
Local Development Framework

Submission Stage Report Development Management policies

Habitat Directive Assessment (HDA) Screening Report

May 2011

Executive summary

This report presents the findings of a Habitats Directive Assessment (HDA) Screening exercise undertaken in compliance with the EU Habitats Directive for Barnet's Development Management Policies. This screening exercise will determine whether any of the policies and proposals that form the Development Management Policies will have a likely significant impact on any European designated site within or adjacent to the plan area.

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Abbreviations

AA	Appropriate Assessment
CLG	Communities and Local Government
DPD	Development Plan Document
HDA	Habitat Directive Assessment
LDD	Local Development Document
LDF	Local Development Framework
PCT	Primary Care Trust
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SR	Screening Report
UDP	Unitary Development Plan

1 Introduction

- 1.1 We are undertaking this Screening Report (SR) to consider the need for an Appropriate Assessment (AA) known for this report as a Habitat Directive Assessment (HDA), in compliance with the EU Habitats Directive, as part of Barnet's Local Development Framework. The HDA screening exercise considers whether the approach to a plan or project is likely to have a significant effect on the conservation objectives of a European site.
- 1.2 The first step in undertaking a screening exercise for a Habitat Directive Assessment (HDA) is to identify any policies and proposals with the potential for significant impact on any European designated site within or adjacent to the plan areas. These policies would then be taken through subsequent stages of the HDA process. This screening exercise is presented here.

2 The need for habitat directive assessment

- 2.1 In October 2005, the European Court of Justice ruled that HDA's must be carried out on all land use planning documents in the UK. The purpose of the HDA of land use plans is to ensure that the protection and integrity of European nature conservation sites (also known as the Natura 2000 network) is part of the planning process at the regional and local level. In response to this ruling, a new section (Part IVA) was inserted into Conservation (Natural Habitats & c) Regulations, 1994 ('the regulations') during August 2007 which requires local planning authorities to undertake habitat directive assessment of land use plans in England and Wales in accordance with the provision of the Habitats Directive.
- 2.2 The requirement for a HDA of plans or projects is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('Habitats Directive'). The EU Habitats Directive is implemented in the UK through 'the regulations'. The regulations are responsible for safeguarding designated conservation sites considered of EU importance. Such designated sites include Special Protection Areas (SPAs), Special Areas for Conservation (SACs) and international RAMSAR sites.
- 2.3 Guidance from the Department of Communities and Local Government (CLG) on HDAs (Planning for the Protection of European Sites: Appropriate Assessment – Guidance for Regional Spatial Strategies and Local Development Documents (August 2006)) summarises the HDA process prescribed in Article 6(3) and (4) of the Habitat Directive into three main stages:
 - Task 1 – Likely significant effects
 - Task 2 – Appropriate assessment to ascertain adverse impacts on site integrity
 - Task 3 – Mitigation and alternative solutions
- 2.4 Task 1 of the process to identify whether a plan option may have likely significant effects on European sites and is referred to as a 'screening' exercise under the regulations. This determines whether stages 2 and 3 (the HDA) are required.
- 2.5 In accordance with the regulations a HDA is required when, in view of a European Site's objectives, the effect of a land use plan:
 - a) is likely to have adverse impact on a European site in Great Britain (either alone or in combination with other plans and projects); and
 - b) is not directly connected with or necessary to the management of the site.

3 The purpose of screening

- 3.1 Screening for HDA will determine whether the plan is likely to have a significant adverse impact on the conservation objectives of European sites and therefore whether stage 2 and stage 3 (the HDA) are required. In situations where significant indirect impacts of the plan implementation could occur within Natura 2000 Sites beyond the plan area, these remote sites should be considered at the HDA screening stage.
- 3.2 If the potential for significant adverse impacts on Natura 2000 sites is identified during screening, a HDA considers the potential for impacts in more detail and whether alternative measures can be adopted. If there are no viable alternatives, the Plan can only be implemented if there are 'imperative reasons of overriding public interest' (Article 6(4)).

4 Methodology

- 4.1 In accordance with 'Planning for the Protection of European Sites: Appropriate Assessment' and 'The Assessment of Regional Spatial Strategies and Sub- Regional Strategies under the Provisions of Habitats Regulation Guidance' (the guidance) the following methodology was adopted for this screening report:

- **Identification of Natura 2000 sites**

This involved the identification of European sites within or in close proximity (within 15km) to Barnet.

- **Site information**

Information was obtained for each European site, based on information relating to the site's qualifying features, geographical boundaries and conservation objectives, available from the Joint Nature Conservation Committee (JNCC), the statutory advisor to the government on UK nature conservation.

- **Analysis of the plan for potential adverse impacts**

Providing a framework of criteria against which the policies can be assessed for impact.

- **Screening Analysis of the Development Management policies**

Using the codes / criteria for recording the effect and impacts of a policy on a European Site, the options for each issue of the Development Management Policies DPD will be assessed for its impact on a European Site.

- **Assessment of 'in-combination' effects**

This involved the consideration of other plans which may, in combination with the Core Strategy, have the potential to adversely impact European sites.

- 4.2 This report comprises the first stage of the process, screening, which determines likely significant effects the Development Management Policies may have on a Natura 2000 site and thus whether or not a HDA is needed.
- 4.3 The policies in the Development Management Policies document are described and a test is applied to identify any likely significant effects on the likely impact of the principles on the conservation objectives of designated Natura 2000 sites.
- 4.4 Where one or more likely significant effects are found, or where it cannot be objectively shown that adverse impact on site integrity will not occur, the second stage of the process will commence and the Plan becomes subject to a Habitats Directive Assessment against the conservation objectives of each of the Natura 2000 sites. If no adverse impacts on site integrity are identified, the Development Management Policies document can proceed.

- 4.5 The figure below highlights the methodology to be followed when applying Regulation 85 of the Habitats Regulation, with the steps recorded within this report highlighted in yellow.

