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# **Local Plan Sustainability Appraisal Final Report**

## **Core Strategy**

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September 2012



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# 1. Non technical summary

- 1.1.1 The following non-technical summary has been produced to inform consultees and the general public on the appraisal process, avoiding the use of technical terms.
- 1.1.2 The London Borough of Barnet is preparing a collection of planning documents which will guide development in the borough, known as the Local Plan (formerly the Local Development Framework [LDF]). The Local Plan will advise on how and where housing, shops, offices, industry, transport and leisure facilities are located over the next 15 years. The first Development Plan Document (DPD) to be produced is the Core Strategy DPD.
- 1.1.3 As essential consideration when drawing up these documents is their effect on the environment and people's quality of life, both now and in the future. Therefore a Sustainability Appraisal (SA) and a Strategic Environment Assessment (SEA) have been carried out alongside the preparation of these plans to make sure social, environmental and economic issues are taken into account at every stage.
- 1.1.4 This section summarises the findings of the SA of the Submission version of the Core Strategy and subsequent amendments which came out of the public examination process.

## 1.2 Scoping

- 1.2.1 Before production of the DPDs started, a scoping stage was necessary to propose and agree the appraisal methodology and collate the information needed to carry this out. The appraisal needed to be set within the context of existing plans and policies and an understanding of the current baseline situation was essential to predict effects and identify key sustainability issues and problems.
- 1.2.2 Sustainability is a complex issue so 22 sustainability objectives were produced to consider local issues. The objectives cover a range of social, environmental and economic impacts, for example: improving the education and skills of the population, reducing contributions to climate change and improving air quality.

## 1.3 Refining options and predicting effects

- 1.3.1 There is more than one way of meeting the needs of people who live and work in Barnet, so various options for development were proposed at the Issues and Options stage in June 2008. The Sustainability Appraisal tested each of the options and predicted their significant positive and negative impacts on the range of sustainability issues. Recommendations were made on the most sustainable options and these suggestions were fed into the plan-making process. This alongside, public consultation responses, informed the choice of policy approach.

## 1.4 Changes made – Core Strategy

- 1.4.1 A range of alternative ways of meeting the Core Strategy objectives was tested using the methodology set out at the scoping stage. The options with the most positive and least negative sustainability impacts were recommended to the plan-makers, and without exception these were taken forward as policy approaches in the Preferred Options document which was called 'Direction of Travel' in October 2009

## 1.5 Evaluation of Impacts

- 1.5.1 Once the policy approaches were selected they were drafted and published in the Direction of Travel. Likely significant effects of these policy approaches were evaluated by testing potential outcomes against the baseline data and targets set in other plans and programmes. At this stage the input from consultation comments relating to the prediction of effects was included and helped refine the methodology.

During this evaluation, measures were suggested to mitigate against adverse effects and maximise beneficial effects to further improve the sustainability of each policy.

### 1.6 Changes made – Core Strategy

- 1.6.1 As the policy approaches were developing, each was appraised to evaluate any specific impacts; the identification of these impacts and proposals for improvement helped fine-tune the plan and enhance its overall sustainability.
- 1.6.2 After extensive public consultation on the policy approaches set out in the Direction of Travel, the Publication Stage policies were drafted. Where these policies differed significantly from the earlier policy drafts in the Direction of Travel, a new sustainability appraisal was carried out on the differences, or significant changes made to the policies. At this stage the appraisal considered the implementation of all policies simultaneously, for example recognising where one policy can provide mitigation for another. To illustrate; some policies including CS13 Ensuring the efficient use of natural resources, will help remove some of the adverse environmental effects arising from the provision of new development.
- 1.6.3 At this stage of Core Strategy preparation, suggestions proposing amendments to policy wording have come about as a result of comments received from consultation and from recommendations made during the earlier stages of the SA. This has led to 11 significant policy changes which have been subjected to SA in chapter 11 of this report.
- 1.6.4 The final stage of policy preparation was an Examination in Public (EIP) by an independent planning Inspector which took place in December 2011. Following this the Council proposed changes to the Core Strategy. Only the changes made which go to the soundness of the document were subject to further SA.

### 1.7 Mitigation

- 1.7.1 In identifying the effects of the Core Strategy DPD, mitigation measures have been suggested to help combat the impacts arising from the plan. Mitigation measures are to be implemented in the following way:
- Amendments to existing policy wording;
  - Additional policy criteria have been included to combat negative effects of others;
  - Lower tier documents in the Local Plan will implement mitigation measures, for example, the Supplementary Planning Document on Sustainable Design and Construction and the Development Management Policies DPD.
  - Identification of areas requiring further study, for example through an Environmental Impact Assessment.

### 1.8 Consultation

- 1.8.1 There have been four formal stages of consultation and public participation throughout the appraisal process, with ongoing informal comments accepted over the last three years. The Final Sustainability Report gives details of how the appraisal has been amended in light of each response received.

### 1.9 Monitoring

- 1.9.1 Significant effects identified by the Sustainability Appraisal should be monitored to highlight specific performance issues and lead to informed decision making in the future to respond to any adverse effects.
- 1.9.2 The Core Strategy includes a monitoring framework of appropriate indicators in Appendix B of the document. These indicators will form the basis of Barnet's Annual Monitoring Report and will track the performance of the Core Policies.

## 2. Introduction

- 2.1.1 Sustainability Appraisal (SA) is required by the Planning and Compulsory Purchase Act. This is the final stage in the Sustainability Appraisal process and follows the publication of the first Scoping Report in October 2007, the subsequent commentary on the Issues and Options in June 2008 when an update to the Scoping report was also published, the Direction of Travel report, published in October 2009, the Publication Stage which took place in September 2010 and the Further Proposed Changes published in January 2012 following examination in public.
- 2.1.2 In response to representations received on the Publication Stage and to update the document the Council has published Pre-Submission Amendments to the Core Strategy. A total of 369 changes (mainly of a minor nature) have been made to the Core Strategy. These changes have been incorporated into the Core Strategy – Submission Stage.
- 2.1.3 The aim of the SA is to ensure sustainable development is fully integrated within the emerging Core Strategy and forms a key part of evaluation of the Core Strategy at Submission Stage. This report sets out the SA process to date and its findings. The report complies with the requirements of the SEA Directive and the guidance provided by Communities and Local Government (CLG) and the Planning Advisory Service (PAS).
- 2.1.4 In line with guidance and the iterative nature of the process the report draws on and repeats information contained in the Scoping Report, and the commentaries on the Issues and Options, the Direction of Travel, Publication and Pre-Submission Amendments of the Core Strategy development.
- 2.1.5 Sustainability appraisal has been defined as  
*“A systematic and iterative process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.”<sup>1</sup>*
- 2.1.6 SA is therefore an ongoing process, which seeks to improve the sustainability performance of a plan by testing it throughout its preparation in order to expose any weaknesses in its contribution to achieving sustainable development. It is an integral part of good plan-making, and to enable it to be effective and worthwhile, the appraisal must start early in the plan-preparation process. By doing so the SA assists with the identification of sustainability issues and options, which in the case of the Core Strategy, will be refined through the SA process into policies to form its eventual content.

## 2.2 Purpose

*“Sustainable development is central to the reformed planning system. The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).”<sup>2</sup>*

<sup>1</sup> Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance, Department for the Environment, Transport and the Regions. London, 2000

<sup>2</sup> Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance, Department for the Environment, Transport and the Regions. London, 2005

- 2.2.1 This document is the Core Strategy Sustainability Appraisal and seeks to determine the performance, in terms of sustainability, of the Strategic Objectives and Core Policies of Barnet's Core Strategy, but does not seek to pre-judge the approach which the Core Strategy should adopt. Its role is to assist with the identification of the appropriate sustainable approach to predict implications for sustainable development and put forward recommendations for improvement where necessary.

### 2.3 Previous Stages of Sustainability Appraisal

- 2.3.1 In line with Government guidance the Council has undertaken SA throughout all stages of plan preparation, from the initial pre-preparation and evidence gathering stage, through to the 'Issues and Options', 'Direction of Travel', 'Publication' and 'Further Proposed Changes' stages of Core Strategy preparation.

#### 2.3.2 **Stage 1: Pre-preparation and Local Evidence Gathering**

The initial stages of preparing the Core Strategy, involving local evidence gathering, policy research and identifying key sustainability objectives, targets and indicators, led to the production of the 'Sustainability Appraisal Scoping Report, in October 2007. The Scoping Report was the first stage in incorporating SA into the Local Development Framework (LDF) process. It set out a review of the baseline information that has been collected so far which gives an understanding of the current state of Barnet and how it may change in the future. It included a draft SA Framework and proposals as to how the SA would be carried out. Through consultation with relevant statutory consultees (English Heritage, Natural England and Environment Agency) and others, feedback was gained on various elements of the Scoping Report which were amended accordingly.

#### 2.3.3 **Stage 2: Issues and Options**

The Core Strategy Issues and Options report set out a series of issues facing development in Barnet, and a range of options for dealing with them. These options were therefore appraised against the 22 Sustainability Objectives formulated in the Scoping Report within a matrix and accompanying commentary providing a justification for the appraisal.

#### 2.3.4 **Stage 3: Direction of Travel**

Following on from the Issues and Options, the preferred way forward on the key issues for Barnet's future were identified in 'The Direction of Travel'. This approach was developed taking into account a number of sources, including:

- Responses to consultation on key issues and options for the Core Strategy;
- Evidence collected and commissioned;
- Policies and plans of the government and the Mayor of London;
- Barnet's Sustainable Community Strategy and other Council plans and strategies; and
- Other relevant plans and policies.

As with the previous stage, the Direction of Travel policies were appraised against the 22 Sustainability objectives and appraisal consisted of a matrix and accompanying commentary to provide a justification for the appraisal.

Recent amendments to the procedures contained in the Town and Country Planning Regulations 2008 have increased the flexibility for local authorities in developing local development documents. Linked to this, the recommended SA process has also been slightly amended. The Plan-making Manual (Planning Advisory Service) sets out that, under new Regulation 25, it is recommended that



*“in commenting on options it would help the public if the performance of different options in the sustainability appraisal is indicated. This is so that they can then see (with the benefit of technical evidence) how different options fare and can in turn use this to assist their own feedback on the options.”<sup>33</sup>*

This stage of the SA therefore contained an appraisal of the alternative options which were deselected at this stage of the Core Strategy preparation. This appraisal can be found in the previous stage of the SA, the 'Core Strategy Sustainability Appraisal Publication Stage'

### 2.3.5 **Stage 4: Publication Stage**

Following consultation of the Direction of Travel, draft Core Strategy policies were amended accordingly. Many of the changes to Core Strategy policy were considered to be of significance and therefore worthy of SA. These significant changes to Core Strategy policies were appraised against the 22 sustainability objectives in a matrix and were accompanied by commentary.

The detailed appraisals of the Issues and Options, Direction of Travel and Publication Stage policies can be viewed in a single document entitled 'Core Strategy Sustainability Appraisal Publication Stage' published in November 2010.

### 2.3.6 **Stage 5: Examination and Further Proposed Changes**

- 2.3.7 The Hearings of the Examination in Public (EiP) of the Core Strategy took place in December 2011. Following the EiP into the Core Strategy and Development Management Policies DPDs the Council proposed further changes to both documents. Only the changes made which go to the soundness of the document were subject to Sustainability Appraisal. These can be found in the document 'SA on Further Proposed Changes to Barnet's Development Management Policies and Core Strategy DPD' and have been incorporated into this final SA document.

## 2.4 The Current SA Report

- 2.4.1 This document represents the Final SA Report on the Core Strategy. It builds upon work previously undertaken by the Council in the preparation of the 'SA Scoping Report', the 'Core Strategy SA Publication Stage', the 'Core Strategy SA Submission Stage' and the 'SA on Further Proposed Changes to Barnet's Development Management Policies and Core Strategy DPD'.
- 2.4.2 This report evaluates the likely effects identified throughout the process of policy formulation of the 9 Strategic Objectives and the 15 Core Policies of the Core Strategy against the Council's SA Framework.

## 3. Appraisal Methodology

*Which sets out the approach taken to the appraisal and how it relates to the guidance, who was consulted and any difficulties encountered*

### 3.1 The sustainability framework

- 3.1.1 The SA criteria, which set out the Council's sustainability objectives, have been the principal tool in the appraisal of the Core Strategy at each stage of its development. This is known as the Sustainability Framework (but is sometimes referred to as the 'sustainability objectives'). The Sustainability Framework was devised within the

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<sup>33</sup> Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance, Department for the Environment, Transport and the Regions. London, 2005

Sustainability Appraisal Scoping Report in 2008 and has been amended following consultation to include more clarification over certain key objectives.

- 3.1.2 The sustainability framework has formed the basis of the SA of the Core Strategy at each stage of its development. The Core Strategy objectives have been appraised against the sustainability objectives in chapter 5 of this report with a table matrix and is followed by commentary.

### 3.2 Approach taken for sustainability appraisal of Core Policies

- 3.2.1 The formal appraisal of the core policies at Submission Stage has taken the form of a matrix. This follows the approach identified in the guidance published as part of the Plan Making manual on the Planning Advisory Service website and the content of the SEA guidance published in 2005.
- 3.2.2 The sustainability framework has been used to assess the impact of the Core Strategy Submission Stage policies – predicting likely significant effects. As the guidance states, we are only required to assess the likely significant effects of the Core Strategy, not all possible effects. The matrix does this in terms of 'positive effects' or 'negative effects', the timeframe, – short to long term, and whether the effect will be permanent or temporary.
- 3.2.3 Mitigation is considered following this assessment of significant effects considering potential to mitigate adverse impacts and also to maximise positive impacts. Alternatives to policy wording may be suggested.

### 3.3 Who was consulted and when?

- 3.3.1 As required by the SEA Regulations the statutory consultees were consulted for the Scoping Report. Letters were sent in October 2007 and responses were received from all three statutory consultees. The Environment Agency and English Heritage provided substantial comments raising the following issues:
- The absence of an SFRA from the evidence base
  - Various amendments to the objectives and suggestions for indicators
  - Amendments and suggestions to widen the scope of the baseline data
  - The identification of a number of further environmental problems affecting the historic environment
  - English Nature noted the requirement to comply with the appropriate assessment regulations
- 3.3.2 In June 2008 the Sustainability Appraisal was published alongside the Issues and Options consultation.
- 3.3.3 In October 2009 the Sustainability Appraisal was published alongside the Direction of Travel consultation.
- 3.3.4 In September 2010, the Sustainability Appraisal was published alongside the Publication Stage consultation.
- 3.3.5 In January 2012, the Sustainability Appraisal of the Further Proposed Changes to the Core Strategy and Development Management Policies was published.

### 3.4 Difficulties encountered in compiling information or carrying out the assessment

- 3.4.1 The June 2008 update to the Scoping Report identified the following evidence gaps

Table 1 – Gaps in the evidence base

Gap	When
Strategic Flood Risk Assessment	Completed August 2008
Barnet Town Centres (Retail and Other Uses) Study (PPS6 )	Completed April 2009
Open Space, Sport and Recreation Assessment of needs and opportunities (PPG17)	Completed November 2009
Habitats Directive Assessment (screening)	Completed June 2008
Employment Land Review (PPG4)	Completed July 2009
Biodiversity Action Plan	Using the London BAP
Characterisation Study	Completed 2010
Strategic Housing Market Assessment	Completed 2011
Strategic Housing Land Availability Assessment	Completed summer 2009
Joint Strategic Needs Health Assessment	Completed March 2009

- 3.4.2 Many policies are specific and only have an impact on their aspects of the sustainability objectives in the matrix i.e. a social policy generally only impacts the social objectives, therefore it is better to try and look at things cumulatively. At the same time it should be noted that the relationship between policies is complex and it depends on what actual development comes forward in order to implement them. This is where monitoring is key to help determine the impacts and effects of policy implementation.
- 3.4.3 Much of the SA cannot be assessed in quantitative terms, therefore the analysis produces a broad based qualitative prediction. Further data will improve the SA in particular on flooding, biodiversity and energy use. The same data will be used as part of the evidence base for the Local Plan.
- 3.4.4 Annual monitoring of the Core Policies will illustrate Barnet's progress in achieving it's core strategy objectives.

## 4. Core Strategy preparation

### 4.1 The Local Plan and Core Strategy

- 4.1.1 The Local Plan replaces the Unitary Development Plan (UDP) (adopted May 2006). It embodies spatial planning – the practice of 'place shaping' to deliver positive social, economic and environmental outcomes and provide the overarching local policy framework for delivering sustainable development in Barnet. The Local Plan in Barnet is best described as a 'folder' of separate documents, the most important of which is the Core Strategy. This contains the 'vision' for the Local Plan and the most fundamental, cross-cutting objectives and policies that the local authority and its partners will seek to deliver.
- 4.1.2 The Core Strategy will contribute to achieving the vision and objectives of Barnet's Sustainable Community Strategy and will help our partners and other organisations to deliver relevant parts of their programmes. It covers the physical aspects of location and land use traditionally covered by planning but also addresses other factors that make places attractive and distinctive as well as sustainable and successful. It will help to shape the kind of place that Barnet will be in the future, balancing the needs of residents, businesses and future generations.

### 4.2 Other Local Plan Documents

- 4.2.1 Barnet's Local Plan will contain a number of documents which will help to achieve the vision and objectives set out in the Core Strategy. These documents are:

**Development Management Policies DPD** – which will support the Core Strategy by setting out more detailed planning policies that the Council will use in determining the outcome of applications for planning permission. In essence, it puts flesh on the broader policies contained within the Core Strategy.

**Site Allocations DPD** – which will set out the Council's proposals for places that are expected to experience significant development.

**North London Waste Plan** – which will identify sites for major recycling and other waste handling facilities in North London and set out policies relating to waste. It is being jointly prepared by Barnet and six other borough's in the North London Waste Authority area.

**Supplementary Planning Documents (SPDs)** – these will give detailed guidance on how the Council's planning strategy and policies will be implemented for specific topics, areas or sites. Although they will not form part of the statutory development plan for Barnet, and will therefore not have the same weight in decision making. However, they will become important considerations in the determination of planning applications. An example is Barnet's SPD for Sustainable Design and Construction.

### 4.3 How we have prepared the Core Strategy

- 4.3.1 The main stages in the preparation of the Core Strategy have been as follows:

- Gathering background information and consulting on key Issues and Options for the future of Barnet;
- Developing the Council's preferred approach as set out in the Core Strategy Direction of Travel and carrying out consultation;
- Further development and refinement of the Core Strategy taking into account representations from previous consultation, as set out in the Core Strategy Publication Stage and consulting on it; and
- Further refinements made to the final Core Strategy document, taking into account representations from previous consultation and then undertaking further consultation. This is the current stage.
- Submitting the Core Strategy to the government ('Submission') for a public examination, where the document is assessed by a Planning Inspector;
- Publication of the Inspectors report; and
- Adoption of the Core Strategy by the Council.

- 4.3.2 The preparation of the Core Strategy has taken into account many sources of information and the results of three consultation exercises, in particular:

- Responses to the public consultations on key issues and options for the Core Strategy, the Core Strategy Direction of Travel and the Core Strategy Publication Stage;
- The evidence base documents which we have collected and commissioned;
- Barnet's Sustainable Community Strategy and other relevant plans and strategies;
- National and regional policies and plans
- Sustainability Appraisals of the Core Strategy at earlier stages of preparation.

### 4.4 Public consultation

- 4.4.1 The preparation of the Core Strategy has involved three main stages of public consultation. We firstly gathered views on the key issues facing the borough and the options for tackling them. The Issues and Options consultation ran from June until

September 2008. The results of this consultation helped inform the development of our Core Strategy Direction of Travel.

- 4.4.2 The next stage of consultation, the Direction of Travel, ran from November 2009 until January 2010. This consultation generated over 2,000 written comments from 334 respondents.
- 4.4.3 Engagement on the previous stage of the Core Strategy – Publication Stage ran from September until November 2010 and generated 247 comments from 44 respondents. The comments and input we received from consultation and involvement were taken into consideration in the drafting of this version of the Core Strategy.
- 4.4.4 For each stage of consultation we have published a Consultation Report that gives detail of the consultation carried out, summarises the comments received and sets out the Council's response to them. In line with the regulations for submission and examination stage of the process the results of these consultations have been compiled into one report – 'Barnet's Core Strategy and Development Management Policies Documents Consultation statement'.
- 4.4.5 Further consultation was carried out following examination on 'Further Proposed Changes' to both DPD's. The last stage of consultation was carried out in April 2012 on the changes made as a result of the publication in March 2012 of the National Planning Policy Framework (NPPF).

## 4.5 Supporting evidence

- 4.5.1 The final Core Strategy needs to be based on a thorough understanding of the issues and challenges the borough will face in coming years. The core policies therefore must be supported by robust evidence. We have collected and commissioned a wide range of studies to inform the preparation of the Core Strategy which is known as the "evidence base".
- 4.5.2 Barnet's published evidence base for the Core Strategy includes, but is not limited to, the following –
  - Demographic information including Census data and GLA projections
  - the Sustainability Appraisal
  - Barnet's Affordable Housing Viability Assessment
  - Barnet's Annual Monitoring Reports
  - Barnet's Characterisation Study
  - Barnet Employment Land Review
  - Barnet's Housing Needs Study 2006
  - Barnet's Infrastructure Delivery Plan
  - Barnet Open Spaces, Sport and Recreational Facilities Needs Assessment
  - Barnet Town Centres Floorspace Needs Assessment and 2010 Update
  - BRE Housing Stock Model Update for Barnet 2009
  - Crime, Disorder and Substance Misuse Strategic Assessment
  - Joint Strategic Needs Assessment for Health and Social Care
  - London Biodiversity Action Plan
  - London Strategic Housing Land Availability Assessment
  - London Town Centre Health Check Analysis Report
  - London Regional Landscape Framework
  - North London Strategic Flood Risk Assessment
  - Barnet's Heat Mapping Study
  - Barnet's Tall Buildings Study



- North London Strategic Housing Market Assessment

### 4.6 Barnet's Sustainable Community Strategy and other relevant plans and strategies

- 4.6.1 The Core Strategy needs to take into account other plans and strategies that influence the borough. The Sustainable Community Strategy is the 'umbrella strategy' for all the plans and strategies of our key partners. The Local Strategic Partnership (One Barnet Partnership Board) has revised the borough's Sustainable Community Strategy (SCS) for the period 2010 to 2020. One Barnet sets out the strategic vision for Barnet as a place and provides the vehicle for considering and deciding how to address difficult cross-cutting issues such as maintaining the quality of life that makes the borough an attractive place to live.
- 4.6.2 Other strategies which have influenced development of the Core Strategy and are relevant to the Local Plan include the following:
- Three Strands Approach – Protection, Enhancement and Consolidated Growth
  - One Barnet Programme
  - Corporate Plan
  - Children and Young People's Plan,
  - Older People's Commissioning Strategy,
  - Housing Strategy,
  - Health and Well-being Commissioning Framework
  - Regeneration Strategy and
  - The Safer Communities Strategy

### 4.7 National and regional policies and plans

- 4.7.1 The adopted London Plan published in July 2011, provides the London-wide context for borough planning policies. This version is currently the statutory development plan for the borough and the starting point for decisions on planning applications. The Core Strategy must have cognisance of this strategic background and be in general conformity with it as well as being consistent with national planning guidance.
- 4.7.2 Our planning documents must also be consistent with national policy prepared by the government in the National Planning Policy Framework unless we have strong evidence that an alternative approach is more appropriate in Barnet.
- 4.7.3 Barnet's Sustainability Appraisal Scoping Report was produced in June 2008. Since then there have been significant changes to national planning policy guidance through updates to Planning Policy Statements and their ultimate replacement by the National Planning Policy Framework in March 2012. These changes have been taken into consideration in producing this SA report and are listed and summarised briefly below.
- 4.7.4 **PPG 13 Transport updated January 2011** - The amendments affect parking standards for new residential development and abandon parking charges being set to encourage use of "alternative" methods of transport.
- 4.7.5 **PPS 10 Planning for Sustainable Waste Management - updated March 2011** to ensure that it incorporates the new waste hierarchy set out in the revised Waste Framework Directive (2008/98/EC).
- 4.7.6 **PPS 3 updated June 2010** - Two key changes: the definition of previously developed land in Annex B now excludes private residential gardens; and the national indicative minimum density of 30 dwellings per hectare is deleted from paragraph 47. This is part of the drive to put power back into the hands of local authorities and communities to decide the best locations and types of development needed.

