proximity to where residents of Barnet live, should encourage more shorter and more sustainable trips to access recreational related activities and thereby reduce the propensity for Barnet residents to visit any of the designated national network sites that are all located a considerable distance away outside of the Borough. | | | No |
| **Housing** | | | | | | |  |
| MM33  HOU01 – Affordable Housing | Within the context of a strategic London Plan target of 50% of all new homes to be affordable the Council will seek to maximise the delivery of affordable housing . This policy in itself will not lead to development and is therefore not likely to have significant effects on national network sites.  MM33 clarifies that the Council is seeking to maximise delivery of affordable housing in accordance with London Plan. It also clarifies that assessment of site capacity is on basis of ensuring development is optimised, provide certainty that off-site provision or off-site contributions only sought in circumstances set out in London Plan. Policy re-focussed on optimising use of land and facilitating delivery of housing to meet needs of each affordable housing tenure. Provides clarification on approach to First Homes | No Likely Significant Effects.  This is a policy relating to the provision of affordable housing.  This policy does not identify any location or quantum of development. The MM removes reference to the minimum 35% affordable housing figure and clarifies that the Council seeks to maximise delivery of affordable housing in accordance with London Plan policies. | | | No |
| MM34  HOU02 – Housing mix | This policy aims to provide a mix of dwelling types and sizes in order to provide choice for a growing population and it is therefore not likely to have significant effects on designated sites.  MM34 clarifies requirement to deliver mixed and inclusive neighbourhoods, and that proposals will be supported where they provide a mix of dwelling types and sizes to help meet current and future housing needs. Re-wording reflect purpose of Table 6 in setting out the Council’s dwelling size priorities, and that all housing proposals are expected to reflect these priorities unless it can be demonstrated that a variation to the preferred mix is justified based on criteria in Policy HOU02. Adds site optimisation and provision of Build to Rent and viability as further material considerations on mix. Clarification that flexibility for Specialist Housing schemes supported by Policy HOU04 will necessarily be applied. | No Likely Significant Effects.  This is a policy relating to the mix and type of housing to be provided. This policy does not identify any location or quantum of development. | | | No |
| MM35  HOU03 – Residential Conversionsand Redevelopment of Larger Homes | This policy aims to optimise the potential for housing delivery arising from residential conversions the redevelopment of larger homes; and also manage housing growth to ensure that residential conversions do not have a detrimental impact on local areas. The policy will not of itself directly lead to development and housing development arising from conversions and redevelopment of larger houses will, in any case by definition, be within the Borough’s boundaries and thus directed away from designated sites.  MM35 clarifies prioritisation of delivery of family homes and to address the needs identified in Table 6 of the Plan. Provides support for optimising potential for housing delivery in locations specified in London Plan. Takes into account need for three-bedroom houses and specifies that conversions have at least one family sized home with three bedrooms capable of providing 4 bedspaces with access to rear garden. Stipulates that gross internal floor area should be not less than 135m2 at time of application where two self-contained residential dwellings are proposed. Requires at least 61sqm of gross internal floor space (i.e. the minimum for a family sized dwelling) required for each additional home. Clarifies when proposals will be supported relative to character and there is no unacceptable impact on amenity of neighbouring properties. | No Likely Significant Effects.  This is a development management policy aimed at optimising the potential for housing delivery arising from residential conversions and the redevelopment of larger homes. The policy does not identify any location or quantum of development. The MM provides a supporting approach to residential conversions and redevelopment of larger homes and clarification regarding the criteria to be applied when assessing proposals. Whilst the policy does not require a specific quantum of development to come forward, it could increase the windfall housing development that comes forward as family homes. It is, therefore, possible that increased population and growth may arise from the policy and could potentially lead to an increase in recreational visits at identified national network sites. However, Barnet has a large number of its own open spaces to provide alternatives and potential locations of windfall development are all located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such any development associated with residential conversions and redevelopment of larger homes are not considered to have a likely significant effect. | | | No |
| MM36  HOU04 - Specialist Housing | This policy sets out how specialist housing will be provided, including housing for older people, HMOs, student accommodation and shared living accommodation. Since this type of development will be within the Borough’s boundaries and thus directed away from national network sites, there is not likely to be any significant effect on any of the designated sites.  MM36 shows re-structuring to split sections relating to older persons housing (with cross reference to requirements of London Plan) and wider housing choice for people with social care and health support needs. Rewording in terms of support for proposals for people with social care and health support needs, as well as highlighting suitability of locations with PTAL3 or more and accessible to local shops, as well as social infrastructure and health care. With HMOs, proposals should demonstrate that they meet an identified need and avoid overconcentration of HMO. Protection of living conditions for residents and occupiers of neighbouring properties through HMO management plan. Clarification that existing HMO of a reasonable standard is protected unless no need demonstrated. Re-wording that student proposals demonstrate how they meet an identified housing need, provide a management plan so no unacceptable impact on living conditions of occupiers of neighbouring properties. All specialist housing proposals expected to achieve highest standards of accessible and inclusive design in accordance with London Plan Policies D5 and D7 | No Likely Significant Effects.  This is a development management policy detailing the provision of specialist types of housing provision within the Borough. The policy that does not identify any locations nor, with the exception of older persons housing provision, quantum of development. The MM provides a supporting approach to specialist housing including older persons housing, housing choice for people with social care and health support needs, HMOs, student accommodation and purpose built shared living accommodation. The MM provides clarification regarding the criteria to be applied when assessing any proposals relevant to the application of this policy. There are no impact pathways present. The policy does not therefore identify any location or quantum of development and the MM does not change that.  Whilst not requiring a specific quantum of development to come forward, other than seeking to meet the indicative benchmark figure for older persons housing in the London Plan, the policy will likely increase the development of different forms of specialist housing. It is, therefore, possible that increased population and growth may arise from the policy and could potentially lead to an increase in recreational visits at identified national network sites. However, Barnet has a large number of its own open spaces to provide alternatives and potential locations of specialist housing developments are all located far enough away from the designated sites which would limit the need and likelihood of a significant increase in recreational visits to more distant locations outside of the Borough. As such any development associated with specialist housing are not considered to have a likely significant effect. | | | No |
| MM37  HOU05 – Efficient Use of Barnet’s housing Stock | This policy seeks to ensure the efficient use of Barnet’s housing stock in addressing identified housing needs. Since this policy relates to development of existing housing stock, this is within the Borough’s boundaries and thus directed away from designated sites; consequently, there is not likely to be any significant effect on designated sites.  MM37 re-wording provides a positive approach setting out that the net loss of housing will be supported only in specific limited circumstances. Expressed support for provision of social, physical or green infrastructure where local needs are clearly demonstrated. Requires proposed use not to be detrimental to amenity of existing residents. Clarification about ‘short-stay holiday rental accommodation to be used for more than 90 days a year’. Supports temporary (meanwhile) uses subject to no unacceptable impact on the amenity of existing residents and that they would not prevent sites from being redeveloped. | No Likely Significant Effects.  The policy promotes the efficient use of Barnet’s housing stock to meet identified needs. The policy does not identify any location or quantum of development. The MM provides clarification regarding the application of development management criteria to be used when assessing proposals that would result in a net loss of residential accommodation, protecting permanent conversion to short term holiday rental and the provision of temporary meanwhile accommodation. | | | No |
| MM38  HOU06 – Meeting Other Housing Needs | This policy aims to provide the right number of homes to meet various different housing needs. Since this type of development will be within the Borough’s boundaries and thus directed away from Designated sites, there is not likely to be any significant effect on Designated sites.  MM38 shows that this policy is deleted as proposals for build to rent and self-build are addressed by MM to Policy GSS01. | No Likely Significant Effects.  Matters previously covered by this draft policy which is deleted by the MM are now alternatively covered in Policy GSS01 (as modified) the HRA assessment for which is given above in this table. | | | No |
| MM39  HOU06~~7~~ - Gypsies,  Travellers and Travelling  Showpeople | This policy outlines the criteria for the provision of pitches and plots for Gypsies, Travellers and Travelling show people. Since this type of development will be within the Borough’s boundaries and thus directed away from designated sites, there is not likely to be any significant effect on designated sites.  MM39 clarifies that Council have identified no objectively assessed need for provision of pitches and plots for Gypsies and Travellers and Travelling Showpeople households. Proposals for accommodation will be supported if they meet the listed criteria. Rewording in seeking effective use of previously developed land, together with safe access to the site with adequate space on site to allow for manoeuvring of vehicles. Revisions in approach to layout and landscaping, including promoting opportunities for healthy lifestyles and assisting the integration of the site with surrounding communities. Rewording on equivalent requirements of development in terms of unacceptable impacts on character and amenity. Ensures that the site has, or will be served by, a suitable supply of essential services. Clarification on flood risk and approach to negotiated stopping as part of the management of unauthorised encampments, and a commitment that the preparation and publication of findings of a London-wide Gypsy and Traveller accommodation needs assessment, will inform the committed early review of the Plan.  MM revisions provide certainty that in the event that proposals for Gypsies and Travellers, and Travelling Showpeople accommodation come forward they will be supported provided that they meet the listed criteria.    The MM updates and clarifies the implementation of the policy criteria to be applied when assessing relevant proposals and ensures closer alignment / general conformity with the London Plan and national policy guidance. It is noted that the Mayor of London is currently undertaking a London Gypsy and Traveller Accommodation Needs Assessment (GTANA), the results of which will be used to inform the next iteration of the London Plan. Also, the proposed inclusion of this policy as a strategic policy within the LBBLP (MM8 refers) and therefore, within the scope of the early review of the Plan should help to ensure that if unmet needs are identified in the future they can be addressed | No Likely Significant Effects.  Whilst this policy relates to provision of new Traveller sites, as there is no identified objectively assessed need it does not itself identify any quantum, nor the location of any sites potentially suitable for pitches and plots. The policy does however provide criteria to be applied in assessing proposals that may come forward; these ensure that no adverse impact upon the local / natural environment will occur. The MM provides clarity on implementation of the policy, both the objective assessment of current and future accommodation need, and on the detailed criteria to be applied in assessing any proposals that may come forward. | | | No |
| **Character, Design and Heritage** | | | | | | |  |