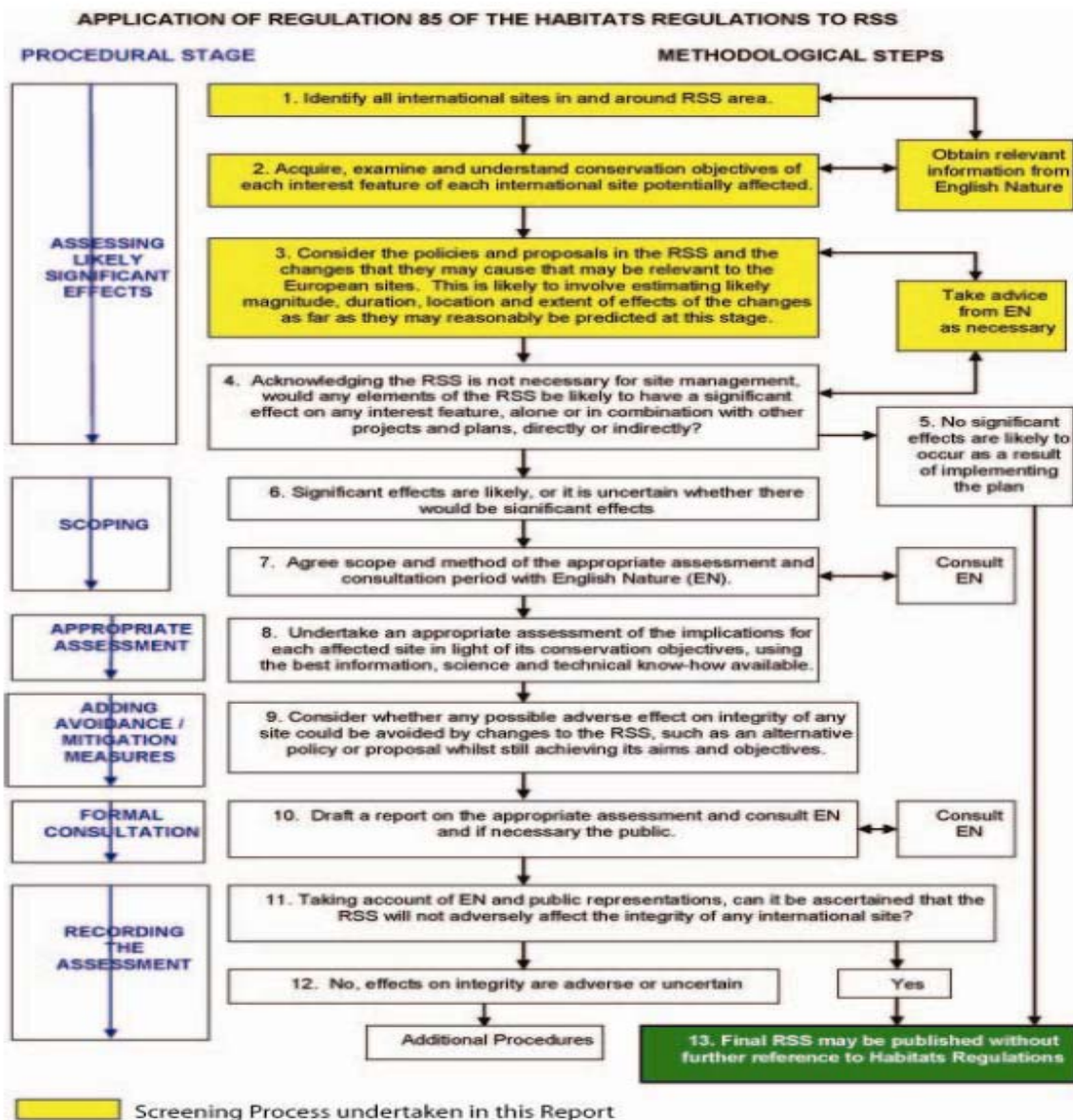


Figure 1: Steps involved in carrying out an Appropriate Assessment

5 Identification of sites

- 5.1 For the authority to undertake this part of the screening assessment, it is necessary to identify which Natura 2000 sites should be considered in the assessment. Only then can an assessment be made as to whether the Development Management Policies document is directly connected with or necessary to the management of the Natura 2000 sites.
- 5.2 In identifying which Natura 2000 sites may be affected by proposals within the Development Management Policies document, the authority has considered any site that lies within 15 Km of the borough's administrative boundaries. Maps of sites within this radius are included in Appendix 1. In order to take a precautionary approach a 15 Km buffer has been selected.

5.3 5 Natura 2000 sites were identified between 0 and 15 Km of the Plan area. The sites are:

- Lee Valley (Ramsar / SPA)
- Epping Forest (SAC)
- Richmond Park (SAC)
- Wimbledon Common (SAC)
- Wormley – Hoddesdonpark Woods (SAC)

6 Site information

6.1 The following table identifies the general characteristics and the reasons for its designation or conservation objectives / issues.

Type of Site	Site Name	General Site Character	Conservation Objectives / Issues
SAC	Richmond Park	<p>846.62 Ha</p> <p>Inland water bodies (standing water, running water) (1.5%)</p> <p>Bogs. Marshes. Water fringed vegetation.</p> <p>Fens (0.5%)</p> <p>Scrub. (25%)</p> <p>Dry grassland. (18%)</p> <p>Humid grassland. Mesophile grassland (5%)</p> <p>Improved grassland (20%)</p> <p>Broad-leaved deciduous woodland (25%)</p> <p>Mixed woodland (5%)</p>	<p><u>Annex I habitats that are a primary reason for selection of this site;</u> Not applicable</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site;</u> Not applicable.</p> <p><u>Annex II species that are a primary reason for selection of this site;</u></p> <p>1083 Stag beetle <i>Lucanus cervus</i></p> <p>Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection;</u> Not applicable.</p>
SAC	Epping Forest	<p>1630.5 Ha</p> <p>Inland water bodies (standing water, running water) (6%)</p> <p>Bogs. Marshes. Water fringed vegetation.</p> <p>Fens (0.2%)</p> <p>Heath. Scrub. (3.8%)</p> <p>Dry grassland. Steppes (20%)</p> <p>Broad-leaved deciduous woodland (70%)</p>	<p><u>Annex I habitats that are a primary reason for selection of this site;</u></p> <p>9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion roboretanae</i> or <i>Ilici-Fagenion</i>)</p> <p>Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site;</u></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p><u>Annex II species that are a primary reason for selection of this site;</u></p> <p>1083 Stag beetle <i>Lucanus cervus</i></p> <p>Epping Forest is a large woodland area in which records of stag beetle <i>Lucanus cervus</i> are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection;</u> Not applicable.</p>

SAC	Wimbledon Common	<p>351.38 Ha</p> <p>Inland water bodies (standing water, running water) (1%)</p> <p>Bogs. Marshes. Water fringed vegetation.</p> <p>Fens (0.5%)</p> <p>Heath. Scrub. (5%)</p> <p>Dry grassland. (45%)</p> <p>Improved grassland (3.5%)</p> <p>Broad-leaved deciduous woodland (45%)</p>	<p><u>Annex I habitats that are a primary reason for selection of this site;</u> Not applicable.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site;</u></p> <p>4010 <u>Northern Atlantic wet heaths with <i>Erica tetralix</i>.</u></p> <p>4030 <u>European dry heaths.</u></p> <p><u>Annex II species that are a primary reason for selection of this site;</u></p> <p>1083 <u>Stag beetle <i>Lucanus cervus</i></u></p> <p>Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>, and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy <i>et al.</i> 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection.</u> Not applicable.</p>
SAC	Wormley-Hoddesdon Woods	<p>336.47 Ha</p> <p>Heath Scrub.(2%)</p> <p>Dry grassland. (3%)</p> <p>Broad-leaved deciduous woodland (90%)</p> <p>Coniferous woodland (3%)</p> <p>Mixed woodland (2%).</p>	<p><u>Annex I habitats that are a primary reason for selection of this site;</u></p> <p>9160 <u>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinus betuli</i>.</u></p> <p>Wormley Hoddesdonpark Woods in south-east England has large stands of almost pure hornbeam <i>Carpinus betulus</i> (former coppice), with sessile oak <i>Quercus petraea</i> standards. Areas dominated by</p> <p>Bluebell <i>Hyacinthoides non-scripta</i> do occur, but elsewhere there are stands of great wood-rush <i>Luzula sylvatica</i> with carpets of the mosses <i>Dicranum majus</i> and <i>Leucobryum glaucum</i>. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses <i>Dicranum montanum</i>, <i>D. flagellare</i> and <i>D. tauricum</i>.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site;</u> Not applicable.</p> <p><u>Annex II species that are a primary reason for selection of this site;</u> Not applicable.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection;</u> Not applicable.</p>
Ramsar	Lee Valley	<p>451.29 Ha</p> <p>Series of embanked water supply reservoirs; sewage treatment lagoons, and former gravel pits extending along about 24km of the valley from near Ware southward to Finsbury Park in London.</p>	<p>These water bodies support internationally important numbers of wintering Gadwall and Shoveler (Criterion 6) and nationally important numbers of several other bird species. The site also contains a range of wetland and valley bottom habitats, both human made and semi-natural, which support a diverse array of wetland fauna and flora. Four SSSIs are included within the site. Virtually all parts of the site are subject to management plans in which nature conservation is a high or sole priority. Potential threats from eutrophic condition of the water, over-abstraction of surface water for public supply in periods of drought, and urban development pressures are felt to be addressed by several directives and regulations. Non-consumptive recreational activities are important and mostly well regulated.</p>

7 Analysis of the plan for potential adverse impacts

- 7.1 Using the following coding for recording effects and impacts on a European Site¹, each Development Management policy has been assessed and the relevant criterion / criterion determined for each. Those awarded one or more of the criterion numbered 1-7 in the table below will be assessed as having no effect on a European Site. Those policies awarded 8 are considered to have a potential impact and those awarded a 9 are likely to have a significant effect on a European site. Policies considered to have no impact on a European Site, do not require an Appropriate Assessment.

<i>Reason why policy would not have likely significant effects on a European Site</i>	
1.	The policy itself will not itself lead to development (e.g. it related to design or other qualitative criteria for development, or it is not a land use planning policy).
2.	The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations e.g. county, or district, or sub region) but the location of the development is to be selected following consideration of options in lower tier plans (Development Plan Documents).
3.	No development could occur through this policy alone, because it is implemented through sub-ordinate policies that are more detailed and therefore more appropriate to assess for their likely significant effects on a European Site and associated sensitive areas.
4.	Concentration of development in urban areas will not affect a European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5.	The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6.	The policy is intended to protect the natural environment, including biodiversity.
7.	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measure will not be likely to have any effect on a European Site.
<i>Reason why policy could have a potential effect</i>	
8.	The Local Development Framework steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
<i>Reason why policy would likely to have a significant effect</i>	
9.	The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

8 Screening analysis of the Development Management policies document

- 8.1 This section screens the policies contained within the Development Management Policies submission stage report. The policies are assessed, for their impact, against the criteria provided in Section 7.