- 4.7.7 **PPS4 updated December 2009** - brings together different strands of policy to provide an overarching framework for economic development, to include development within B Use Classes, public and community uses and main town centre uses, which of course includes retail. The overarching objective of the PPS is 'sustainable economic growth' through the familiar themes of regeneration, reducing the need to travel, promoting town centres, and tackling deprivation.
- 4.7.8 Whilst a shift from the previous adopted PPS6 in large part it reaffirms thinking set out in the draft PPS4. The policy now seeks that proposals for economic development are considered favourably where they don't have significant adverse impact and meet the sequential approach (Policies EC10 and EC17). The need test has been removed for Development Control purposes, although Council's are still required to consider need in preparing their LDF's. No competition test is included within the policy, but the aim of enhancing competition remains.
- 4.7.9 **PPS25 updated March 2010** - The changes are very similar to those proposed in the consultation document. The recent report by CLG confirms overwhelming support for the change in definition of flood zones. If implemented in the way CLG intends, this change will pave the way for a more sensible interpretation of Functional Floodplain.
- 4.7.10 **PPS5 updated March 2010** - The streamlined PPS5 replaces existing planning guidance in PPGs15 and 16 and introduces a number of new concepts aimed at encouraging better understanding and management of the historic environment, in order to capitalise on the social and economic benefits of well considered conservation and regeneration. PPS5 and the Practice Guide now take an integrated approach to all types of heritage asset such as buildings, archaeological remains, monuments, landscapes, parks & gardens and even historic battlefields. It is the significance of an asset that policy now sets out to promote and protect, and steps for determining and recording significance are outlined in the Practice Guide. For Local Authorities it means greater clarity on the acceptability of development relating to the historic environment.
- 4.7.11 **National Planning Policy Framework** – Published in March 2012 and replaces the existing suite of planning policy statements (not including PPS10 and some Planning Circulars). Introduces the presumption in favour of sustainable development and streamlines the national planning policy framework into one concise document. Retains much of the principles set out in previous PPS including the approaches to town centre first, green belt, flood risk, heritage, employment land and housing delivery.
- 4.7.12 As part of the examination process in early September 2011 the council produced a general statement of conformity of Barnet's Core Strategy and Development Management documents with the draft National Planning Policy Framework. The conclusion of the statement considered that the Core Strategy and DMP documents are generally in keeping with the National Planning Policy Framework.

## 4.8 Sustainability appraisal of the Core Strategy

- 4.8.1 The preparation work for this Core Strategy includes a sustainability appraisal to assess its environmental, social and economic impacts. This has helped to make sure that our strategy and policies are sustainable by identifying any likely harmful impacts and suggesting ways to mitigate them and maximise beneficial impacts.
- 4.8.2 Sustainability appraisal has taken place at all stages of Core Strategy preparation. Each sustainability appraisal has been consulted upon and comments received have been taken into consideration. The stages of consultation have been: Issues and Options, Direction of Travel, Publication Stage and the present stage; Submission Stage.

## 4.9 Habitats Directive Assessment and Equalities Impact Assessment

- 4.9.1 A Habitats Directive Assessment has also been carried out. This is a process to determine whether the Core Strategy's emerging approach and policies are to have any likely significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites. This screening assessment found that no likely significant effects were likely and therefore it was not necessary to carry out Task 2 (Appropriate Assessment) or Task 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment process.
- 4.9.2 The conclusion of the screening is as follows:
- I. The Core Strategy sets out the spatial vision, objectives and key planning policies, which will determine how Barnet develops over the next 15 years. The HDA has identified a range of indirect, and/or in combination impacts, which could possibly affect five Natura 2000 sites within a 15KM radius of the borough.
  - II. The assessment has screened these impacts against the sites qualifying features and can conclude that there will be no significant adverse impact on the integrity of Natura 2000 sites as a result of Barnet's Core Strategy. Therefore in accordance with guidance, a HDA is not necessary and does not need to be undertaken.
- 4.9.3 Legislation requires authorities to consider impacts of policies and strategies upon certain equality target groups. These are the Race Relations (Amendment) Act 2000; Disability Discrimination (Amendment) Act 2005; Equality Act 2006 and Gender Equality Duty 2007. An Equality Impact Assessment (EqIA) takes into account all of the existing legislation.
- 4.9.4 The EqIA helps to avoid any discriminatory or negative consequences on particular groups, on grounds of race, disability, gender, age, faith or sexuality. It highlights the likely impact on target groups and the mitigation to improve policies.
- 4.9.5 The EqIA is aimed at target groups considered to be at particular risk of discrimination and inequality of opportunity. As set out in the GLA's guidance on EqIAs, these groups are:
- Black and minority ethnic people
  - Disabled People
  - Women
  - Young people and children
  - Older people
  - Lesbians
  - Gay men
  - Bisexuals
  - Trans people; and
  - People from different faith groups.
- 4.9.6 The assessment has found that the Core Strategy policies will have a significantly positive impact on the equalities target groups identified. New development will bring a variety of benefits to the equality target groups, mainly focussed around better access to a wider range and choice of homes, jobs, services and community facilities. Improved transport infrastructure will support this process by ensuring affordable and safe access from residential areas to its services and facilities, and to areas beyond the borough boundary.



## 4.10 Other relevant plans, strategies and policies

- 4.10.1 The following table sets out the policies, plans, programmes and strategies reviewed as part of the SA process. These were used to help identify issues of relevance in the borough, and helped produce our sustainability objectives against which the LDF could be appraised.

**Table 1: Policies and programmes of relevance to the SA/SEA of Barnet's LDF (from the Sustainability Appraisal Scoping Report (2008))**

Policy, Strategy or Plan	Date
<b>International Context:</b>	
The Johannesburg Declaration on Sustainable Development	2002
European Spatial Development Perspective	1998
Air Quality Framework Directive (96/62/EC) and daughter documents	1996
Directive 2006/12/EC on Waste	2006
Habitats Directive (92/43/EEC)	1992
Birds Directive (79/409/EEC)	1979
Landfill Directive (1999/31/EC)	1999
Water Framework Directive (2000/60/EC)	2000
UN Convention on Biological Diversity	1992
The Aarhus Convention	June 1998
EU Sixth Environmental Action Plan	2000-2012
<b>National:</b>	
The UK Government Sustainable Development Strategy 2005	2005
National Planning Policy Framework	2012
PPS1: Delivering sustainable development	2005
PPG2: Green belts	2001
PPS3: Housing	2006
PPG4: Industrial, commercial development and small firms EU Sixth Environmental Action Plan	1992
PPG 5 : Simplified Planning Zones	1992
PPS6: Planning for town centres	2005
PPS7: Sustainable development in rural areas	2004
PPG8: Telecommunications	2001
PPS9 Biodiversity and geological conservation	2005
PPS10: Planning and waste management	2005
PPS12: Local Development Frameworks	2008
PPG13: Transport	2001
PPG14 Development on unstable land	1990
PPG15: Development and the historic environment	1994
PPG16: Archaeology and planning	1990
PPG17: Planning for open space, sport and recreation	2002
PPG19: Outdoor advertising	1992
PPG22: Renewable energy	2004
PPS23: Planning and pollution control	2004
PPG24: Planning and noise	1994
PPS25: Development and flood risk	2007
Planning for a Sustainable Future White Paper	2007
Air Quality Strategy	2007
Environment Act 1995	1995
Planning (Listed buildings and Conservation Areas) Act 1990	1990

Policy, Strategy or Plan	Date
The Historic Environment: A Force for our future (DCMS)	2001
White Paper Heritage Protection for the 21 <sup>st</sup> Century	2007
Ancient Monuments and Archaeological Areas Act 1979	1979
English Heritage's Streets for All	2005
<b>Regional and London-wide:</b>	
The London Plan	2008
London's Quality of Life Indicators	2005
A Sustainable Development Framework for London	2003
The Mayor's Air Quality Strategy	2002
The Mayor's Biodiversity Strategy	2002
The Mayor's Cultural Strategy	2003
The Mayor's Transport Strategy	2001
The Mayor's Economic Development Strategy	2005
London Housing Strategy (Draft)	2007
The Mayor's Ambient Noise Strategy	2004
The Mayor's Energy Strategy	2004
The Mayor's Municipal Waste Strategy	2003
The Mayor's Business Waste Strategy (draft)	2007
The Mayor's Older People Strategy	2006
The Mayor's Children and Young People's Strategy	2005
The Mayor's Strategy for Strategy for Refugee Integration in London (draft)	2007
The Mayor's Climate Change Action Plan	2007
The Mayor's Water Strategy (draft)	2007
The Mayor's Health Inequalities Strategy (draft)	2007
The Mayor's London Food Strategy	2006
Hertfordshire Structure Plan	1998
Hertsmere Local Plan	2003
<b>Sub-regional:</b>	
Barnet, Enfield and Haringey Clinical Strategy	2006
NHS London Health Strategy	2007
North London Sub Regional Development Framework	2006
<b>Local:</b>	
Barnet's Air Quality Strategy	2002
Barnet's Children and Young People's Plan	2007
Barnet's Conservation Area Appraisals:	
• Cricklewood Railway Terraces	1998
• Golders Green	1998 (Revised 2007)
• The Bishops Avenue	1999
• Totteridge	2000 (Revised 2007)
• Mill Hill	2000 (Revised 2007)
• Wood Street	June 2007
• Glenhill Close	2002
• Watling Estate	June 2007
• Church End	November 2007
• Monken Hadley	January 2007
Barnet's Contaminated Land Strategy	2001
Barnet's Equalities Policy	2007
Barnet's Homelessness Strategy	2007

Policy, Strategy or Plan	Date
Barnet's Housing Strategy	2006
Barnet's Local Implementation Plan	2005/6
Barnet's Premier Parks Strategy	2006
Barnet's Safer Communities Strategy	2007
Barnet's Statement of Community Involvement	2007
Barnet's Supporting People Strategy	2006
Barnet's Sustainable Community Strategy	2007
Barnet's Three Strands Approach	2005
Barnet's Waste Prevention Strategy	2005
London Borough of Barnet UDP	2006

## 5. Core Strategy vision and objectives

- 5.1.1 The overall vision of the Sustainable Community Strategy (SCS) and the Core Strategy is that: Barnet will be a successful London suburb.
- 5.1.2 Four themes (and sub ambitions) were identified in the Sustainable Community Strategy to achieve this vision:
- a successful London suburb
  - strong safe communities for everyone
  - investing in children, young people and their families
  - healthy and independent living

- 5.1.3 Barnet's vision is:

***'It is 2026. Barnet is known as a successful London suburb. It has successfully ridden difficult times to emerge as resilient as ever. The public service is smaller than before but the organisations within it, through effective partnerships, work together to deliver good services and there is a healthy relationship between them, and residents who do things for themselves and their families.'***

***Established and new residents value living here for the Borough's excellent schools, strong retail offer, clean streets, low levels of crime and fear of crime, easy access to green open spaces and access to good quality healthcare.***

***Barnet is an economically and socially successful place. With high levels of educational qualifications and access to good transport networks, residents continue to have access locally, in other parts of London and beyond to jobs in a wide variety of different industries.***

***Barnet's success is founded on its residents, in particular through a strong civic society, including its diverse faith communities, founded on an ethos of self-help for those that can, and support through a wide range of volunteering activities for others. Different communities get on well together with each other.'***

- 5.1.4 We have developed a series of strategic objectives for the Core Strategy which operate together to guide delivery of the vision above.

### 5.2 The Core Strategy objectives

- 5.2.1 A series of core objectives have been developed in order to deliver the Local Plan vision:

Within the Core Strategy we have developed a series of core strategic objectives in order to deliver the Local Plan vision (amendments are shown in **bold** and deletions have been ~~struck through~~). The core strategy objectives were updated as part of the Direction of Travel and the total number was reduced from 15 to 9. These are:

### A To manage housing growth to meet housing aspirations

- to promote the development of the major ~~growth~~ **regeneration and development** areas, priority estates and town centres in order to provide in the range of ~~25,000~~ **20,000** new homes (**contributing to a borough total of 28,000 new homes**) by 2026 to meet local and regional housing needs
- to regenerate the priority housing estates at Dollis Valley, Grahame Park, **Granville Road**, Stonegrove - Spur Road and West Hendon to replace 3,000 existing homes with a greater range of accommodation that provides access to affordable and decent new homes
- to provide a range of housing, including family and extra care accommodation, that enables choice between types and tenures, as well as over lifetimes and within neighbourhoods

### B To meet social infrastructure needs

- to ensure provision for community needs arising from housing growth including education, health, **policing**, social care and integrated community facilities
- to ~~develop~~ **provide** new and improved **primary and secondary schools** through ~~Primary Schools Capital Investment Programmes and Building Schools for the Future~~
- **to support the improvement and expansion of further and higher education to meet needs of a growing population and economy**
- to provide community facilities to meet the changing needs of Barnet's diverse communities

### C To promote Barnet as a place of economic growth and prosperity

- to support the continued vitality and viability of 20 town centres, focusing commercial investment in our priority centres of Chipping Barnet, Edgware, Finchley **Church End Central**, ~~New Barnet~~, **and** North Finchley and ~~Whetstone~~
- to ensure that the regeneration of Brent Cross - Cricklewood creates a new metropolitan town centre and commercial district **that serves the sub-region and beyond** of ~~greater than sub-regional reach~~
- to ensure that in the borough's main commercial areas including designated employment locations and town centres there are sufficient opportunities available to help business grow and prosper
- to ensure that residents are equipped with the skills to access the 21,000 jobs that the regeneration of the major growth areas will deliver by ~~2026/27~~ **2025/26**.

### D ~~To reduce the need to~~ **provide effective and efficient travel**

- ~~to keep Barnet moving in a sustainable way which provides choice by encouraging the use of convenient, reliable and affordable transport including the private car, public transport, cycling and walking~~
- ~~reducing the need to travel by promoting home working and new technologies, whilst recognising that car ownership is important to many and ensuring it is appropriately planned for.~~
- **to ensure more efficient use of the road network including taking a comprehensive approach to tackling the school run**
- **to deliver high quality transport systems in regeneration areas and provide more environmentally friendly transport networks**

## E To promote strong and cohesive communities

- to enable communities to become confident and cohesive by providing facilities through which residents can play a part, diversity is valued and local pride is promoted.
- to create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour, particularly in known 'hotspots'.

## F To promote healthy living and well-being

- to secure a healthier Barnet by addressing the factors underpinning poor health and well-being **and educating citizens as to their own responsibilities for health**
- to provide opportunities for vulnerable people to live more independent lives by planning for appropriate facilities and support services that can meet their future needs.

## G To protect and enhance the suburbs

- to respect and enrich Barnet's distinctive built heritage by protecting the historic environment and enhancing the high quality suburban character of townscapes and conservation areas.
- **to promote heritage led regeneration to make better use of our historic assets and engender civic pride in them**

## H To ensure efficient use of land and natural resources

- to promote mixed use development of previously developed land in the major growth areas and larger town centres
- to reduce energy demand through highest possible standards for design and construction **and identify opportunities for decentralised heating networks**
- to minimise waste and maximise re-use and recycling and promote an appropriate framework for integrated waste management.

## I To enhance and protect our green and natural open spaces

- to improve access to, and enhance the quality of the Green Belt, Metropolitan Open Land and other open spaces as places for recreation and biodiversity
- to create new and enhanced public open spaces **in to support of Barnet's growing population growth, including at least 22 18 ha in the three major growth areas Brent Cross-Cricklewood, Colindale and Mill Hill East.**

# 6. Sustainability issues in Barnet

## 6.1 Baseline characteristics

- 6.1.1 A baseline assessment involves looking at the existing environmental, social and economic characteristics of the area being appraised, and how these might develop without intervention. Accurate baseline information is useful for ensuring that a defined 'start point' is used for sustainability appraisal. It must be borne in mind that the baseline data was formulated as part of the Sustainability Appraisal Scoping Report in 2007/08.
- 6.1.2 As part of the SA it is necessary to identify the key sustainability issues facing the borough from the baseline data collected as part of the Sustainability Appraisal Scoping Report. This baseline data gives us a snapshot of the borough prior to the formation of the Core Strategy. Issues have been set out under the categories of economic issues, environmental issues and social issues. There are of course some issues that cut across more than one of the categories identified. To avoid duplication these cross cutting issues have been limited to one category only.

## 6.2 Economic Issues

- 6.2.1 In the financial year 2006/07 the percentage of people in employment in Barnet was 71.2%, which is slightly higher than the percentage for London. Projections suggest that the population of Barnet will reach 367,400 by 2021 with growth focused predominately in the west of the borough.
- 6.2.2 However Barnet's economy has been stagnating with the loss of 5,000 jobs between 2001 and 2007 with only the public sector growing in this period when the national economy was growing as a whole and London grew by 1.5%. The main sectoral strengths are retail, business services and health and social services. There is a high proportion of small firms providing 32% of employment. There is only minor specialisation in Barnet's economy with retail providing the greatest specialisation with over 30% more employed in this sector – more than would be expected in an equivalent economy.
- 6.2.3 There is a wide skills gap. Barnet has a high level of very skilled people of employment age in comparison to other boroughs - nearly 60% of those employed who live in the borough work in professional or managerial roles. Equally it has a sector that lacks the skills necessary to gain employment. This can be evidenced by the six super output areas that are within the 10 per cent most deprived nationally.
- 6.2.4 Parts of the borough suffer from poor transport accessibility especially in Mill Hill, High Barnet and East Barnet. There is a high dependency on travelling by car . Barnet is a major net exporter of labour. With 47,400 people commuting into Barnet in 2001, almost double (85,800) commuted out of the borough to work although this is similar to other outer London boroughs.
- 6.2.5 The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space – Barnet hosts a range of employment land, but this is declining. With a stagnating economy the pressure on releasing employment land is high yet giving in to this pressure will only reduce opportunities to new and developing businesses.
- 6.2.6 The need to support development in existing centres and ensure the health of town centres – in accordance with Barnet's Three Strands Approach. Intensified mixed use development is likely to take place in town centres, whilst protecting and maintaining the suburban and more rural areas of the borough.

## 6.3 Environmental Issues

- 6.3.1 Over the next two decades we will build over 28,000 new homes and regenerate our areas of concentrated deprivation. Many of these new builds will attract younger and more ethnically diverse communities and in 20 years the boroughs population is likely to exceed 380,000. With this growth will come new business, retail and leisure facilities and significant employment opportunities.
- 6.3.2 We need to understand what tackling climate change means in an aspirational, growth area. There is a clear tension between the benefits of an economically vibrant and developing community and the environmental impact of the activities of that community. We must increase awareness, facilitate behaviour change and demonstrate the longer term economic benefits of good environmental practice.
- 6.3.3 Because of poor air quality the whole of Barnet has been designated an Air Quality Management Zone. The air pollution targets set by DEFRA are exceeded along large stretches of the main roads that cross the borough, such as the A406 and the A1. The Council fails on particulates (PM10) and nitrogen dioxide. In part this pollution is down to congestion as the A406 suffers significant congestion, in particular between its junctions with the A5 and A1 and at the eastern side of the borough adjacent to Enfield. This congestion has an adverse knock on effect on many borough roads.



- 6.3.4 Car ownership within Barnet is relatively high compared to London and outer London with the 2001 census identifying that 26.1% of Barnet households had access to a car or van which is less than the outer London average of 28.6%. The 2001 census revealed that over 59,000 Barnet residents chose to drive to work.
- 6.3.5 Improved public transport and cycling facilities could help to mitigate this issue. However there are relatively few cyclists in Barnet, (0.6% of trips undertaken by Barnet residents are by cycling). A possible reason for this low level of cyclists could be the high number of traffic casualties in the borough. 147 people were killed or seriously injured in road traffic accidents in 2007/08 – this is nearly double the England average. There is significant potential for cycling though with 31% (38,000) of Barnet residents travelling less than 5km to work in 2001.
- 6.3.6 London is responsible for 8% of the UK's CO2 emissions. Barnet's carbon footprint is higher than the London average at 12.31 tonnes compared with the average 11.38 tonnes (2005 data). Given the residential nature of the borough just over half of these emissions come from households with the remaining half split equally between transport and industry/commerce. The average SAP rating for the energy efficiency rating for Council owned property increased to just over 70 in 2007/08 which almost matches the best result in England but council property only makes up 13% of the total housing stock. Private home ownership is high at around 70%.
- 6.3.7 Barnet has a green and open character and benefits from having 2,466 hectares of green belt, 690 hectares of metropolitan open space and over 200 parks – 16 of which are 'premier parks'. With expected growth of the population at 12% over 15 years there may be pressure to carry out development on greenfield sites. We also need to ensure greater access to those areas that are lacking in good quality open spaces. Adjacent development will also increase pressure on biodiversity and habitats which may need greater protection.
- 6.3.8 We need to minimise waste arisings and deal with waste locally and in sustainable manner – need to increase waste recycling in order to reach more sustainable levels. Just over 30% of household waste was recycled in 2007/08 with 438 kg of waste collected per head of population. New major developments will provide opportunities to implement better recycling facilities.
- 6.3.9 Flood risk and managing surface water run off through the use of Sustainable Drainage Systems – Barnet lies within the Brent River catchment which flows into the Thames at Brentford. There are over 14,000 meters of water courses in the Borough.
- 6.3.10 There will be a greater need to protect the 18 conservation areas and 1,300 nationally listed buildings in the borough with the expected growth in population. Conservation of the historic environment is important because these areas and buildings are an integral part of the borough's heritage and development.
- 6.3.11 Noise nuisance and vibration – some adjacent uses such as housing and employment land can pose difficulties in terms of their compatibility. This can lead to complaints regarding noise pollution. The number of complaints received by Environmental Health Officers each year is increasing significantly and as the borough's population grows this issue is only set to increase.