| MM41  CDH01 - Promoting High Quality Design | This policy sets out requirements to ensure that development is built to a high-quality design. It will not in itself lead to development and therefore, it is not likely to have significant effects on effect on designated sites.  MM41 re-wording to reflect the purpose and role of associated SPD. Revisions for soundness, general conformity with London Plan including policies D3 and H2 in respect of design-led approach to development. Clarification on provision of safe environments, and that proposals should design out crime with Secured by Design principles. Clarifies that development may affect amenity of occupiers of property beyond immediately adjacent and refers to threshold for acceptability of amenity impacts that is consistent with other policies in the Plan. Broadens scope to address pollution impacts. In supporting text adds reference to the Healthy Streets Approach, Secured by Design as well as references to relevant fire safety legislation. | No Likely Significant Effects.  This is a development management policy relating to design. The policy does not identify any location or quantum of development. It is a positive policy as it includes text relating to sustainable design and includes reference to need to provide outdoor amenity space complying with Policy CDH07 – see below this policy which provides details on this matter. The MM provides clarification on the detailed design related matters that proposals will be expected to address where it is relevant to do so. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy in respect of national legislation and guidance and ensures closer alignment / general conformity with the London Plan. | | | No |
| MM44  CDH02 - Sustainable  Inclusive Design and  Development Standards | The policy provides design requirements for new development in respect of climate change mitigation, energy and accessibility. The policy in itself will not lead to development and therefore, it is not likely to have significant effects on designated sites.  MM44 rewording for soundness general conformity with London Plan. Clarifications in respect of climate change and that BREEAM ‘Very Good’ rating is encouraged for all development Inclusive Design Statements required within Design and Access Statements to ensure alignment with London Plan Policy D5. | No Likely Significant Effects.  This is a development management policy relating to sustainable and inclusive design. The policy does not identify any location or quantum of development. It is a positive policy in that it includes requirements for development proposals leading to the delivery of higher quality and sustainable design. The MM provides revised wording to ensure closer alignment / general conformity with the London Plan, appropriate regard is paid to relevance supporting guidance outwith the Barnet Local Plan and clarification on the matters covered by the policy in order to ensure consistent and effective implementation. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy in respect of national legislation and guidance and ensures closer alignment / general conformity with the London Plan. | | | No |
| MM45  CDH03 – Public Realm | This policy sets criteria for public realm as a key aspect of effective design in neighbourhoods and town centres. These measures may have indirect environmental benefits, for example through the provision of Green Infrastructure, although they are not likely to impact the designated sites within the scope of the study due to their location in existing urban areas.  MM revisions for soundness, general conformity with London Plan. Emphasises that development required to contribute positively to public realm. Clarification on Healthy Streets Approach and rewording on safety and security issues for crowds. Highlight that due regard given to the Council’s town centre strategies as well as TfL’s Streets Toolkit.    The MM provides clarification on the detailed public realm related matters that proposals will be expected to address where it is relevant and to do so. In addition to clarifying the implementation of the policy criteria to be applied when assessing relevant proposals, the MM also updates the policy to ensure closer alignment / general conformity with the London Plan and related guidance. | No Likely Significant Effects  This is a development management policy. It does not identify any location, quantum or type of development. The MM provides revised wording to ensure closer alignment / general conformity with the London Plan, appropriate regard is paid to relevance supporting documents and guidance out with the Barnet Local Plan and clarification on the matters covered by the policy in order to ensure consistent and effective implementation. | | | No |
| MM46  CDH04 - Tall Buildings | The policy provides design requirements for the developments of tall buildings in respect of the Barnet’s character and heritage. The policy will not of itself lead to development but rather control the level of development within existing urban areas that are suitable for intensification and therefore, it is not likely to have significant effects on designated sites.  MM revisions for soundness, general conformity with London Plan. Clarification on roles and status of current and proposed future SPDs. Changes include setting no upper storey or metre height limit; and clarifying that locations for tall buildings are evidence based. As the setting of a height limit was not justified reference to this in the policy has been removed thereby allowing assessment of the suitability of each proposal in the context of its surroundings.  Clarification that locally important views identified on Map 4 are a relevant consideration for applications. Reference added to the Building Safety Act 2022.  Clarification how visual impact will be addressed in line with London Plan Policy D9(C). | No Likely Significant Effects.  The policy stipulates the areas within Barnet where construction of tall buildings (defined as 8 storeys or 26m and above) may be appropriate. This is a development management policy and does not prescribe either a quantum or specific type of development, the MM clarifies locations where tall buildings may be appropriate and influences site considerations as well as decision making and outcomes.  The MM provides revised wording to ensure closer alignment / general conformity with the London Plan and clarification on the roles and status of current and proposed future SPDs. | | | No |
| MM48  CDH05 - Extensions | This policy provides design criteria for extensions to ensure that account of context and local character and be designed in accordance with the Residential Design Guidance and Sustainable Design and Construction SPDs. The policy will not in itself lead to development and therefore, it is not likely to have significant effects on Designated sites.  MM revisions for soundness, general conformity with London Plan. Clarification on roles and status of current and proposed future SPDs and retention of satisfactory amenity space in accordance with Policy CDH07. | No Likely Significant Effects.  This is a development management policy and does not identify either locations or a quantum of development.  The MM provides revised wording to ensure closer alignment / general conformity with the London Plan and clarification on the roles and status of supporting guidance and, to ensure effective implementation, cross references to other relevant policies included within the Barnet Local Plan. | | | No |
| MM49  CDH06 – Basements | This policy provides design criteria for basements to ensure that account is taken of context and local character and be designed in accordance with the Residential Design Guidance and Sustainable Design and Construction SPDs. The policy will not in itself lead to development and therefore, it is not likely to have significant effects on designated sites.  MM revisions for soundness, general conformity with London Plan. Clarification on roles and status of current and proposed future SPDs. Changes include policy renamed as also applicable to different forms of below ground development. | No Likely Significant Effects.  This is a development management policy relating to subterranean, basement and other forms of below ground development. This policy ensures that new development should have regard to local geological conditions, thus ensuring that new development will not impact upon subterranean hydrological systems. The MM provides revised wording to ensure closer alignment / general conformity with the London Plan and clarification on the roles and status of supporting guidance to ensure effective implementation also adds cross references to other relevant policies included within the Barnet Local Plan. Part h) is replaced with a requirement that the proposal is in compliance with flood risk requirements of national policy. | | | No |
| MM50  CDH07 - Amenity Space and Landscaping | This policy will not lead to development but rather seeks to outline criteria that proposals for outdoor space and amenity should adhere to and therefore, it is not likely to have significant effects on designated sites.  MM revisions for soundness, general conformity with London Plan. Clarification about Plan’s amenity space standards set out in the Plan and provide play, spaces in line with London Plan. Clarification on elements regarding amenity, access and parking areas, reference to the amenity of both existing and future occupiers of property. Clarification that landscaping should be designed to provide biodiversity benefits such as habitat creation. | No Likely Significant Effects.  This is a development management policy to be used to assess development proposals and does not identify either locations or a quantum of development.  The MM provides revisions to ensure closer alignment / general conformity with the London Plan and clarifications to ensure the effective and consistent implementation of the policy. | | | No |
| MM51  CDH08 – Barnet’s Heritage | The policy seeks to conserve the Borough’s heritage assets and their setting and will not itself lead to development and therefore, it is not likely to have significant effects on Designated sites.  MM revisions for soundness, general conformity with London Plan. Redrafting to align with NPPF and setting out clear procedures for designated and non-designated heritage assets, including consideration of potential impact of a proposed development on significance of designated heritage assets and the approaches where a proposal would result in substantial or less than substantial harm. | No Likely Significant Effects.  This is a development management policy in respect of designated and non-designated heritage assets to be used to assess development proposals and does not identify either locations or any specific development. Relating to heritage assets that, for example includes Registered Parks and Gardens spaces, which can act to divert recreational pressure away from designated sites.  MM revisions for soundness are required to ensure closer alignment with legislation and national policy as set out in NPPF and NPPG, and to ensure general conformity with the London Plan. In addition, the MM provides for a number of clarifications to ensure the effective and consistent implementation of the policy. | | | No |
| MM52  CDH09 - Advertisements | This policy sets out design requirements for advertisements and will not itself lead to development and therefore, it is not likely to have significant effects on designated sites.  MM revisions for soundness, general conformity with London Plan. MM revisions provides clarity on the relevant requirements under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Clarification that advertisements subject to control in the interests of amenity and public safety only. Clarification on light pollution and illumination, physical or visual obstruction, and visual clutter. | No Likely Significant Effects.  This is a development management policy relating to advertisements and does not identify either locations or any specific development.  MM revisions for soundness, closer alignment / general conformity with London Plan and to ensure effective and consistent policy implementation. | | | No |
| **Town Centres** | | | | | | |  |
| MM53  TOW01 - Vibrant Town Centres | This policy seeks to promote the vitality and viability of the Borough’s town centres by distributing growth appropriately and retaining a strong hierarchy of town centres that support a mix of uses. Since this type of development will be within the Borough’s boundaries in existing urban areas and thus directed away from Designated sites, there is not likely to be any significant on Designated sites.  MM revisions for soundness, general conformity with London Plan.  MM53 emphasises support for redevelopment at Brent Cross Growth Area. clarification on strong retail offer, with a wider mix of main town centre uses as part of new Metropolitan Town Centre (GSS02), clarification on approach in Edgware Major Town Centre (GSS05), and Cricklewood Town Centre (GSS04) with clarification on approach to District Town Centres (GSS08).  Clarification on definition of ‘local level of retail’ and that residential-led mixed use development should be proportionate. Clarification on ‘Lower PTAL’ and support for expansion of leisure uses in town centre locations where opportunities of suitable scale arise. Clarification on impact assessments on proposals over 500 sq.m of retail or leisure uses in an edge of centre or out of centre location relative to the Major and District Town Centre boundaries. Consequential changes to paras 7.6.7 and 7.6.8 better explain approach to sequential test | No Likely Significant Effects.  This is a policy relates to Barnet’s Town Centre Hierarchy and ensuring that main town centre use development proposals contribute positively to the vitality and viability of the Borough’s town centres.  This policy does not identify any quanta for different uses nor site specific locations for development.  MM revisions needed for soundness and to ensure closer alignment / general conformity with London Plan. | | | No |