¹ Tyldesley and Associates – prepared for Natural England Draft Guidance – The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006 – Annex 2

- 8.2 The policies included in the submission stage report for Barnet's Development Management Policies were analysed for their potential to result in likely significant impacts on European sites. A precautionary approach was used and the assessment also considers cumulative impacts.

Policy DM01: Protecting Barnet's character and amenity

- a. All development should represent high quality design which demonstrates high levels of environmental awareness and contributes to climate change mitigation and adaptation.
- b. Development proposals should be based on an understanding of local characteristics. Proposals should preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets.
- c. Development proposals should ensure attractive, safe and, where appropriate, vibrant streets which provide visual interest, particularly at street level and avoid blank walls.
- d. Development proposals should create safe and secure environments and reduce opportunities for crime and minimise the fear of crime.
- e. Development proposals should be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users.
- f. Development proposals for lighting schemes should not have a demonstrably harmful impact on residential amenity or biodiversity.
- g. Development proposals should retain private garden amenity space having regard to its character.
- h. Conversion of dwellings into flats in roads characterised by houses will not normally be appropriate
- i. Loss of houses in roads predominantly characterised by houses will not normally be considered appropriate
- j. Development proposals will be required to include hard and soft landscaping that::
 - i. Is well laid out in terms of access, car parking and landscaping
 - ii. Considers the impact of hardstandings on character
 - iii. Achieve a suitable visual setting for the building
 - iv. Provide an appropriate level of new habitat including tree and shrub planting
 - v. Make a positive contribution to the surrounding area
 - vi. Contributes to biodiversity including the retention of existing wildlife habitat and trees
 - vii. Adequately protects existing trees and their root systems

- k. Trees should be safeguarded. When protected trees are to be felled the Council will require replanting with suitable size and species of tree where appropriate.

Policy DM02: Development standards

Where appropriate, development will be expected to demonstrate compliance with the following national and Londonwide standards and those set out in the Council's suite of Supplementary Planning Documents:

1. By Design, the CABI urban design principles
2. Lifetime homes, the 16 design criteria required by the London Plan policy 3.8
3. Code for Sustainable Homes, the national standard for sustainable homes
4. BREEAM, the environmental assessment method for non residential development
5. Wheelchair accessibility, the London Plan policy 3.8
6. Minimum floor space, the London Plan policy 3.5
7. Outdoor amenity space
8. Secured by Design, the national Police initiative
9. Play space, the London Plan policy 3.6

DM03: Accessibility and inclusive design

Development proposals should meet the highest standards of accessible and inclusive design by demonstrating that they meet the following principles:

- i. can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances
- ii. are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- iii. are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways
- iv. are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

Policy DM04: Environmental Considerations

- a. All major development will be required to demonstrate through an Energy Statement compliance with the Mayor's targets for reductions in carbon dioxide emissions within the framework of the Mayor's energy hierarchy.

- b. Where Decentralised Energy (DE) is feasible or planned, major development will either provide:
 - i. suitable connection
 - ii. the ability to connect in future
 - iii. a feasibility study
 - iv. a financial contribution to a proposed feasibility study.
- c. Where there is a localised source of air pollution, buildings should be designed and sited to reduce exposure to air pollutants. The proposal will ensure that development is not contributing to poor air quality and require air quality assessments where appropriate.
- d. Proposals to locate development that is likely to generate unacceptable noise levels close to noise sensitive uses will not normally be permitted. Proposals to locate noise sensitive development in areas with existing high levels of noise will not normally be permitted. Mitigation of noise impacts through design, layout, and insulation will be expected where appropriate.
- e. Proposals on land which may be contaminated should be accompanied by an investigation to establish the level of contamination in the soil and/or groundwater/surface waters and identify appropriate mitigation. Development which could adversely affect the quality of groundwater will not be permitted.
- f. Proposals for Notifiable Installations or developments near to existing Notifiable Installations will only be permitted provided that:
 - i. There is no unacceptable risk to an individual's health and safety; and
 - ii. There will be no significant threat to environmental quality.
- g. Development should demonstrate compliance with the London Plan water hierarchy for run off especially in areas identified as prone to flooding from surface water run off. All new development in areas at risk from fluvial flooding must demonstrate application of the sequential approach set out in Planning Policy Statement 25 and provide information on the known flood risk potential of the planning application site.
- h. Development will wherever possible naturalise a water course, ensure an adequate buffer zone is created and enable public accessibility. Where appropriate, contributions towards river restoration and de-culverting will be expected.

DM05: Tall Buildings

Tall buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:

- i. an active street frontage where appropriate
- ii. successful integration into the existing urban fabric
- iii. a regard to topography and no adverse impact on Local Viewing

- Corridors, local views and the skyline
- iv. no adverse impact on the setting of heritage assets

Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape

Policy DM06: Heritage and Conservation

- a. All heritage assets will be protected in line with their significance. All development will have regard to the local historic context. Proposals affecting heritage assets which respond to climate change will be expected to maintain the quality of the heritage asset.
- b. Development proposals must preserve or enhance the character and appearance of Conservation Areas.
- c. Proposals involving or affecting the heritage assets set out in table 5.1 should demonstrate they comply with the principles set out in PPS5: Planning for the Historic Environment policy HE6 to HE12.
- d. There will be a presumption in favour of retaining all locally listed buildings and any buildings which makes a positive contribution to the character or appearance of a conservation area.
- e. Archaeological remains will be protected in particular in the identified Local Areas of Special Archaeological Significance and elsewhere in the borough. Any development that may affect archaeological remains will need to demonstrate the likely impact upon the remains and the proposed mitigation to reduce that impact.

Policy DM07: Protecting housing in Barnet

Loss of residential accommodation will not be granted unless:

- a. the proposed use is for a local facility (children's nursery, educational or health use)
- b. where need can be demonstrated (provided that it is not detrimental to residential amenity) and;
- c. the demand for the proposed use cannot adequately be met elsewhere and is in line with other policies
or;
- d. the location is no longer environmentally suitable and viable for residential use
or;
- e. it involves identified regeneration areas with large scale demolition of housing and estates which provides for the net replacement of the total residential units

Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

Development should provide where appropriate a mix of dwelling types and sizes in order to provide choice for a growing and diverse population for all households in the borough.

Our dwelling size priorities are:

- i. For social rented housing – homes with 3 bedrooms are the highest priority
- ii. For intermediate affordable housing – homes with 3/4 bedrooms are the highest priority
- iii. For market housing – homes with 4 bedrooms are the highest priority, homes with 3 bedroom are a medium priority

Policy DM09: Specialist housing – Houses in Multiple Occupation, student accommodation and housing choice for older people**a: Houses in Multiple Occupation (HMO)**

The Council will seek to retain existing HMO provided that they meet an identified housing need.

Proposals for new HMO will be encouraged provided that they meet an identified need, do not have a demonstrably harmful impact on the character and amenities of the surrounding area, are easily accessible by public transport, cycling and walking and meet the relevant housing standards for HMO.

b: Student Accommodation

The Council expects proposals for student accommodation to demonstrate that they support educational establishments within Barnet and meet an identified local need. Provision for students should be located in accessible locations.

c: Housing Choice for Older People

Housing proposals for older people should:

- i. help to meet an identified need;
- ii. not have a demonstrably harmful impact on the character and amenities of the surrounding area; and
- iii. be within walking distance of local shops and easily accessible by public transport; and
- iv. provide adequate communal facilities including accommodation for essential staff on site.

Policy DM10: Affordable housing contributions

All new development providing 10 or more units will be required to achieve on-site, subject to viability, a minimum of 30% affordable housing.

Subject to viability a more flexible approach to affordable housing delivery will be permitted where the number of additional units is between 10 and 15 units.