## 6.4 Social Issues

- 6.4.1 The growth in the borough will change our existing communities, attracting a much younger and diverse population. Over the next 10 years there will be a marked increase in the number of children aged between 5-14 years old and number of people over 65. Making housing choice for older people more attractive as well as locally accessible could make the housing stock in Barnet more flexible. Owner occupation is high, accounting for around 70% of households. The housing stock in the Borough comprises apartments (39%), semi-detached (31%), terraced dwellings (18%) and detached homes (11%).

- 6.4.2 Health inequalities exist in Barnet spatially and by gender. Men in affluent wards such as Hampstead Garden Suburb have an average life expectancy which is up to seven years longer than their counterparts in Colindale. In an attempt to counter this trend Barnet is piloting a project known as 'Finding the 5000' which will through social marketing target people in the most deprived areas of Barnet tackle the high rates of Coronary Vascular Disease (CVD) that occur in Barnet's social housing stock.
- 6.4.3 We are faced with an imbalanced housing stock with 1 household in 3 considered to under-occupy, while the demands for increased housing choice, affordable housing, and family homes to meet aspirations of home ownership are increasing.
- 6.4.4 Between 2001 and 2004 statistics revealed that deprivation in Barnet had increased. In 2007 new statistics revealed that this trend is continuing. This data released in December 2007 shows that Barnet just comes within the 36% most deprived local authority areas in the country. We have six super output areas within the 10 per cent most deprived nationally with much of the highest deprivation existing in the western part of the borough. The growth areas identified in this part of the borough gives us the opportunity to address issues of inequality and deprivation.
- 6.4.5 The infrastructure to support growth including schools, healthcare, community facilities, parks, utilities, improvements to transport connectivity needs to be developed on a collective understanding of how the needs of our residents are changing.
- 6.4.6 Crime and fear of crime have significant effects on the quality of people's lives in the borough although instances of recorded crime are actually falling in the borough.
- 6.4.7 An increasing population will mean increased pressure on community facilities. There will be a greater need for the efficient distribution of goods and services.
- 6.4.8 Educational attainment in the borough is high. Just under 70% of pupils achieved more than 5 GCSEs at A-C level. The average in England is 63%. However there will be a large growth in population over the plan period and we need to ensure that the quality and quantity of all education facilities is maintained within the borough across all age groups.
- 6.4.9 The diagram below illustrates how some of the key trends in the borough may evolve in the absence of the development plan documents.



	What's the situation now?	What's the likely situation in the future without the plan? (2016)
<b>Affordability</b> (affordable dwellings completed as a % of all new housing completions)	29.5 % (2005/06)	- likely to have decreased
<b>Barnet Town Centre Vacancies</b> (% of vacant units within regional, district and major town centres)	7 % (2006/07)	+ likely to have increased
<b>Employment</b> (B1/B2 floor space lost to residential use in hectares)	0.66 ha (2006/07)	+ likely to have increased
<b>Sustainable Transport</b> (% of the resident population who travel to work by public transport)	37 % (2001))	- likely to have decreased
<b>CO<sub>2</sub> Emissions</b> per Household in Barnet (Average tonnes per household)	6.11 Tonnes (2007)	+ likely to have increased
<b>Housing Stock</b> (% of dwellings with 5 or more habitable rooms (excluding bathrooms))	57 % (2001)	- likely to have decreased
<b>Employability</b> (%16-18 year olds not in education, employment or training) (NEET)	4.6% (Nov-Jan 08)	+ likely to have increased

## 7. The SA framework and objectives

7.1.1 The establishment of SA objectives and criteria is central to the SA process. The SA framework, based on these objectives, provides a way in which sustainability effects can be described, assessed and compared. Sustainability objectives are distinct from those of the Core Strategy, but in some cases may overlap.

7.1.2 The 22 sustainability objectives were developed in the Sustainability Appraisal Scoping Report and are based on the government's four themes of Sustainable Development as set out in the strategy "A Better Quality of Life" in 1999. These are:

- Maintenance of high and stable levels of economic growth and employment;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Social progress which meets the needs of everyone.

7.1.3 The table below sets out the objectives and their associated sub-objectives:

Objective	Sub-Objectives – Will the Policy.....?
<b>Economic</b>	
To encourage sustained economic growth and contribute to economic prosperity	<ul style="list-style-type: none"> <li>• Improve business development</li> <li>• Enhance the image of the area as a business location</li> <li>• Improve the health of Barnet's town centres</li> <li>• Increase economic activity</li> </ul>
To offer the opportunity for rewarding and satisfying employment	<ul style="list-style-type: none"> <li>• Help reduce unemployment, in particular in the wards of the borough where it is the highest</li> <li>• Promote flexible forms of working</li> </ul>
To encourage and accommodate both indigenous and inward investment	<ul style="list-style-type: none"> <li>• Encourage indigenous business</li> <li>• Encourage inward investment</li> <li>• Make land and property available for business development</li> </ul>
To reduce disparities in economic performance & promote regeneration	<ul style="list-style-type: none"> <li>• Promote regeneration; reducing disparity with surrounding areas</li> </ul>
<b>Environmental</b>	
To reduce the effect of traffic on the environment	<ul style="list-style-type: none"> <li>• Promote the use of calming measure to reduce traffic volume</li> <li>• Increase the proportion of journeys using modes other than the car</li> <li>• Encourage walking or cycling</li> <li>• Reduce the need to travel</li> <li>• Improve access to public transport</li> </ul>
To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	<ul style="list-style-type: none"> <li>• Improve the landscape and ecological quality and character of open spaces</li> <li>• Minimise visual intrusion and protect views</li> <li>• Help to preserve and record archaeological features</li> </ul>
To conserve and enhance the borough's existing biodiversity and seek to increase where possible	<ul style="list-style-type: none"> <li>• Ensure the protection and enhancement of the Special Areas of Conservation</li> <li>• Protect and enhance the borough's Sites of Special Scientific Interest and Sites of Metropolitan Importance for Nature Conservation</li> <li>• Encourage protection and enhancement of and increase number of tree</li> <li>• Conserve and enhance species diversity; and in particular avoid harm to protected species</li> <li>• Encourage the use of green roofs, landscaping or open space to improve biodiversity.</li> </ul>
To reduce the risk of flooding for people and property	<ul style="list-style-type: none"> <li>• Minimise the risk of flooding from rivers and watercourses to people and property</li> </ul>

## Sustainability Appraisal of Barnet's Core Strategy

Objective	Sub-Objectives – Will the Policy.....?
	<ul style="list-style-type: none"> <li>Reduce surface water run-off and promote the use of sustainable urban drainage systems (SUDS)</li> <li>Take a sequential approach to the location of new development away from areas at highest risk of flooding</li> </ul>
To improve air quality	<ul style="list-style-type: none"> <li>Improve air quality</li> <li>Achieve the objectives of the Air Quality Management Plan</li> <li>Contribute to a reduction in the levels of NO2 and PM10 in the borough.</li> </ul>
To conserve and where appropriate enhance the historic environment and cultural assets	<ul style="list-style-type: none"> <li>Protect and enhance conservation areas and other sites, features and areas of historic and cultural value.</li> <li>Protect listed buildings and historic parks and garden</li> <li>Help preserve and record archaeological features</li> <li>Maintain and strengthen local distinctiveness and sense of place</li> </ul>
To achieve sustainable management of waste	<ul style="list-style-type: none"> <li>Increase the re-use of materials</li> <li>Increase rates of recycling and composting, or recovery of energy from waste</li> <li>Reduce hazardous waste</li> <li>Reduce waste in the construction industry</li> </ul>
To reduce contributions to climate change and reduce vulnerability to climate change	<ul style="list-style-type: none"> <li>Limit emissions of greenhouse gases</li> <li>Ensure that the borough is prepared for the impacts of climate change</li> </ul>
To increase energy efficiency and the proportion of energy generated from renewable sources	<ul style="list-style-type: none"> <li>Lead to an increased proportion of energy needs being met from renewable energy sources</li> <li>Increase energy efficiency in the Borough's housing stock</li> </ul>
To encourage sustainable use of land	<ul style="list-style-type: none"> <li>Minimise development on Greenfield sites</li> <li>Ensure that where possible; new development occurs on derelict, vacant and underused previously developed land and buildings</li> <li>Ensure land is remediated as appropriate</li> </ul>
To achieve sustainable water resources management	<ul style="list-style-type: none"> <li>Improve the quality and quantity of water in Barnet</li> <li>Reduce the demand for water</li> </ul>
<b>Social</b>	
To improve the health of Barnet's population	<ul style="list-style-type: none"> <li>Assist in tackling health inequalities in the borough</li> <li>Improve access to health services, in particular to a GP</li> <li>Encourage healthy lifestyles and provide opportunities for sport and recreation</li> <li>Promote access to healthy eating</li> </ul>
To improve the education and skills of the population	<ul style="list-style-type: none"> <li>Improve the exam performance of pupils in Barnet's schools</li> <li>Reduce the number of adults with no qualifications</li> <li>Help fill the skills gap</li> <li>Promote high quality, multi purpose educational facilities</li> </ul>
To provide Barnet's population with the opportunity to live in a decent affordable home	<ul style="list-style-type: none"> <li>Increase access to good quality and affordable housing</li> <li>Encourage mixed use and range of housing type and tenure</li> <li>Reduce the number of unfit homes</li> <li>Reduce homelessness</li> </ul>
To provide good quality surroundings for all	<ul style="list-style-type: none"> <li>Improve the satisfaction of people with their neighbourhoods as places to live</li> <li>Improve residential amenity and sense of place</li> </ul>
To reduce crime and the fear of crime	<ul style="list-style-type: none"> <li>Reduce anti social behaviour by designing out crime</li> <li>Reduce the fear of crime</li> </ul>
To improve accessibility for all to services and facilities	<ul style="list-style-type: none"> <li>Improve access to key community services</li> <li>Improve the level of investment in key community services</li> <li>Improve access to green and open spaces</li> <li>Improve access to public transport</li> </ul>
To encourage a sense of	<ul style="list-style-type: none"> <li>Encourage engagement in community activities</li> </ul>

## Sustainability Appraisal of Barnet's Core Strategy

Objective	Sub-Objectives – Will the Policy.....?
community; identity and welfare	<ul style="list-style-type: none"><li>• Foster a sense of pride in an area</li><li>• Improve community cohesion</li><li>• Encourage people to respect and value their contribution to society</li><li>• Increase the ability of people to influence decisions</li></ul>

## 8. Sustainability appraisal of Core Strategy objectives

8.1.1 Each of the nine Core Strategy objectives (A-I) have been compared against each of the SA objectives to determine the extent to which they could be considered as compatible. The core strategy objectives were updated as part of the Direction of Travel and the total number was reduced from 15 to 9. Further changes to the core objectives were made as part of the Pre Submission Amendments. These were not considered significant changes. Table 2 illustrates the outcome of this comparison.

**Table 2 - Compatibility of Core Strategy objectives against the SA objectives**

	Sustainability Objectives																					
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
<b>A</b>	√	√	√	√	X	0	?	?	X	?	0	X	0	√	0	0	0	√	√	0	0	?
<b>B</b>	√	√	√	√	√	√	0	0	0	√	0	0	0	√	0	√	√	0	√	0	0	√
<b>C</b>	√	√	√	√	?	√	0	0	?	√	0	?	0	√	0	0	0	0	√	0	√	√
<b>D</b>	√	0	√	√	√	0	0	0	√	0	0	√	√	0	0	0	0	0	√	0	0	0
<b>E</b>	√	√	√	√	√	0	0	0	√	√	0	√	0	0	0	√	√	0	√	√	√	√
<b>F</b>	√	0	√	0	0	0	0	0	0	√	0	0	0	√	0	√	√	0	√	0	√	√
<b>G</b>	?	0	?	X	0	√	√	0	0	√	0	0	0	√	0	0	0	√	√	0	√	√
<b>H</b>	√	√	√	√	√	√	0	?	√	?	√	√	√	√	?	√	√	√	√	0	0	0
<b>I</b>	√	0	√	√	√	√	√	√	0	√	0	0	0	√	0	0	0	0	√	√	√	√
To encourage sustained economic growth and promote economic prosperity																						
To offer everybody the opportunity for rewarding and satisfying employment																						
To encourage and accommodate both indigenous and inward investment																						
To reduce disparities in economic performance and promote regeneration																						
To reduce the effect of traffic on the environment																						
To maintain and enhance the quality of landscapes, townscapes and local distinctiveness																						
To conserve and enhance the borough's existing biodiversity and seek to increase where possible																						
To reduce the risk of flooding for people and property																						
To improve air quality																						
To conserve and where appropriate enhance the historic environment and cultural assets																						
To achieve sustainable management of waste																						
To reduce contributions to climate change and reduce vulnerability to climate change																						
To increase energy efficiency and the proportion of energy generated from renewable sources																						
To encourage sustainable use of land																						
To achieve sustainable water resources management																						
To improve the Health of Barnet's population																						
To improve the education and skills of the population																						
To provide Barnet's population with the opportunity to live in a decent affordable home																						
To provide good quality surroundings for all																						
To reduce crime and the fear of crime																						
To improve accessibility for all to services and facilities																						
To encourage a sense of community; identity and welfare																						

### Sustainability objectives

Key	Symbol
Compatible	√
Incompatible	x
No link	0
Questionable impact	?

## 9. Commentary on the appraisal of the Core Strategy objectives

### 9.1 A To manage housing growth to meet housing objectives

- 9.1.1 This objective has a negative impact on three of the Sustainability objectives. Providing 28,000 new homes is unlikely to reduce traffic levels, which also has an effect on air quality and contributions to climate change. It is also likely to impact biodiversity and flood risk. Equally meeting growth targets in town centres could put pressure on the historic environment. Finally, regeneration of the housing estates could lead to short term impacts on community cohesiveness. There are also many positive aspects associated with our approach to housing growth. Providing new homes will present the opportunity to create good quality surroundings and will provide the opportunity for all Barnet residents to live in a decent and affordable home.

### 9.2 B To meet social infrastructure needs

- 9.2.1 This objective has either positive impacts or no link with the Sustainability Appraisal objectives

### 9.3 C To promote Barnet as a place of economic growth and prosperity

- 9.3.1 A question has been raised over the possible negative impact that this objective might have on congestion, air quality and contributions to climate change. In particular the growth in retail at Brent Cross could lead to increases in car emissions. But at the same time the objective is encouraging growth and prosperity in the town centres which are the most accessible locations in the borough.

### 9.4 D To provide effective and efficient travel

- 9.4.1 This objective on its own has either positive impacts or no link with the Sustainability Appraisal objectives despite the possible negative implications raised by other Core Strategy objectives for growth and economic growth.

### 9.5 E To promote strong and cohesive communities

- 9.5.1 This objective has either positive impacts or no link with the Sustainability Appraisal objectives.

### 9.6 F To promote healthy living and well being

- 9.6.1 This objective has either positive impacts or no link with the Sustainability Appraisal objectives.

### 9.7 G To protect and enhance the suburbs

- 9.7.1 There is a need for a balance with this objective as it could have an impact on sustained economic growth which is why it has been questioned. Overprotection of the suburbs may restrict sustained economic growth in particular in the town centres. This is a balance that will need to be monitored. The same question is raised over encouraging inward investment. This possible conflict highlights the wider tension within the Core Strategy between conservation and growth.

### 9.8 H To ensure efficient use of land and natural resources

- 9.8.1 There is a question over whether the promotion of mixed use development in the town centres will have an effect on protecting the historic environment as it could lead to pressure on historic buildings in the town centres. More importantly the objective does not mention water either as a resource or in relation to flooding issues.

### 9.9 I To enhance and protect our green and natural open spaces

- 9.9.1 This objective has either positive impacts or no link with the Sustainability Appraisal objectives.

## 10. Sustainability appraisal of the Core Policies

- 10.1.1 This section presents the results of the appraisal of the Core Strategy policies at publication stage. The likely significant impacts of the 15 Core Policies on the social, economic and environmental objectives of sustainable development set out in the Council's SA Framework have been assessed, having regard to:
- The nature of the predicted impact;
  - The scale/significance of the predicted impact; and
  - The likely duration of the impact
- 10.1.2 Chapter 11 highlights specific changes to core policies at Submission Stage and a detailed appraisal of these changes is undertaken.
- 10.1.3 Chapter 12 highlights specific changes to core policies at Further Proposed Changes stage of consultation and a detailed appraisal of these changes is undertaken.

### Policy CS 1 – Barnet's Place Shaping Strategy – Protection, Enhancement and Consolidated Growth – The Three Strands Approach

Barnet's place shaping strategy is to concentrate and consolidate housing and economic growth in well located areas that provide opportunities for development, creating a quality environment that will have positive economic impacts on the deprived neighbourhoods that surround them. The key diagram sets out the areas where we expect housing and economic growth.

The council, along with its partners, will focus major housing and economic growth in the most suitable locations and manage it to ensure that we deliver sustainable development, while continuing to conserve and enhance the distinctiveness of Barnet as a place to live work and visit. An appropriate level of transport provision will be provided as the regeneration schemes roll out.

We will seek the highest standards of urban design in order to generate development proposals of landmark quality and create an accessible safe and attractive environment for people who live in, work in or visit Barnet's areas of housing and economic growth.

We will only consider tall buildings in the strategic locations we have identified in Core Strategy Policy CS5 subject to them not having an unacceptably harmful impact on their surroundings.

We will work with partners and other relevant organisations to secure 'critical', 'necessary' and 'preferred' infrastructure as set out in Barnet's Infrastructure Delivery Plan and ensure that new development funds infrastructure through S106 and other funding mechanisms.

As our focus of housing and employment growth we will promote opportunities on the west side of the borough in the strategically identified North West London – Luton Coordination Corridor. We will promote the following **regeneration** and development areas in the west of the borough:

- Brent Cross – Cricklewood regeneration area - 5,100 new homes by 2026 (out of a total of 7,550)
- Colindale regeneration area - 8,100 new homes by 2026
- Mill Hill East development area – 2,100 new homes by 2026

Core Strategy Policy CS 3 sets out the areas where we expect:

in the range of 22,000 new homes to be delivered between 2011/12 and 2021/22 to meet the ten-year housing target in the draft revised London Plan

in the range of 28,000 new homes to be delivered between 2011/12 and 2025/26 as Barnet's 15 year housing target

Core Strategy Policy CS 4 sets out our aim to create successful communities by providing quality homes and housing choice

Consolidated growth will be complemented by:

Protection of

- Green Belt and Metropolitan Open Land that covers over one third of Barnet
- Core Strategy Policy CS 5 sets out how we will ensure that development helps to protect and enhance Barnet's heritage and character
- Core Strategy Policy CS 7 sets out how in order to create a greener Barnet we will enhance and protect our open spaces

Enhancement of

- priority town centres (Chipping Barnet, Edgware, Finchley Church End and North Finchley) where we will promote mixed use development in accordance with the place making policies set out within the Core Strategy;



- the historic suburban environment comprising 16 conservation areas, 1,300 listed buildings and registered historic parks and gardens
- Core Strategy Policy CS5 sets out how we will, through Residential Design Guidance SPD, develop a framework to protect and enhance those high quality suburbs not protected by conservation area designation.
- Core Strategy Policy CS 6 sets out how we will realise development opportunities in town centres in order to promote them as successful and vibrant places
- Core Strategy Policy CS 8 sets out how in order to provide opportunity for economic advancement we will ensure a strong and prosperous Barnet

### Policy CS 2 – Brent Cross – Cricklewood

Brent Cross – Cricklewood is identified as an Opportunity Area in the London Plan and on Map 5. It will be a major focus for the creation of new jobs and homes, building upon the area's strategic location and its key rail facilities.

We will seek comprehensive redevelopment of Brent Cross – Cricklewood in accordance with the London Plan, the saved UDP policies (Chapter 12) and the adopted Development Framework. This will provide the key elements of the local planning policy framework for deciding future planning applications unless and until replaced by new DPD or SPD as a result of the LDF Monitoring and review process. It is considered likely that comprehensive regeneration will be achieved in accordance with the planning permission. If this proves unlikely then we will consider whether in the circumstances the LDF needs to be reviewed.

Specific monitoring indicators for Brent Cross – Cricklewood are set out in Appendix B and we will have regard to them in monitoring the progress made in the implementation and delivery of regeneration, including the achievement of important milestones (as set out in Appendix B) towards the initiation of development under the planning permission described in the information box on Brent Cross – Cricklewood.

It is anticipated that the BXC Development Partners are committed to progressing the project as quickly as reasonably practicable towards commencement of the development under the permission subject to securing the necessary planning approvals, highways orders and site assembly. On the basis of these indicators we expect that comprehensive re-development will commence in relation to Phase 1 at some time between 2015 and 2017.

If in the light of progress made in securing pre-commencement approvals and other related procedures as well as actual delivery of the development these milestones are not achieved (or are not likely to be capable of being delivered) we will consider the possible need for a review of the Core Strategy policy on Brent Cross – Cricklewood in the light of progress that is being made in delivering this important strategic project.

### Policy CS 3 - Distribution of Growth in Meeting Housing Aspirations

On the basis of our Three Strands Approach we expect that in the range of 28,000 new homes will be provided within the lifetime of this Core Strategy 2011/12 to 2025/26.

As our focus of growth we will promote opportunities on the west side of the borough in the strategically identified North West London – Luton Coordination Corridor. We will promote the following regeneration and development areas in the Corridor:

- Brent Cross - Cricklewood
- Colindale
- Mill Hill East

These areas are expected to provide in the range of 16,000 new homes between 2011/12 to 2025/26. An appropriate level of transport provision will be provided as the regeneration schemes roll out.

We will, in order to meet the Decent Homes standard, and deliver a greater range and variety of accommodation, also promote the regeneration of priority housing estates at:

- Dollis Valley
- West Hendon
- Granville Road
- Stonegrove and Spur Road
- Grahame Park<sup>4</sup>

These areas are expected to provide in the range of 3,200 new homes between 2011/12 to 2025/26

We will also promote the development area of the North London Business Park and Oakleigh Road South in order to develop 400 new homes by 2020/21 as part of a mixed use development in accordance with the adopted Planning Brief of June 2006

Through the regeneration and development areas, regeneration estates and town centres housing will be provided in the following 5 year phases as set out in Table 2. Figures are net additions.

#### 2011/12 to 2015/16

- Colindale 4,500 new homes

<sup>4</sup> The regeneration of Grahame Park and development of 1,670 net additional homes before 2026 is incorporated into the Colindale regeneration area



• Mill Hill East	930 new homes
• North London Business Park	150 new homes
• Priority Estates of	
• Dollis Valley	240 new homes
• Granville Road	125 new homes
• Stonegrove and Spur Road;	300 new homes
• West Hendon	840 new homes
<b>TOTAL</b>	<b>7,085 new homes</b>

### 2016/17 to 2020/21

• Brent Cross - Cricklewood	1,800 new homes
• Colindale	3,320 new homes
• Mill Hill East	1,000 new homes
• North London Business Park	250 new homes
• Priority Estates of	
• Dollis Valley	300 new homes
• Stonegrove and Spur Road;	150 new homes
• West Hendon	680 new homes
<b>TOTAL</b>	<b>7,500 new homes</b>

### 2021/22 to 2025/26

• Brent Cross - Cricklewood	3,300 new homes
• Colindale	300 new homes
• Mill Hill East	200 new homes
• Priority Estates of	
• West Hendon	570 new homes
<b>TOTAL</b>	<b>4,370 new homes</b>

Through a programme of town centre strategies we will develop frameworks for the town centres of Chipping Barnet, Edgware, Finchley Church End and North Finchley. These locations will provide the main focus for enhancement and infill housing development: and will provide for residential uses above ground floor level

Our strategic approach on further development opportunity sites will be set within the context of the density matrix in the existing London Plan. We will seek to optimise rather than simply maximise housing density to reflect local context, public transport accessibility and provision of social infrastructure.