| MM54  TOW02 - Development  Principles in Barnet’s  Town Centres | This policy sets out a range of criteria for development proposals in town centres and will not in itself lead to development and therefore, it is not likely to have significant effects on Designated sites.  MM Revisions for soundness, general conformity with London Plan. These revisions include ensuring consistent terminology for Local and Neighbourhood Centres. Clarification that safeguarding approach applies to Use Class E. Clarifications on significance of reduction of retail facilities; properties expected to retain active frontages at ground floor level; consideration of attracting visitors, periods of continuous marketing. Restructuring to show requirements for alternative uses at ground floor level; provide clarification on suitability of utilising upper floors for alternative uses. Development with significant adverse effect on living conditions of occupiers of neighbouring properties resisted in accordance with Agent of Change. In addition, revisions clarifying the supportive approach to meanwhile uses of vacant sites and buildings that make positive contribution. Explanation of changes to Use Classes Order and related permitted development rights, including those which apply to Class E and Class MA and influence the requirements relating to continuous marketing periods. Updates to para 7.7.6 to emphasise importance of reducing vehicular traffic to improving public realm. | NoLikely Significant Effects.  This policy outlines development principles and criteria for proposals within Barnet’s Town and Local Centres and parades. The policy does not identify any quanta for different uses nor site specific locations for development.  MM revisions needed for soundness, updates to ensure the policy fully takes into account use class changes (notably introduction of the new use class E) introduced in 2020 and to ensure closer alignment / general conformity with London Plan. | | | No |
| MM55  TOW03 - Managing  Clustering of Town Centre  Uses | This policy will not lead to development but rather seeks to resist uses (hot food take away and betting shops) in town centres that would adversely affect amenity and therefore not likely to have significant effects on designated sites.  MM revisions for soundness, general conformity with London Plan. Ensures approach to hot food takeaways is positively prepared, indicating circumstances and locations where proposals supported whilst preserving their viability and vitality by avoiding over-concentrations of such a use. Revised policy now sets out requirements rather than restrictions. MM revisions provide clarifications regarding no unacceptable impact on living environment for nearby residents. Clarification on compliance with the Council’s Healthy Catering Commitment. New criteria to ensure that details of suitable drainage facilities provided for hot food takeaways. Re-wording of B to ensure approach to stated uses is positively prepared, indicating circumstances and locations where proposals supported whilst preserving their viability and vitality by avoiding over-concentrations of such uses. Clarification on intention to address health inequalities. Associated changes to show related requirements rather than restrictions. Removal of requirement that betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars be located more than 400m from the boundary of an existing school or youth centre as not justified by supporting evidence of its necessity to avoid demonstrable harm. Clarification on specific circumstances where Council will expect Health Impact Assessments to accompany the related proposals. | No Likely Significant Effects.  This is a development management policy relating to managing and controlling potential harmful impacts arising from proposals relating to one of the uses named in the policy. The policy does not however identify either specific locations or quanta for any of these types of development.  MM revisions for soundness, closer alignment / general conformity with London Plan and to ensure effective and consistent policy implementation. | | | No |
| MM56  TOW04 - Night Time Economy | This policy supports the provision of night-time economy uses in town centres provided that there is no adverse impact. Since any night-time economy uses will be concentrated in town centres, policy has the effect of directing development away from designated sites.  MM Revisions for soundness, general conformity with London Plan. Cross-reference to requirement to accord with London Plan Policy HC6 which is also relevant to evening economy uses. Emphasises that scale and type of use should reflect role and function of town centre, and positively contribute to viability and vitality by preserving or enhancing existing night-time economy activities or creating new ones. Revisions also to ensure proposals would not result in unacceptable impacts upon highway safety or living environment of adjoining or adjacent uses, in terms of noise, disturbance, odours and anti-social behaviour. Clarification on unacceptable impacts arising from cumulative effect with the number, capacity and location of other night-time economy uses in the surrounding area and the regard needing to be had to the impact of proposals on the historic environment / heritage assets. | No Likely Significant Effects.  This is a development management policy relating to night and evening time uses. It identifies the town centres where such uses will be supported and outlines criteria that will be applied in assessing individual proposals. Other than naming seven town centres, the policy does not identify either specific locations or quanta for any of these types of development.  MM revisions for soundness, to ensure closer alignment / general conformity with London Plan and to ensure effective and consistent policy implementation. | | | No |
| **Community Uses, Health and Wellbeing** | | | | | | |  |
| MM57  CHW01 – Community  Infrastructure | This policy is mostly concerned with the preservation of existing social and community uses. It promotes flexible community spaces and where development places increased demand on current facilities, new facilities and/or contributions will be required. This type of development will be within the Borough’s boundaries within existing centres so not likely to have any significant on any designated site.  MM revisions for soundness, general conformity with London Plan. Clarification that policy applies to outdoor sports facilities including playing fields and pitches. Clarification on ‘multi-purpose community facilities’ and that such facilities are preferred in but not limited to locations in Growth Areas, town centres, local centres and public sector estate. Council’s preference for large scale development to provide community facilities or land for such facilities on site to meet the needs generated by development.  Reflect approach to outdoor sports facilities, including playing fields and pitches. Clarification that ‘not fit for purpose’ makes clear that facilities should be demonstrated to be not suitable ‘or’ viable. Deletion of nomination of Assets of Community Value as a potential planning consideration, as no evidence that nominations will necessarily lead to the formal designation of such assets. Deletion of criteria that limit locations where new community infrastructure is supported, and to resolve overlap and internal consistency issues.  Deletion of requirement for all proposals to be subject to legal agreements as not required for all new community infrastructure.  Clarification that Policy CHW04 provides a separate approach for public houses. Deletion of Council’s Community Asset Strategy, Community Asset Implementation Plan and Community Participation Strategy, as more relevant and up-to-date information is contained in the IDP. Deletion of reference to ‘Lifetime Neighbourhoods’ as it is not explained or otherwise justified in the Plan. | No Likely Significant Effects.  This is a development management policy relating to community, leisure and cultural facilities. The policy does not however identify either specific locations or quanta for any of these types of development. Loss of leisure facilities has the theoretical potential to lead to an increase in recreational pressure upon a designated site, as such provides policy to prevent this loss, except in some circumstances as outlined. However, in practice this is very unlikely in this case given the distances involved between Barnet and any of the designated sites considered as part of this HRA screening.  MM revisions for soundness, general conformity with London Plan and to provide clarification on a number of matters including that the policy applies to outdoor sports facilities including playing fields and pitches. | | | No |
| MM58  CHW 02 – Promoting health and well being | This policy seeks to promote health and wellbeing across the Borough, which will include investment in play and leisure facilities. It sets out ways in which the Council will support the health and well-being of its residents and reduce health inequalities including measures for development proposals addressed through Health Impact Assessments (HIAs). As such, the policy relates to development within the Borough’s boundaries so not likely to have any significant on any designated site.  MM provides clarification that HIA required for major development proposals and that Sport England’s Active Design Principles are guidance to which due regard should be given only. Clarification on cross-reference to CDH03 as it does not require ‘new and improved’ public realm to be provided as indicated. Rewording to ensure consistency with revised approach to Healthier Catering Commitment in MM to Policy TOW03. New cross reference to London Plan Policy T2 in respect of the Healthy Streets Approach.  Clarifications to ensure consistency with other Plan policies. Clarification on how contributions referenced in CHW02 part (b) would be needed and calculated, in alignment with London Plan para 11.1.37 and with reference HUDU Planning Contributions Model. New reference to London Plan Policy S6 to ensure that its requirements regarding public toilets are fully considered for relevant proposals. Revision to ‘HIA’ so that it aligns fully with definition in the London Plan’s glossary. | No Likely Significant Effects.  This is a development management policy relating to the promotion of health and wellbeing of residents, use of HIAs for major development proposals and the provision of related essential facilities and services. The policy does not however identify either specific locations or quanta for any particular form of development.  MM revisions provide clarification on a number of matters addressed and referenced in the policy. | | | No |
| MM59  CHW03 - Making Barnet a safer place | This policy sets out a range of measures to make the Borough a safer place and will not in itself lead to development. For this reason, it is not likely to have significant effects on designated sites.  MM provides clarifications on Council commitments and parts that set out criteria for development proposals to comply with. Support for development proposals that reflect Secured by Design principles’ or similar. Deletion of specific requirement for all development proposals to work with Secured by Design Officers is not justified. Clarification about CHW03 as it does not expressly promote safer streets and public areas including open spaces as identified. Clarification on ‘town centre strategy programme’. Revision to para 8.20.4 to make clear that Secured by Design principles and consultation with the Metropolitan Police Secured by Design Officers are encouraged, and signpost at para 8.20 to Policy D12 of the London Plan in respect of fire safety. | No Likely Significant Effects.  This policy relating to making Barnet a safer place outlines and promotes the range of measures that the Council will pursue and partners it will work with in meeting this policy objective. The policy does not however identify either specific locations or quanta for any particular form of development.  MM revisions provide clarification on a number of matters addressed in the policy and add cross referencing to other relevant policies in this emerging Barnet Local Plan as well as the London Plan. | | | No |
| MM60  CHW04 – Protecting Public Houses | This policy is concerned with the preservation and protection of publics houses and will not in itself lead to new development. For this reason, it is not likely to have significant effects on designated sites.  MM provides clarification on the protection of public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres. Deletion of support only for public houses that come forward as mixed-use development, as unduly restrictive and is unjustified. Cross reference to London Plan Policy HC7; as no substantive local evidence that vacancy test is required. Policy HC7(B) with supporting para 7.7.7 provides a robust means to test whether public houses will endure.  Clarification that where London Plan Policy HC7 is satisfied, proposals for other community uses will be supported, and alternate uses will be permitted where the relevant criteria of Policy CHW01 that relate to proposals involving the loss or replacement of existing community facilities are met. Criteria of Policy CHW01 added for clarity. Deletion of nomination of ACV as a potential planning consideration. Clarification that Policy CHW01 (after MM) only applies to public house proposals where Part D applies. | No Likely Significant Effects.  This development management policy seeks to protect existing public houses in Barnet and preferred location (within Growth Areas and Town Centres) for new pubs. It sets out criteria to be applied to any proposals involving the loss of a public house. The policy does not however identify either specific locations or quanta for any particular form of development including pubs.  MM revisions provide clarification on a number of matters addressed in the policy and add cross referencing to relevant policies in this emerging Barnet Local Plan as well as the London Plan. | | | No |
| **Economy** | | | | | | |  |