Policy DM11 : Development principles in the town centres

The Council will expect a suitable mix of appropriate uses as part of development within the town centres to support their continued vitality and viability.

a: Town centre uses

- i. Significant new retail and other appropriate uses outside the town centres or any expansion of existing out of centre sites will be refused unless they can meet the sequential approach and tests set out in Planning Policy Statement 4 or are identified in an adopted Area Action Plan. Edge of centre proposals will not normally be appropriate and therefore should demonstrate why they are not locating in a town centre site.
- ii. The town centre boundaries, primary and secondary retail frontages are shown in the maps in Appendix 2.

b: Primary and secondary frontages

- i. A development proposal which reduces the combined proportion of class A1 retail use at ground floor level (including vacant) in the primary frontage below 75% will not be permitted. The proposal should not create an over-concentration of similar uses which detracts from the retail function of the town centre.
- ii. A development proposal which reduces the combined proportion of class A1 retail use at ground floor level (including vacant) in the secondary frontage below 65% will not be permitted. The proposal should not create an over-concentration of similar uses which detract from the retail function of the town centre.
- iii. Change from a retail use (Class A1) will be strongly resisted unless it can be demonstrated that there is no viable demand for continued Class A1 use. When it can be demonstrated that the site has been marketed effectively for Class A1 use acceptable alternatives to Class A1 use will be Class A2, A3, A4, A5 or community uses. Conversion of any Class A use to a community use will be expected to present an active frontage at ground floor and be able to demonstrate a similar weekday footfall to Class A1 use. All alternatives to Class A1 use will be subject to amenity impacts.
- iv. Any significant new retail development will be expected to provide a mix of unit sizes, avoid an inward looking layout, maintain the street frontage and provide suitable and convenient linkages for shoppers to access other town centre uses.
- v. Evening economy uses will be expected not to have an adverse affect on the amenity of local residents and be in keeping with the scale and character of the surrounding area. Planning conditions and planning obligations will be used to manage impact from food, drink and entertainment venues.

c: Mixed use development

1. The protection of employment floorspace should meet the requirements set out in DM14: New and Existing Employment Space unless otherwise indicated in the:

- i. Site Allocation DPD
- ii. Town Centre Frameworks
- iii. identified as a Locally Significant Industrial Site or Business Locations.

- 2 Appropriate mixed use re-development will be expected to provide re-provision of employment use, residential and community use.
- 3 The Council will consider the location of new and the relocation of existing community, leisure and cultural uses (including arts) to the town centres only where they maintain active frontages.

Policy DM12: Maintaining local centres and parades

The Council will protect all retail uses (Class A1) in the existing local centres, parades and isolated shops unless it can be demonstrated that:

- i. there will be no significant reduction of shopping facilities as a result; and
- ii. that alternative shopping facilities that are similarly accessible by walking, cycling or public transport exist to meet the needs of the area; and
- iii. the proposed use is within Class A2, A3, A4, A5 or meets an identified local need; and
- iv. there is no demand for continued Class A1 use, and that the site has been marketed effectively for such use.

A proposal that either creates an over concentration of Class A3, A4 and A5 uses or has a significant adverse affect on the amenity of existing residents will be refused. Community uses will be expected to present an active frontage at ground floor and be able to demonstrate a similar weekday footfall to Class A1 use. Proposals for residential use should not cause a break in a frontage.

Policy DM13: Community and education uses

a: Loss of community / educational use

Loss of community / educational use will only be acceptable in exceptional circumstances where:

- i. New community or education use of at least equivalent quality or quantity are provided on the site or at a suitable alternative location; or
- ii. There is no demand for continued community or education use, and that the site has been marketed effectively for such use.

b: New community or educational use

Where it can be demonstrated that no town centre or local centre site is available, new community or educational uses should be located where they are accessible by

public transport, walking and cycling.

New community or educational uses should ensure that there is no significant impact on the free flow of traffic and road safety. New community or educational uses will be expected to protect the amenity of residential properties.

Policy DM14: New and existing employment space

a: Existing employment space

- i. Proposals which result in a redevelopment or change of use of a Locally Significant Industrial Site or Industrial Business Location as shown on the Proposals Map to a non B Class use will not be permitted.
- ii. Outside these locations loss of a B Class use will only be permitted where it can be demonstrated to the Council's satisfaction that a site is no longer suitable and viable for its existing or alternative business use in the short, medium and long term and a suitable period of active marketing has been undertaken. Where this can be demonstrated the priority for re-use will be a mixture of small business units with residential use.
- iii. Office space (Class B1) should be retained in town centres and edge of centre locations. Loss of office space (Class B1) will only be permitted in town centres and edge of centre locations where it can be demonstrated to the Council's satisfaction that a site is no longer suitable and viable for its existing or alternative business use in the short, medium and long term and a suitable period of active marketing has been undertaken. Where this can be demonstrated the proposal will be expected to provide appropriate mixed use re-development which provides some re-provision of employment use, residential and community use.
- iv. Proposals to redevelop or reuse an existing employment space which reduces the levels of employment use and impacts negatively on the local economy will be resisted.
- v. Where appropriate, loss of employment space will be expected to provide mitigation in the form of contributions to employment training.

b: New employment space

- i. All proposals for new office space should follow a sequential approach which considers town centre sites before edge of centre sites.
- ii. New industrial/warehousing space will be expected to locate in Locally Significant Industrial sites. Warehousing uses or uses which generate high levels of movement should be located in close proximity to tier one and two roads as set out in DM17 Travel Impact and Parking Standards and minimise impact on residential areas.

- iii. Proposals for new employment space will be expected to provide on site servicing for the intended use and include space for waiting for goods vehicles.

Policy DM15: Green Belt and Open Spaces

a: Green Belt / Metropolitan Open Land

1. Development proposals in Green Belt are required to comply with Planning Policy Guidance 2: Green Belt. In line with the London Plan the same level of protection given to Green Belt land will be given to Metropolitan Open Land (MOL).
2. Except in very special circumstances, the Council will refuse any development in the Green Belt or MOL which is not compatible with their purposes and objectives and does not maintain their openness and would harm their visual amenity.
3. The construction of new buildings, and changes of use of existing land and buildings, within the Green Belt or Metropolitan Open Land, unless there are very special circumstances, will be inappropriate, except for the following purposes:
 - i. Agriculture, horticulture and woodland;
 - ii. Nature conservation and wildlife use; or
 - iii. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of Green Belt or MOL.
4. Extensions to buildings in Green Belt or MOL will only be acceptable where they do not result in a disproportionate addition over and above the size of the original building or an over intensification of the use of the site.
5. The replacement or re-use of buildings will not be permitted where they would have a greater adverse impact on the openness of the area or the purposes of including land in it, compared with the dwellings they replace or the previous buildings use.
6. Development adjacent to Green Belt/MOL should not have a detrimental impact on visual amenity and respect the character of its surroundings.

b: Open Space

1. Open space will be protected from development. In exceptional circumstances loss of open space will be permitted where the following can be satisfied:
 - i. The development proposal is a small scale ancillary use which supports the use of the open space or
 - ii. Equivalent or better quality open space provision can be made.

Any exception will need to ensure that it does not create further public open space deficiency and has no significant impact on biodiversity.
2. In areas which are identified as deficient in public open space, where the development site is appropriate or the opportunity arises the Council will expect on site provision in line with the standards set out in the supporting text [para 16.3.7].

DM16: Biodiversity

- a. When considering development proposals the Council will, where appropriate, seek the retention and enhancement, or the creation of biodiversity.
- b. Where development will affect a Site of Importance for Nature Conservation and / or species of importance the Council will expect the proposal to meet the requirements of London Plan Policy 7.9E.
- c. Development adjacent to or within areas identified as part of the Green Grid Framework will be required to make a contribution to the enhancement of the Green Grid.

Policy DM17: Travel impact and parking standards

a: Road Safety

The Council will ensure that the safety of all road users is taken into account when considering development proposals, and will refuse proposals that unacceptably increase conflicting movements on the road network or increase the risk to vulnerable users.

b: Road Hierarchy

The Council will seek to ensure that roads within the borough are used appropriately according to their status in the defined road hierarchy. In taking into account the function of adjacent roads the council may refuse development proposals which would result in inappropriate road use, or adversely affect the operation of roads in an area

c: Development, Location and Accessibility

The Council will expect major development proposals with the potential for significant trip generation to be in locations which are, or will be made, highly accessible by a range of transport modes.

d: Transport Assessment

In considering planning applications for new development, the Council will require developers to submit a full Transport Assessment (as defined by Department for Transport criteria) where the proposed development is anticipated to have significant transport implications in order to ensure that these impacts are considered. This assessment should include an analysis of accessibility by all modes of transport.

e: Travel Planning

For significant trip generating developments, (defined by Department for Transport criteria), the Council will require the occupier to develop, implement and maintain a satisfactory Travel Plan (or plans) to minimise increases in road traffic and meet

mode split targets. In order to ensure that they are delivering this the travel plan will need to contain measurable outputs so that they can be monitored.