## Policy CS 4 - Providing quality homes and housing choice in Barnet

We will aim to create successful communities in Barnet by:

- seeking to ensure a mix of housing products in the affordable and market sectors to provide choice for all households and enable Barnet residents to progress on a housing journey that can meet the aspirations of home ownership
- seeking to ensure that all new homes are built to Lifetime Homes Standards and that through extending the inclusive design principles embedded in Lifetime Homes we can create Lifetime Neighbourhoods that are welcoming, accessible, and inviting for everyone, regardless of age, or health, or disability.
- seeking a range of dwelling sizes and types of housing including family and lifetime homes that meets our identified housing priorities and does not undermine suburban character or local distinctiveness. Policy CS 5 on Protecting and Enhancing Barnet's Character to Create High Quality Places sets out how we will secure high quality design.
- seeking a variety of housing related support options that maximise the independence of vulnerable residents including young people, people with disabilities, older people, homeless people and other vulnerable adults
- delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a boroughwide target of 30% affordable homes on sites capable of accommodating ten or more dwellings
- seeking an appropriate mix of affordable housing of 60% social rented and 40% intermediate for Barnet that will support our objectives of widening home ownership and providing family homes
- on sites which are suitable for the provision of an element of affordable housing, we may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision

Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers, having regard to:

- potential of the site for good management

- impact on local environment, character and amenity
- access to essential services including water and waste disposal

We will monitor the delivery of additional housing against our target of 28,000 new homes by 2025/26 and will seek to maintain supply at the rate necessary to meet or exceed the target. In seeking to maintain the housing supply we will adjust the type and mix of housing sought, having regard to the financial viability of development, the housing market and the needs of different groups.

### **Policy CS 5 - Protecting and enhancing Barnet's character to create high quality places**

We will ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high quality design. Developments should:

- address the principles, aims and objectives set out in the following national design guidance :  
By Design, Secured by Design, Safer Places, Inclusive Design, Lifetime Homes and Building for Life:
- be safe, attractive and fully accessible
- provide vibrant, attractive and accessible public spaces
- respect and enhance the distinctive natural landscapes of Barnet
- protect and enhance the gardens of residential properties
- protect important local views from places within Barnet
- enhance the borough's high quality suburbs and historic areas through the provision of buildings of the highest quality that are sustainable and adaptable

All development should maximise the opportunity for community diversity, inclusion and cohesion and should contribute to people's sense of place, safety and security.

#### **Heritage and Character**

We will work with partners to proactively protect and enhance Barnet's heritage including conservation areas, listed buildings, locally listed buildings, registered parks and gardens; scheduled monuments, areas of archaeological significance and London's only battlefield site.

We will require proposals within or affecting the setting of heritage assets to provide a site assessment which demonstrates how the proposal will respect and enhance the asset. CS 13 addresses the adaptation of heritage assets to reduce carbon emissions and ensure efficient use of natural resources.

We will ensure through our programme of Conservation Area Character Appraisals that these areas are protected and enhanced.

We will ensure through our Green Infrastructure SPD that the key characteristics of Barnet's landscape (Barnet Plateau and Finchley Ridge) are protected and enhanced

We will encourage community involvement in the review of the Local List of important local buildings

The Barnet Characterisation Study forms the baseline for the identification of places with a consistent and coherent architectural character. Within the typologies identified in the Characterisation Study we will through our Development Management Policies DPD and Residential Design Guidance SPD develop a framework to protect and enhance those high quality suburbs in Barnet not protected by Conservation Area designations.

#### **Tall Buildings**

Tall buildings (8 storeys (or 26 metres) or more) will only be considered in the following strategic locations:

Brent Cross – Cricklewood Regeneration Area

Colindale – Colindale Avenue Corridor of Change, Edgware Road Corridor of Change (in accordance with Policy 5.3 Building Heights in the Colindale Area Action Plan, 2010)

Grahame Park Estate

Stonegrove and Spur Road Estate

West Hendon Estate

And the Priority Town Centres of

Edgware

Finchley Church End and

North Finchley

- Proposals for tall buildings will be considered in accordance with DM 05 – Tall Buildings, London Plan Policy 7.7 – Location and Design of Tall and Large Buildings and Guidance on Tall Buildings (2007) by English Heritage and CABE

Sustainability Objectives	Core Policies	CS1	CS2	CS3	CS4	CS5
1. To encourage sustained economic growth & promote economic prosperity		++	++	++	+	?+
2. To offer everybody the opportunity for rewarding & satisfying employment		++	++	++	O	O
3. To encourage & accommodate both indigenous & inward investment		?+	++	?+	+	O
4. To reduce disparities in economic performance & promote regeneration		?+	+	?+	O	O
5. To reduce the effect of traffic on the environment		+/-	?-	+/-	?	O
6. To maintain & enhance the quality of landscapes, townscapes & local distinctiveness		+	++	+	O	++
7. To conserve & enhance the borough's existing biodiversity & seek to increase where possible		O	O	O	?	?+
8. To reduce the risk of flooding for people and property		?	O	?	?	?+
9. To improve air quality		+/-	?-	+/-	?	O
10. To conserve & where appropriate enhance the historic environment and cultural assets		+	O	+	+	++
11. To achieve sustainable management of waste		O	O	O	?	O
12. To reduce contributions to climate change & reduce vulnerability to climate change		-	?-	-	?-	?O
13. To increase energy efficiency & the proportion of energy generated from renewable sources		?O	+	?O	?+	?O
14. To encourage sustainable use of land		+	+	+	+	?
15. To achieve sustainable water resources management		O	O	O	?+	?O
16. To improve the Health of Barnet's population		+	O	+	++	?O
17. To improve the education and skills of the population		+	O	+	O	O
18. To provide Barnet's population with the opportunity to live in a decent affordable home		++	+	++	+	O
19. To provide good quality surroundings for all		+	+	+	?+	++
20. To reduce crime and the fear of crime		+	+	+	+	?O
21. To improve accessibility for all to services and facilities		+	+	+	O	O
22. To encourage a sense of community; identity and welfare		?+	?	?+	O	+

## Commentary

### 10.2 Policy CS1 – Barnet's place shaping strategy – Protection, Enhancement and Consolidated Growth – The Three Strands Approach

- 10.2.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.2.2 The most significant change to this policy happened at Publication Stage when growth is described as 'consolidated' rather than 'major'. The implication is that growth will now only be targeted in Barnet's regeneration and development areas, such as Brent Cross – Cricklewood and in specified town centres (these areas are listed in Table 2 in the Core Strategy). Barnet will not be seeking growth along major thoroughfares within the borough described in an earlier draft of the policy. Consolidating growth in these clearly identified areas will help encourage and accommodate inward investment in these parts of the borough. Attracting investment to the town centres will help to ensure their success as commercial places. However, only focussing investment in these locations could divert it from other town centres and lead to disparities across Barnet.
- 10.2.3 Growth in the most accessible locations may minimise the effect of traffic on the environment.
- 10.2.4 High quality design should help ensure that development creates successful and vibrant places.

- 10.2.5 The SA recommended that the design/climate change/flood risk/ density issues could be taken forward through the Development Management Policies DPD or the individual Town Centre Frameworks / Planning Briefs that address local development pressures.
- 10.2.6 The majority of Barnet's most deprived wards are in the western half of the borough. Improvements to transport provision and other infrastructure in this area will aid regeneration and combat economic disparities which are more prominent in the west of Barnet. Successful regeneration may have a knock-on effect in neighbouring areas thereby helping to reduce economic disparities within Barnet. Improvements in public transport and highway infrastructure may result in more efficient use of the road and rail network.

### 10.3 Policy CS2 – Brent Cross – Cricklewood

- 10.3.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.3.2 Regeneration of Brent Cross – Cricklewood is essentially retail-led regeneration. As such the economic benefits are great. With this economic growth will come the provision of a wide range of newly created employment opportunities and the attraction of further investment into the local area. Successful regeneration may promote further regeneration and attract investment in neighbouring areas.
- 10.3.3 The success of this regeneration is likely to result in increases in road traffic, which will have a negative effect on air quality and the environment. However, improvements to public transport accessibility, including the new step-free railway station and rapid transit bus service for buses at Brent Cross could offset some of the increases in road traffic and therefore mitigate negative effects on the environment.
- 10.3.4 Regeneration at Brent Cross – Cricklewood, will seek to maximise the use of land in the most sustainable ways. Mixed use developments will contribute to more sustainable communities where most services and facilities will be located within walking distance of people's homes.
- 10.3.5 Regeneration of this area presents the opportunity to create good quality surroundings for all who live, work and visit Brent Cross – Cricklewood. Well designed environments with good quality buildings and supporting green, physical and social infrastructure are vitally important to the success of this project.
- 10.3.6 Regeneration can destroy social capital; that is, the social networks and social ties that exist between individuals in a neighbourhood. It is important that necessary social infrastructure is provided in regeneration areas where opportunities to develop social capital can play a role in successful regeneration projects.

### 10.4 Policy CS3 – Distribution of Growth in Meeting Housing Aspirations

- 10.4.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.4.2 At the earlier stages of the sustainability appraisal process this policy was assessed in conjunction with policy CS1 and as such much of the commentary above applies here (see CS1 above). Two town centres (Whetstone and New Barnet) and the major transport routes originally identified as locations for mixed use development including housing growth have now been re-assessed
- 10.4.3 The appraisal process at publication stage has had limited effect on the evolution of this policy as we are obliged to follow policy set out in the Mayor's London Plan. Policy CS3 addresses the boroughwide housing target (as set in the London Plan) and lists the components of Barnet's housing supply. However, the regeneration and development areas identified in policy CS3 are located in some of the most accessible locations within Barnet.

- 10.4.4 Most housing growth will take place in the western parts of the borough which could still lead to polarisation within Barnet in the long term. That is, areas in the north and east of the borough may experience a lack of investment in the future as growth investment is being concentrated in the southern and western parts of Barnet. The risk of this policy direction is that it could effectively result in an east/west divide within the borough with a majority of development investment going westwards

### 10.5 Policy CS4 – Providing quality homes and housing choice in Barnet

- 10.5.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.5.2 Ensuring the right mix of housing in terms of numbers of bedrooms and tenure mix to meet need identified in the North London SHMA will help ensure the efficient and effective use of land.
- 10.5.3 With London's fourth highest housing target the levels of traffic, emissions and air pollution from cars and buildings as well as waste produced will increase. This will be mitigated by timely delivery of infrastructure such as highway improvements as set out in the Infrastructure Delivery Plan. It will also be mitigated by policy on car parking and enforcement of our SPD on Sustainable Design and Construction. The mitigation measures proposed in policy CS9 are not guaranteed to reduce car travel and managing parking may not be enough either. Other more environmentally focussed policies could be enhanced through the revisions to the SPD on Sustainable Design and Construction with a revised target level of the Code for Sustainable Homes. Reduced levels of run-off to reduce surface water flooding could be demanded through the use of SUDS (Sustainable Urban Drainage Systems) to mitigate some of these impacts.
- 10.5.4 Policy CS4 addresses the need to identify available land to meet the needs of gypsies and travellers – this goes towards the opportunity for all Barnet residents to live in a decent and affordable home.
- 10.5.5 The sub regional North London SHMA and the Affordable Housing Viability Study have provided the evidence base for this policy and support for a new affordable housing target. The appraisal has highlighted the importance of achieving the right amount of affordable housing as demand for too much could stifle development. However, the provision of good quality affordable housing provides all Barnet residents with the opportunity to live in a decent and affordable home and will provide the opportunity to create high quality environments.
- 10.5.6 The policy now specifies a requirement for a 60%/40% ratio of social rented to intermediate housing for all affordable housing. This is a shift from 70%/30% and is intended to give Barnet residents greater opportunity for some form of home ownership.
- 10.5.7 Lifetime Homes and Neighbourhoods will provide more inclusive environments for the elderly and less mobile

### 10.6 Policy CS5 – Protecting and enhancing Barnet's character to create high quality places

- 10.6.1 The appraisal has highlighted how the quality of urban environment can contribute to economic, environmental and social aspects of life within the borough. It is important that Barnet protects and enhances its historic and cultural assets and it is essential that development proposals are sensitive to the local environment. This could be achieved through use of design and access statements as part of the planning application process and could be specified in the Development Management Policies DPD. In the more deprived areas of the borough it is vitally important that urban design is of the highest standard in order to guarantee every chance of success for new development. Poorly designed and poorly located development can impact on social cohesion, the local economy and levels of crime, so it is important that suitable



development is located in the right places and is of the highest quality. Barnet will produce residential design guidance which will provide a clear framework and will help to achieve the highest levels of design which respect local environment.

- 10.6.2 Increased emphasis on the preservation of an area's character may increase the cost of home ownership and possibly reduce homeowners' ability to make their homes flexible to changing lifestyle requirements. This has both affordability and social impacts which could lead to people leaving an area.
- 10.6.3 The original reference regarding the control of flatted development through design guidance has now been removed through the appraisal process. Design guidance which seeks to control flatted development should not be overly restrictive.
- 10.6.4 Due consideration will be given to development proposals for tall buildings (in excess of 8 storeys). Tall buildings can have a great impact on their surroundings and can be seen from a distance. They can also hinder protected views and could be a problem for some types of birds. A Tall Buildings Study has assessed existing tall buildings in Barnet as a basis for guidance on assessing new proposals for tall buildings.
- 10.6.5 The majority of opportunities for new housing will be in the west of Barnet, serving a younger and more diverse population. Opportunities for inward investment in Barnet's attractive, low density suburbs may be limited by this approach which could potentially lead to an east-west divide.

### **Policy CS 6 – Promoting Barnet's town centres**

In order to promote competitive town centre environments and provide consumer choice, we will realise development opportunities for the town centres of Edgware, North Finchley, Finchley Church End, and Chipping Barnet. We will pursue the individual planning objectives for each centre as set out in their Town Centre Frameworks and ensure the delivery of environmental, design, transport, car parking and community safety measures. Development in these town centres will reflect the preferred sequential approach in PPS 4 – Planning for Sustainable Economic Growth.

- we will promote successful and vibrant centres throughout Barnet to serve the needs of residents, workers and visitors and ensure that new development is of an appropriate scale and character for the centre in which it is located
- we will promote the distribution of retail growth to meet the capacity for an additional 2,200 m2 of convenience goods floorspace across Barnet by 2021 -2026. The majority of the convenience capacity arises in the East sub-area (centred on the District Centre of North Finchley) and West sub-area (centred on the Major Centre of Edgware) beyond 2016. **We will therefore not plan further significant convenience goods provision before 2026**
- we will promote the distribution of retail growth to meet the capacity for an additional 16,800 m2 of comparison goods floorspace across Barnet by 2021 -2026. The majority of this capacity arises in the East, West and South West sub-areas. On basis of continued expenditure growth we will in addition support comparison goods provision in Edgware, North Finchley and Chipping Barnet
- we will ensure that food, drink, entertainment uses as part of a healthy evening economy in our town centres do not have a harmful effect on residents and the local area
- we will ensure the efficient use of land and buildings in all town centres, encouraging a mix of compatible uses including retail, managed affordable and flexible workspace, leisure and residential that add to the vibrancy of the area whilst respecting character
- we will take a planned approach to manage development opportunities in Golders Green, Whetstone and New Barnet and through our Site Allocations DPD promote development opportunities in our smaller District Centres at Burnt Oak, Colindale – the Hyde and Cricklewood that enhance the overall attractiveness of these centres.
- We will pursue further opportunities for town centre enhancement at smaller centres that attract private sector investment or have been highlighted for priority action
- we will, in order for them to compete with other centres and particularly out of centre retail parks and shops, support retail uses in town centres by improvements to the public realm, the public transport network, short-trip parking and accessibility by cyclists and pedestrians. We will promote investment in the historic environment of town centres
- we will seek to protect and enhance more 'local' neighbourhood centres and parades of shops in terms of their potential contribution to sustainable suburbs and shopping; and
- we will seek to protect existing markets as part of the retail offer of Burnt Oak, Chipping Barnet and North Finchley town centres and, where appropriate, use S106 contributions to ensure the provision of 'affordable shops' in new retail development.

**Brent Cross / Cricklewood**

In order to create a distinct and attractive business offer we will promote Brent Cross/Cricklewood as a new metropolitan town centre and an Outer London Development Centre through mixed use regeneration which delivers an additional 55,000m<sup>2</sup> (net) of comparison floorspace in town centre north and 370,000 m<sup>2</sup> of office floorspace as part of a mix of uses that accords with the London Plan and the saved suite of UDP Policies on Brent Cross-Cricklewood. Brent Cross does not currently perform as wide a range of functions as a typical town centre. Any substantial future extension or redevelopment should be linked to an enhanced role for public transport to serve its catchment area and should make a positive contribution to encouraging a modal shift from car use to public transport. We will expect any substantial extension of Brent Cross and redevelopment of its immediate environs to:

- complement the role of Brent Cross as a new metropolitan town centre and an Outer London Development Centre; and
- to contribute to the balanced regeneration of the Brent Cross / Cricklewood Regeneration Area.

### Policy CS 7 - Enhancing and Protecting Barnet's Open Spaces

In order to maximise the benefits that open spaces can deliver and create a greener Barnet we will work with our partners to improve Barnet's Green Infrastructure. We will create a greener Barnet by:

- protecting open spaces, including Green Belt and Metropolitan Open Land
- enhancing open spaces, ensuring positive management of Green Belt and Metropolitan Open Land to provide improvements in overall quality and accessibility
- ensuring that the character of green spaces of historic significance is protected
- meeting increased demand for access to open space and opportunities for physical activity, by tackling deficiencies and under provision through:
- securing additional on-site open space or other open space improvements in the identified growth areas including 8 ha of new provision at Brent Cross – Cricklewood, 5.5 ha of new provision at Mill Hill East and 5 ha at Colindale
- improving access to open spaces particularly in North and East Finchley and other areas of public open space deficiency identified by Map 9. We will seek to improve provision in these areas of deficiency with the objective of increasing the area of the borough that has access to district and local parks in accordance with the London Plan criteria
- securing improvements to open spaces including provision for children's play, sports facilities and better access arrangements, where opportunities arise, from all developments that create an additional demand for open space. Standards for new provision are set out in DM 15 – Green Belt and Open Spaces
- maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses enabling green corridors to link Barnet's rural, urban fringe and urban green spaces
- protecting existing Sites of Nature Conservation Importance and working with our partners including the London Wildlife Trust to improve protection and enhancement of biodiversity in Barnet
- ensuring that development protects existing site ecology and makes the fullest contributions to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements; and
- enhancing local food production through the protection of allotments and support for community food growing including the Mayor's Capital Growth Initiative

In supporting new Green Infrastructure we will:

- set out an approach to improving the network of green spaces within the Green Infrastructure SPD
- as part of the All London Green Grid work with neighbouring authorities to establish Area Frameworks as the basis for identification, creation and management of new green spaces as part of:
  - Lea Valley and Finchley Ridge Green Grid Area
  - Brent Valley and Barnet Plateau Green Grid Area

Reflect the policies and objectives in the Watling Chase Forest Plan when assessing development proposals in the area covered by the Community Forest

### Policy CS 8 – Promoting a strong and prosperous Barnet

The Council and its partners will ensure a strong and prosperous Barnet that provides opportunity for economic advancement.

We will support Barnet residents in accessing work by:

- Delivering 1,500 new jobs in our growth areas of Colindale and Mill Hill East by 2021 and a total of 20,000 new jobs in Brent Cross-Cricklewood by 2026
- Attracting business growth as part of Brent Cross - Cricklewood with further provision in the other growth areas and town centres to meet the forecast demand for business space of 13.5 ha by 2026
- requiring major developments to provide financial contributions and to deliver employment and training initiatives in consultation with the Skills Development and Employability Group;

- working in partnership with the Skills Development and Employability Group in delivering the skills agenda required for a growing borough in a successful London suburb

We will support businesses by:

- safeguarding existing employment sites that meet the needs of modern business in accordance with DM14 New and Existing Employment Space.
- encouraging development that improves the quality of existing employment provision
- encouraging new mixed use commercial floorspace in our priority town centres (Edgware, North Finchley, Finchley Church End and Chipping Barnet) where access to public transport is good
- in order to support small to medium sized enterprises new employment provision should include a range of unit sizes and types such as affordable and flexible workspaces and home working hubs
- through the Skills Development Group building an understanding about the experience of local businesses and their skills needs
- encouraging partnership working between providers of further and higher education and local business

We will support providers of further and higher education by :

- encouraging the provision of new and improved facilities within Barnet and
- encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research.

### **Policy CS 9 – Providing safe, effective and efficient travel**

We will promote the delivery of appropriate transport infrastructure in order to support growth, relieve pressure on Barnet's transport network and reduce the impact of travel whilst maintaining freedom and ability to move at will.

We will ensure that new development funds infrastructure (through Section 106 and other funding mechanisms) that enables Barnet to keep the existing traffic moving and cope with new movements both by all modes of transport.

#### **Ensuring more efficient use of the local road network**

- In order to enable traffic to flow more smoothly we will prioritise the reduction of congestion, including through encouraging trips to route according to the road hierarchy, the implementation of development related schemes that also address pinch-points, a review of traffic signals, parking management measures and more efficient freight movements.
- We will continue to invest in improvements to the condition of roads and footways in the borough to ensure that the local road network operates efficiently and safely, and seek to improve co-ordination of maintenance and utility works
- We will continue to manage a parking regime which recognises that many Barnet residents will continue to own and travel by car
- We will work with TfL to review and improve the bus network
- We will continue to make travel safer and more attractive by improving street lighting, security coverage and accessibility at transport interchanges and around bus stops as well as delivering, where resources permit, targeted local safety schemes.