| MM61  ECY01 - A Vibrant Local Economy | * 1. This policy seeks to protect and promote new employment opportunities. Since this type of development will be within the Borough’s boundaries there is not likely to be any significant effect on designated sites.   2. MM provides clarification on locations where Council will prioritise promoting new employment opportunities. Clarification on approach to safeguarding offices as main town centre use in context of Class E and the required period of active marketing of a period of 12 months to be undertaken for proposals seeking redevelopment of office uses outside of Town Centres and edge of centre locations. Clarification of office requirements and role of this non-strategic policy with support of strategic policies (such as Policy BSS01 and GSS01). Clarification on locations where new office proposals supported and approach for proposals in other locations that are not in an existing town centre (i.e. application of the sequential test for main town uses). Clarification with LSIS identified in Table 14 and that proposals for office uses in these locations should be ancillary to main employment use of premises or land. Clarification that proposals for co-location to support delivery of residential or other uses, such as social infrastructure, should only occur as part of intensification of a LSIS with no net-loss of employment floorspace and are supported by a coordinated master planning process. Deletion of reference to Article 4 direction. Clarification at Part C that as such uses fall within Use Class E (alongside main town centre uses), it should be clarified that it is proposals for development or change of use where permission is required that involve the loss of employment accommodation in those areas that will not be supported. Support for new employment space is subject to site not being allocated in Plan for an alternative use. Clarification that the fit out of all employment premises should be to at least Category A standard. Clarification that travel plans, transport statements or transport assessments are provided in accordance with national policy, London Plan Policy T4 and are consistent with any related MMs to Policy TRC01. | No Likely Significant Effects.  This is a development management policy relating to ensuring the maintenance of a vibrant local economy affording a range of employment opportunities. Whilst steering employment uses to general areas, the policy as modified does not identify either specific locations or quanta for any of these types of development.  MM includes clarifications on locations where the Council will prioritise promoting new employment opportunities and the approach to safeguarding offices as main town centre use and on a range of other matters designed to provide certainty and ensure effective and consistent implementation of the policy. MM revisions for soundness, general conformity with London Plan policies and provides clarification on a number of matters as detailed in the previous column. | | | No |
| MM62  ECY02 - Affordable Workspace | This policy promotes economic diversity and supports existing and new business development in Barnet. Since this type of development will be within the Borough’s boundaries there is not likely to be any significant effect on designated sites.  MM provides clarification on proposals for new employment floorspace in designated employment areas, together with Brent Cross GA, Brent Cross West GA, Edgware GA, New Southgate Opportunity Area, and Barnet’s District Town Centres, to sustain a mix of business uses which contribute to the character of an area. Clarification to ensure consistency with national policy and general conformity with the London Plan, that a minimum 10% of affordable workspace, or equivalent contribution to off-site provision, is typically sought unless a viability assessment says not viable. Revision in Part C to ensuring provision of units that are suitable for sub-division and provide fully customisable spaces for end user, whilst ensuring consistency with MM to Policy ECY01 that requires minimum Category A fit out. Clarification that policy applies to major developments for new employment floorspace and/ or which would provide net additional floorspace as extension(s) to existing employment premises.  Clarification about SPD and that contributions sought are in line with relevant requirements of national policy and CIL Regulations and take account of any viability assessment accompanying the application. | No Likely Significant Effects.  This is a development management policy relating to the provision of affordable workspace. Whilst steering employment uses to general areas, the policy as modified does not identify either specific locations or quanta for any of these types of development.  MM includes clarifications on locations where the Council will prioritise promoting new employment opportunities and the approach to safeguarding offices as main town centre use and on a range of other matters designed to provide certainty and ensure effective and consistent implementation of the policy. MM revisions for soundness, general conformity with London Plan policies and provides clarification on a number of matters as detailed in the previous column. | | | No |
| MM63  ECY03- Local Jobs, Skills and Training | This policy aims to increase local employment opportunities across the Borough and will not in itself lead to development. For this reason, it is not likely to have significant effects on designated sites.  MM revisions are needed to improve the effectiveness of policy implementation and to ensure closer alignment with the London Plan.These include clarifications to provide certainty on qualifying development where Council seeks increased employment opportunities in the Borough, i.e. major developments where 20 or more full-time equivalent (FTE) jobs created. Proposals required to set out skills, employment and training opportunities to be delivered and deletion of requirement for a LEA (to align with London Plan Policy E11). Rewording in Part C is necessary to reflect the status of SPDs, clarifying that decision makers should have regard to any relevant SPD guidance intended to be provided with respect to jobs, skills and training. Revisions in the policy supporting text provide clarification regarding how FTE job creation calculated for decision making in terms of permanent jobs arising from development, and where temporary jobs are created during construction. Revisions to encourage developers to liaise with the Council at early stage to identify opportunities associated with proposed developments. | No Likely Significant Effects.  This policy outlines measures that the Council will take to increase employment opportunities arising from developments for local people. The policy does not identify either specific locations or quanta for any of this type of employment generating development.  MM includes clarifications to improve the effectiveness of policy implementation. | | | No |
| **Environment and Climate Change** | | | | | | |  |
| MM64  ECC01 – Mitigating Climate Change | The policy sets out design requirements for development to minimise contributions to climate change. As such, it is designed to safeguard the built environment and will not itself lead to development and for this reason, it is not likely to have significant effects on designated sites.  MM revisions are focussed on soundness and to ensure closer alignment / general conformity with London Plan and national policy. These revisions include:    Part A) - re-wording to align with Policy BSS01 in terms of locations for growth and para 20 of the NPPF in respect of climate change mitigation and adaptation.  Part B) - explanation of ‘promote the highest environmental standards’ and ‘exemplary levels of sustainability’;  Parts C) and D) - clarification on energy matters to reflect London Plan terminology; deletion of reference to Part L of the Building Regs to provide clarity that it is the zero-carbon target that is sought to be achieved by major development in accordance with London Plan Policy SI2. Deletion of the reference that minor development proposals should meet Council’s carbon reduction target of at least 6% beyond Part L of the Building Regs is required as there is insufficient evidence to justify imposition of this target as a requirement in all circumstances.  Part E - requirements relating to decentralised energy deleted and instead alignment with Policy SI3 of the London Plan.  Part H - wording relating to harm to the significance of heritage is replaced with a reference to Policy CH08 to ensure consistency; also, additions included to ensure that the policy wording is consistent with the Council’s support of the retrofitting, reuse and adaptation of existing buildings at paragraph 10.6.3. | No Likely Significant Effects.  This is a development management policy relating to design requirements leading to low carbon, reduced energy consumption and increased levels of renewable energy. No type, location or extent of development is identified. | | | No |
| MM65  ECC02 - Environmental Considerations | Revisions for soundness, general conformity with London Plan. This policy sets out environmental considerations that will be taken into account when assessing development proposals, including air pollution and noise levels, water infrastructure and quality. This may indirectly benefit biodiversity through the reduction of air pollution impacts upon nearby habitats (although effects on the Designated sites within the scope of this HRA are unlikely due to their distance from the Borough boundary).  MM revisions for soundness, general conformity with London Plan and national policy, notably alignment with approaches to air quality at NPPF para 192 and London Plan Policy SI1 and London Plan Policy SI1. Clarification that demolition and construction management plans may be conditioned where necessary. New parts F and G added on light pollution and odour criterion.. Cross references to Tables for setting out requirements on light pollution and consistent references to both noise and vibration. | No Likely Significant Effects.  This is a development management policy relating to seeking opportunities to improve air quality, noise levels, light pollution and mitigate pollutants. No type, location or extent of  development is identified. This is a positive development management policy relating to  environmental impact, pollution and land contamination as it provides for preventing detrimental impacts as a result of environmental conditions resulting from new  development such as air quality thus reducing atmospheric pollutants further.  MM revisions are focussed on soundness and to ensure closer alignment / general conformity with the London Plan and NPPF to clarify the status of current and future SPDs. | | | No |
| MM66  ECC02A -Water Management | This policy seeks to mitigate against flooding and puts measures in place to protect/enhance the overall water environment in Barnet. This may indirectly benefit the environment and biodiversity (although effects on the designated sites within the scope of this HRA are unlikely due to their distance from the Borough boundary).  These include in Part A in relation to flood risk:  i)  At Aa) specific reference to the Council seeking to ensure that development is located in areas at lowest risk of flooding assessed through applying, as appropriate, the sequential test.  ii) At Ab) additional reference made to the need for development to ensure that flood risk is not increased elsewhere.  iii) At Ac) clarifications that improvements to flood defences may be needed and be maintained in perpetuity, having regard to climate change that defended areas should be protected; also reference added in respect of land adjacent to flood defences needing to be protected to provide space for flood water in the event of breach; for clarity of intent, references also added to needing to consider future improvement, the introduction of natural flood management techniques, public amenity ‘space’ together with biodiversity ‘enhancements’.  iv) At Ad) clarifications added in outlining the circumstances when a site-specific flood risk assessment should be undertaken.  In Part B with regards surface water management, clarifications provided with respect to sustainable drainage run-off expectation, and that where it is necessary that management and maintenance plan arrangements are in place, the need as relevant for these to be secured through planning conditions or obligations.  In Part C clarification that major development proposals will be required to demonstrate how appropriate solutions to water capacity issues will be delivered in appropriate timeframes. This also includes deletion of Table 20 as submitted which includes water efficiency requirements as it repeats parts, but not all, of Policy SI 5 of the London Plan and Policy ECC02A.  In Part D clarification in respect of water courses of the expectation that proposals adjacent to a river corridor ensure a buffer zone of at least 10 metres. Also, additional reference made to encouragement for naturalisation of river corridors with clarification of the requirement where necessary for contributions towards river restoration and de-culverting.  Additional criterion (Part Dc) requiring that all applications for sites adjacent to a river corridor provide an assessment of impacts (including cumulative impacts) of the development on the riverine environment and other matters. | No Likely Significant Effects.  This is a positive development management policy relating to management and reduction of flood risk. It provides for the requirement for new development to manage and reduce surface run-off and waste water discharges. By definition, sustainable drainage systems would not result in likely significant effects upon internationally designated sites. This is a positive policy as it aims to improve water quality and reduce runoff.  This is a positive policy that ensures that development does not lead to deterioration to the quality or stability of a watercourse and refers to the Water Frame Directive. This is a positive development management policy as it ensures that the public sewerage network has sufficient capacity to serve existing and new development, and that provision of new  infrastructure is in place prior to occupation, thus preventing a reduction in water quality. This is a positive development management policy that provides for enhanced water use efficiency, thus reducing the need for water abstraction.  MM revisions for soundness, general conformity with London Plan. | | | No |