f: Local Infrastructure Needs

- i. Developments should be located and designed to make the use of public transport more attractive for all users by providing improved access to existing facilities, and if necessary the development of new routes and services, including improved and fully accessible interchange facilities.
- ii. The Council will expect development to provide safe and suitable access arrangements for all road users to new developments. Where improvements or changes to the road network are necessary by virtue of an approved development, the Council will secure a Legal Agreement from the developer.
- iii. The Council will require appropriate measures to control vehicle movements, servicing and delivery arrangements. Where appropriate the Council will require Construction Management and/or Delivery and Servicing Plans.
- iv. Where appropriate, development will be required to improve cycle and pedestrian facilities in the local catchment area by providing facilities on site and/or funding improvements off site

g: Parking management

1. The Council will expect development to provide parking in accordance with the London Plan standards, except in the case of residential development, where the standards will be:
 - i. 2 or more spaces per unit for detached and semi detached houses (4 or more bedrooms)
 - ii. 1 or more spaces per unit for terraced houses and flats (1 to 3 bedrooms)
2. Residential development may be acceptable which proposes limited or no parking where either of the following can be demonstrated:
 - i. surveys indicate that there is sufficient on-street parking capacity and
 - ii. In cases where the proposal is within a Controlled Parking Zone (CPZ) or town centre and surveys indicate there is not sufficient on street parking capacity, the roads outside a CPZ which are in close proximity to the proposal will need to have sufficient on-street parking capacity to accommodate parking from the development and the applicant is willing to enter into a legal agreement which restricts future occupiers from obtaining on street parking permits.

Policy DM18: Telecommunications

Proposals for the installation of telecommunications equipment will be permitted where it can be demonstrated that:

- i. There is no significant adverse effect on the external appearance of the building on which or space in which they are located;
- ii. The special character and appearance of all heritage assets are preserved or enhanced;
- iii. The possibility of sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and where practical becomes the preferred location;
- iv. Technologies to miniaturise and camouflage any telecommunications apparatus have been fully explored;
- v. They are appropriately designed, coloured and landscaped to take account of their setting; and
- vi. There is no significant adverse impact on the visual amenities of neighbouring occupiers.

9 Tyldesley analysis

Core Strategy Policy	European Site Effect ²	Likelihood of Impact	Comments Where Needed
Policy DM01 – Protecting Barnet's character and amenity	1, 3, 6 & 7	No likely impact	The policy aims to protect character and amenity for residents and users. Part of this relates to the creation of and protection of landscaping and trees.
Policy DM02 – Development Standards	1 & 3	No likely impact	The policy sets out the standards which will be used to control new development.
Policy DM03 – Accessibility and inclusive design	1	No likely impact	The policy aims to improve accessibility for all in new development.
Policy DM04 – Environmental considerations for development	1, 3 & 4	No likely impact	The policy sets out the approach to reducing carbon emissions, flooding and the impact of air/noise pollution.
Policy DM05 – Tall Buildings	1	No likely impact	The policy sets out the criteria for tall buildings.
Policy DM06 – Barnet's Heritage and conservation	1 & 7	No likely impact	The policy sets out the approach for protecting and conserving the boroughs heritage.
Policy DM07 – Protecting housing in Barnet	1	No likely impact	The policy aims to protect housing from development to other uses in Barnet.
Policy DM08 – Ensuring a variety of sizes of homes in Barnet	1	No likely impact	The policy sets out the details for ensuring a wider choice of housing is provided as part of development.
Policy DM09 – Specialist Housing	4	No likely impact	The policy deals with the redevelopment of and location of specialist housing in areas which are in accessible locations.
Policy DM10 – Affordable housing contributions	1	No likely impact	The policy provides the detail for the delivery of affordable housing.
Policy DM11 – Development principles for Barnet's town centres	4	No likely impact	The policy provides the detail for development in the town centres.
Policy DM12 – maintaining our local centres and parades	4	No likely impact	The policy provides the detail for development in the local centres.
Policy DM13 – Community and education uses	4	No likely impact	The policy sets the detail for the protection of and location of community facilities.

Policy DM14 – New and existing employment space	4	No likely impact	The policy provides the details of protecting employment uses and location of new employment uses.
Policy DM15 – Green Belt and open spaces	6 & 7	No likely impact	The policy sets out the protection of green belt, open spaces and accessibility to them.
Policy DM16 – Biodiversity	6 & 7	No likely impact	The policy sets out the protection of biodiversity and the creation of new biodiversity.
Policy DM17 – Travel impact and parking standards	4	No likely impact	The policy sets out the details on policy for transport and parking in the borough.
Policy DM18 – Telecommunications	1	No likely impact	The policy sets the details for telecommunications equipment.

European site condition and potential threats to site integrity

Site Name	Reason for Designation	Conservation Objectives	Condition of site and potential threats to integrity
Richmond Park	Extensive area with large number of ancient trees with decaying timber – an important habitat for invertebrates, and in particular Stag Beetles	Maintenance of woodland pastures through grazing, pollarding and leaving remains of fallen trees which form important fungi and invertebrate habitats. Active management of acidic grasslands through grazing and prevention of invasive scrub and bracken. Avoid pollution from inorganic fertilisers and pesticides. Management of access and recreational activities.	86% of site area considered to be in unfavourable condition no change. This means that much of the area will not reach a favourable condition unless management or external conditions change. However, the woodland elements of the site (for which the site is European protected) are in favourable condition or are recovering due to thinning/coppicing and bracken clearance. The site is surrounded by urban area and is prone to high recreational pressure.
Epping Forest	Atlantic acidophilus beech forest. Supports rare species of moss. History of pollarding means that the site is rich in fungi and dead-wood invertebrates including the Stag Beetle.	Repollarding and cutting to maintain diverse woodland density. Preserve fallen timber and decaying wood as habitat for fungi and invertebrates. Deer management and protection from rabbits or livestock.	Over half the area surveyed is in a favourable or unfavourable condition. However, other areas are showing poor levels of beech regeneration due in particular to air pollution and high NO2 levels. Pollarding is required to maintain supporting habitats.
Wimbledon Common	Has a large number of old trees and much fallen decaying timber and supports relatively large numbers of stag beetle as well as other scarce invertebrate species associated with decaying timber. The site also represents Northern Atlantic wet heaths and European dry heath habitats. These factors are not primary reasons for selection of this site.	Maintaining open nature of heath through low intensity grazing or cutting/mowing. Active management of acidic grasslands through grazing and prevention of invasive scrub and bracken. Avoid pollution from inorganic fertilizers and pesticides. Management of access and recreational activities.	99% of the site area is in a favourable or unfavourable recovering condition. The woodland elements of the site are in favourable condition and will maintain so with some thinning and coppicing. Surrounded by urban area and is prone to high recreational pressure. Air pollution can also have an impact on the quality of heathland habitat.
Wormley-Hoddesdon Woods	Broadleaved, mixed and Yew Woodland – Lowland.	No loss of semi-natural stands or ancient woodland. Avoid human impacts in 'minimum intervention' stands. Maintain regeneration through establishment and growth of young trees. Limit presence of invasive aliens and non-native/non-naturalised species. Maintain vegetation structure, age mix, amount of open space and sufficient number of dead trees	Death or replacement of woodland species due to pollution (e.g. eutrophication from adjacent farmland). Excessive grazing is a potential problem. Recreational pressure also presents a potential issue.

Lee Valley	<p>Open water and surrounding marginal habitats which support wintering populations of Bittern, Shoveler and Gadwell.</p>	<p>Water level management.</p> <p>Protection of habitats associated with shallowly sloping margins that are not too exposed to wave action.</p> <p>Protection of water quality by ensuring nutrient levels do not increase (due to pollution from direct and diffuse sources and due to changes in water levels).</p> <p>Maintenance of appropriate nesting and feeding areas free from disturbance during breeding and winter periods.</p> <p>Management of recreational activities such as angling and boating.</p>	<p>Walthamstow reservoirs are in 100% favourable condition.</p> <p>Increase in recreational activity could impact upon wintering wildfowl numbers.</p> <p>Management plans are in place in which nature conservation is a high or sole priority.</p> <p>There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought. This will be addressed through the Environment Agency review of consents.</p>
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10 Possible impacts of Barnet's Development Management Policies document on European sites