#### **Taking a comprehensive approach to tackling the school run**

- We will seek to improve the effectiveness of our School Travel Plans to achieve a greater reduction in car based journeys and increase levels in walking and cycling to and from school
- We will implement complementary traffic management schemes outside schools, including preventing pupil parking

#### **Delivery of high quality transport systems in regeneration areas and town centres**

We will ensure that development is matched to capacity and promote key transport infrastructure proposals in our town centres and regeneration areas to support Barnet's growth, in particular we will:

- pursue housing and commercial growth in the areas outlined in CS1 (Barnet's Place Shaping Strategy - the Three Strands Approach), CS3 (Distribution of Growth in Meeting Housing Aspirations), and CS 6 (Promoting Barnet's Town Centres).
- ensure major planning proposals incorporate Transport Assessments, Travel Plans, Delivery and Servicing Plans, mitigation measures and S106 contributions / planning conditions and that adequate capacity and high quality safe transport facilities are delivered in line with demand for schemes that have phased delivery programmes
- deliver with partners
  - high quality public transport improvements along the A5 corridor
  - bus service enhancements as part of regeneration schemes, particularly at BXC and Colindale, including a new state of the art bus station as part of the redevelopment of the Brent Cross Shopping Centre and better bus services connecting these two key areas in Barnet



- a Rapid Transit Bus Service at BXC - a dedicated bus service system which will link the key interchanges and destinations in the growth area
- we will promote public transport provision that is accessible to people with physical or sensory impairment including
  - a new step-free rail station at BXC together with improvements to Brent Cross underground and Cricklewood train stations
- we will promote major improvements to the strategic road network, especially the A406 (North Circular Road) at Staples Corner and the A41 interchanges, and in the long term Golders Green Road and Henlys Corner
- we will promote through Town Centre Frameworks and other planned approaches town centre development opportunities and enhancement programmes to improve the public realm, public transport services, and interchange, short-trip making by walking, parking and servicing controls and accessibility improvements
- we strongly support improvements to rail services in the borough including upgrades to the Thameslink and Northern Line routes.

### More environmentally friendly transport networks

- We will support the use of low emission vehicles including electric cars through provision of charging points in new developments
- We will encourage mixed use development that will help to reduce the distances people need to travel to access everyday goods and services
- We will require the minimisation of road based freight movements associated with the roll-out of our regeneration schemes through, for BXC, the establishment of a (preferably rail based) construction consolidation centre, and for all regeneration schemes, the use of Delivery, Servicing, and Construction Management Plans.
- Through the development management process and partnership working we will seek further efficiencies and inter-modal transfer through the implementation of the Rail Freight Facility as part of the Brent Cross Cricklewood Proposals, and the promotion of Consolidation Centres and Freight Quality Partnerships.
- Where appropriate land for transport purposes will be identified and safeguarded in the Site Allocations DPD.

## Policy CS 10 – Enabling Inclusive and Integrated Community Facilities and Uses

The Council will work with our partners to ensure that community facilities including schools, libraries, leisure centres and pools, places of worship, community meeting places and facilities for younger and older people, are provided for Barnet's communities.

We will:

- ensure that our programmes for capital investment in schools and services for young people address the needs of a growing, more diverse and increasingly younger population
- promote the role of schools as 'community hubs', providing a wide range of educational, advice, leisure and support services to children, families and the wider community
- support the enhancement and inclusive design of community facilities ensuring their efficient use, and the provision of multi-purpose community hubs that can provide a range of services to the community at a single accessible location
- expect development that increases the demand for community facilities and services to make appropriate contributions towards new and accessible facilities, particularly within the regeneration and development areas of the borough or improving existing provision, particularly within town centres
- work with the Mayor and cemetery providers to establish current supply of burial space, identify barriers to supply and any necessary changes to planning policy.

In addressing educational needs within Barnet and responding to the need for parental choice we will support proposals for parent promoted schools or 'Free Schools' that:

- Conform with DfE guidance on becoming a new school and
- Meet parental demand for school places and
- Provide educational facilities that conform with basic school requirements as set out in relevant DfE guidance.

Through the Site Allocations DPD we will seek to allocate sites for development that are capable of providing new school premises including parent promoted schools that meet DfE requirements.

Core Policies	CS6	CS7	CS8	CS9	CS10
<b>Sustainability Objectives</b>					
1. To encourage sustained economic growth & promote economic prosperity	++	O	++	++	+
2. To offer everybody the opportunity for rewarding & satisfying employment	++	O	++	O	O

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3. To encourage & accommodate both indigenous & inward investment	++	O	++	++	+
4. To reduce disparities in economic performance & promote regeneration	+	O	++	++	?
5. To reduce the effect of traffic on the environment	+	O	+	?	+
6. To maintain & enhance the quality of landscapes, townscapes & local distinctiveness	++	++	O	?+	O
7. To conserve & enhance the borough's existing biodiversity & seek to increase where possible	O	++	O	O	O
8. To reduce the risk of flooding for people and property	O	++	O	O	O
9. To improve air quality	+	?	O	?	?
10. To conserve & where appropriate enhance the historic environment and cultural assets	++	++	O	O	O
11. To achieve sustainable management of waste	O	O	O	O	O
12. To reduce contributions to climate change & reduce vulnerability to climate change	?	++	+	++	+
13. To increase energy efficiency & the proportion of energy generated from renewable sources	O	O	?+	O	O
14. To encourage sustainable use of land	++	+	O	+	++
15. To achieve sustainable water resources management	O	O	O	O	O
16. To improve the Health of Barnet's population	+	++	O	?+	+
17. To improve the education and skills of the population	O	O	+	O	++
18. To provide Barnet's population with the opportunity to live in a decent affordable home	O	O	O	O	O
19. To provide good quality surroundings for all	++	++	O	O	+
20. To reduce crime and the fear of crime	?	O	O	+	O
21. To improve accessibility for all to services and facilities	++	+	O	+	++
22. To encourage a sense of community; identity and welfare	++	+	O	?+	++

## Commentary

### 10.7 Policy CS 6 – Promoting Barnet's town centres

- 10.7.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.7.2 Ensuring that residents can easily access services in local shopping parades, neighbourhood centres and town centres is socially positive as is the support for uses that contribute to the vitality and viability of these places. Environmentally, supporting the town centres helps to encourage less driving, resulting in less air pollution and emissions whilst supporting walking and cycling which contributes positively to improving residents health and well-being.
- 10.7.3 The Town Centres Floorspace Needs Assessment and 2010 Update forms a part of the evidence base for the Core Strategy and identifies where convenience and comparison shops are required in order to meet future social needs. Town Centre development frameworks are being developed for the following town centres: Edgware, North Finchley, Finchley Church End and Chipping Barnet. These frameworks may help to mitigate any negative impacts regarding economic disparity caused by the regeneration of Brent Cross – Cricklewood. Promoting mixed use development in town centres is considered a more sustainable and efficient use of land compared with out-of-town centre locations. In order to maximise levels of sustainability, public and other modes of transport will need to be supported and actively promoted in an attempt to reduce unsustainable single occupancy car trips.
- 10.7.4 It is important to note that Whetstone and New Barnet town centres have been re-assessed and are no longer considered to merit designation as priority town centres.
- 10.7.5 It is important that we tackle polarisation of Barnet's town centres across the borough in order to address disparities in economic performance. Where smaller centres have been unable to diversify their offer or create niche markets they have suffered. The policy addresses this through reference to our Site Allocations DPD which will seek to identify development opportunities in Barnet's town centres. Our town centres need to

establish their own identities by creating their own 'niches'. Barnet's Town Centre Floorspace Needs Assessment highlights each of the town centres' strengths and identifies potential development opportunities.

- 10.7.6 In order to avoid 'cloned' high streets Barnet should actively support small local businesses and independent retailers. Market places present an opportunity for the sale of locally produced goods and locally grown foods; promotion of which could help reduce Barnet's ecological footprint. Such an approach would help to differentiate Barnet's town centres from others in and outside the borough.

### 10.8 Policy CS 7 - Enhancing and Protecting Barnet's Open Spaces

- 10.8.1 Policy CS7 highlights the increases in publicly accessible open space in the regeneration and development areas. It is important that the policy ensures that access is improved given the wealth of open space in the borough as there are still pockets of deficiency. Protecting back and front gardens is also important as cumulatively this will have a considerable impact on biodiversity, run off and above all character if development is not controlled. How this is done will be clarified at a lower level in the Development Management Policies DPD or SPD on Residential Design Guidance.
- 10.8.2 There is an issue with continued protection of all Green Belt as there is a possibility that it has an effect on increasing development pressure elsewhere in the borough and London through over intensification of land leading to wider negative impacts on the cities population.
- 10.8.3 The policy supports the Mayor's Capital Growth Initiative which is concerned with community food growing and the promotion of healthy lifestyles. The protection and enhancement of allotments within the borough could contribute to reducing Barnet's ecological footprint. Imported food is the single largest contributing factor to Barnet's ecological footprint.
- 10.8.4 Many positive benefits result from this policy; the enhancement of landscapes; provision of natural drainage systems reduces impact on existing sewerage infrastructure; outdoor activity increases health benefits of individuals and green spaces are places where social interaction can take place promoting a sense of community and identity.

### 10.9 Policy CS 8 – Promoting a strong and prosperous Barnet

- 10.9.1 This policy encourages employment growth in town centres which are among the most accessible locations and makes reference to the largest increase in employment floorspace in the borough at Brent Cross. Innovative proposals such as home hubs (working from home) will help to reduce peoples need to drive.
- 10.9.2 The appraisal has identified that the economic benefits of this policy will bear fruit in the long term as regeneration schemes roll out across the borough. New employment opportunities will be created as development takes place within Barnet's growth areas. For example, regeneration of Brent Cross – Cricklewood is expected to take at least 20 years to complete. The construction phases of such projects will also create employment opportunities within the construction and associated industries and will provide the basis for training opportunities in the form of apprenticeships and on-the-job training.
- 10.9.3 The promotion of flexible workspaces in accessible locations such as Barnet's town centres, closer to people's homes may reduce the length of journeys to and from work.
- 10.9.4 Working in partnership with the Skills Development Group will help to ensure that young people develop the necessary skills to enter the job market more successfully. Support for the Skills Development Plan should bear many positive sustainability benefits, the most important being the opportunity for satisfying and rewarding employment. This approach could reduce the number of young people not in education, employment or training (NEET).

- 10.9.5 More business and employment provision within the borough is likely to generate more journeys by car and public transport and associated negative effects on air quality and the environment. Promotion of mixed-use development and encouraging cycling, walking and the use of low emission vehicles should help to mitigate these potential negative effects. Local jobs for Barnet's residents will result in shorter journeys to work and will reduce the need for individuals to seek employment opportunities elsewhere in London. In light of this it is expected that although there may be the chance of more localised negative impacts with associated car journeys within Barnet, it is very likely that this policy will reduce overall contribution to climate change with respect to London on the whole.
- 10.9.6 A strong and prosperous Barnet should benefit all Barnet residents. The objective of the Skills Development Plan of helping residents into work is sustainably positive which will not only tackle issues of polarisation within Barnet but will also help to create mixed and balanced communities. The creation of 21,500 new jobs identified in the policy will provide for a wide range of job opportunities, requiring a range of skills and knowledge which should provide work opportunities for all Barnet residents and help to keep employment rates high.

### 10.10 Policy CS 9 – Providing safe, effective and efficient travel

- 10.10.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.10.2 Without active management car use may increase in the long term as personal affluence does. Issues of increased congestion and the impacts that this has on economic growth and the attractiveness of the borough as a place to live and work may be affected. Also air pollution will continue to affect resident's health. Barnet is an Air Quality Management Area and the principle cause of this is road transport. Particulates, nitrogen dioxide and sulphur dioxide are the principle emissions which regularly exceed EU levels in Barnet and subsequently harm human health.
- 10.10.3 The Infrastructure Delivery Plan (IDP) will identify and ensure that necessary transport infrastructure is in place to support the regeneration and development areas within Barnet. The IDP will also identify where, when and how public transport improvements will take place. Improvements to public transport will increase the choice of public transport services on offer to Barnet residents and will also improve accessibility to other services by bus.
- 10.10.4 Policy CS9 seeks to make more efficient and effective use of existing road infrastructure in Barnet in an attempt to reduce traffic congestion. Slow moving traffic produces more harmful emissions than faster moving traffic. Necessary improvements to road infrastructure will help prevent congestion and will therefore help mitigate this negative environmental effect.
- 10.10.5 The strategy to reduce road congestion may attract more traffic if congestion is lower in Barnet than in neighbouring boroughs which would lead to an overall increase in air pollution and other associated negative impacts on the environment.
- 10.10.6 The promotion of mixed-use development in areas served by good public transport contributes significantly toward achieving the sustainability objectives. Also the creation of the new rail freight facility at Brent Cross will help to reduce amounts of freight transported by road and will result in more efficient transport of freight generally. It is likely that most freight transport in the future will be to serve Brent Cross Shopping Centre, which is sustainably located in close proximity.
- 10.10.7 The school run is a major contributor to traffic congestion in Barnet. The effective implementation of school travel plans and the promotion of walking and cycling to schools should help to reduce traffic congestion on Barnet's roads during peak times. Such an approach will promote alternative forms of transport other than private car-use generally. If more children attended their local schools this could result in less road traffic at peak times as the need to drive children to school would be reduced.

This is part of a wider issue regarding the currently high demand for school spaces due to recent increases in birth rates in Barnet and as a consequence there is a need to provide more choice in educational facilities. Promotion of parental choice is addressed in policy CS10.

- 10.10.8 This policy recognises the fact that as an outer London borough there will always be a significant reliance on car usage and that improved ease of movement by road should result in positive economic benefits in Barnet's regeneration and development areas.

### 10.11 Policy CS 10 – Enabling Inclusive and Integrated Community Facilities and Uses

- 10.11.1 Creating multi use community hubs by combining a number of facilities in one location should help to reduce the need to drive and therefore the effect of traffic on the environment. It is also a much more efficient use of land and buildings, providing facilities and services out-of-school-hours. The appraisal noted that the regeneration and development areas and town centres will be the focus for improvements in community facilities so residents in these locations will benefit the most. But provision in the suburban hinterland also needs to be considered to ensure that every resident has reasonable access as presumably enhancements should be considered in these locations too.
- 10.11.2 With recent increases in birth rates in Barnet it is likely that there will be an immediate need for increased primary school capacity to meet demand for school places. The demand for school spaces should be met by provision which satisfies parental choice and meets the needs of all Barnet residents. The appraisal has led to the inclusion in this policy that schools should be promoted as community hubs for a variety of community services and uses out-of-school-hours. Such an approach will make more efficient and effective use of accessible educational facilities.
- 10.11.3 The policy promotes parental choice and support for proposals for parent promoted schools or free schools and points to the Site Allocations DPD as the means of identifying appropriate sites. With a third of the borough as Green Belt / MOL Barnet does not have enough brownfield land to match local demand with local sites for new schools. Inevitably choice means travel and negative environmental effects. This can be mitigated by effective School Travel Plans.

### Policy CS 11 – Improving health and well being in Barnet

We will improve health and well-being in Barnet by:

- supporting the plans of NHS Barnet and from 2013 its successor bodies (including GP Consortiums) to deliver modern primary and community care and to commission other health care services
- working with partners on projects which enable us to progress better service integration, locating services where access can be improved, particularly for vulnerable groups
- supporting the plans of the Health and Well Being Board to integrate commissioning of local NHS services, social care and health improvement
- supporting healthier neighbourhoods through targeting of unhealthy lifestyles such as smoking and those which cause obesity and addressing health inequalities in terms of ill health and access to health facilities as identified in the Joint Strategic Needs Assessment
- supporting the remodelling of residential care homes to other forms of special accommodation in order to widen housing choice, support healthy and independent lives and to reduce over supply
- ensuring that vulnerable residents benefit from housing choice and that additional residential care home provision is only supported when evidence of local need can be demonstrated and that the proposal addresses the priorities of NHS Barnet, or its successor bodies, and the Council's Adult Social Services
- ensuring increased access to Barnet's green spaces and opportunities for higher levels of physical activity through the Green Infrastructure SPD.

### Policy CS 12 - Making Barnet a safer place

We will aim to make Barnet a safer place. It is important that we ensure through the management of growth that Barnet is a place where people from different communities get on together. We will:



- work with our partners to tackle crime, fear of crime and anti-social behaviour;
- work with the Metropolitan Police to provide re-modelling of its estate as a basis for an effective and responsive police service in Barnet;
- work with Her Majesty's Court Service as it reviews its estate to ensure that it best meets needs for modern court facilities;
- support the work of neighbourhood policing teams to make our neighbourhoods safer places to live in, work in and visit;
- encourage appropriate security and community safety measures in buildings, spaces and the transport system;
- require developers to demonstrate that they have incorporated design principles which contribute to community safety and security in all new development;
- ensure that through the town centre strategy programme we promote safer and more secure town centre environments; and
- promote safer streets and public areas including open spaces.

### **Policy CS 13 - Ensuring the efficient use of natural resources**

We will seek to minimise Barnet's contribution to climate change and ensure that through the efficient use of natural resources the borough develops in a way which respects environmental limits and improves quality of life.

- We will promote the highest environmental standards for development and through our SPDs on Sustainable Design and Construction and Green Infrastructure we will continue working to deliver exemplary levels of sustainability throughout Barnet in order to mitigate and adapt to the effects of a changing climate
- We will expect all development to be energy-efficient and seek to minimise any wasted heat or power.
- In line with the London Plan we will expect major development to reduce carbon dioxide emissions by at least 20 per cent through use of on-site energy generation
- We will maximise opportunities for implementing new district-wide networks supplied by decentralised energy (including renewable generation) in partnership with key stakeholders in areas of major mixed use growth including town centres. Where feasible we will expect all development to contribute to new and existing frameworks
- We will support solutions that minimise or avoid harm to a heritage asset's significance while delivering improved energy performance or generation.
- We will make Barnet a water efficient borough and minimise the potential for fluvial and surface flooding by ensuring development does not cause harm to the water environment, water quality and drainage systems subject to local geology and ground water levels. Development should utilise Sustainable Urban Drainage Systems (SUDS) in order to reduce surface water run-off and ensure such run-off is managed as close to its source as possible
- We will improve air and noise quality by requiring Air Quality Assessments and Noise Impact Assessments from development in line with Barnet's SPD on Sustainable Design and Construction

### **Policy CS 14 – Dealing with our waste**

We will encourage sustainable waste management by:

- promoting waste prevention, re-use, recycling, composting and resource efficiency over landfill
- requiring developments to provide waste and recycling facilities which fit current and future collection practices and targets
- designating sites through the NLWP to meet an aggregated apportionment target across the seven North London boroughs. These sites will be the principle locations considered suitable for waste facilities
- safeguarding all existing waste facilities in Barnet including a Waste Management Facility in the Brent Cross - Cricklewood Regeneration Area.

### **Policy CS 15 - Delivering the Core Strategy**

We will work with the One Barnet Partnership Board and other partners to deliver the vision, objectives and policies of this Core Strategy. We will:

- Utilise the Infrastructure Delivery Plan to improve understanding of current and future assets and their long term investment and management
- work with relevant providers and developers to ensure that necessary infrastructure is secured and delivered in time to support Barnet's consolidated growth and development and provide the facilities needed for the borough's communities.



## Sustainability Appraisal of Barnet's Core Strategy

- use planning obligations where appropriate alongside other suitable funding mechanisms to support the delivery of infrastructure, facilities and services to meet needs generated by development and mitigate the impact of development;
- work with neighbouring boroughs to co-ordinate delivery across boundaries; and
- monitor the implementation of the Core Strategy and publish the results in our Annual Monitoring Report.

Sustainability Objectives	Core Policies	CS11	CS12	CS13	CS14	CS15
1. To encourage sustained economic growth & promote economic prosperity		O	O	O	O	++
2. To offer everybody the opportunity for rewarding & satisfying employment		O	O	O	O	+
3. To encourage & accommodate both indigenous & inward investment		O	+	O	O	+
4. To reduce disparities in economic performance & promote regeneration		O	O	O	O	+
5. To reduce the effect of traffic on the environment		O	O	O	+	O
6. To maintain & enhance the quality of landscapes, townscapes & local distinctiveness		O	O	O	O	O
7. To conserve & enhance the borough's existing biodiversity & seek to increase where possible		O	O	O	O	O
8. To reduce the risk of flooding for people and property		O	O	O	O	O
9. To improve air quality		O	O	O	+	O
10. To conserve & where appropriate enhance the historic environment and cultural assets		O	O	O	O	O
11. To achieve sustainable management of waste		O	O	O	++	O
12. To reduce contributions to climate change & reduce vulnerability to climate change		O	O	+	O	O
13. To increase energy efficiency & the proportion of energy generated from renewable sources		O	O	+	O	O
14. To encourage sustainable use of land		O	O	O	O	O
15. To achieve sustainable water resources management		O	O	+	O	O
16. To improve the Health of Barnet's population		++	O	O	O	O
17. To improve the education and skills of the population		O	O	O	O	+
18. To provide Barnet's population with the opportunity to live in a decent affordable home		O	O	O	O	O
19. To provide good quality surroundings for all		O	O	O	O	O
20. To reduce crime and the fear of crime		O	++	O	O	O
21. To improve accessibility for all to services and facilities		+	+	O	O	+
22. To encourage a sense of community; identity and welfare		+	+	O	O	O

## Commentary

### 10.12 Policy CS 11 – Improving health and well being in Barnet

10.12.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.

10.12.2 This policy supports the plans of NHS Barnet or its successor bodies to deliver modern primary and community care. NHS Barnet have developed a hub and spoke model of delivering primary and community care. This model intends to improve access to healthcare by making more efficient use of existing facilities. It is unclear given the reforms proposed by the 2010 Health White Paper that this model will be pursued following the abolition of primary care trusts such as NHS Barnet.

10.12.3 The policy seeks to tackle health inequalities in Barnet and could identify where these areas currently exist in the borough.

10.12.4 This policy aims to support vulnerable people's ability to live independently in their own homes and remain within their communities. This has strong social benefits. Residential care has a part to play in providing specialist care as part of a wider choice

for older people. The remodelling of redundant residential care homes provides a more efficient use of land. The policy still ensures that we make adequate provision locally which is positive as it reduces the need for patients, family and friends to travel as far thereby reducing associated congestion, air pollution and climate change emissions.

- 10.12.5 Unhealthy lifestyles will be targeted through supporting healthier neighbourhoods as identified in the Joint Strategic Needs Assessment and through supporting the plans of NHS Barnet and from 2013 its successor bodies. What form our support will take in this instance is unclear.

### 10.13 Policy CS 12 - Making Barnet a safer place

- 10.13.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.13.2 Tackling crime, fear of crime and anti-social behaviour is the objective of this policy. Helping the police to work more effectively through re-modelling of their estate should help to tackle these problems and have positive social and economic impacts from protecting residents and businesses.
- 10.13.3 The policy indicates a requirement that development proposals should demonstrate that they have incorporated design principles which contribute to community safety and security. Such a requirement could form part of design and access statements.
- 10.13.4 Reduction of crime and the fear of crime are vitally important to the success and liveability of neighbourhoods. Neighbourhood policing can provide the basis for community cohesion and a greater sense of security.

### 10.14 Policy CS 13 - Ensuring the efficient use of natural resources

- 10.14.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.14.2 A more appropriate alternative name for the policy could be "Energy Use and Environmental Protection". The current title of the policy is fairly misleading as the policy itself goes beyond issues relating to the use of natural resources e.g. noise pollution is included in this policy and reduction of flood risk does not necessarily concern the efficient use of natural resources.
- 10.14.3 The policy sets out the London Plan target for Carbon Dioxide emissions through on-site energy production but lacks other well defined targets and needs to clearly signpost relevant documents which may contain these figures. However, in some cases it may be more sustainable for a major development to connect to an existing decentralised energy network rather than produce on-site energy.
- 10.14.4 Seeking planning contributions from all major development across the borough for decentralised energy networks could stifle investment in the borough. A more localised approach where contributions are sought from development in close proximity to planned networks may provide a more balanced approach as these developments would benefit from the decentralised energy network in the long term. The Barnet Heat Mapping study has identified potential areas for decentralised energy networks. Reference to the study and sites identified are not mentioned in the policy but could be included in the Development Management Policies DPD.
- 10.14.5 A target level of the Code for Sustainable Homes (CSH) or BREEAM should be set out within the Development Management Policies DPD. Targets for decentralised energy and renewables could be set out too, in Development Management Policies DPD, as this would provide greater potential to reduce emissions overall, thereby achieving higher levels of energy efficiency. There is the same problem with the water efficiency policy as it does not define a level to be achieved in forthcoming development. The CSH defines such targets.