| MM67  ECC03 – Dealing with Waste | This policy encourages sustainable waste management through a range of measures, including the designation of sites through the North London Waste Plan (NLWP) to meet aggregated apportionment targets.  MM revisions for soundness, general conformity with London Plan and updated to reflect adoption of the NLWP. Clarification that Council encourages sustainable waste management in accordance with Policy SI 7 of the London Plan and the NLWP. Improved referencing to North London Waste Plan in respect of Scratchwood Quarry (Site No 29). | No Likely Significant Effects.  This is a development management policy relating to waste management.  MM revisions for soundness to ensure accordance with the adopted North London Waste Plan and closer alignment / general conformity with London Plan. | | | No |
| MM68  ECC04 – Barnet’s Parks and Open Spaces | This policy seeks to maximise the benefits of open space in Barnet and improve green infrastructure. This will help to provide alternative outdoor recreation away from designated sites.  MM revisions for soundness, general conformity with London Plan. Clarifications that Council intends to protect and enhance existing open spaces; on how developers expected to make provision for new and/or improvements to parks and open spaces. This includes where contributions towards offsite provision rather than direct provision may be appropriate and sets out management and maintenance expectations. Includes standards for sports pitches identified in Open Space, Sports and Recreational Facilities Assessment and refers to London Plan Policy S4 in respect of play provision. Clarification on ‘natural green spaces’; and playing fields as a form of open space. Revisions in the policy supporting text explain the Council’s approach for identifying and targeting areas of open space deficiency and deprivation.    In addition to these clarificatory revisions, the MM deletes the part of the policy (part e) that included criteria allowing for the possibility to develop areas of open space deemed to be of low quality and low value. This deletion is to reconcile with the Council’s strategy to address deficiencies in and improve access to parks and open spaces, and to reflect that evidence does not justify a policy approach that permits release of existing open space for development | No Likely Significant Effects.  A positive policy that provides for green infrastructure which has potential to divert recreational pressure away from designated sites. Providing for the retention and extension and enhancement of green infrastructure, the policy has the potential to divert recreational pressure away from designated sites.  MM revisions for soundness to ensure closer alignment / general conformity with London Plan. In addition to other clarificatory revisions, deletion of part of the policy that previously included criteria allowing for the possibility to develop areas of open space deemed to be of low quality and low value. | | | No |
| MM69  ECC05 - Green Belt and Metropolitan Open Land | This policy sets out criteria for development on the green belt and seeks to protect MOL from inappropriate development. Consequently, the policy is not likely to have any negative effect on any designated site.  The MMrevision is necessary for soundness to ensure accordance with national policy in the NPPF and closer alignment / general conformity with the London Plan; it relates to the deletion of criteria that development outside Green Belt affects its openness in the terms of its definition in the NPPF, and it conflicts with the Framework’s approaches to assessing openness. Instead, in respect of development proposed adjacent to Green Belt / MOL, a sentence is added to the policy supporting text strongly advocating a design led approach cross referencing to policy CDH01 and highlighting a focus on landscape and local character where necessary. | No Likely Significant Effects.  This is a development management policy that provides for the protection of the Green Belt and Local Green Space.  MMrevisions for soundness to ensure closer alignment / general conformity with the London Plan and the NPPF. | | | No |
| MM70  ECC06 - Biodiversity | This policy seeks to protect, enhance or create biodiversity in development through a range of measures, which may indirectly benefit biodiversity through habitat creation (although effects on the designated sites within the scope of this HRA are unlikely due to their distance from the Borough).  MM revisions for soundness, general conformity with London Plan. Clarifications that the current and proposed future Green Infrastructure SPDs constitute guidance only, and contributions may be sought towards the opportunities of the Green Grid Areas relevant to Barnet in respect of biodiversity. Confirm that, at a minimum, biodiversity net gain should be provided in accordance with national policy, or legislation and that compliance with the Table in the policy supporting text is required, unless legislation indicates otherwise. Clarifies that development proposals at application stage should be supported by sufficient evidence to demonstrate to a decision maker that the BNG requirement will be capable of being achieved. Clarification that proposals meet the Urban Greening Factor target scores set out by Policy G5 of the London Plan and provide SuDs schemes that maximise biodiversity benefits. Also clarification that where necessary monitoring of biodiversity net gain may need to be secured by planning conditions or obligations as appropriate. Update text on implications of the Environment Act 2021 and associated regulations in respect of biodiversity net gain and Local Nature Recovery Strategies. | No Likely Significant Effects.  This is a positive development management policy with regards to biodiversity relating to the protection of habitats and improving biodiversity.  MMrevisions for soundness to ensure closer alignment / general conformity with the London Plan and the provisions of the Environment Act 2021. | | | No |
| **Transport and Communications** | | |  |  | | | | | | |
| MM71  TRC01 – Sustainable Travel | This policy promotes a more sustainable transport network. The policy may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the designated sites within the scope of this HRA are unlikely due to their distance from the Borough) and will not itself lead to development.  MM revisions for soundness, general conformity with London Plan. Clarifications include i) that development proposals are required to demonstrate that adequate provision is made for necessary transport infrastructure, and that development does not compromise implementation of necessary transport infrastructure projects; ii) seeking contributions to orbital connectivity and public transport enhancements; iii) that the documents referred to in the policy are required where there would be construction vehicle / servicing or delivery issues. Revision needed to clearly set out the requirements for all developments generating significant amounts of movements to provide travel plans and transport assessments/statements. Also, clarification provided in the supporting text that mitigation of highway safety and road network impacts may be sought through planning obligations or agreements under Section 278 of the Highways Act 1980. | No Likely Significant Effects.  This policy provides the positive provision of sustainable transport modes (which by definition would not result in a likely significant effect), provision of infrastructure and improvements to the existing transport network and encourages alternative transport methods (walking cycling and public transport), that have potential to reduce atmospheric pollution contributions). By definition sustainable transport would not result in likely significant effects upon designated sites. Further, this policy does not identify any location, type or scale of development, or any scale or location of any transport schemes. Promoting active travel and health improvements, it contains positive text to encourage modal shift away from the car towards cycling, walking and use of public transport which have potential to reduce atmospheric pollution.  MMrevisions for soundness to ensure closer alignment / general conformity with the London Plan. | | | No |
| MM72  TRC02 – Transport Infrastructure | This policy promotes the delivery of new transport infrastructure to support the travel needs of a growing population and sets out specific pieces of transport infrastructure that will be delivered throughout the plan period. It actively promotes public transport and low emission vehicles which may indirectly benefit the natural environment; however, any significant effects on designated sites within the scope of this HRA are unlikely due to their distance from the Borough.  MM revisions are necessary to provide updates to transport infrastructure proposals and to explain how the Council will work with key partners to deliver capacity improvements. MM revisions delete reference to policies GSS09 and GSS11 as the transport infrastructure referred to within Policy TRC02 has wider application than for land relevant to those policies. Clarifications include that: i) Council will facilitate and support contributions to delivery of specified transport infrastructure, and ii) Brent Cross North bus station may be replaced, remodelled or improved. Updates provided include i) references to the current status of Colindale Station and the West London Orbital; ii) that land at Oakleigh Road South is safeguarded for Crossrail 2; iii) Council will work with TfL and Network Rail to bring forward capacity improvements identified in the Strategic Transport Assessment, and iv) the role of the IDP in relation to transport infrastructure monitoring. Also, explanation is given in the supporting text regarding the roles of, and signposting to, relevant elements of the Long Term Transport Strategy 2020-2041, Strategic Transport Assessment and IDP that relate to the requirements of Policy TRC02.. | No Likely Significant Effects  By definition, development contributions to deliver sustainable transport infrastructure improvements would not result in likely significant effects upon internationally designated sites. Further, this policy does not identify any location, type or scale of development, or any scale or location of any transport schemes. It contains positive text to encourage modal shift away towards cycling, walking and use of public transport have the potential to reduce atmospheric pollution.  MM revisions provide updates to transport infrastructure proposals and how the Council will work with key partners to deliver capacity improvements. | | | No |
| MM73  TRC03 – Parking Management | This policy aims to manage car parking throughout the Borough and will not in itself lead to development. It also refers to cycle parking and electric vehicle charging points.  MM provides clarification that parking should be limited in accordance with London Plan standards. Parking permits may be issued for development in CPZs in line with maximum provision level in Table 23, taking account of any on-site provision and subject to any capacity for additional on-street parking.  Clarification on where new CPZs or alterations to existing CPZs are deemed necessary to make development acceptable, contributions for implementation and monitoring may be required.Deletion of requirement for CPZs to be in place before development. Clarification on ‘car free development’ by making certain that ‘where no parking would be provided within a development site, residential parking permits will be made available to Blue Badge Holders’. Re-wording at Part D to reflect London Plan policies regarding the reprovision. of parking and not providing at previous levels where this would exceed standards. Update references to electric vehicle charging to refer to Part S of the Building Regulations. Clarification that car club parking spaces with active charging facilities encouraged as alternative to private parking for residents. Additional text in the policy stating that the Council will require a Parking Design and Management Plan for all applications which include car parking. | No Likely Significant Effects.  The policy sets out parking standard requirements for development within the Borough.  MMrevisions for soundness to ensure closer alignment / general conformity with the London Plan. | | | No |
| MM74  TRC04 – Digital  Communication and  Connectivity | The policy sets out how development should provide communication and utilities infrastructure and will not itself lead to development.  MM provides clarification that the Council will support the delivery of digital connectivity infrastructure with a particular focus on areas with gaps in connectivity and barriers to digital access as set out in London Plan Policy SI6(B). Clarification also given on the Council’s aims in respect of CCTV provision. The MM clarifies how the use of s106 and CIL can be used to support the delivery of infrastructure in accordance with legislation and London Plan requirements. The MM also provides improved cross referencing to other Local Plan policies. | No Likely Significant Effects.  This is a development management policy relating to the delivery of digital communication infrastructure. This is a positive policy as it required development to have demonstrated sufficient appropriate infrastructure capacity to support the development or that such  capacity will be delivered by the proposed development.  MM provides clarification on the Council support for delivering digital connectivity infrastructure. | | | No |

## Table 2: Screening of Site Allocations for Potential Significant Effects

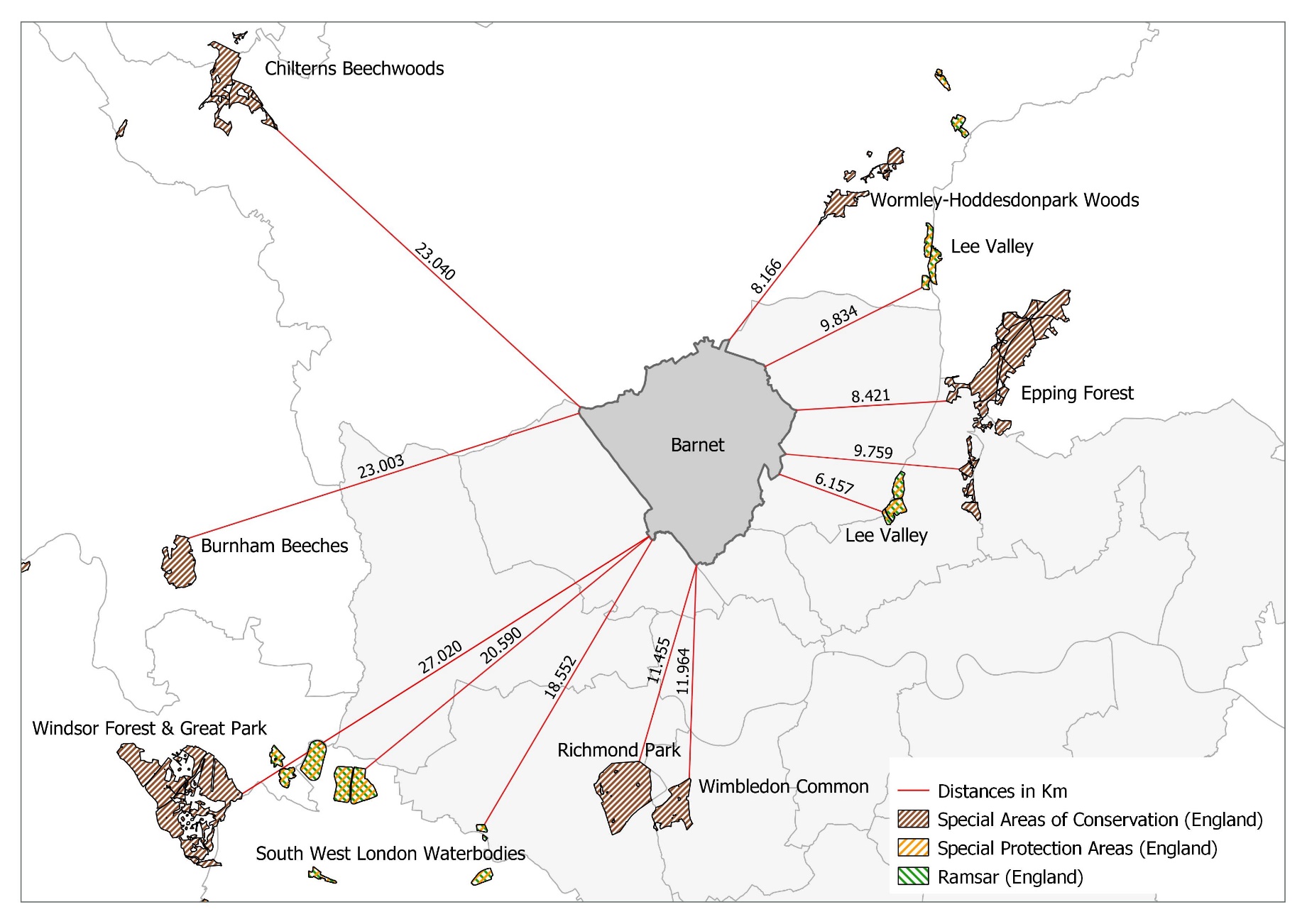
| **MM** | **Location of site proposal** | **Assessment of potential for likely significant effects arising from MMs with for sites additions shown underlined and deletions shown as ~~strikethrough~~** | **Need for AA?** |
| --- | --- | --- | --- |
| MM83  Site 1 | Former Church Farm Leisure Centre | Indicative number of residential dwellings: 12  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM84  Site 2 | North London Business Park | Indicative number of residential dwellings: 1350  Inclusion of non-residential uses: A school, multi-use sports pitch, employment and associated car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM85  Site 3 | Osidge Lane Community Halls | Indicative number of residential dwellings: 16  Inclusion of non-residential uses: Community uses, school ~~access~~ and ~~retained~~ park~~ing~~ access.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM86  Site 4 | Osidge Library & Health Centre | Indicative number of residential dwellings: ~~16~~ 10  Inclusion of non-residential uses: ~~Replacement library and health centre~~ Community uses ~~school and park access~~.  No Likely Significant Effects  Residential development, community uses and park access are to be provided with the number of residential dwellings reduced by the MM from 16 to 10.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM87  Site 5 | Edgware Hospital (Major Thoroughfare) | Indicative number of residential dwellings is ~~366~~ 129  Inclusion of non-residential uses: ~~Hospital continuing in use, with associated car parking~~ Retention of healthcare provision and access.  No Likely Significant Effects  Residential with retention of healthcare provision and access with residential development reduced by the MM from 366 to 129 dwellings. Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM88  Site 6 | ~~Watling Avenue car park & market (Burnt Oak Town Centre)~~  **Site deleted** | Indicative number of residential dwellings: ~~160~~  Inclusion of non-residential uses: ~~40% mixed uses (station building, retail and car parking)~~  No Likely Significant Effects  Site is to be deleted and therefore no new development is now anticipated at this location. | No |
| MM89  Site 7 | Bingo Hall Cricklewood ~~Beacon Bingo~~ (Cricklewood Growth Area) | Indicative number of residential dwellings: ~~132~~ 77  Inclusion of non-residential uses: Leisure uses  No Likely Significant Effects  Residential development proposed on this site is reduced by the MM from 132 to 77 new dwellings. Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM90  Site 8 | Broadway Retail Park (Cricklewood Growth Area) | Indicative number of residential dwellings: ~~1007~~ 1049  Inclusion of non-residential uses: Residential led mixed use development with commercial and community uses  No Likely Significant Effects  Following call in of the application for his determination, the Secretary of State issued his decision on 4th December 2023 to grant planning permission for this residential led mixed use development with commercial and community uses which includes the provision of 1,049 new homes on this site.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM91  Site 9 | ~~Colindeep Lane (adjacent to Northern Line) (Colindale Growth Area)~~  **Site deleted** | Indicative number of residential dwellings: ~~128.~~  No Likely Significant Effects  Site is to be deleted and therefore no new development is now anticipated at this location. | No |
| MM92Site 10 | ~~Douglas Bader Park Estate (Estate Regeneration and Infill)~~  **Site deleted** | Indicative number of residential dwellings: ~~478~~  Inclusion of non-residential uses: ~~Small quantum of community facilities and commercial (retail).~~  No Likely Significant Effects  Site is to be deleted and therefore no new development is now anticipated at this location. | No |
| MM93  Site 11 | KFC/ Burger King Restaurant (Colindale Growth Area) | Indicative number of residential dwellings: ~~162~~ 102  Inclusion of non-residential uses: ~~10% floorspace restaurant~~ Use Class E(b).  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 162 to 102. Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM94  Site 12 | McDonald's Restaurant (Colindale Growth Area) | Indicative number of residential dwellings: ~~175~~ 112  Inclusion of non-residential uses: ~~10% floorspace restaurant~~ Use Class E(b).  No Likely Significant Effects  Number of new residential units proposed on this site is reduced by the MM from 175 to 112. Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM95  Site 13 | Public Health England  (Colindale Growth Area) | Indicative number of residential dwellings: ~~794~~ 391  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Number of new residential units proposed on this site is reduced by the MM from 794 to 391. Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM96  Site 14 | ~~Sainsburys The Hyde (Major Thoroughfare)~~  **Site deleted** | Indicative number of residential dwellings: ~~1309~~  Inclusion of non-residential uses: ~~Commercial (retail), community and car parking~~.  No Likely Significant Effects  Site is to be deleted and therefore no new development is now anticipated at this location. | No |
| MM97  Site 15 | Tesco Coppetts Centre (Major Thoroughfares) | Indicative number of residential dwellings: 397  Inclusion of non-residential uses: Commercial, community and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM98  Site 16 | 45-69 East Barnet Rd (New Barnet Town Centre) | Indicative number of residential dwellings: ~~110~~ 75  Inclusion of non-residential uses: Commercial  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 110 to 75.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM99  Site 18 | Former East Barnet Library | Indicative number of residential dwellings: 12  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM100  Site 19 | East Barnet Shooting Club (New Barnet Town Centre) | Indicative number of residential dwellings: 43  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM101  Site 20 | Fayer’s Building Yard & Church (New Barnet Town Centre) | Indicative number of residential dwellings: 25  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM102  Site 21 | New Barnet Gasholder (New Barnet Town Centre) | Indicative number of residential dwellings: 201  Inclusion of non-residential uses:None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM103  Site 22 | Sainsburys (New Barnet Town Centre) | Indicative number of residential dwellings: 199  Inclusion of non-residential uses: Commercial and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM104  Site 23 | Bobath Centre (East Finchley Town Centre) | Indicative number of residential dwellings: 25  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM105  Site 24 | East Finchley Station Car Park (East Finchley Town Centre) | Indicative number of residential dwellings: 135  Inclusion of non-residential uses: Commercial (office), public realm and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM106  Site 25 | East Finchley Substation (East Finchley Town Centre) | Indicative number of residential dwellings: ~~23~~ 9  Inclusion of non-residential uses: Commercial (office).  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 23 to a minimum of 9.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM107  Site 26 | Park House (East Finchley Town Centre) | Indicative number of residential dwellings: ~~20~~ 19  Inclusion of non-residential uses: Community  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 20 to 19.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM108  Site 27 | Edgware Town Centre (Edgware Growth Area) | Indicative number of residential dwellings: 2379  Inclusion of non-residential uses: Town centre commercial (retail and office), leisure, ~~entertainment~~ community and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM109  Site 28 | Edgware Underground & Bus Stations (Edgware Growth Area) | Indicative number of residential dwellings: ~~2317~~ 2316  Inclusion of non-residential uses: Town centre uses transport, commercial (retail and office), leisure, public realm, ~~and~~ community and car parking.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 2317 to 2316.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM110  Site 29 | Scratchwood Quarry | Indicative number of residential dwellings: 0  Inclusion of non-residential uses: Waste management.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM111  Site 30 | Finchley Central Station (Finchley Central/ Church End Town Centre) | Indicative number of residential dwellings: 566  Inclusion of non-residential uses: Transport infrastructure, commercial uses ~~(retail and offices)~~ and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM112  Site 31 | Brentmead Place (Major Thoroughfare) | Indicative number of residential dwellings: 46  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM113  Site 32 | ~~Manor Park Road car park~~  **Site is deleted** | Indicative number of residential dwellings: ~~7~~  Inclusion of non-residential uses: ~~None~~  No Likely Significant Effects  Site is to be deleted and therefore no new development is now anticipated at this location. | No |
| MM114  Site 33 | Bunns Lane Car Park (Mill Hill Town Centre) | Indicative number of residential dwellings: 43  Inclusion of non-residential uses: Hotel and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM115  Site 34 | Burroughs Gardens Car Park ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: 9  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM116  Site 35 | Egerton Gardens Car Park ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: ~~69 student halls of residence) (equivalent to 23 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)~~  25 residential units (ratio of 2.5 student rooms to 1 standard housing unit).  Inclusion of non-residential uses: None.  No Likely Significant Effects  Amount of residential is increased by the MM from 23 residential units (69 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to 25 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM117  Site 36 | Fenella ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: ~~60 (180 student halls of residence)~~  65 (2.5 student rooms to 1 standard housing unit).  Inclusion of non-residential uses: Educational.  No Likely Significant Effects  Amount of residential is increased by the MM from 60 residential units (180 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to 65 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM118  Site 38 | Ravensfield House ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: ~~84 (252 student halls of residence)~~  90 (2.5 student rooms to 1 standard housing unit).  Inclusion of non-residential uses: Educational uses.  No Likely Significant Effects  Amount of residential is increased by the MM from 84 residential units (252 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to 90 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM119  Site 39 | The Burroughs Car Park ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: 21  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM120  Site 40 | Meritage Centre | Indicative number of residential dwellings: ~~36 (108 student halls of residence)~~ 73 (2.5 student rooms to 1 standard housing unit)  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Amount of residential is increased by the MM from 36 residential units (108 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to 73 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM121  Site 41 | PDSA and Fuller Street Car Park | Indicative number of residential dwellings: ~~12 (36 student halls of residence)~~ 32 (2.5 student rooms to 1 standard housing unit)  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Amount of residential is increased by the MM from 12 residential units (36 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to 32 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM122  Site 42 | Usher Hall ~~(Middlesex University and The Burroughs)~~ | Indicative number of residential dwellings: ~~39 (117student halls of residence)~~  9 (23 student units ratio 2.5 student rooms to 1 standard housing unit)  Inclusion of non-residential uses: None.  No Likely Significant Effects  Amount of residential is reduced by the MM from 39 residential units (117 student halls of residents at a ratio of 3 student rooms to 1 standard housing unit) to a minimum of 9 residential units (2.5 student rooms to 1 standard housing unit).  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM123  Site 43 | Army Reserve Depot (Chipping Barnet Town Centre) | Indicative number of residential dwellings: 193  Inclusion of non-residential uses: Small quantum of commercial uses.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM124  Site 44 | High Barnet Station ~~(Chipping Barnet Town Centre)~~ | Indicative number of residential dwellings: 292  Inclusion of non-residential uses: Commercial, public realm and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM125  Site 45 | Land Adjoining The Whalebones ~~Park (Chipping Barnet Town Centre)~~ | Indicative number of residential dwellings: ~~149~~ 100  Inclusion of non-residential uses: Community facilities and publicly accessible open ~~local green~~ space.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 149 to 100.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM126  Site 46 | IBSA House (Mill Hill East ~~Growth~~ Area) | Indicative number of residential dwellings: 197  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM127  Site 47 | Mill Hill East Station (Mill Hill East ~~Growth~~ Area) | Indicative number of residential dwellings: 127  Inclusion of non-residential uses: ~~Rail~~ Transport infrastructure and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM128  Site 48 | Mill Hill Library  (Mill Hill Town Centre) | Indicative number of residential dwellings: ~~19~~ 10  Inclusion of non-residential uses: Community.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 19 to 10.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM129  Site 49 | Watchtower House & Kingdom Hall (Mill Hill East ~~Growth Area~~) | Indicative number of residential dwellings: ~~224~~ 184  Inclusion of non-residential uses: Open Green Belt and community uses.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 224 to 184.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM130  Site 50 | Watford Way & Bunns Lane (Major Thoroughfare) | Indicative number of residential dwellings: 105  Inclusion of non-residential uses: None.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM131  Site 51 | Great North Road Local Centre (Major Thoroughfare) | Indicative number of residential dwellings: ~~84~~ 27  Inclusion of non-residential uses: Cinema and public house.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 84 to 27.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM132  Site 52 | ~~Kingmaker House (New Barnet Town Centre)~~  **Site deleted.** | Indicative number of residential dwellings: ~~61~~  Inclusion of non-residential uses: ~~None~~  No Likely Significant Effects  The development is approaching completion and therefore the site allocation as proposed in the Plan is no longer necessary. Its inclusion would not be effective and consequently this site allocation is to be deleted from the Plan. | No |