- 10.1 Barnet's Development Management policies document sets out the borough-wide planning policies that implement the Core Strategy and will be used for day to day decision making by the Planning Service and for planning committee determinations..
- 10.2 In summary the Development Management policies set out policy for:
- Protecting character and amenity;
 - Ensuring the highest standards of design are delivered including the impacts of tall buildings
 - Ensuring the environmental impacts of development are considered;
 - Protecting existing housing, providing suitable housing mix and delivering affordable housing in new development;
 - Town centre development and also local centres;
 - Employment and community uses; both their protection of location of new uses
 - Protecting open spaces, biodiversity and the green belt;
 - The provision of parking and impact of transport.
- 10.3 Possible impacts of the Core Strategy on identified European sites are:
- The standards for development set out the conditions and policy for controlling the environmental impacts of the 28,000 new homes which the Core Strategy identifies will be built in the borough. This development could generally lead to greater noise, light and air pollution. The development of tall buildings (especially near the Brent Reservoir) could impact on migrating birds and recent reports have suggested that further study in this area is required.
 - The environmental policies cannot prevent increased water demand and limited supply could affect water quality and levels within European sites. Please see 10.4 below.
 - The policies cannot ensure that they affect the level of traffic generated through housing and commercial development which could lead to increases in air pollution which in turn could affect sensitive species.
- 10.4 Water quality in Barnet is impacted by urban diffuse pollution which could be exacerbated by Barnet's large growth targets during the lifetime of the Core Strategy. The Development Management Policies Document aims to prevent the adverse impact on the quality of ground water but water quality could be affected by the following:
- The boroughs main watercourses flow through developed urban areas with impermeable surfaces, and over London Clay, so they respond quickly to rainfall. Urban run-off carries pollutants directly into the rivers.
 - Misconnections, caused by the incorrect installation of domestic and industrial plumbing, mean untreated water is discharged directly into the watercourse. This is a particular problem for the smaller tributaries where there is less dilution. A programme was initiated between the Environment Agency and Thames Water to tackle the problem of domestic misconnections.
 - Polluted surface water outfalls on Barnet's watercourses can lead to a decline in water quality, particularly at times of low flow.

- 10.5 Some potential negative environmental impacts will be mitigated through other strategies employed in the Local Development Framework, the Mayor's London Plan and national planning policy.
- 10.6 Promotion and improvements to public transport provision and a new railway station at Brent Cross could help to reduce levels of single occupancy car journeys. Promoting walking and cycling such as the cycling super highways could help encourage the use of these modes.
- 10.7 Maximising development within town centres and locations well served by public transport may also lead to reduced car usage as many services and facilities will be within walking distance or easily accessible by public transport.
- 10.8 Reviewing school travel plans and the promotion of walking and cycling to school should help to reduce road traffic levels at peak times.
- 10.9 Other positive strategies include:
 - The implementation of the Flood and Water Management Bill encourages a shift to the use of SUDs in all development which could help to reduce the impact of urban diffuse pollution.
 - the requirement for air quality and noise impact assessments to become a part of all major development proposals;
- 10.10 These are some of the measures which will help mitigate some of the negative effects that could be associated with the Development Management Policies for Barnet.

11 Possible impacts of the Development Management Policies in-combination with wider trends

- 11.1 The Habitat Regulations require that we take into consideration likely cumulative impacts of effects 'in-combination with other plans or projects'. This means that we need to consider the cumulative impact of our strategy in tandem with those of neighbouring authorities, whose plans will be similar and therefore mutually reinforcing. The London Plan Sustainability Report identifies a number of key trends in the London region which are having or are likely to have adverse environmental consequences. Those impacts that are development related and also likely to have adverse impacts on European sites include:
 - Increases in road traffic and associated air pollution;
 - The number of goods vehicles is set to increase – and therefore associated air pollution;
 - Rising water demand and a predicted deficit in periods of drought;
 - Drier summers will have adverse effects on the water levels of London's tributaries;
 - Air pollution is likely to worsen through continued growth and management of municipal waste. London's air pollution is amongst the worst in Europe and it is estimated that targets on NO2 levels will not be met;
 - Continued ambient noise from road traffic, air craft and people may disturb wildlife;
 - Increases in impermeable surfaces and subsequent run-off could lead to greater water pollution;
 - Increases in incidences and severity of floods. This will threaten water quality further;
 - Housing and population growth will place greater recreational pressure on London's open spaces which could result in negative impacts on biodiversity;
 - Increased consumption of non-renewable energy and an increase in waste production.

- 11.2 There are strategies and measures in place which will have positive environmental consequences and will therefore mitigate some of the negative impacts listed above. These include:
- Growth in the environmental economy;
 - Continuous improvement in water quality – through Environment Agency initiatives including the Thames Flood Basin Catchment plan, the implementation of the Flood Water Management Act and other river restoration schemes;
 - European Environmental Noise Directive will reduce ambient noise levels;
 - Mayor's draft London Plan sets targets for increases in production of renewable energy;
 - Increase in freight travel by rail;
 - Woodland area extent is to remain stable or increase.
- 11.3 In-combination effects are largely concerned with overall population and housing growth in London and surrounding areas. Such growth has already been determined through housing targets which have been set out in The London Plan. In summary, implications for European sites relate to:
- Increased air and water pollution;
 - Increases in water demand and its associated threat to water levels in rivers;
 - Noise and disturbance associated with the growth in population and the use of European sites for recreational use.

12 Assessment of in-combination effects

- 12.1 Policies identified in the strategies and plans of neighbouring authorities have the potential to affect Natura 2000 sites at a wider level than that of individual Local authorities. These policies are influenced by the London Plan (Consolidated with Alterations since 2004) which is considering this issue in further detail.
- 12.2 The table below summarises the key policies of Barnet's neighbouring authorities that could lead to 'in combination' impacts with Barnet's Core Strategy:

Growth taking place in neighbouring boroughs

Local Authority	Development Plans or Proposals
LB Brent	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 10,146 additional homes between 2007 and 2017.
LB Camden	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 5,950 additional homes between 2007-2017
LB Enfield	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 3,950 additional homes between 2007-2017
LB Harrow	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 4,000 additional homes between 2007-2017
LB Haringey	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 6,800 additional homes between 2007-2017
Hertsmere BC	LDF Core Strategy sets out a vision to: <ul style="list-style-type: none"> ▪ Deliver 4,200 homes between 2001 and 2021

13 Cross cutting issues

Site	Vulnerability to:			Comments
	Air pollution	Recreation	Water level/quality	
Lee Valley		✓	✓	The whole area is affected by rather eutrophic water quality. The other main threat is that of human recreational pressure, but this is already well regulated. There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought.
Wimbledon Common	✓	✓		The site is located in an urban area and therefore experiences heavy recreational pressure. Air pollution can also have an impact on the quality of heathland habitat.
Richmond Park		✓		The site is surrounded by urban area and therefore experiences high levels of recreational pressure.
Epping Forest	✓			The forest's epiphytic bryophyte population had been declining due to the death of pollards, shading and pollution from acid rain. The reintroduction of pollarding and wood pasture management is helping to reverse the decline. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act. However, other areas are showing poor levels of beech regeneration due in particular to air pollution and high NO ₂ levels. This site is particularly sensitive to atmospheric pollution.
Wormley Hoddesdon park Woods		✓		There is some pressure from informal recreation but this is concentrated on well established paths.

- 13.1 The table above highlights specific conditions which could threaten the integrity of the screened European sites. Each condition should not be considered in isolation but should be assessed in-combination with neighbouring boroughs plans. Each 'threat' will be discussed in turn below.
- 13.2 **Air pollution** - All five of the identified European sites are susceptible to poor air quality. Air pollution can impact negatively on these sites either indirectly, through the process of precipitation leading to water pollution, or directly. Air pollution is a London-wide problem and Barnet's role in reducing contributions is detailed in 'The Local Air Quality Strategy for Barnet' (2002). This strategy is essentially an action plan of 13 policies that aim to improve air quality through specific measures. This strategy is monitored annually.
- 13.3 Of the five European sites, Epping Forest and Wimbledon Common are particularly vulnerable to impacts caused by air pollution. Epping Forest is the only site where air

pollution is listed as a current threat to about half of the site's land area. The forest's epiphytic bryophyte population has declined in the past due to the impact of acid rain caused by air pollution and the regeneration of the Beech population has been slow to recover due in part to high levels of NO₂ in the air.