- 10.14.6 A Green Infrastructure SPD can also help contribute significantly to the reduction of flood risk in areas that are currently deficient of green spaces, and will reduce the burden placed on existing drainage infrastructure. This strategy will also provide for the creation of new habitats and should help to promote biodiversity and also health and well-being within Barnet.

### 10.15 Policy CS 14 – Dealing with our waste

- 10.15.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.15.2 It is recognised that this policy serves as a strategic link between Barnet's Core Strategy and the North London Waste Plan (NLWP). The NLWP provides a policy framework for waste management and identifies new locations for facilities; it therefore reflects the direction of the NLWP. The main point emerging is the positive effect that these policies will have on reducing congestion and its impact on air quality. The positive impact of carrying out the NLWP is also noted.
- 10.15.3 This policy could provide more sign-posts for details on re-used and recycled materials; on-site re-use and recycling of construction, demolition and excavation waste; and, require on-site provision to be made for on-site waste treatment, storage and collection throughout the lifetime of a development. The policy does mention that developments should provide waste and recycling facilities which fit current and future practices and targets. However, it could also make sufficient cross-references with other waste management documents such as Barnet's Waste Management Strategy.

### 10.16 Policy CS 15 - Delivering the Core Strategy

- 10.16.1 There have been no significant changes to this policy at Submission Stage of Core Strategy preparation; it has therefore not been reappraised.
- 10.16.2 Helping to ensure delivery of infrastructure to support growth will have a positive effect on the social, environmental and economic aspects of the sustainability appraisal. It will help to meet the needs of residents, help to encourage economic growth and should reduce the impacts of growth on the environment.
- 10.16.3 The Infrastructure Delivery Plan (IDP) will aid future development within Barnet. It will highlight what infrastructure is needed and where it is required. This document will provide developers with the opportunity to evaluate what planning obligations their development proposals will invoke. It will also include provisions for the security of planning obligations. Timely delivery of essential infrastructure is necessary to fulfil the vision set out in Barnet's Core Strategy.
- 10.16.4 Delivery of critical infrastructure affects all of Barnet's sustainability objectives and is important to the success of all regeneration and development areas in the borough. Policy CS15 itself fails to qualify infrastructure priorities but this will form part of the IDP and is included within the dialogue of the draft Core Strategy. If for example, the IDP prioritises public transport improvements the appraisal would regard this direction favourably on its sustainability merit.
- 10.16.5 Failure to effectively utilise the strategic information available in the IDP may undermine the opportunity to deliver necessary and planned infrastructure in a more joined-up and cost-effective manner.
- 10.16.6 Due to the process of sustainability appraisal this policy now includes commentary regarding the Community Infrastructure Levy and other alternative funding options.

# 11. Sustainability appraisal of significant policy changes at Submission stage

*This part of the appraisal will examine the evolution of policy developments that have taken place since the Publication stage of Core Strategy preparation.*

## 11.1 Changes to submission stage policies

- 11.1.1 This section of the SA focuses only on the significant changes to Core Strategy policies and as such only these changes are appraised against the sustainability objectives.
- 11.1.2 Since Publication Stage there have been 369 amendments made to the Core Strategy document. 11 significant changes to the Core Policies have been made (minor changes have been made to the Core Policies also), and it is here that these significant changes will be appraised.
- 11.1.3 Each of these changes has been appraised using the same format and approach that has been used in earlier appraisals at Publication Stage, Direction of Travel and Issues and Options.
- 11.1.4 The following section will first identify all the significant policy amendments that have taken place. Significant changes which need to undergo sustainability appraisal are then identified in a table which is then followed by the appraisal itself in a table matrix. Finally a commentary is included which discusses the issues arising from the appraisal process.

## 11.2 Policies which have not changed significantly

- 11.2.1 The following policies have been refined or altered since the last stage of the sustainability process. However, the changes are not **significant** with respect to the sustainability appraisal:
  - Policy CS 1 - Barnet's Place Shaping Strategy – Protection, Enhancement and Consolidated Growth – The Three Strands Approach
  - Policy CS 2 – Brent Cross – Cricklewood
  - Policy CS 3 – Distribution of Growth in Meeting Housing Aspirations
  - Policy CS 6 – Promoting Barnet's town centres
  - Policy CS 9 – Providing safe, effective and efficient travel
  - Policy CS 11 - Improving health and well-being in Barnet
  - Policy CS 12 - Making Barnet a safer place
  - Policy CS 13 - Ensuring the efficient use of natural resources
  - Policy CS 14 - Dealing with our waste
  - Policy CS 15 – Delivering the Core Strategy

Because these policies have not changed significantly they have not been subject to further sustainability appraisal.

## 11.3 CS4 - Providing quality homes and housing choice in Barnet

### **Note:**

Words in ***bold, italic and underlined*** are new additional changes to revised policies.

Words/sentences that have been ~~struck through~~ have been omitted from revised policies.

### Publication policy CS4

## Policy CS 4 - Providing quality homes and housing choice in Barnet

We will aim to create successful communities in Barnet by:

- seeking to ensure a mix of housing products in the affordable and market sectors to provide choice for all households and enable Barnet residents to progress on a housing journey that can meet the aspirations of home ownership
- seeking a range of dwelling sizes and types of housing including family and lifetime homes that meets our identified housing priorities and does not undermine suburban character or local distinctiveness
- seeking a variety of housing related support options that maximise the independence of vulnerable residents including young people, people with disabilities, older people, homeless people and other vulnerable adults
- delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a boroughwide target of 30% affordable homes on sites capable of accommodating ten or more dwellings
- seeking an appropriate mix of affordable housing of 60% social rented and 40% intermediate for Barnet that will support our objectives of widening home ownership and providing family homes
- on sites which are suitable for the provision of an element of affordable housing, we may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision

Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers, having regard to:

- potential of the site for good management
- impact on local environment, character and amenity
- access to essential services including water and waste disposal

We will monitor the delivery of additional housing against our target of 28,000 new homes by 2025/26 and will seek to maintain supply at the rate necessary to meet or exceed the target. In seeking to maintain the housing supply we will adjust the type and mix of housing sought, having regard to the financial viability of development, the housing market and the needs of different groups.

### Submission policy CS4 with revisions

## Policy CS 4 - Providing quality homes and housing choice in Barnet

We will aim to create successful communities in Barnet by:

- seeking to ensure a mix of housing products in the affordable and market sectors to provide choice for all households and enable Barnet residents to progress on a housing journey that can meet the aspirations of home ownership
- **seeking to ensure that all new homes are built to Lifetime Homes Standards and that through extending the inclusive design principles embedded in Lifetime Homes we can create Lifetime Neighbourhoods that are welcoming, accessible, and inviting for everyone, regardless of age, or health, or disability.**
- seeking a range of dwelling sizes and types of housing including family and lifetime homes that meets our identified housing priorities and does not undermine suburban character or local distinctiveness. **Policy CS 5 on Protecting and Enhancing Barnet's Character to Create High Quality Places sets out how we will secure high quality design.**
- seeking a variety of housing related support options that maximise the independence of vulnerable residents including young people, people with disabilities, older people, homeless people and other vulnerable adults



- delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a boroughwide target of 30% affordable homes on sites capable of accommodating ten or more dwellings
- seeking an appropriate mix of affordable housing of 60% social rented and 40% intermediate for Barnet that will support our objectives of widening home ownership and providing family homes
- on sites which are suitable for the provision of an element of affordable housing, we may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision

Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers, having regard to:

- potential of the site for good management
- impact on local environment, character and amenity
- access to essential services including water and waste disposal

We will monitor the delivery of additional housing against our target of 28,000 new homes by 2025/26 and will seek to maintain supply at the rate necessary to meet or exceed the target. In seeking to maintain the housing supply we will adjust the type and mix of housing sought, having regard to the financial viability of development, the housing market and the needs of different groups.

### 11.4 The significant changes to policy CS4

Policy CS 4 – Providing quality homes and housing choice in Barnet	
A	Seeking to ensure that all new homes are built to Lifetime Homes Standards and that through extending the inclusive design principles embedded in Lifetime Homes we can create Lifetime Neighbourhoods that are welcoming, accessible, and inviting for everyone, regardless of age, or health, or disability.

### 11.5 Important issues arising from the sustainability appraisal for policy CS4 at publication stage.

11.5.1 Issues were identified through the appraisal at the publication stage. Issues included:

- The importance of securing the right amount of affordable housing – demand for too much affordable housing could stifle development, leading to developers looking for more lucrative opportunities outside the borough where there may be lower affordable housing targets.
- A larger percentage of affordable housing will come forward through more sustainable mixed-use developments thereby encouraging the sustainable use of land.
- The targets for affordable housing provision are evidenced by the Strategic Housing Market Assessment and viability study. The targets above will provide all Barnet residents the opportunity to live in decent and affordable accommodation. It will also provide the opportunity for residents to secure some form of home ownership.

### 11.6 Important issues arising from the sustainability appraisal for policy CS4 at submission stage.

11.6.1 The appraisal has highlighted some issues at the publication stage, these include:

- This change in policy is positive and reflects a more inclusive approach to development. Lifetime Homes and Neighbourhoods will provide more inclusive environments for the elderly and less mobile.
- As Barnet has an ageing population this policy change is of particular relevance and addresses the needs of a large number of Barnet residents. This approach will positively contribute to social inclusion.



Sustainability appraisal of changes to policy CS4	+ / - effects	Perm / Temp / Sec	Commentary
Sustainability Objectives	A		
1. To encourage sustained economic growth and promote economic prosperity	O		There is no significant effect from these policy amendments.
2. To offer everybody the opportunity for rewarding and satisfying employment	O		There is no significant effect from these policy amendments.
3. To encourage and accommodate both indigenous and inward investment	O		There is no significant effect from these policy amendments.
4. To reduce disparities in economic performance and promote regeneration	O		There is no significant effect from these policy amendments.
5. To reduce the effect of traffic on the environment	O		There is no significant effect from these policy amendments.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	O		There is no significant effect from these policy amendments.
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	O		There is no significant effect from these policy amendments.
8. To reduce the risk of flooding for people and property	O		There is no significant effect from these policy amendments.
9. To improve air quality	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	O		There is no significant effect from these policy amendments.
11. To achieve sustainable management of waste	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	O		There is no significant effect from these policy amendments.
13. To increase energy efficiency and the proportion of energy generated from renewable sources	O		There is no significant effect from these policy amendments.
14. To encourage sustainable use of land	O		There is no significant effect from these policy amendments.
15. To achieve sustainable water resources management	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	O		There is no significant effect from these policy amendments.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	++		Lifetime Homes standards will ensure that there is housing choice in Barnet which can accommodate lone elderly residents and others who may suffer from poor mobility. This strategy will provide homes for which people can grow old in without the need to relocate later in life to more suitable accommodation.
19. To provide good quality surroundings for all	+		The creation of Lifetime Neighbourhoods will provide opportunities to improve the local

Sustainability appraisal of changes to policy CS4	+ / - effects	Perm / Temp / Sec	Commentary
Sustainability Objectives	A		
			environments for many residents ensuring that good quality surroundings are provided for all..
20. To reduce crime and the fear of crime	O		There is no significant effect from these policy amendments.
21. To improve accessibility for all to services and facilities	++		This strategic approach should make neighbourhoods more accessible for those who suffer from mobility problems, including the elderly. This will improve the confidence of individuals in going outside their homes and will help to provide more inclusive environments for all Barnet residents.
22. To encourage a sense of community; identity and welfare	++		Lifetime neighbourhood's standards should provide the basis for inclusive and accessible neighbourhoods for residents of all ages. Such an approach should positively impact on identity, welfare and a sense of community for local neighbourhoods.

## 11.7 The difference the appraisal process has made to Policy CS4

- 11.7.1 This policy change has not materialised through the sustainability process. It has come about from direction in the London Plan.
- 11.7.2 This policy amendment should contribute positively towards Barnet's social sustainability objectives. The creation of Lifetime Neighbourhoods will allow older people to feel that they are part of their local communities.

## 11.8 Changes to policy CS5 - Protecting and enhancing Barnet's character to create high quality places

### Publication stage policy CS5

#### Policy CS 5 - Protecting and enhancing Barnet's character to create high quality places

We will ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high quality design that:

- are safe and attractive and fully accessible
- provide vibrant, attractive and accessible public spaces
- respect and enhance the distinctive natural landscapes of Barnet
- protect and enhance the gardens of residential properties
- protecting important local views from places within Barnet
- enhance the borough's high quality suburbs and historic areas through the provision of buildings of the highest quality that are sustainable and adaptable
- protect and enhance Barnet's rich heritage including conservation areas, listed buildings and historic parks and gardens; and London's only battlefield site

The Barnet Characterisation Study forms the baseline for the identification of places with a consistent and coherent architectural character. Within the typologies identified in the Characterisation Study we will through our Development Management Policies DPD and Residential Design Guidance SPD develop a framework to protect and enhance those high quality suburbs in Barnet not protected by Conservation Area designations.

#### Tall Buildings

Tall buildings (~~in excess of~~ 8 storeys) will only be considered subject to the key considerations outlined in the Tall Buildings Study. These considerations include

- ~~Proximity and access to green open space~~
- ~~Integration into urban grain and use of active street frontages and podium blocks~~
- ~~Impact on important local views~~
- ~~Impact on historic environment~~
- ~~Access to good public transport, shops and services~~
- ~~Landmark tall buildings should only be located in places that warrant marking and have regard to their topography~~

### Submission stage policy CS5 with revisions

#### Policy CS 5 - Protecting and enhancing Barnet's character to create high quality places

We will ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high quality design. **Developments should:**

- **address the principles, aims and objectives set out in the following national design guidance :**

**By Design, Secured by Design, Safer Places, Inclusive Design, Lifetime Homes and Building for Life:**

- be safe, attractive and fully accessible
- provide vibrant, attractive and accessible public spaces
- respect and enhance the distinctive natural landscapes of Barnet
- protect and enhance the gardens of residential properties
- protect important local views from places within Barnet
- enhance the borough's high quality suburbs and historic areas through the provision of buildings of the highest quality that are sustainable and adaptable

**All development should maximise the opportunity for community diversity, inclusion and cohesion and should contribute to people's sense of place, safety and security.**

**Heritage and Character**

**We will work with partners to proactively** protect and enhance Barnet's heritage including conservation areas, listed buildings, **locally listed buildings, registered** parks and gardens; **scheduled monuments, areas of archaeological significance** and London's only battlefield site.

**We will require proposals within or affecting the setting of heritage assets to provide a site assessment which demonstrates how the proposal will respect and enhance the asset. CS 13 addresses the adaptation of heritage assets to reduce carbon emissions and ensure efficient use of natural resources.**

**We will ensure through our programme of Conservation Area Character Appraisals that these areas are protected and enhanced.**

**We will ensure through our Green Infrastructure SPD that the key characteristics of Barnet's landscape (Barnet Plateau and Finchley Ridge) are protected and enhanced**

**We will encourage community involvement in the review of the Local List of important local buildings**

The Barnet Characterisation Study forms the baseline for the identification of places with a consistent and coherent architectural character. Within the typologies identified in the Characterisation Study we will through our Development Management Policies DPD and Residential Design Guidance SPD develop a framework to protect and enhance those high quality suburbs in Barnet not protected by Conservation Area designations.

**Tall Buildings**

Tall buildings (8 storeys **(or 26 metres) or more**) will only be considered **in the following strategic locations:**

**Brent Cross – Cricklewood Regeneration Area**

**Colindale – Colindale Avenue Corridor of Change, Edgware Road Corridor of Change (in accordance with Policy 5.3 Building Heights in the Colindale Area Action Plan, 2010)**

**Grahame Park Estate**

**Stonegrove and Spur Road Estate**

**West Hendon Estate**

**And the Priority Town Centres of**

**Edgware**

**Finchley Church End and**

**North Finchley**

- **Proposals for tall buildings will be considered in accordance with DM 02 – Design Considerations for Development, London Plan Policy 7.7 – Location and Design of Tall and Large Buildings and Guidance on Tall Buildings (2007) by English Heritage and CBE**

## 11.9 The significant changes to policy CS5

<b>Policy CS 5 - Protecting and enhancing Barnet's character to create high quality places</b>	
<b>A</b>	All development should maximise the opportunity for community diversity, inclusion and cohesion and should contribute to people's sense of place, safety and security.
<b>B</b>	We will require proposals within or affecting the setting of heritage assets to provide a site assessment which demonstrates how the proposal will respect and enhance the asset. CS 13 addresses the adaptation of heritage assets to reduce carbon emissions and ensure efficient use of natural resources.
<b>C</b>	Tall buildings (8 storeys (or 26 metres) or more) will only be considered in the following strategic locations: Brent Cross – Cricklewood Regeneration Area Colindale – Colindale Avenue Corridor of Change...
<b>D</b>	We will encourage community involvement in the review of the Local List of important local buildings

### 11.10 Important issues arising from the sustainability appraisal for policy CS5 at the Publication stage.

#### 11.10.1 Issues identified included:

- Enhancement of Barnet's historic assets could result in increases in tourism and therefore encourage economic growth.
- Enhancement and protection of historic and cultural assets will have a positive effect on Barnet's townscapes and landscapes. Such action will provide good quality surroundings for all.
- Well thought-out and high quality urban design can promote a sense of community, identity and welfare. This will be achievable through provisions set out in the SPD on Residential Design Guidance and the Development Management Policies DPD.
- Due consideration needs to be taken in selecting the location of high-rise developments. Such development could have negative impacts on migratory bird populations where they are an obstruction to migratory paths.

### 11.11 Important issues arising from the sustainability appraisal for policy CS5 at the Submission stage.

#### 11.11.1 Issues identified at the submission stage include:

- The requirement to provide detailed site assessments to entail how a development will respect and enhance a heritage asset positively contributes to Barnet's sustainability objectives. This approach will lead to well designed buildings which respect local settings and the rich historic environment of Barnet. Such an approach will ensure that distinctive areas of Barnet, which are not protected by Conservation Area status, are able to maintain their local character and distinctiveness.
- Tall buildings will now only be allowed in specific areas which are named within the text of the policy. This approach will ensure that tall buildings are located in areas

where these are already present thereby protecting other areas from inappropriate high-rise development which could have negative impacts on a locality.

- Increased involvement from the local community in reviewing the Local List of important buildings will give communities greater ownership over the areas in which they live. This approach should contribute very positively to promoting a sense of identity and community.

### 11.12 The difference the appraisal process has made to Policy CS5

- The appraisal process has influenced policy development which will now afford greater consideration of the local historic environment in development proposals.
- The greater involvement of the community in protecting their local areas has come about through the appraisal process. Many local residents have far greater local knowledge than policy officers about buildings and areas of local importance and therefore their input in protecting local heritage assets is of great importance.



SA of changes to policy CS5	+ / - effects				Perm / Temp / Sec	Commentary
Sustainability objectives	A	B	C	D		
1. To encourage sustained economic growth and promote economic prosperity	O	O	O	O		There is no significant effect from these policy amendments.
2. To offer everybody the opportunity for rewarding and satisfying employment	O	O	O	O		There is no significant effect from these policy amendments.
3. To encourage and accommodate both indigenous and inward investment	O	O	O	O		There is no significant effect from these policy amendments.
4. To reduce disparities in economic performance and promote regeneration	O	O	O	O		There is no significant effect from these policy amendments.
5. To reduce the effect of traffic on the environment	O	O	O	O		There is no significant effect from these policy amendments.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	O	++	++	++		The requirement of site assessments affecting heritage assets should enhance quality of townscapes, landscapes and should protect local distinctiveness. Restricting development of tall buildings to identified locations together with clear guidance on how such proposals will be considered will help protect and enhance existing landscapes and townscapes. Community Involvement in compiling the local list of buildings will ensure that lesser known assets are highlighted.
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	O	O	O	O		There is no significant effect from these policy amendments.
8. To reduce the risk of flooding for people and property	O	O	O	O		There is no significant effect from these policy amendments.
9. To improve air quality	O	O	O	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	O	++	++	++		The requirement of site assessments affecting heritage assets should enhance quality of townscapes, landscapes and should protect local distinctiveness. Restricting development of tall buildings to identified locations together with clear guidance on how such proposals will be considered will help protect and enhance existing landscapes and townscapes. Community Involvement in compiling the local list of buildings will ensure that lesser known assets are highlighted.
11. To achieve sustainable management of waste	O	O	O	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	O	O	?	O		Tall buildings may be considered as a more efficient and sustainable use of land. Such buildings may benefit from economies of scale e.g. water conservation can be achieved on a far greater scale than in individual smaller buildings.
13. To increase energy efficiency and the	O	O	O	O		There is no significant effect from these policy amendments.

SA of changes to policy CS5	+ / - effects				Perm / Temp / Sec	Commentary
Sustainability objectives	A	B	C	D		
proportion of energy generated from renewable sources						
14. To encourage sustainable use of land	O	O	?	O		Tall buildings may be considered as a more efficient and sustainable use of land. Such buildings may benefit from economies of scale e.g. water conservation can be achieved on a far greater scale than in individual smaller buildings.
15. To achieve sustainable water resources management	O	O	O	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O	O	O	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	O	O	O	O		There is no significant effect from these policy amendments.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	O	O	O	O		There is no significant effect from these policy amendments.
19. To provide good quality surroundings for all	O	++	++	++		The requirement of site assessments affecting heritage assets should enhance quality of townscapes, landscapes and should protect local distinctiveness. Restricting development of tall buildings to identified locations together with clear guidance on how such proposals will be considered will help protect and enhance existing landscapes and townscapes. Community Involvement in compiling the local list of buildings will ensure that lesser known assets are highlighted.
20. To reduce crime and the fear of crime	+	O	O	O		Encouraging community cohesion should have positive effects on reducing fear of crime and should enhance residents' sense of safety.
21. To improve accessibility for all to services and facilities	+	O	O	O		By definition socially inclusive environments are ones which ensure that there is good access for all residents to local services and facilities. Maximising opportunities to create socially inclusive and cohesive environments should contribute positively to this SA objective.
22. To encourage a sense of community; identity and welfare	++	+	+	++		Conserving Barnet's cultural and historic assets will help to maintain the borough's character and identity. Involving the community in conserving local assets will help to encourage a sense of community and pride in local neighbourhoods. Maximising opportunities for community diversity, inclusion and cohesion will contribute to the creation of socially sustainable communities which will encourage a sense of community, identity and welfare.

## 11.13 Policy CS7

### Publication stage policy CS7

#### Policy CS 7 - Enhancing and Protecting Barnet's Open Spaces

In order to create a greener Barnet we will ~~enhance and protect Barnet's Open Spaces by:~~

- ~~protecting designated open spaces, including Green Belt and Metropolitan Open Land, and other suitable land with the potential to be used as open space~~

Meeting increased demand for access to open space and opportunities for physical activity, by tackling deficiencies and under provision through:

- securing additional on-site open space or other open space improvements in the identified growth areas including 8 ha of new provision at Brent Cross – Cricklewood, 5.5 ha of new provision at Mill Hill East and 5 ha at Colindale
- improving access to open spaces particularly in North and East Finchley and other areas of public open space deficiency identified by Map 9 (see Appendix D). We will seek to improve provision in these areas of deficiency with the objective of increasing the area of the borough that has access to district and local parks in accordance with the London Plan criteria
- securing improvements to open spaces including provision for children's play, sports facilities and better access arrangements, where opportunities arise, from all developments that create an additional demand for open space
- maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses enabling green corridors to link Barnet's rural, urban fringe and urban green spaces
- protecting existing Sites of Nature Conservation Importance and working with our partners including the London Wildlife Trust to improve protection and enhancement of biodiversity in Barnet
- ensuring that development protects existing site ecology and makes the fullest contributions to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements; and
- enhancing local food production through the protection of allotments and support for community food growing including the Mayor's Capital Growth Initiative

In supporting new green infrastructure we will:

- as part of the All London Green Grid work with neighbouring authorities to establish Area Frameworks as the basis for identification, creation and management of new green spaces as part of:

Lea Valley and Finchley Ridge Green Grid Area

Brent Valley and Barnet Plateau Green Grid Area

Reflect the policies and objectives in the Watling Chase Forest Plan when assessing development proposals in the area covered by the Community Forest

### Submission policy CS7 with revisions

#### Policy CS 7 - Enhancing and Protecting Barnet's Open Spaces

In order to ***maximise the benefits that open spaces can deliver and*** create a greener Barnet we will ***work with our partners to improve Barnet's Green Infrastructure. We will create a greener Barnet***  
***by:***

- protecting open spaces, including Green Belt and Metropolitan Open Land
- ***enhancing open spaces, ensuring positive management of Green Belt and Metropolitan Open Land to provide improvements in overall quality and accessibility***

- **ensuring that the character of green spaces of historic significance is protected**
- meeting increased demand for access to open space and opportunities for physical activity, by tackling deficiencies and under provision through:
- securing additional on-site open space or other open space improvements in the identified growth areas including 8 ha of new provision at Brent Cross – Cricklewood, 5.5 ha of new provision at Mill Hill East and 5 ha at Colindale
- improving access to open spaces particularly in North and East Finchley and other areas of public open space deficiency identified by Map 9. We will seek to improve provision in these areas of deficiency with the objective of increasing the area of the borough that has access to district and local parks in accordance with the London Plan criteria
- securing improvements to open spaces including provision for children's play, sports facilities and better access arrangements, where opportunities arise, from all developments that create an additional demand for open space. **Standards for new provision are set out in DM 13 – Open Spaces and Biodiversity**
- maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses enabling green corridors to link Barnet's rural, urban fringe and urban green spaces
- protecting existing Sites of Nature Conservation Importance and working with our partners including the London Wildlife Trust to improve protection and enhancement of biodiversity in Barnet
- ensuring that development protects existing site ecology and makes the fullest contributions to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements; and
- enhancing local food production through the protection of allotments and support for community food growing including the Mayor's Capital Growth Initiative

In supporting new Green Infrastructure we will:

- **set out an approach to improving the network of green spaces within the Green Infrastructure SPD**
- as part of the All London Green Grid work with neighbouring authorities to establish Area Frameworks as the basis for identification, creation and management of new green spaces as part of:
  - Lea Valley and Finchley Ridge Green Grid Area
  - Brent Valley and Barnet Plateau Green Grid Area

Reflect the policies and objectives in the Watling Chase Forest Plan when assessing development proposals in the area covered by the Community Forest

### 11.14 The significant changes to policy CS7

Policy CS 7 - Enhancing and Protecting Barnet's Open Spaces	
A	• enhancing open spaces, ensuring positive management of Green Belt and Metropolitan Open Land to provide improvements in overall quality and accessibility
B	• ensuring that the character of green spaces of historic significance are protected

### 11.15 Important issues arising from the sustainability appraisal for policy CS7 at the Publication stage.

11.15.1 Issues identified include:

- Increasing green space provision in areas of deficiency will lead to the enhancement of townscapes and landscapes within the borough

- Increasing green space provision in areas of deficiency will increase the provision of natural drainage systems and reduce the burden on existing drainage infrastructure.
- Allotments encourage and promote the process of composting which will aid sustainable management of waste. Allotments are also considered a sustainable use of land.
- Outdoor activities, recreation and walking will help to improve the overall health of Barnet's population
- Green spaces and allotments are places where people can meet and events can take place – such interactions help to create a sense of local identity and community.

### **11.16 Important issues arising from the sustainability appraisal for policy CS7 at the Submission stage.**

11.16.1 Issues identified at the submission stage include:

- The large number of historic green spaces that exist within Barnet will now directly be afforded the protection that they need. Many of these green spaces are of great historic value and are characteristic in many parts of the borough.

### **11.17 The difference the appraisal process has made to Policy CS7**

11.17.1 The sustainability appraisal has lead to greater protection of Barnet's historic green spaces such as those which exist in Hampstead Garden Suburb, which are of national as well as local importance.

11.17.2 This amendment is of particular importance to Barnet as green spaces of historic significance characterise many areas within the borough.

Sustainability appraisal of changes to policy CS7	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
1. To encourage sustained economic growth and promote economic prosperity	O	O		There is no significant effect from these policy amendments.
2. To offer everybody the opportunity for rewarding and satisfying employment	O	O		There is no significant effect from these policy amendments.
3. To encourage and accommodate both indigenous and inward investment	O	O		There is no significant effect from these policy amendments.
4. To reduce disparities in economic performance and promote regeneration	O	O		There is no significant effect from these policy amendments.
5. To reduce the effect of traffic on the environment	O	O		There is no significant effect from these policy amendments.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	++	++		Over a 100 formal green spaces are considered to have historic significance. Conserving these spaces will continue to enhance the quality of landscapes and townscapes throughout Barnet. These historic spaces give areas of Barnet their local distinctiveness and individual characteristics. Enhancing open spaces by improving quality and accessibility will contribute positively to the general enhancement and quality of Barnet's landscapes, townscapes and will promote local distinctiveness.
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	+	+		Conserving green spaces of historic significance will maintain existing habitats and biodiversity within the borough. Positive management of Green Belt and Metropolitan Open Land should help enhance the borough's existing biodiversity through ensuring that habitats are maintained and cared for.
8. To reduce the risk of flooding for people and property	?+	?+		Historic green spaces may help to reduce the risk of flooding in nearby areas by reducing run-off rates and by providing permeable areas for 'soaking up' rainwater. Positive management of Green Belt and Metropolitan Open Land will ensure that there is provision of green open spaces throughout the borough which will help attenuate flood waters during periods of heavy rainfall
9. To improve air quality	O	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	+	++		Over 100 formal green spaces are considered to have historic significance. Conserving these spaces will continue to enhance the historic environment throughout Barnet. These historic spaces give areas of Barnet their local distinctiveness and individual characteristics. Positive management of Green Belt and Metropolitan Open Land will contribute positively to the conservation and enhancement of Barnet's historic green spaces.
11. To achieve sustainable management of waste	O	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	+	?+		Positive management of Green Belt and Metropolitan Open Land could positively contribute to reducing the risk of flooding in nearby areas. Historic green spaces may help to reduce the risk of flooding in nearby areas by maintaining natural run-off



Sustainability appraisal of changes to policy CS7	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
				rates and by providing permeable areas for 'soaking up' rainwater.
13. To increase energy efficiency and the proportion of energy generated from renewable sources	O	O		There is no significant effect from these policy amendments.
14. To encourage sustainable use of land	O	O		There is no significant effect from these policy amendments.
15. To achieve sustainable water resources management	O	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	O	O		There is no significant effect from these policy amendments.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	O	O		There is no significant effect from these policy amendments.
19. To provide good quality surroundings for all	+	+		Positive management of Green Belt and Metropolitan Open Land will ensure that quality of these open spaces is maintained providing good quality surroundings for all. Conserving Barnet's historic green spaces will continue to enhance their localities and provide good quality surroundings for residents and visitors.
20. To reduce crime and the fear of crime	O	O		There is no significant effect from these policy amendments.
21. To improve accessibility for all to services and facilities	O	O		There is no significant effect from these policy amendments.
22. To encourage a sense of community; identity and welfare	+	+		Positive management of Green Belt and Metropolitan Open Land will provide good quality spaces where social interaction can take place. This should contribute positively towards encouraging a sense of community and identity. Over 100 formal green spaces are considered to have historic significance. These historic green spaces contribute positively to Barnet's characteristics providing a sense of local identity and pride.

## 11.18 Policy CS8

### Publication stage policy CS8

#### Policy CS 8 – Promoting a strong and prosperous Barnet

The Council and its partners will ensure a strong and prosperous Barnet that provides opportunity for economic advancement.

We will support Barnet residents in accessing work by:

- Delivering 1,500 new jobs in our growth areas of Colindale and Mill Hill East by 2021 and a total of 20,000 new jobs in Brent Cross-Cricklewood by 2026
- Attracting business growth as part of Brent Cross - Cricklewood with further provision in the other growth areas and town centres to meet the forecast demand for business space of 13.5 ha by 2026
- requiring major developments to provide financial contributions and to deliver employment and training initiatives in line with the Skills Development Plan;
- working in partnership with the Skills Development Group in delivering the skills agenda required for a growing borough in a successful London suburb

We will support businesses by:

- safeguarding existing employment sites that meet the needs of modern business.
- encouraging development that improves the quality of existing employment provision
- encouraging new mixed use commercial floorspace in our priority town centres (Edgware, North Finchley, Finchley Church End and Chipping Barnet) where access to public transport is good
- in order to support small to medium sized enterprises new employment provision should include a range of unit sizes and types such as affordable and flexible workspaces and home working hubs
- through the Skills Development Group building an understanding about the experience of local businesses and their skills needs
- encouraging partnership working between providers of further and higher education and local business

### Submission policy CS8 with revisions

#### Policy CS 8 – Promoting a strong and prosperous Barnet

The Council and its partners will ensure a strong and prosperous Barnet that provides opportunity for economic advancement.

We will support Barnet residents in accessing work by:

- Delivering 1,500 new jobs in our growth areas of Colindale and Mill Hill East by 2021 and a total of 20,000 new jobs in Brent Cross-Cricklewood by 2026
- Attracting business growth as part of Brent Cross - Cricklewood with further provision in the other growth areas and town centres to meet the forecast demand for business space of 13.5 ha by 2026
- requiring major developments to provide financial contributions and to deliver employment and training initiatives in line with the Skills Development Plan;
- working in partnership with the Skills Development Group in delivering the skills agenda required for a growing borough in a successful London suburb

We will support businesses by:

- safeguarding existing employment sites that meet the needs of modern business **in accordance with DM12 New and Existing Employment Space.**

- encouraging development that improves the quality of existing employment provision
- encouraging new mixed use commercial floorspace in our priority town centres (Edgware, North Finchley, Finchley Church End and Chipping Barnet) where access to public transport is good
- in order to support small to medium sized enterprises new employment provision should include a range of unit sizes and types such as affordable and flexible workspaces and home working hubs
- through the Skills Development Group building an understanding about the experience of local businesses and their skills needs
- encouraging partnership working between providers of further and higher education and local business

We will support providers of further and higher education by:

- **encouraging the provision of new and improved facilities within Barnet and**
- **encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research.**

### 11.19 The significant changes to policy CS8

Policy CS 8 – Promoting a strong and prosperous Barnet	
A	We will support providers of further and higher education by : <ul style="list-style-type: none"> <li>• encouraging the provision of new and improved facilities within Barnet and</li> </ul>
B	<ul style="list-style-type: none"> <li>• encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research.</li> </ul>

### 11.20 Important issues arising from the sustainability appraisal for policy CS8 at the publication stage.

#### 11.20.1 Issues identified include:

- Due to the Brent Cross – Cricklewood regeneration and the proposed creation of 20,000 new jobs, there is the likelihood that this project could cause disparities in employment growth across the borough. Encouraging growth in Barnet's other town centre locations through the formulation of town centre frameworks will help mitigate this potential problem.
- The growth in employment provision at Brent Cross may only primarily provide jobs within the retail sector. Ideally there would be the provision of a wide range of employment offerings across many sectors which would address the needs of all Barnet residents.

### 11.21 Important issues arising from the sustainability appraisal for policy CS8 at the submission stage.

#### 11.21.1 Issues identified include:

- The creation of new educational facilities could have wide ranging positive effects across the economic and social sustainability objectives. Barnet's population will have greater access to further and higher educational facilities.
- Greater provision of educational and training programmes should directly improve the education and skills of the local population thereby increasing opportunities for individuals to secure good employment opportunities.
- The increased provision of educational facilities should lead to an increase in the student population in the borough. This will help the Barnet economy through the provision of student accommodation and the increased demand for everyday goods in the retail sector.

- This strategy could help stem the flow of students moving out of the borough to seek higher education opportunities. This approach should also increase access to education and training for all Barnet residents.
- Residential areas which have large numbers of student accommodation could possibly suffer from studentification.

### 11.22 The difference the appraisal process has made to Policy CS8

- 11.22.1 The appraisal process has highlighted the many positive effects that may be brought about through the increased provision of educational and training opportunities.

Sustainability appraisal of changes to policy CS8	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
1. To encourage sustained economic growth and promote economic prosperity	?	?		Students relocating into the borough for educational reasons may generate economic growth in the student accommodation and retail sectors.
2. To offer everybody the opportunity for rewarding and satisfying employment	++	++		Improving the number of skills based training programmes will improve Barnet's skill pool thereby enhancing the opportunity for those of working age to gain rewarding and satisfying employment.
3. To encourage and accommodate both indigenous and inward investment	?	?		Increasing educational provision may see an increase of inward investment primarily in the form of student accommodation
4. To reduce disparities in economic performance and promote regeneration	+?	+?		Increased student population could increase demand for goods and services as well as accommodation. This could help to promote regeneration within the borough.
5. To reduce the effect of traffic on the environment	?	?		Increased numbers of students could increase local levels of traffic.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	?	?		Studentification could become an issue with regards to student accommodation provided by private landlords. This could have a negative effect on residential areas of Barnet
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	O	O		There is no significant effect from these policy amendments.
8. To reduce the risk of flooding for people and property	O	O		There is no significant effect from these policy amendments.
9. To improve air quality	O	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	O	O		There is no significant effect from these policy amendments.
11. To achieve sustainable management of waste	O	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	O	O		There is no significant effect from these policy amendments.
13. To increase energy efficiency and the proportion of energy generated from renewable sources	O	O		There is no significant effect from these policy amendments.
14. To encourage sustainable use of land	O	O		There is no significant effect from these policy amendments.
15. To achieve sustainable water resources management	O	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	++	++		Provision of more skills based training will lead to the improvement of the education and skill levels of Barnet's working age population. This should lead to a larger and improved skills pool within the borough.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	O	O		There is no significant effect from these policy amendments.

Sustainability appraisal of changes to policy CS8	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
19. To provide good quality surroundings for all	O	O		There is no significant effect from these policy amendments.
20. To reduce crime and the fear of crime	O	O		There is no significant effect from these policy amendments.
21. To improve accessibility for all to services and facilities	?	?		Increases in provision of educational and skills based training may improve accessibility for all Barnet residents to these particular programmes.
22. To encourage a sense of community; identity and welfare	?	?		Increased provision of educational facilities and programmes may become a prominent characteristic of Barnet, leading to an improved sense of identity for Barnet's residents.



## 11.23 Policy CS10

### Publication stage policy CS10

#### Policy CS 10 – Enabling Integrated Community Facilities and Uses

The Council will work with our partners to ensure that community facilities including schools, libraries, leisure centres and pools, community meeting places and facilities for younger and older people, are provided for Barnet's communities.

We will:

- ensure that our programmes for capital investment in schools and services for young people address the needs of a growing, more diverse and increasingly younger population;
- promote the role of schools as 'community hubs', providing a wide range of educational, advice, leisure and support services to children, families and the wider community;
- support the enhancement of community facilities ensuring their efficient use and the provision of multi-purpose community hubs that can provide a range of services to the community at a single accessible location; and
- expect development that increases the demand for community facilities and services to make appropriate contributions towards new and accessible facilities, particularly within the regeneration and development areas of the borough or improving existing provision, particularly within town centres.

In addressing educational needs within Barnet and responding to the need for parental choice we will support proposals for parent promoted schools or 'Free Schools' that:

- Conform with DfE guidance on becoming a new school and
- Meet parental demand for school places and
- Provide educational facilities that conform with basic school requirements as set out in relevant DfE guidance.

Through the Site Allocations DPD we will seek to allocate sites for development that are capable of providing new school premises including parent promoted schools that meet DfE requirements.

### Submission policy CS10 with revisions

#### Policy CS 10 – Enabling **Inclusive and** Integrated Community Facilities and Uses

The Council will work with our partners to ensure that community facilities including schools, libraries, leisure centres and pools, **places of worship**, community meeting places and facilities for younger and older people, are provided for Barnet's communities.

We will:

- ensure that our programmes for capital investment in schools and services for young people address the needs of a growing, more diverse and increasingly younger population
- promote the role of schools as 'community hubs', providing a wide range of educational, advice, leisure and support services to children, families and the wider community
- support the enhancement **and inclusive design** of community facilities ensuring their efficient use, and the provision of multi-purpose community hubs that can provide a range of services to the community at a single accessible location
- expect development that increases the demand for community facilities and services to make appropriate contributions towards new and accessible facilities, particularly within the regeneration and development areas of the borough or improving existing provision, particularly within town centres

- **work with the Mayor and cemetery providers to establish current supply of burial space, identify barriers to supply and any necessary changes to planning policy.**

In addressing educational needs within Barnet and responding to the need for parental choice we will support proposals for parent promoted schools or 'Free Schools' that:

- Conform with DfE guidance on becoming a new school and
- Meet parental demand for school places and
- Provide educational facilities that conform with basic school requirements as set out in relevant DfE guidance.

Through the Site Allocations DPD we will seek to allocate sites for development that are capable of providing new school premises including parent promoted schools that meet DfE requirements.

## 11.24 The significant changes to policy CS10

Policy CS 10 – Enabling Integrated Community Facilities and Uses	
A	<ul style="list-style-type: none"> <li>• work with the Mayor and cemetery providers to establish current supply of burial space, identify barriers to supply and any necessary changes to planning policy.</li> </ul>
B	<ul style="list-style-type: none"> <li>• support the enhancement <b><i>and inclusive design</i></b> of community facilities ensuring their efficient use, and the provision of multi-purpose community hubs that can provide a range of services to the community at a single accessible location</li> </ul>

## 11.25 Important issues arising from the sustainability appraisal for policy CS10 at the Publication Stage.

### 11.25.1 Issues identified include:

- Promoting the role of schools as 'community hubs' will help to improve the education of Barnet residents and will result in improved access to various services and facilities. Using schools out-of-hours for various community uses will provide the opportunity for residents to meet and will promote social cohesion.
- The provision of state-of-the-art schools and improvements to existing ones should help to increase educational standards of Barnet's resident population in the long term. Greater provision of schools as the population grows will increase accessibility to educational facilities and reduce competition for school places.
- Provision of more schools may lead to increases in car related traffic during term time and therefore greater impacts on the environment. This issue will depend on levels of public transport provision and the distribution of schools in relation to residential development. Policy CS9 refers to a review of school travel plans which should help to mitigate this potential problem.
- Improved performance of schools could indirectly affect property values in neighbouring areas and could potentially stimulate development as parents may wish to move into school catchment areas in attempts to secure school places.

## 11.26 Important issues arising from the sustainability appraisal for policy CS10 at the Submission stage.

### 11.26.1 Issues identified include:

- Adequate supply of burial space within the borough will have positive effects on social aspects of the sustainability objectives. This strategy should help to encourage a sense of community, identity and welfare for all Barnet residents if provision is made for all of Barnet's diverse faith communities.

## **11.27 The difference the appraisal process has made to Policy CS10**

- 11.27.1 The sustainability appraisal has not informed this change in policy. This change has come about through proposed changes to the London Plan and through our consultation process. Provision of adequate burial space is a complex issue and is best coordinated at a regional level.
- 11.27.2 Sufficient and adequate burial space provision should have positive impacts on the social sustainability objectives, contributing to a sense of community, identity and welfare.

Sustainability appraisal of changes to policy CS10	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
1. To encourage sustained economic growth and promote economic prosperity	O	O		There is no significant effect from these policy amendments.
2. To offer everybody the opportunity for rewarding and satisfying employment	O	O		There is no significant effect from these policy amendments.
3. To encourage and accommodate both indigenous and inward investment	O	O		There is no significant effect from these policy amendments.
4. To reduce disparities in economic performance and promote regeneration	O	O		There is no significant effect from these policy amendments.
5. To reduce the effect of traffic on the environment	O	O		There is no significant effect from these policy amendments.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	O	O		There is no significant effect from these policy amendments.
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	O	O		There is no significant effect from these policy amendments.
8. To reduce the risk of flooding for people and property	O	O		There is no significant effect from these policy amendments.
9. To improve air quality	O	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	O	O		There is no significant effect from these policy amendments.
11. To achieve sustainable management of waste	O	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	O	O		There is no significant effect from these policy amendments.
13. To increase energy efficiency and the proportion of energy generated from renewable sources	O	O		There is no significant effect from these policy amendments.
14. To encourage sustainable use of land	?+	+		Working with the Mayor of London may lead to more sustainable practices in supplying adequate provision of burial space in the borough. Promoting the inclusive design of community facilities is considered a socially sustainable approach and therefore a more sustainable use of land.
15. To achieve sustainable water resources management	O	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	O	O		There is no significant effect from these policy amendments.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	O	O		There is no significant effect from these policy amendments.
19. To provide good quality surroundings for all	O	+		Good quality surroundings are ones which are inclusive – that is, they are accessible

Sustainability appraisal of changes to policy CS10	+ /- effects		Perm /Temp /Sec	Commentary
Sustainability objectives	A	B		
				to all, regardless of disability or age. Therefore, inclusive community facilities should contribute positively towards this objective.
20. To reduce crime and the fear of crime	O	O		There is no significant effect from these policy amendments.
21. To improve accessibility for all to services and facilities	+	++		Making sure that there is sufficient burial space for future needs of the borough will improve access to this provision for all Barnet residents regardless of faith. Inclusive design of community facilities will make these buildings and associated services accessible to all Barnet residents and will contribute towards social sustainability.
22. To encourage a sense of community; identity and welfare	++	++		Supply of adequate burial space within the borough will positively contribute to a sense of community and identity for Barnet residents. Provision of faith specific burial space for Barnet's diverse faith communities will also promote a sense of community. Inclusive design of community facilities will allow all residents access to services and facilities within the borough, regardless of age or disability. Such an approach will enhance social inclusion through social interaction and access to services. This in turn will contribute positively towards encouraging a sense of community, identity and welfare.

## 12. Sustainability Appraisal of Further Proposed Changes to the Core Strategy

*This part of the appraisal will examine the evolution of policy developments that have taken place since the submission of Core Strategy and changes made following the examination in public by a Planning Inspector.*

### 12.1 Changes to submission stage policies

- 12.1.1 This section of the SA focuses only on the significant changes to Core Strategy policies made following the examination in public and as such only these changes are appraised against the sustainability objectives.
- 12.1.2 The changes has been appraised using the same format and approach that has been used in earlier appraisals at Publication Stage, Direction of Travel and Issues and Options.
- 12.1.3 The following section will first identify all the significant policy amendments that have taken place. Significant changes which need to undergo sustainability appraisal are then identified in a table which is then followed by the appraisal itself in a table matrix. Finally a commentary is included which discusses the issues arising from the appraisal process.
- 12.1.4 Changes have been made to Core Strategy Policy CS2 – Brent Cross Cricklewood. However, the strategic direction of the policy has remained unaltered. These changes are therefore considered to be not significant and have not been subject to SA.
- 12.1.5 Other changes have also been made as part of the examination, but these do not go to the soundness of either document and are therefore not significant and do not warrant SA.
- 12.1.6 The significant changes which will be appraised were made as a result of discussions on Matter 2: Housing, at Barnet's EiP, when the Inspector suggested that the Council review its approach to Policy CS4 in order to consider three aspects;
- Whether a target should be included for Gypsy and Traveller housing.
  - Whether the policy should incorporate the needs of Travelling Show-people
  - Whether the council's approach to the provision of affordable housing including proportions and thresholds is justified
- 12.1.7 Below is the newly drafted policy showing additions and deletions.

#### **Revised Policy CS 4 - Providing quality homes and housing choice in Barnet**

We will aim to create successful communities in Barnet by:

- seeking to ensure a mix of housing products in the affordable and market sectors to provide choice for all households and enable Barnet residents to progress on a housing journey that can meet the aspirations of home ownership
- seeking to ensure that all new homes are built to Lifetime Homes Standards and that through extending the inclusive design principles embedded in Lifetime Homes we can create Lifetime Neighbourhoods that are welcoming, accessible, and inviting for everyone, regardless of age, or health, or disability.
- seeking a range of dwelling sizes and types of housing including family and lifetime homes that meets our identified housing priorities and does not undermine suburban character or



local distinctiveness. Policy CS 5 on Protecting and Enhancing Barnet's Character to Create High Quality Places sets out how we will secure high quality design.

- seeking a variety of housing related support options that maximise the independence of vulnerable residents including young people, people with disabilities, older people, homeless people and other vulnerable adults
- delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a boroughwide target of ~~30~~ **40%** affordable homes on sites capable of accommodating ten or more dwellings
- seeking an appropriate mix of affordable housing of 60% social rented and 40% intermediate for Barnet that will support our objectives of widening home ownership and providing family homes
- on sites which are suitable for the provision of an element of affordable housing, we may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision

~~Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers,~~

**Proposals for sites for Gypsies and Travellers and Travelling Show-people will have having regard to the following criteria:**

- **close proximity to a main road and safe access to the site with adequate space on site to allow for the manoeuvring of vehicles**
- **reasonable access to local shops and other community facilities in particular schools and health care**
- ~~potential of the site for good management~~
- **the scale of the site is in keeping with local context and character**
- **appropriate landscaping and planting to address impact on local environment, character and amenity and enable integration of the site with the surrounding environment**
- **any use on the site does not have any unacceptable adverse impacts on neighbouring residents**
- **appropriate facilities are provided on-site access to essential services including water and waste disposal**

**Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers and Travelling Showpeople based on an evidence base of the range of pitches/plots required in Barnet.**

We will monitor the delivery of additional housing against our target of 28,000 new homes by 2025/26 and will seek to maintain supply at the rate necessary to meet or exceed the target. In seeking to maintain the housing supply we will adjust the type and mix of housing sought, having regard to the financial viability of development, the housing market and the needs of different groups.

## 12.2 The significant changes to policy CS4

Policy CS 4 – Providing quality homes and housing choice in Barnet	
A	<ul style="list-style-type: none"> <li>• delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a boroughwide target of <del>30</del> <b>40%</b> affordable homes on sites capable of accommodating ten or more dwellings</li> </ul>

B	<p><b>Proposals for sites for Gypsies and Travellers and Travelling Showpeople will have</b> <del>having</del> regard to the following criteria:</p> <ul style="list-style-type: none"> <li>• <b>close proximity to a main road and safe access to the site with adequate space on site to allow for the manoeuvring of vehicles</b></li> <li>• <b>reasonable access to local shops and other community facilities in particular schools and health care</b></li> <li>• <del>potential of the site for good management</del></li> <li>• <b>the scale of the site is in keeping with local context and character</b></li> <li>• <b>appropriate landscaping and planting to address</b> <del>impact on local environment, character and amenity</del> <b>and enable integration of the site with the surrounding environment</b></li> <li>• <b>any use on the site does not have any unacceptable adverse impacts on neighbouring residents</b></li> <li>• <b>appropriate facilities are provided on-site</b> <del>access to essential services</del> including water and waste disposal</li> </ul>
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### 12.3 Important issues arising from the sustainability appraisal for policy CS4 at Further Proposed Changes following EiP.

- 12.3.1 The appraisal has highlighted some issues at the Further Proposed Changes stage, these include:
- Increasing the borough wide target for affordable housing will help to meet wider need than just Barnet's need. The 30% borough-wide target met Barnet's need. However, achieving this target will depend on the sites which come forward over the plan period and their suitability. This change should be considered positive as it may help provide Barnet's population to live in a decent and affordable home. The appraisal recognises that investment in housing may depend on the affordable housing targets of neighbouring boroughs.
  - The policy changes relating to Gypsies and Travellers and Travelling Show-people has been expanded to clarify the range of need and to set suitable criteria for potential sites.
- 12.3.2 These policy amendments should contribute positively towards Barnet's social sustainability objectives. Provision of sites for Travelling Show-People, Gypsies and Travellers has now been given greater detail ensuring that these social groups have been given due consideration in the future development of the borough.
- 12.3.3 Greater provision of affordable housing will ensure that Barnet will be able to meet its own needs and also the wider needs of neighbouring boroughs.
- 12.3.4 Increasing the affordable housing target could potentially discourage investment in housing in Barnet, particularly if other neighbouring boroughs have lower targets.

Sustainability appraisal of changes to policy CS4	+ / - effects		Perm / Temp / Sec	Commentary
Sustainability Objectives	A	B		
1. To encourage sustained economic growth and promote economic prosperity	O	O		There is no significant effect from these policy amendments.
2. To offer everybody the opportunity for rewarding and satisfying employment	O	O		There is no significant effect from these policy amendments.
3. To encourage and accommodate both indigenous and inward investment	?	O		Increasing the affordable housing target to 40% may discourage investment, especially if other neighbouring boroughs have lower targets.
4. To reduce disparities in economic performance and promote regeneration	O	O		There is no significant effect from these policy amendments.
5. To reduce the effect of traffic on the environment	O	O		There is no significant effect from these policy amendments.
6. To maintain and enhance the quality of landscapes, townscapes and local distinctiveness	O	+		Careful consideration of landscaping and planting in relation to the provision of sites for Gypsies, Travellers and Travelling Show-people should help to maintain and enhance existing landscapes and townscapes.
7. To conserve and enhance the borough's existing biodiversity and seek to increase where possible	O	O		There is no significant effect from these policy amendments.
8. To reduce the risk of flooding for people and property	O	O		There is no significant effect from these policy amendments.
9. To improve air quality	O	O		There is no significant effect from these policy amendments.
10. To conserve and where appropriate enhance the historic environment and cultural assets	O	O		There is no significant effect from these policy amendments.
11. To achieve sustainable management of waste	O	O		There is no significant effect from these policy amendments.
12. To reduce contributions to climate change and reduce vulnerability to climate change	O	O		There is no significant effect from these policy amendments.
13. To increase energy efficiency and the proportion of energy generated from renewable sources	O	O		There is no significant effect from these policy amendments.
14. To encourage sustainable use of land	O	O		There is no significant effect from these policy amendments.
15. To achieve sustainable water resources management	O	O		There is no significant effect from these policy amendments.
16. To improve the Health of Barnet's population	O	O		There is no significant effect from these policy amendments.
17. To improve the education and skills of the population	O	O		There is no significant effect from these policy amendments.
18. To provide Barnet's population with the opportunity to live in a decent affordable home	+?	+?		By increasing the affordable housing target to 40% Barnet will be able to meet this demand, ensuring that all Barnet residents are provided with the opportunity to live in decent and affordable homes. Further clarity is given in the newly revised policy CS4 with regards to travelling show-people, gypsies and travellers resulting in a more inclusive approach for the provision of decent affordable housing for all Barnet residents.

Sustainability appraisal of changes to policy CS4	+ / - effects		Perm / Temp / Sec	Commentary
Sustainability Objectives	A	B		
19. To provide good quality surroundings for all	O	+		As now set out in the policy, landscaping and planting will be sought to enhance sites for travelling show-people, gypsies and travellers. This will also help integrate such sites within an area and reduce any impact on the amenity of existing residents and gypsies and travellers themselves.
20. To reduce crime and the fear of crime	O	O		There is no significant effect from these policy amendments.
21. To improve accessibility for all to services and facilities	O	+		Greater clarity in the policy for the housing needs of travelling show-people, gypsies and travellers should improve access to housing for these social groups. Locating these sites as now set out in the policy should help improve access to education and healthcare and other services already enjoyed by other groups within Barnet.
22. To encourage a sense of community; identity and welfare	++	++		Increased provision of affordable housing will ensure that within large scale developments there is a well balanced social mix which will lead to the creation of diverse and balanced local communities. This strategy could help to reduce social exclusion leading to a greater sense of community. Provision of sites for travelling show-people, gypsies and travellers has now been given greater clarity. This approach ensures that this cultural group is catered for in an inclusive manner which takes account of particular needs.

## **12.4 The difference the appraisal process has made to Policy CS4**

- 12.4.1 This policy change has materialised through the Examination in Public. The appraisal does not recommend any amendments to the changes.

## 13. Implementation: proposals for monitoring

- 13.1.1 Implementation of the plan policies will determine the success of the Core Strategy vision and objectives. We will monitor the effectiveness of the Core Strategy in delivering its objectives by assessing performance against a series of indicators as set out in Appendix B of the Core Strategy document. These include core indicators, set by the government, and local, Barnet-specific indicators.
- 13.1.2 Each year we will publish an Annual Monitoring Report, which will:
- assess the performance of the Core Strategy and other LDF documents by considering progress against the indicators proposed
  - set out Barnet's updated housing trajectory
  - identify the need to reassess or review any policies or approaches
  - make sure the context and assumptions behind our strategy and policies are still relevant
  - identify trends in the wider social, economic and environmental issues facing Barnet

## 14. Conclusions

### 14.1 Consistency of spatial strategy with sustainability objectives, national and regional policies and the community strategy

- 14.1.1 This SA report demonstrates that Barnet's vision, strategic objectives and Core Strategy policies for the future development of the borough are fully consistent with:
- The sustainability objectives and targets which form the basis of the Council's SA Framework;
  - All relevant policies, plans and programmes set at the international, national, regional and local levels;
  - Meeting the needs of the local community for housing, employment, retail, leisure and other uses;
  - Achieving the vision and aims of Barnet's Sustainable Community Strategy.

### 14.2 Difference the appraisal has made

- 14.2.1 The SA is an iterative process that makes recommendations on the policy development process as it progresses in order to improve the content of the Core Strategy in terms of its impacts on the sustainability objectives.
- 14.2.2 Through the SA process itself, and through feedback received from statutory consultees and stakeholder engagement on the SA at its various stages the Council has developed more sustainable policies.

### Difference the appraisal has made since Publication

Policy	Difference the appraisal made to the Core Strategy Submission Stage policies and subsequent further proposed changes
<b>CS1 – Barnet's place shaping strategy</b>	The appraisal at publication stage highlighted that consolidated growth rather than dispersed growth is positive as it will help to protect Barnet's character. Infrastructure improvements will be more focussed and easier to achieve and will this approach will bring social, environmental and economic benefits to those areas of the borough most in need of regeneration.



## Sustainability Appraisal of Barnet's Core Strategy

Policy	Difference the appraisal made to the Core Strategy Submission Stage policies and subsequent further proposed changes
<b>CS2 – Brent Cross - Cricklewood</b>	This is a new policy which has been included at publication stage. Changes have been made to Core Strategy Policy CS2 – Brent Cross Cricklewood as part of the further proposed changes following examination. However, the strategic direction of the policy has remained unaltered. These changes are therefore considered to be not significant and have not been subject to SA.
<b>CS3 - Distribution of growth in meeting housing aspirations</b>	Due to the appraisal the policy now sets out clearly the targets for consolidated housing growth in defined areas. We are no longer seeking more dispersed growth to take place along major transport routes. The policy has now adopted a more targeted and focussed approach.
<b>CS4 – Providing quality homes in Barnet</b>	The further proposed changes set a new borough wide target for affordable housing and the SA highlighted that this approach will provide more opportunities for residents to enjoy some form of home ownership within the borough. The further proposed changes highlighted provision of sites for Travelling Show-People, Gypsies and Travellers has now been given greater detail ensuring that these social groups have been given due consideration in the future development of the borough. However these policy changes have materialised through the Examination in Public and the appraisal does not recommend any amendments to the changes.
<b>CS5 – Protecting &amp; enhancing Barnet's character</b>	The appraisal process helped to clarify the policy as previously some of the areas identified for protection of their character were the town centres which were also identified for housing growth. Although not necessarily an issue it didn't really fit the ethos of this policy so it was revised. The Town centre strategies for these centres would be covering the design guidance in these locations.
<b>CS6 – Promoting Barnet's town centres</b>	The SA at publication stage has identified that a more targeted approach of promoting development in four of Barnet's town centres through Town Centre Frameworks is positive, focussed and should help to mitigate any negative polarisation effects caused by regeneration of Brent Cross – Cricklewood.
<b>CS7 – Enhancing &amp; protecting Barnet's open spaces</b>	The appraisal at publication stage has highlighted the significance of this policy in terms of health and well being; reduction of flood risk; protection and enhancement of biodiversity and the improvement of landscapes and townscape.
<b>CS8 – Promoting a strong &amp; prosperous Barnet</b>	Most employment and commercial growth will occur at Brent Cross – Cricklewood. Any negative effects should be mitigated through the production of four Town Centre Development Frameworks which will help reduce any polarisation.
<b>CS9 – Providing effective &amp; efficient travel</b>	The SA at publication stage has highlighted the need to make more efficient use of existing road networks. It has also highlighted the need to transport freight more efficiently and the need to increase public transport provision as regeneration occurs.
<b>CS10 – Enabling integrated community facilities and uses</b>	The SA made a difference by highlighting the opportunity that community facilities can provide for special groups in the borough such as the young, elderly and disabled. The need to utilise existing facilities such as schools more effectively has been highlighted through the appraisal process.
<b>CS11 – Improving health and well being in Barnet</b>	At an earlier stage of policy development this policy included text that referred to 'making travel modes safer'. The SA recommended that this be moved to the policy related to integrated travel.
<b>CS12 – Making Barnet a safer place</b>	The appraisal did not highlight any changes
<b>CS13 – Ensuring the efficient use of natural resources</b>	The only significant change is the identification of a threshold for the reduction of dioxide emissions.
<b>CS14 – Dealing with our Waste</b>	The appraisal did not highlight any changes
<b>CS15 – Delivering the Core Strategy</b>	The appraisal has highlighted the fact that failure to effectively utilise the strategic information available in the IDP may undermine the opportunity to deliver necessary and

Policy	Difference the appraisal made to the Core Strategy Submission Stage policies and subsequent further proposed changes
	planned infrastructure in a more joined-up and cost-effective manner.

- 14.2.3 On balance the SA shows that the Vision, the Strategic Objectives and the Core Strategy policies set out in the Core Strategy Proposed Submission document are predicted to have positive sustainability impacts.

# 15. Appendix

## 15.1 Summary of appraisal of alternative Core Strategy policy options

15.1.1 The table below sets out a summary of the conclusions of the Sustainability Appraisal of the alternative options that were identified as part of the policy development process contained in the Direction of Travel. The full appraisal is set out in the tables in the Sustainability Appraisal of the Core Strategy: Publication Stage.

### Summary of appraisal of alternative Core Strategy policy options

Alternative policy	Summary of appraisal
<b>Alternative CS 1 / CS 2: Allow growth to take place across all parts of Barnet</b>	In the short term there would be a boost to the local economy as investment flows into the borough but over time this could reduce as the initial attractions for that investment were diminished. Barnet's suburban character would be impacted through over development which is one of the features that makes it an attractive place to live in the first place. Improving infrastructure may be harder as it would be less focused and more spread across the borough than just concentrating on the growth areas. Also cross borough growth would increase congestion as it would not be the most accessible locations and people would have to drive more. This is one of the most significant effects of this alternative dispersed growth policy and would lead to greater congestion, air pollution and contributions to climate change. Growth will lead to an increase in contributions to climate change as more people increase energy demands in dwellings and on the transport system. Finally development would naturally be attracted to the easier sites leaving the areas that need regeneration and employment growth could also take place in locations that would impact on existing employment clusters thereby increasing economic disparity.
<b>Alternative CS 3: Design and Access Statements should set out how they respect local character, distinctiveness and sustainability</b>	Design and Access statements help to clearly set out how a development will affect people and be used by people. It will cover its design and how that affects its wider environment written in a clear way to justify the proposal to help those affected by the proposal to comment. Going through this process should help to improve design considerations in a proposal thereby enhancing the quality of landscapes and townscape. But a question is raised by the appraisal as to whether this is quite a detailed policy which might sit better in the Development Management DPD rather than at the strategic level.
<b>Alternative CS 4: Allow further shopping and commercial town centre related development to meet projected demand in any town centre in Barnet</b> <b>OR</b> <b>Allow further shopping and commercial town centre related development to meet projected demand in existing out of centre retail parks in Barnet</b> <b>OR</b> <b>Allow retail expenditure to go outside Barnet</b>	Allowing retail growth to spread across the borough could impact the larger centres who are in competition with equivalent sized centres in neighbouring boroughs. This may result in them being unable to attract the right schemes because they are going to the smaller centres for various reasons e.g. land values are less. This could lead to stagnation of the larger town centres with vacant units. Equally allowing growth to the out of centre retail centres could have the same effect. Allowing growth to migrate to neighbouring centres out of the borough would have the most significant negative effect on all centres in the borough. However encouraging mixed use development in the smaller town centres could be positive provided the scale was in keeping.  A large number of people currently walk to their town centre in the borough therefore any policy that reduces the attractiveness of any town centre in the borough is likely to encourage people to drive more. The out of centre option in particular. In the long term the cross borough retail growth option could have negative effects on all town

Alternative policy	Summary of appraisal
<p><b>OR</b></p> <p><b>Allow substantial mixed-use development in all town centres</b></p>	<p>centres reducing individual attractiveness of certain centres. The only positive could be the mixed use option as this could lead to the introduction of more community related uses in town centres.</p>
<p><b>Alternative CS 6 Allow the redevelopment of employment sites when mixed use development is proposed incorporating residential uses and replacement employment use</b></p> <p><b>OR</b></p> <p><b>Allow the redevelopment of existing employment sites only if there is no proven need for other priority commercial uses</b></p>	<p>It is not clear whether allowing mixed use development would provide the right sort of employment accommodation. Mixing uses could reduce the ability for sites to deliver flexible accommodation for employment purposes. Equally allowing loss of employment space where there is no proven need is likely to hit those locations where need is more marginal. This could increase disparities in the economic performance of the borough making regeneration harder in those areas which need to protect their employment use the most.</p> <p>However allowing mixed use development that provides employment on site will provide people with a greater opportunity to travel less and as road transport has the greatest effect on air quality this could be positive.</p>
<p><b>Alternative CS 7: Introduce a flexible sliding scale for affordable housing with a 50% target on sites of 25 units or more, and a lower target on sites of 10 to 24 units</b></p> <p><b>OR</b></p> <p><b>Retain the existing approach to affordable housing with a 50% target on sites of 10 units or more</b></p> <p><b>Seek mixed and balanced communities by delivering affordable housing in areas where that tenure is underrepresented</b></p> <p><b>Prioritise new family sized homes outside of the growth areas</b></p>	<p>Reducing the amount of affordable housing provided reduces the ability to provide those in need in Barnet's population with a home. Evidence of need shows that we cannot build enough homes to meet the need so therefore we have to try and maximise the amount of affordable housing provided on site. Maintaining the 50% target increases the ability to do this even if not every site achieves the target. The introduction of a sliding scale has the opposite effect as it will reduce the amount overall although that may be debatable if it discourages housing development from coming forward in the first place. However rigidly applying this to every site will restrict this and have a negative impact.</p> <p>With regards to the sliding scale option there is evidence to suggest that the boroughs supply of smaller housing schemes has fallen off because of the impact of the 50% affordable housing target. This option could therefore be positive in encouraging more investment. However setting the threshold at 25 units should be questioned as an arbitrary cut off point. The location of affordable housing is questioned and could be positive or negative. It is uncertain whether providing affordable housing in areas where it is already unrepresented will be economic particularly if land values are high in these locations therefore you could end up with less affordable housing delivered overall. Work on viability will help to clarify this. Prioritising family sized homes has a similar effect as it could reduce the overall amount of housing delivery. Evidence work on the sub regional SHMA and affordable housing viability will inform this further.</p>
<p><b>Alternative CS 8 Restrict ability to travel in ways that make non public transport usage less attractive</b></p>	<p>In principle restricting travel by private vehicle could have a negative impact on the economic growth and access to services. It could reduce the ability of people to make choices about how they commuted and travelled. This would make the borough less attractive to employers. Public transport in a large outer London borough like Barnet does not adequately cover the whole borough therefore the private car is necessary in parts to access various community services. There are obvious environmental benefits. But it should be noted that there could be detrimental effects in the long term if congestion grows beyond the capacity of the roads if alternatives are not in place.</p>
<p><b>Alternative CS9: Protect existing community facilities (including sport, leisure and recreation)</b></p>	<p>Allowing under used community facilities to be lost could increase the distances that people have to drive thereby increasing the effects of traffic on the environment and in particular air quality. Ensuring sufficient coverage is important as allowing community uses to be</p>

Alternative policy	Summary of appraisal
<b>where fully utilised, from displacement by development, ensuring re-provision of facilities</b>	lost to higher land value uses because they are not fully utilised could leave gaps in provision which would have social and economic impacts as services and jobs would be lost.
<b>Alternative CS12: Climate change should be the overriding principle for new development</b>	If more stringent carbon reduction targets were implemented then it could discourage development of employment schemes which could have a detrimental effect on the number of jobs created in the borough. The same applies for the delivery of housing which could also be constrained leading to less affordable housing and associated infrastructure benefits. There would be obvious benefits to the environment though but a more balanced approach could bring wider benefits.