| MM133  Site 53 | Allum Way (Whetstone Town Centre) | Indicative number of residential dwellings: ~~600~~ 599  Inclusion of non-residential uses: ~~TfL rail~~ Transport infrastructure, commercial (office and light industrial), community and car parking.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 600 to 599.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM134  Site 54 | ~~Barnet House (Whetstone Town Centre)~~  **Site deleted.** | Indicative number of residential dwellings: ~~139~~  Inclusion of non-residential uses: ~~None~~  The site has full planning permission (21/3726/FUL) that has been implemented and the development is under construction with significant progress having been made. The site allocation as proposed in the Plan is therefore no longer necessary as its inclusion would not be effective. Consequently, this site allocation is to be deleted from the Plan. | No |
| MM135  Site 55 | Woodside Park Station East (Existing Transport Infrastructure) | Indicative number of residential dwellings: 95  Inclusion of non-residential uses: Car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM136  Site 56 | Woodside Park Station West (Existing Transport Infrastructure) | Indicative number of residential dwellings: ~~356~~ 86  Inclusion of non-residential uses: None.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 356 to a minimum of 86.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM137  Site 57 | 309-319 Ballards Lane (North Finchley Town Centre) | Indicative number of residential dwellings: ~~130~~ 83  Inclusion of non-residential uses: Commercial and community.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 130 to 83.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM138  Site 58 | 811 High Rd & Lodge Lane car park (North Finchley Town Centre) | Indicative number of residential dwellings: 132  Inclusion of non-residential uses: Commercial and public car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM139  Site 59 | Central House (Finchley Central / Church End Town Centre) | Indicative number of residential dwellings: ~~48~~ 42  Inclusion of non-residential uses: Commercial.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 48 to a minimum of 42.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM140  Site 60 | Finchley House ~~()~~ (North Finchley Town Centre) | Indicative number of residential dwellings: ~~202~~ 128  Inclusion of non-residential uses: Commercial and community.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 202 to 128.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM141  Site 61 | Tally Ho Triangle ~~(key site 1)~~ (North Finchley Town Centre) | Indicative number of residential dwellings: ~~281~~ 205  Inclusion of non-residential uses: Commercial, town centre uses ~~(retail, and office)~~, leisure, transport infrastructure, car parking and community facilities.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 281 to 205.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM142  Site 62 | Tesco Finchley (~~Central~~ Finchley Central / Church End Town Centre) | Indicative number of residential dwellings: 170  Inclusion of non-residential uses: Commercial and car parking.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM143  Site 63 | Philex House (Major Thoroughfare) | Indicative number of residential dwellings: ~~48~~ 22  Inclusion of non-residential uses: None.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 48 to a minimum of 22.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM144  Site 64 | 744-776 High Rd (North Finchley Town Centre) | Indicative number of residential dwellings: ~~175~~ 112  Inclusion of non-residential uses: Commercial.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 175 to 112.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM145  Site 65 | Barnet Mortuary (former) (Major Thoroughfare) | Indicative number of residential dwellings: ~~20~~ 60  Inclusion of non-residential uses: None.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is increased by the MM from 20 to a minimum of 60.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM146  Site 66 | East Wing ~~(key site 4)~~ (North Finchley Town Centre) | Indicative number of residential dwellings:~~125~~ 80  Inclusion of non-residential uses: Commercial and cultural.  No Likely Significant Effects  Number of new residential dwellings proposed on this site is reduced by the MM from 125 to 80.  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |
| MM147  Site 67 | Great North Leisure Park (Major Thoroughfare) | Indicative number of residential dwellings: 352  Inclusion of non-residential uses Leisure, commercial and community.  No Likely Significant Effects  Due to the distances involved to any designated site, (see map at Appendix B), there are no impact pathways present and in combination effect of recreational pressure and urbanisation do not require consideration. | No |

**Appendix A: Plans with the potential for in-combination effects**

Plans and supporting documents have been considered from Regulation 19 Stage, where there is reasonable certainty about levels of development that might come forward.

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| **Regional Plans** |
| **London Plan (2021)** |
| Status: On 29 January 2021 the Secretary of State wrote to the Mayor confirming that he is content for the London Plan to be formally published, with no further changes. The London Plan was then subsequently published in March 2021.    HRA: The July 2016 HRA of the London Plan concludes that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects. Therefore, there are no likely in-combination effects of the adopted London Plan with the Local Plan.Updates to the HRA during the process of examination have not changed the outcomes of the assessments in relation to the Barnet Local Plan. |
| **Local Plans and Strategies: Neighbouring Authorities** |
| **London Borough of Harrow: Core Strategy (2012); Development Management Plan (2013); Site Allocations Local Plan (2013)** |
| Status: The adopted Harrow Local Plan is comprised of the Core Strategy, Development Management Plan and the Site Allocations Local Plan.  Planned growth: The adopted Core Strategy provides for 6,050 net additional dwellings over the period 2009 to 2026. The majority of new homes will be provided within the Harrow and Wealdstone Intensification Area, and remaining growth directed to town centres and strategic previously developed sites. The Core Strategy set a target to deliver 4,000 net additional new jobs over the plan period. It is anticipated that 3,000 of these jobs will be delivered within the Harrow and Wealdstone Intensification Area.  HRA: The November 2011 HRA concluded that that no likely significant effect to the qualifying features of the European site would occur as a result of their growth/policies.  Reg 18 draft local plan issued for consultation  The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. The Regulation 18 Consultation began on 26 February 2024 and will end on 25th April 2024.  Planned growth for draft local plan: Strategic Policy 03: Meeting Harrow’s Housing Needs of the Regulation 18 draft local plan seeks to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 - 2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough.  The London Plan (2021) includes a target to deliver a minimum of 3,7505 (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029.  No European designated Habitat Sites are present within Harrow Borough but the HRA will consider whether there is potential for activities within the Borough of Harrow to affect Habitats Sites outside of the Borough. Wimbledon Common and Richmond Park are the closest SACs to Harrow, located 20km South of the Borough boundary. South West London Waterbodies is the closest SPA to Harrow, located 23 km South-West of the Borough boundary.  Each preferred policy within the draft Local Plan has been screened to identify potential impact pathways between the policies and the Habitats Sites, in isolation and/or in combination with other plans or projects. The screening has identified potential pathways in relation to recreation pressure, air quality, water quality and water resources in relation to a number of the Habitats Sites. None of the Habitats Sites included within the scope of the HRA has been screened out as yet. The potential risks to Habitats Sites relate to the amount of development proposed. The policies that have a direct relationship to the quantum of development are those listed below and therefore these are the policies that need to be considered further in relation to potential impact pathways.  The policies for which potential pathways could exist leading to effects on recreation, air quality, water quality and water resources, are as follows: • Spatial Strategy Policy • Strategic Policy 01: High Quality Growth • Strategic Policy 03: Meeting Harrow’s Housing Needs • HO1 Dwelling Size Mix • HO3 Optimising the use of small housing sites • Strategic Policy 04: Local Economy • Strategic Policy 05: Harrow & Wealdstone Opportunity Area • LE3 Industrial Land • LE4 Culture and Creative Industries • LE5 Tourism and Visitor Accommodation Screening of the Local Plan is ongoing.  The HRA statement will be updated following the further investigation and the consultation on the Regulation 18 draft Local Plan. |
| **London Borough of Brent: Brent Local Plan 2019-2041** |
| Status: The Brent Local Plan 2019-2041 was adopted by Full Council on 24 February 2022.  Planned growth: The plan seeks grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide a minimum 23,250 homes in the period 2019/20-2028/29 and a minimum of 46,018 homes in the period 2019/20 – 2040/41.  HRA: The HRA concludes that the Plan is unlikely to lead to any significant adverse effects (either alone or in combination) on any European Sites. |
| **London Borough of Camden: Local Plan (2017)** |
| Status: The Camden Local Plan was adopted in 2017 and sets out a vision to 2031.    Planned Growth: The plan seeks to meet Camden’s objectively assessed needs, which include 16,800 additional homes, 695,000sqm of office floorspace and 30,000sqm of retail floorspace. Development will take place throughout the borough but with the most significant growth expected to be delivered through a concentration of development in the growth areas of Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead interchange and Kentish Town Road Regis Road.    HRA: The 2015 HRA concluded that that no likely significant effect to the qualifying features of the European site would occur as a result of their growth/policies.  The Council consulted on the draft new Local Plan from Wednesday 17 January to Wednesday 13 March 2024.  The Local Plan will cover the period from 2026 - 2041.  Planned growth: The Council in their draft new local plan will aim to deliver 11,550 additional homes over the Plan period to 2041. The Council’s Economic Needs Assessment 2023 forecasts a demand for approximately 406,359 sqm of net additional office floorspace (use classes E(g) (i) and E(g)(ii)) by 2041. The Council proposes to meet this need from:  • Existing planning permissions - the Economic Needs Assessment has identified that existing approvals of major schemes total approximately 211,028sqm (net internal area) office floorspace, of which the vast majority of schemes are under construction or expected to be delivered in the first 5 years of the Plan period.  • Site allocations – suitable sites have been allocated for development in this Plan to deliver new employment floorspace in the borough.  • Windfall development – this is expected to deliver increases in office floorspace both in the CAZ and in other centres commensurate with their individual size and role.  A HRA -Screening Opinion was prepared to support the Regulation 18 draft local plan in January 2024. The HRA concluded that the proposed draft Local Plan policies, in combination with other plans and projects, are not considered likely to have significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. The screening assessment considered the scope of the Local Plan and its relationship with other plans, in particular the adopted London Plan. Therefore it was not considered necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment. |
| **London Borough of Haringey: Strategic Policies 2013 (with alternations 2017) and Site Allocations (2017); Development Management DPD (2017)** |
| Status: Haringey Council's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. |
| Planned Growth: The strategy seeks to deliver 19,800 new net new homes over the plan period. In addition, the strategies forecasts that 23,800sqm of B class floorspace will be needed up to 2026.  The Council has started work on a new Local Plan which is intended to run from 2024 to 2039 and consulted on a first steps document in February 2021. A draft local plan for further consultation is anticipated Summer 2024.    HRA: The 2015 HRA concluded that the potential impact pathway of recreational pressure upon Epping Forest was screened out, both alone and in-combination with other projects or plans. Following assessment of Lee Valley SPA and Ramsar site, the potential impact pathway of disturbance (from recreational pressure), urbanisation, water abstraction, water quality and air quality were also screened out, both alone and in-combination with other projects or plans. The impact pathway of disturbance to avian features from construction activities is a residual impact pathway as development is proposed within close proximity to the SPA and Ramsar site. Provided Haringey’s Alterations to Strategic Policies document provides clear measures to address potential disturbance to bird features resulting from construction activities, then Haringey’s Alterations to Strategic Policies document can be screened from further assessment and no likely significant effects upon internationally designated sites will result, either alone or in combination with other projects or plans.  An updated IIA was produced in support of the new Local Plan and the consultation on this document closed in March 2021. There are no further updates on the Regulation 18 Plan at this time and therefore the assessment for the Barnet Plan considers the adopted Local Plan for Haringey. |
| **London Borough of Enfield: Core Strategy (2010); Local Plan Policies Map (2010); Development Management DPD (2014) and AAPs** |
| Status: Enfield Council’s development framework is made up of the Core Strategy which was adopted in 2010 and provides a vision up to 2025 and a Development Management DPD adopted in 2014, Edmonton Leeside Area Action Plan – 2020, North East Enfield Area Action Plan – 2016, North Circular Area Action Plan – 2014 and North London Waste Plan – 2022. The Core Strategy is supported by the Local Plan Policies Map.  Enfield Council is preparing a new Local Plan to set the framework for development in the borough over the next 15 years. The new Local Plan will replace the Core Strategy (2010), the Development Management Document (2014) and Area Action Plans. A pre-publication Regulation 19 Draft Local Plan was published in December 2023 The Regulation 19 consultation on Proposed Submission version of Enfield Local Plan 2019-2041 was approved by Full Council on 19 March 2024.  The consultation period will commence on Thursday 28 March and conclude on Monday 20 May 2024.  Planned Growth: The Core Strategy plans for 11,000 new homes over the planned period and a minimum of 6,000 new jobs. Large scale growth and regeneration will be focused in four broad locations – Central Leeside and North Enfield in the Upper Lee Valley, in addition to the area around the North Circular Road at New Southgate and the Boroughs major town centre – Enfield Town.    The Regulation 19 Enfield draft plan plans for 33,280 over the plan period 2019-2041 and will provide for a minimum of: • 304,000 sqm of net additional industrial and logistics floorspace; and • 40,000 sqm of net additional office floorspace.  HRA:   * The Appropriate Assessment Screening Report determined that the baseline for the 2009 AA screening for the Core Strategy remains relevant and appropriate. The 2009 AA screening undertaken for the Core Strategy concluded that none of the policies were likely to have any significant adverse impacts on European sites. * HRA work on the emerging Local Plan began in May 2020 with an HRA Scoping Report contained within the Integrated Impact Assessment Scoping Report. The Scoping Report concluded that the main issues that would need to be the focus of HRA, were recreation pressure / disturbance and air pollution at Epping Forest SAC, Lee Valley SPA/Ramsar and Wormley Hoddesdonpark Woods SAC. It considered that the effects at Epping Forest SAC would be more likely to be significant than at the other sites, and concluded that water resource and quality impacts could be scoped out of the HRA. * The IIA in support of the new Regulation 18 Plan was consulted on in September 2021. The HRA report concluded that no adverse effect on the integrity of the European sites were expected, providing that recommended policy amendments were incorporated, and subject to the outcomes of further work on traffic and air quality assessment, and development of the borough’s recreation mitigation strategy. * The Enfield Local Plan is currently at the Regulation 19 stage and an HRA has assessed the intended Publication version. The HRA screening of the emerging Local Plan previously determined that Appropriate Assessment was required, as likely significant effects from the plan’s policies and site allocations could not be ruled out through screening. The Enfield Local Plan will result in new development (e.g. housing, employment and infrastructure), which will have associated impacts (e.g. changes to traffic distribution, types or distribution of recreation, water abstraction and discharge, light or noise). The December 2023 HRA report produced in support of the Regulation 19 Draft Local Plan states that: “A number of European sites have the potential to be adversely affected by the Local Plan due to their proximity and/or ecological connectivity to the Plan area and were therefore considered within this HRA. There are no European sites within LB Enfield (LBE). The following European sites are within 15km of the Plan area and were screened in: ν Epping Forest SAC (c.0.3km from LBE); ν Lee Valley SPA and Ramsar (c.0.7km from LBE); and ν Wormley Hoddesdon park Woods SAC (c.3.8km from LBE). No other European sites were considered to be functionally connected to the LBE.” The report continues: “Likely significant effects from the Local Plan alone could not be ruled out at the screening stage in relation to functionally linked habitat, air pollution, recreation pressure, and water quantity and quality as discussed below and presented in relation to each of the Local Plan policies and sites.” The HRA report then concludes that: “Through the information reviewed and mitigation measures considered during the Appropriate Assessment, it was possible to conclude that no adverse effect on integrity will occur for the following impacts and European sites, as a result of confirmed mitigation measures.” There are no significant changes arising for the Barnet Plan. |
| **Hertsmere Borough Council: Core Strategy (2013); Elstree Way Corridor Area Action Plan (2015); Site Allocations and Development Management Policies Plan (2016); Policies Map** |
| Status: The Hertsmere Local Plan is made up of four parts (listed above) and provides a vision up to the period 2027.    Planned Growth: The Core Strategy sets a target to deliver 3,900 new homes over the plan period (equating to 229 new homes per year). In addition, it is expected that approximately 2,700 new office jobs and 240 new warehousing jobs and 660 fewer industrial jobs over the plan period.    HRA: The HRA scoping report (2017) introduced the HRA process to be undertaken in relation to the new Hertsmere Local Plan. However, this version of the Local Plan has now been set aside and the Council is proposing to restart the plan process. Councillors agreed in November 2023 a framework setting out how land in the borough will be used up until 2040 and beyond and updated LDS timetable noting that the draft plan must be submitted by June 2025 with adoption then expected by the end of 2026. The HRA Screening report for the Barnet Local Plan has considered the relevant information from the evidence documents prepared (including a Sustainability Report and HRA produced in October 2021 which concluded that the potential for adverse air pollution effects from the local plan upon Epping Forest SAC and Wormley Hoddesdonpark Woods SAC were uncertain until further assessment was carried out) in support of the ‘set-aside’ Hertsmere Local Plan Review.  In November 2023, Full Council agreed to the procedures and timeframes detailed in the Local Development Scheme (LDS). The updated LDS showed that there will be a further public consultation (Regulation 18) in spring 2024 ahead of the publication of the final Regulation 19 version of the Hertsmere Local Plan (HLP) to be submitted for public examination.    In light of the updated LDS, Hertsmere Council has revised and amended the HLP, by giving greater weight to the importance of Hertsmere’s Green Belt, whilst still seeking to deliver green and sustainable growth over the next 15 years and beyond.    Following detailed consideration of the responses from previous consultations, Hertsmere Council agreed to revise its work programme to include a further Regulation 18 public engagement stage in spring 2024, before progressing to Regulation 19 Publication stage. Revisions to the Reg 18 HLP include a 40 per cent reduction in the amount of Green Belt land being lost and 9,500 new homes to meet our housing need - a fall of 22 per cent from the previous draft Local Plan.  Public consultation on the Draft Local Plan document started on Wednesday 3rd April 2024. |
| **Epping Forest District Council, Local Plan 2011-2033, Policies Map** |
| The Epping Forest District Local Plan 2011 to 2033 was adopted at an Extraordinary Meeting of the Council on 6 March 2023  Planned Growth: Within the period 2011-2033 the Local Plan will provide for a minimum of 11,400 new homes, including a minimum of 2,851 new affordable homes between 2016 – 2033. The local plan will also provide for a figure of 10,800 jobs between 2011 – 2033. This includes 7,900 jobs for the 2016-2033 period. This translates into between 2-5 hectares of land for new office uses and 14 hectares for new industrial uses.  HRA: The Epping Forest District Council assessment began in 2016 with the determination of Likely Significant Effects followed by the HRA of the Epping Forest District Local Plan 2011-District 033 Submission Version which incorporated Strategic and Development Management Policies, together with site allocations and designations, and the two stages of Main Modifications undertaken.  There are three internationally important sites that lie partly within Epping Forest District:  • Epping Forest SAC;  • Lee Valley SPA; and  • Lee Valley Ramsar site.  Outside the District, the following site also requires consideration because there is potential for impacts stemming from the Local Plan to create significant effects even though the site lies outside the authority boundary:  • Wormley-Hoddesdonpark Woods SAC located 2.2km west of the District.  Habitats Regulations Assessments were undertaken during the course of the development of the Epping Forest District Local Plan 2011–2033 as follows: EB205 Habitats Regulations Assessment 2016  EB206 Habitats Regulations Assessment 2017  EB206A Habitats Regulations Assessment 2017 Non-technical summary  EB209 Habitats Regulations Assessment January 2019 EB211A Habitats Regulations Assessment June 2021  EB211B Habitats Regulations Assessment: Appendix E June  2021 ED149 Habitats Regulations Assessment October 2022 ED149A Habitats Regulations Assessment: Appendix E October 2022.  The HRA 2022 concluded that, with the delivery of the urbanisation/recreational pressure and air quality mitigation packages to which Epping Forest District Council is committed, a sufficient protective framework exists to ensure that there will be no adverse effect on the integrity of any Internationally important sites including Epping Forest SAC. Therefore, the further Main Modifications to the Submission Version of the Epping Forest District Local Plan 2011–2033 as proposed to be modified (at the time) met its legal requirements in ensuring that no adverse effect on the integrity of any European sites will arise from its adoption, either alone or in combination with other plans or projects. |
| **London Borough of Waltham Forest Council; Waltham Forest Local Plan Part 1 2020-2035. Local Plan Part 2 Site Allocations** |
| The Council adopted Local Plan Part 1 (LP1) on 29 February 2024.  This document sets out a spatial vision, strategic objectives and a planning policy framework for development in the Borough until 2035, and includes thematic policies on topics such as housing, climate change, green and blue infrastructure, and heritage. It replaces the previously adopted development plan documents including the Core Strategy (2012), Development Management Policies Document (2013) and the Area Action Plans for Walthamstow Town Centre (2014) and Blackhorse Lane (2015)  Planned growth: Within the period 2023-2035 the Local Plan will provide for 27,000 additional homes; and 52,000sqm employment floorspace.  The Council are in the process of preparing Local Plan Part 2: Site Allocations (LP2). The document has been subject to 2 public consultations, and the Council will hold a further statutory consultation on the document in the summer/ autumn 2024. The most recent version of the document was published for consultation in November 2021  HRA: The Site Allocations Plan, Habitats Regulations Assessment Report dated 2021 considered the following European sites   * Epping Forest Special Area of Conservation (SAC); and   • Lee Valley Specially Protected Area (SPA) and the Lee Valley Ramsar site.  The HRA concluded that; with the suggested mitigation in place within the Regulation 19 Local Plan (Part 2) Site Allocations Document, the supporting SANG Strategy (incorporated into a Mitigating the Impact of Development on SAC SPD) and Air Quality Mitigation Strategy, it will be possible to conclude that the Waltham Forest Local Plan (Part 2) Site Allocations Document will not result in adverse effects on the integrity of Epping Forest SAC in relation to recreational pressures, air quality and urban effects when the Plan is assessed on its own or in combination with growth in neighbouring areas.  The Appropriate Assessment was also able to conclude that the Local Plan (Part 2) Site Allocations Document will not result in adverse effects on the Lee Valley SPA and the Lee Valley Ramsar site, both alone and in combination with growth in neighbouring areas. |

**Appendix B – Map of designated site network in proximity to London Borough of Barnet**



A letter with text on it

Description automatically generated**Appendix C – Correspondence with Natural England relating to consideration of MMs**

1. The HRA Technical Note November 2022 (EXAM 39), the Updated HRA Screening Report 2022 (EXAM 8), the Regulation 18 and Regulation 19 Integrated Impact Assessments (IIA), the Updated IIA Non-Technical Summary, and the IIA Technical Paper. [↑](#footnote-ref-1)
2. [The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (legislation.gov.uk)](https://www.legislation.gov.uk/ukdsi/2019/9780111176573) [↑](#footnote-ref-2)
3. <http://curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=619449> [↑](#footnote-ref-3)
4. <https://ie.vlex.com/vid/holohan-v-an-bord-793932545> [↑](#footnote-ref-4)
5. <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-127/02> (Wadanzee) and <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-258/11> (Sweetman) [↑](#footnote-ref-5)
6. <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-258/11> (Sweetman) [↑](#footnote-ref-6)
7. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021> [↑](#footnote-ref-7)