- 13.4 **Air pollution from road traffic** - One of the main contributors of air pollution in Barnet comes from road traffic. Vehicle emissions from road traffic include Carbon Monoxide, Oxides of Nitrogen (NO₂), volatile organic compounds and particles less than 10 microns in size (PM₁₀'s).
- 13.5 Pollution from vehicle emissions is highly localised, with pollution levels decreasing exponentially with distance from its source. Since the five European sites under consideration are not within the borough's boundary it is fairly safe to conclude that the potential for Barnet road traffic to have any impact on them is remote. This scenario fails to consider that new development in Barnet in combination with development elsewhere could lead to increases in levels of road traffic outside the borough boundary which may be adjacent to European sites. Road traffic air pollution can also contribute to diffuse ambient air pollution levels, which we will discuss later. Successful implementation of Barnet's Core Strategy will reduce contributions to air pollution from vehicular emissions through several different approaches. For example, the Core Strategy places strong emphasis on tackling the school run and its effects as a major contributor to traffic congestion. There will also be improvements to public transport including rapid transit services at Brent Cross as part of improvements to the bus network.
- 13.6 Major development in the borough is to be located within urbanised areas which are well served by public transport and have good PTAL's. Development is to be promoted in Barnet's town centres which form the community 'hubs' and are also well served by public transport.
- 13.7 Mixed-use development is being promoted in growth areas and town centres within the borough, which means that shops and facilities will be located closer to resident's homes and therefore the need to travel by car will be greatly reduced. The Core Strategy seeks to improve the strategic road network at 'pinch points' and especially the A406. The Development Management Policies document also introduces policy for car free development although it does increase the parking provision for housing. This could lead to less road congestion and therefore lower car emissions.
- 13.8 The Development Management Policies document requires travel plans and transport assessments to form a requirement for planning applications which will have a significant transport implication. This makes the reduction of car based journeys a major consideration in determining the grant of planning permission. The Core Strategy also seeks the promotion of low emission vehicles, including electric cars, through the provision of charging points that utilise 'green energy' in public places in new developments.
- 13.9 These strategies in-combination with London-wide plans, such as low-emission zones and congestion charging will help to mitigate the negative impacts of traffic-associated air pollution across Barnet and London generally.
- 13.10 **Diffuse and other sources of air pollution** - The London Borough of Barnet is a designated Air Quality Management Area (AQMA) for NO₂ and PM₁₀s; as such the council therefore have an Air Quality Action Plan (AQAP), which employs strategies to improve air quality by reducing air pollution emissions, both directly and indirectly. The AQAP includes strategies including; carrying out vehicles emissions testing; improving coordination of traffic lights to improve traffic flow; introduction of controlled parking zones (CPZs) and the promotion of alternative forms of transport for school children e.g. 'walking buses'.
- 13.11 The AQAP is currently under review and will reinforce and strengthen the policies within the Development Management Policies document which aim to:
 - Concentrate mixed-use development in locations that are well served by public transport;

- Encourage new office and community facilities to consider locating in town centre locations first before other less accessible locations
- Promote Barnet's SPD on Sustainable Design and Construction;
- Ensure development opportunities to implement district-wide networks supplied by decentralised energy are taken; and
- These measures, in-combination with existing national and international restrictions on emissions should protect the integrity of European sites.

- 13.12 **Water quality and water levels** - Barnet is predominantly within the Brent river catchment, but also covers part of the Lower Lee catchment in the north-east and the Colne catchment in the north-west.
- 13.13 Lee Valley is the only protected site of the five under consideration that is particularly sensitive to water quality and vulnerable to change in water levels.
- 13.14 The Environment Agency has identified that water quality in Barnet is particularly impacted by urban diffuse pollution. Urban diffuse pollution is caused by the following:
- The borough's main watercourses flow through developed urban areas with impermeable surfaces, and over London Clay, so they respond quickly to rainfall. Urban run-off carries pollutants directly into the rivers.
 - Misconnections, caused by the incorrect installation of domestic and industrial plumbing, mean untreated water is discharged directly into the watercourse. This is a particular problem for the smaller tributaries where there is less dilution. A programme has been implemented between the Environment Agency and Thames Water to tackle the problem of domestic misconnections.
- 13.15 Polluted surface water outfalls on Barnet's watercourses can lead to a decline in water quality, particularly at times of low flow.
- 13.16 Although there are no European sites within the borough boundary, Pymmes Brook is part of the River Lee catchment and feeds the Walthamstow Reservoirs SSSI. Therefore water quality impacts, resulting from development in the borough, may be felt downstream.
- 13.17 The Borough of Barnet is served by two water companies: Thames Water and Three Valleys Water. The 5 year average (2004 – 2009) per capita consumption is 158.4 litres per day in the London Water Resources Zone which is above the England and Wales average.
- 13.18 Additional development will lead to increased demand for water extraction, which in turn can impact negatively on water levels, and so European sites. The Environment Agency has the responsibility for meeting the water demand of the population "without damaging the environment". This is achieved through regulation of water abstraction, environmental monitoring and working closely with the water industry and abstractors to plan for future needs. Water companies are required to produce water resource management plans, which show how they will protect the environment. The Environment Agency is consulted on all major development applications which allows for the assessment of potential impacts on water resources.
- 13.19 Barnet's Development Management Policies document contains policies which will mitigate potential negative impacts that development may have. These strategies include:
- We will promote the highest environmental standards through our SPD on Sustainable Design and Construction;
 - In line with the London Plan development should reduce surface water run-off to green field rates thereby reducing the potential for urban diffuse pollution; and
 - Making Barnet a more water efficient borough.
- 13.20 Barnet's SPD on Sustainable Design and Construction makes it necessary that:

- Residential developments are designed to achieve average water use in new dwellings of less than 40m³ per bed space per year (approx.110 litres/head/day). This should be calculated according to the same methodology used in Ecohomes or the Code for Sustainable Homes. Planning applications must provide a schedule of the measures to be included in a development to achieve this standard, and to which the development will be conditioned.
- The council requires that in development proposals where there are insufficient measures to meet the above standard, then a feasibility study must be provided on the potential to incorporate grey water recycling. If proven technically feasible, such a system must be committed to in the designs.
- The council requires that all new development, including house extensions, must include provision of water butts or equivalent techniques for rainwater harvesting for use in gardens and landscaping, unless it can be shown that these are inappropriate.
- The council requires that proposals for hotels and offices must demonstrate that water consumption is 'below average' against the benchmarks provided by CIRIA (see SPD). The BREEAM water calculator should be used for estimating the design performance.

13.21 The above measures will help to mitigate the burdens placed upon water resources in the borough in light of forthcoming developments. With such measures in place it is unlikely that future development will impact on any of the European sites in any significant way.

13.22 **Impacts from increased recreation** - It has been estimated that Barnet's population will increase from 338,100 in 2008 to 384,600 by 2026. Also, between 2007 and 2026 it is expected that Barnet will have built 28,000 new homes to accommodate the growing population. This will be in-combination with overall population and housing growth across London and the wider region. This will put additional visitor pressure on London's green spaces including the European sites. Also, increased provision for employment growth will lead to increased recreational demand from workers.

13.23 All of the identified European sites are popular destinations for visitors from London and further afield. Lee Valley, Wimbledon Common, Richmond Park and Wormley Hoddesdonpark Woods have all been identified as being particularly vulnerable to the potential impacts of recreation.

13.24 Potential negative impacts, for example, include:

- Lee Valley Park is a popular destination for angling and water sports. Such activity can cause disturbance to protected wintering bird populations;
- At Richmond Park the majority of visitors arrive by car – 79%, which can result in negative impacts on conservation including wildlife accidents and noise pollution;
- There is the risk of major blazes caused by visitors lighting small fires during long, hot dry spells; and
- The heaths at Wimbledon Common are sensitive to trampling.

13.25 Such threats to the conservation status of these sites tends to be mitigated through local management plans. An example of this is the Lee Valley Planning Authority's Water Management Strategy which aims to minimise the conflict between recreational interests and nature conservation by separately allocating nature conservation and recreation uses to open waters and rivers within the park. At Richmond Park, traffic speed limits have been introduced to reduce accidents and noise pollution.

13.26 Barnet's Development Management Policies document seeks to enhance and protect open spaces within the borough. This strategy recognises that there is an unmet need for public open space in Barnet. As identified in the Core Strategy much of the new provision of open spaces will come about as part of the regeneration taking place in Barnet's regeneration and development areas such as Mill Hill East, Colindale and Brent Cross/Cricklewood.

- 13.27 Increasing the provision of and improving access to and the facilities provided at green spaces within the borough should result in reduced pressure on the European sites under scrutiny in this report. The need to travel to these European sites will be significantly reduced if there is good quality green space provision in Barnet and neighbouring boroughs. Such sites would offer alternative destinations other than the European sites. For example, The Welsh Harp provides 170 ha of open space. Activities at the Welsh Harp include: bird watching, walking, jogging, dog-walking and passive recreation. Local sailing clubs provide organised water activities on the reservoir. Hadley Common, Totteridge Common and Hampstead Heath (including the extension) offer further alternative destinations for green space provision in Barnet. We should also take into consideration the fact that approximately a third of Barnet's land area is designated as Green Belt land.
- 13.28 Recreational pressure poses a risk to the conservation status of 4 out of the 5 screened European sites. Risk to these sites is mitigated to a considerable extent by site management plans and interventions. The screened European sites are not immediately accessible to Barnet residents and workers, and there are a number of alternative open spaces within the borough and neighbouring boroughs that will attract visitors away from protected European sites. Housing and employment growth in Barnet, in-combination with other London boroughs, will increase pressure on the capital's open spaces and biodiversity. However, Barnet's in-combination contribution will be significantly reduced through its strategy to protect all open space in the borough and seek enhancements and new open space in areas of deficiency. In light of the above we can conclude that Barnet's Core Strategy will have no likely significant effects through recreational impacts on European protected sites.

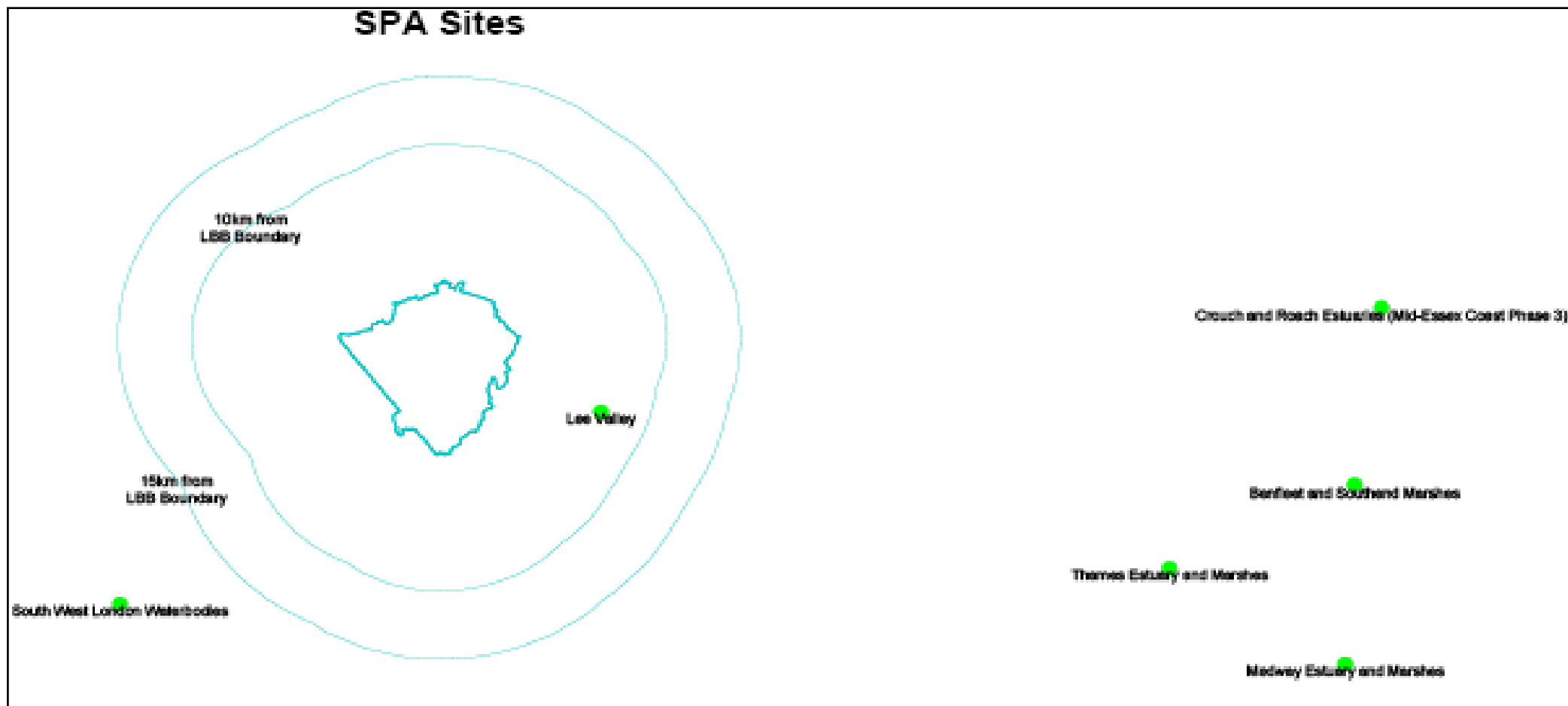
14 Conclusions

14.1 Habitat Directive Assessment HDA – Screening Stage

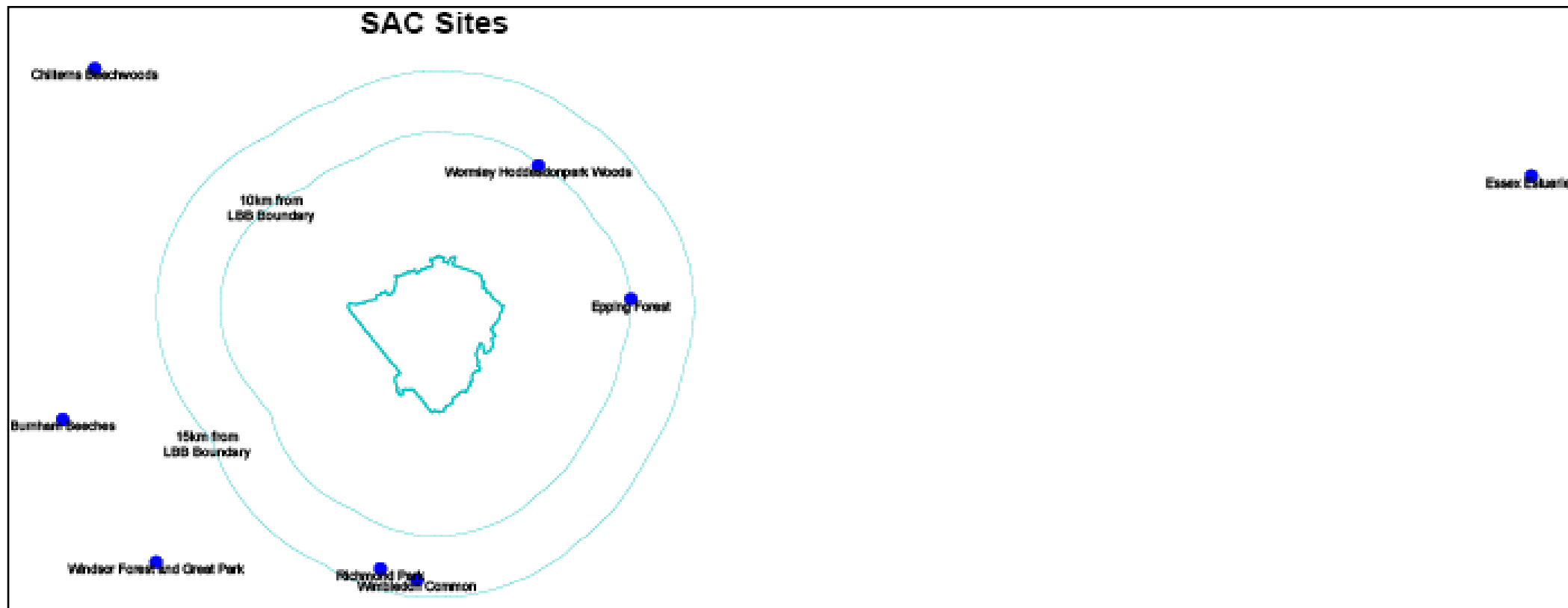
- 14.2 Barnet's Development Management Policies document sets out the borough-wide planning policies that implement the Core Strategy and will be used for day to day decision making by the Planning Service and for planning committee determinations. This HDA has identified a range of indirect, and/or in combination impacts, which could possibly affect five Natura 2000 sites within a 15 Km radius of the borough.
- 14.3 The assessment has screened these impacts against the sites qualifying features and can conclude that there will be no likely significant effect on the integrity of Natura 2000 sites as a result of Barnet's Development Management Policies document. Therefore in accordance with guidance, a Habitat Directive Assessment is not necessary and does not need to be undertaken.

15 Appendix 1

SPA Sites within 15 Km of the Borough Boundary:



SAC Sites within 15 Km of the Borough Boundary:



RAMSAR sites within 15 Km of the Borough Boundary:

