

Sustainability Appraisal of London Borough of Brent's Local Development Framework

Pre-Submission Site Specific Allocations

Commentary on the informal consultation draft



August 2008

**Prepared for London Borough of Brent
by
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ABBREVIATIONS

CEP	Collingwood Environmental Planning
DCLG	Department of Communities and Local Government
DPD	Development Plan Documents
EiP	Examination in Public
FRA	Flood Risk Assessment
GIS	Geographical Information System
GP	General Practitioner
Ha	Hectare
IMD	Index of Multiple Deprivation
LBB	London Borough of Brent
LDD	Local Development Documents
LDF	Local Development Framework
ODPM	Office of the Deputy Prime Minister
OSD	Open Space Deficiency
PAS	Planning Advisory Service
PPS	Planning Policy Statement
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SPD	Supplementary Planning Document
SSA	Site Specific Allocation
SUDs	Sustainable Urban Drainage

1. BACKGROUND

Purpose of this report

- 1.1 The purpose of this report is to provide an initial commentary and recommendations, from a sustainability perspective on the London Borough of Brent's (LBB's) evolving Site Specific Allocation Development Plan Document (DPD) and the sites contained within it. This report has been drafted to accompany the "informal consultation" being conducted by LBB on a pre-Submission version of the Site Specific Allocations (SSAs)¹. It also aims to provide LBB's planning policy officers with initial views of the team responsible for the Sustainability Appraisal (SA) on the evolving revised draft prior to the completion of formal appraisal on the Submission version which is likely to be completed by October 2008.
- 1.2 The Site Specific Allocations is one of two DPDs currently being prepared by LBB as part of their Local Development Framework (LDF). A separate SA Commentary has also been prepared for a pre-Submission version of the Core Strategy DPD. The background to, and reason for the revision of these two DPDs which were both previously Submitted but subsequently withdrawn is described under **Context and background to this report**, below.
- 1.3 In addition, LBB previously also produced a suite of policies for the management of development within a Preferred options version of a Development Policies DPD (June 2007). However this DPD is not being progressed at present until the Core Strategy is finalised.

Context and background to this report

- 1.4 In November 2007 Brent submitted its Core Strategy DPD and SSA DPD to the Secretary of State, with the intention of proceeding to an Examination in Public (EiP) in May 2008. The Submission versions of these DPDs were accompanied by SA Reports, prepared by Collingwood Environmental Planning (CEP) in association with LBB, which comprised full SA Reports on the Preferred Options versions with an Annex detailing the appraisal of the changes between the Preferred Options and Submission stages.
- 1.5 Although they were submitted together, the draft Core Strategy and SSA DPDs were developed over different timescales. Due to this, and the different appraisal methods adopted, separate SA Reports were originally developed for each. The SA Report on the Preferred Options version of the Core Strategy DPD was completed in October 2006, and the SA Report on the Preferred Options version of the SSA DPD was completed in June 2007. The June 2007 SA Report also included an appraisal of the

¹ Note that the version of the pre-Submission Site Specific Allocations DPD considered within this commentary was the version made available to CEP on 28th July 2008

Preferred Options version of the Development Control Policies DPD. The additional SA Annex was produced by LBB in November 2007 and covered both the final alterations made to the Submission versions of the Core Strategy and the SSA DPDs.

- 1.6 Prior to the proposed EiP the appointed Inspector prepared a “preliminary note” and requested an “exploratory” meeting with LBB to discuss certain concerns he had about the soundness of the Core Strategy, and explore the options for progress. Following this meeting, LBB asked the Secretary of State to withdraw the Core Strategy and SSA DPD’s, and this was agreed².
- 1.7 The Council is now in the process of making revisions to the Core Strategy and SSA DPDs. In response to the Inspector’s concerns, and in line with requirements of the new PPS12³, the revised DPDs will seek to map out implementation in more detail and provide a more “Brent” focus to the overall spatial strategy and policies for the borough. Given the level of consultation on earlier versions of the Core Strategy, and in line with recommendations set out in PPS12 that the scale of consultation “should be proportionate”, the intention is to consult with the public on the Submission versions of the Core Strategy and SSA DPDs towards the end of 2008, in order to hold the EiP early in 2009.
- 1.8 The changes being made to the objectives, vision and policies in the Core Strategy DPD, and the SSA DPD are considered to be of a significant nature and it has been decided that the revised DPDs should be accompanied by a new SA Report. This SA commentary is therefore the first output of the ongoing SA of the pre-Submission Site Specific Allocations DPD. As noted a separate commentary has been prepared for the pre-Submission Core Strategy DPD. Where appropriate this SA will draw on the previous SA Reports and processes.
- 1.9 The SA methodology is expanded upon in Section 2 below.

Contents of this report

- 1.10 Following this section, **Section 2** of this report sets out a brief introduction to the background and SA methodology. The intention is that this provides sufficient information to those who are new to the LDF and SA processes.
- 1.11 **Section 3** of this report describes the key differences between the previous Submission SSA DPD (November 2007) and the current pre-Submission version of the SSA DPD (August 2008).

² The Inspector’s preliminary note and related documents, as well as a more complete description of the developments leading to the drafting of revisions to the Core Strategy and SSAs, are available through the LBB website:

<http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-160>.

³ <http://www.communities.gov.uk/planningandbuilding/planning/regionallocal/localdevelopmentframeworks/pps12/>

- 1.12 **Section 4** provided a commentary on the sustainability of the new and modified sites included in the pre-Submission SSA DPD. **Section 5** provides a short summary of the next steps in the SA process.

2. SUSTAINABILITY APPRAISAL METHOD

Sustainability Appraisal of Development Plan Documents

- 2.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA will consider the DPD's implications, from a social, economic and environmental perspective, by assessing options and the revised draft DPDs against available baseline data and sustainability objectives.
- 2.2 SA is mandatory for Local Development Documents (LDDs) under the requirements of the Planning and Compulsory Purchase Act (2004)⁴, which includes DPDs. Article 19 (5) states that the local planning authority must also "(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal". The Act also requires that SA is an integral part of the LDF production process.
- 2.3 Planning Policy Statement (PPS) 12: Local Spatial Planning (DCLG, 2008⁵) states (paragraph 4.43) that "*the Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.*" PPS12 also set out more flexible consultation procedures for Local Authorities in relation to LDDs.
- 2.4 The Government's guidance on Strategic Environmental Assessment (SEA)⁶ indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁷ – the SEA Regulations.
- 2.5 In November 2005 the Government published guidance entitled *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*⁸. While SEA and SA are distinct processes, the SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.
- 2.6 The guidance advocates a five stage process to undertaking SA, with each stage are divided into a number of tasks:

⁴ <http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs>

⁵ <http://www.communities.gov.uk/planningandbuilding/planning/regionallocal/localdevelopmentframeworks/pps12/>

⁶ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

⁷ Statutory Instrument 2004 No. 1633.

⁸ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
 - Stage B: Developing and refining options.
 - Stage C: Appraising the effects of the preferred options.
 - Stage D: Consultation on the preferred options and SA Report.
 - Stage E: Monitoring implementation of the DPDs.
- 2.7 The SA process is illustrated in Table 1. This also includes comments on how these relate to the SA of the revised DPDs.
- 2.8 Since the publication of the official Government guidance in 2005, a considerable amount of good practice documentation and other guidance has been developed by a wide range of organisations⁹, and this SA will seek to reflect best practice in SA of DPDs as appropriate.

Introduction to proposed sustainability appraisal method

- 2.9 The SA process for the revised Brent DPDs will follow the SA process set out in Government guidance. However this will be adapted to reflect the particular circumstances of this appraisal. As noted in Section 1, the SA of the pre-Submission DPDs follows on from the large amount of SA work completed in the preparation of the previous Submission versions of the DPDs, including the development of and consultation on a single SA Scoping Report (June 2005) and two SA Reports, one to accompany the Preferred Options Core Strategy DPD (October 2006), and the other to accompany the Preferred Options Development Control Policies and SSA DPDs (June 2007). In addition LBB produced an SA Annex in November 2007 in response to late alterations between the Preferred Options and Submission versions of the DPDs.
- 2.10 The SA of the revised Submission DPDs will draw on the findings of this previous appraisal work. For example, it is not intended to produce a new Scoping Report, rather, the collation and analysis of baseline context which was prepared for the previous Scoping Report in 2005, updated in 2006 and again in 2007 will remain largely relevant, requiring only to be updated, once more, to reflect new data available, such as that through the latest Brent Annual Monitoring Report (2006 - 07). Similarly the appraisal objectives and framework set out in the previous Scoping Report and SA Reports are expected to remain largely unchanged, with modifications only where key new data and/or sustainability issues have arisen.
- 2.11 Whereas previously two SA Reports were prepared due to the divergent timescales in the drafting of the DPDs, it is intended that, as the DPD revisions are being progressed simultaneously, one combined SA Report will be produced to include the

⁹ For example: Planning Advisory Service (PAS) December 2007 – Local Development Frameworks: Guidance on Sustainability Appraisal. <http://www.pas.gov.uk/pas/aio/51863>

SAs of the both the Submission versions of the Core Strategy and SSA DPDs. These will be included in separate parts within the SA Report, with a third part detailing the sustainability context and evidence base which supports both appraisals.

Proposed programme

- 2.12 The SA of the revised DPDs is to be carried out simultaneously with LBB's work on the DPDs. This commentary, and the recommendations it contains, represents the first step towards the formal appraisal of the Submission version of the Core Strategy and SSA DPDs. More detailed appraisal, including GIS mapping, revised appraisal against the site criteria previously used but drawing on updated data as appropriate and appraisal of the overall effects of the whole SSA DPD against the sustainability objectives, will be undertaken prior to the formal consultation on the Submission version on the SSAs, which is expected to take place late 2008 or early 2009. This consultation will be accompanied by a combined SA Report for the Submission Core Strategy DPD and the Submission SSA DPD. In addition, it is proposed that for the SA Report some further work will be undertaken on the appraisal of alternative used for each site.
- 2.13 This commentary is intended to accompany informal consultation between 4th August and 15th September 2008 with selected stakeholders by LBB alongside a pre-Submission version of the SSA DPD.
- 2.14 Following this commentary, a draft SA Report will be produced, by end October 2008, which is intended to accompany a final draft of the Submission versions of the Core Strategy and SSA DPD to be considered by the LBB Planning Committee and Executive in November 2008. In the light of this, revisions may be made to both the DPDs and the SA Report prior to formal consultation and submission to the Secretary of State in early 2009.

Table 1 : Proposed Sustainability Appraisal stages and tasks

DPD Pre-Production	Comments on SA of revised Submission DPDs
SA Stage A: Setting the context & objectives, establishing the baseline & deciding on the scope	<p>Included in SA Scoping Report (June 2005), with information updated for the SA Reports on the Core Strategy and Development Policies and SSA October 2006 and June 2007 respectively.</p> <p>Information, including baseline, plan and programme review and issues to be reviewed and updated as appropriate in light of any new data and information available since June 2007, and included in new SA Report (proposed October 2008).</p> <p>Consultation bodies to be updated via the SA Commentary (August 2008).</p>
Tasks	
<ul style="list-style-type: none">Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the DPDs (Task A1)	
<ul style="list-style-type: none">Collect relevant social, environmental and economic baseline information and produce characterisation of the DPD area (Task A2)	
<ul style="list-style-type: none">Identify key sustainability issues for the SA to address (Task A3)	
<ul style="list-style-type: none">Develop the SA framework, including defining the sustainability objectives, indicators and targets (Task A4)	
<ul style="list-style-type: none">Produce Scoping Report and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible solutions (Task A5)	
DPD Production	<p>Included in previous SA Reports (October 2006, June 2007) plus Annex (November 2007).</p> <p>To be reviewed and updated as appropriate and included in new the SA Report (proposed October 2008). This Commentary Report presents some initial work on tasks B3 – B5.</p>
SA Stage B: Developing and refining options	
Tasks	
<ul style="list-style-type: none">Test the DPD objectives against the sustainability objectives (Task B1)	
<ul style="list-style-type: none">Develop the DPD options (Task B2)	
<ul style="list-style-type: none">Predicting the effects of the DPD including options (Task B3)	
<ul style="list-style-type: none">Evaluating the effects of the DPD including options (Task B4)	
<ul style="list-style-type: none">Mitigating adverse effects and maximising beneficial effects (Task B5)	
<ul style="list-style-type: none">Proposing measures to monitor the significant effects of the DPDs implementation (Task B6)	
SA Stage C: Preparing the SA Report	<p>Revised SA Report to be prepared for the Submission Core Strategy and SSA DPDs (proposed October 2008).</p>
Tasks	
<ul style="list-style-type: none">Preparing the SA Report (Task C1)	
SA Stage D: Consultation on the draft DPD and SA Report	<p>Consultation on the Submission DPDs and the SA Report is expected late 2008 or early 2009.</p>
Tasks	
<ul style="list-style-type: none">Public Participation on the draft DPD and SA Report (Task D1)	
<ul style="list-style-type: none">Assessing the significant changes (Task D2)	
DPD Examination	
Tasks	
<ul style="list-style-type: none">Submission of DPD, Pre-Submission Consultation Statement and SA Report to Secretary of State	
<ul style="list-style-type: none">Assessing significant changes made as a result of representations, if necessary (Task D2 cont.)	
DPD Adoption and monitoring	
Tasks	
<ul style="list-style-type: none">Make the DPD and SA Report available for public viewing and produce an adoption statement	
<ul style="list-style-type: none">Making decisions and providing information (Task D3)	
SA Stage E: Monitoring implementation of the DPDs	
Tasks	
<ul style="list-style-type: none">Developing aims and methods for monitoring (Task E1)	
<ul style="list-style-type: none">Publishing results of monitoring the sustainability effects of the DPD in the annual monitoring reports as new information becomes available	
<ul style="list-style-type: none">Responding to adverse effects (Task E2)	

3. CHANGES TO THE SITE SPECIFIC ALLOCATIONS DPD

Changes to the Site Specific Allocations between the withdrawn Submission version and the current pre-Submission version

- 3.1 Since the Inspector made his comments on Brent's Submission DPS earlier in 2008, the LBB has reviewed the content of the SSA document and is proposing a number of key changes, these include:
- 1) proposing six new sites compared with the previous Submission document;
 - 2) proposing modifications to four of the existing sites in the previous Submission document;
 - 3) organising the sites by growth area (as well as "elsewhere in Brent" for the sites outside the growth areas), rather than the development control areas (North, South and West); and
 - 4) for each allocation including an estimated development capacity and projected phasing to portray how the site will contribute to the delivery of the growth strategy (for the sites which include housing).
- 3.2 The pre-Submission SSA document focuses on the ten new or modified sites, rather than the sites that remain unchanged from the previous Submission document (points 1 and 2 above). For these sites, it organises them by growth area (point 3 above) and includes details of the estimated development capacity and projected phasing (point 4 above). It is understood from LBB that this approach will be replicated for all the sites in the revised Submission DPD once drafted.
- 3.3 For information, the sites included in the initial Submission SSA DPD are listed in Table 2 and illustrated in Figure 1.

Table 2: Sites included in initial Submission SSA DPD (November 2007)

Site Allocations North
SSA 11: London Transport Sports Ground, Forty Avenue
SSA 12: Brent Town Hall, Forty Lane
SSA 19: Dollis Hill Estate, Brook Road
SSA 22: Metro House, 1-3 The Mall
SSA 23: Morrison's, Westmoreland Road
SSA 25: Oriental City, Edgware Road
SSA 39: Alpine House, Honeypot Lane
SSA 42: Kingsbury Library and Community Centre, Stag Lane
SSA 49: Garages at Barnhill Road
SSA 51: Dollis Hill House, Gladstone Park
SSA 53: Gavin/Station House, Neasden Lane
SSA 57: Sainsbury's Superstore
SSA 59: Theoco Garage, 3-5 Burnt Oak Broadway, Edgware Road

SSA 62: 655 North Circular Road
 SSA 63: Old St Andrew's Church, Old Church Lane
 SSA 85: Capitol Way
 SSA 88: 12-24 Carlisle Road
 SSA 90: Barningham Way
 SSA 91: Oxgate Lane
 SSA 92: Humber Road
 SSA 93: Site adjoining The Link, Staples Corner
 SSA 104: Sarena House, Grove Park, 381-395 Edgware Road & Primary School
 SSA 109: Neasden Lane/ Birse Crescent, Neasden
 SSA 110: Neasden Lane/ North Circular Road, Neasden
 SSA 112: Clock Cottage, Kenton Road

Site Allocations South

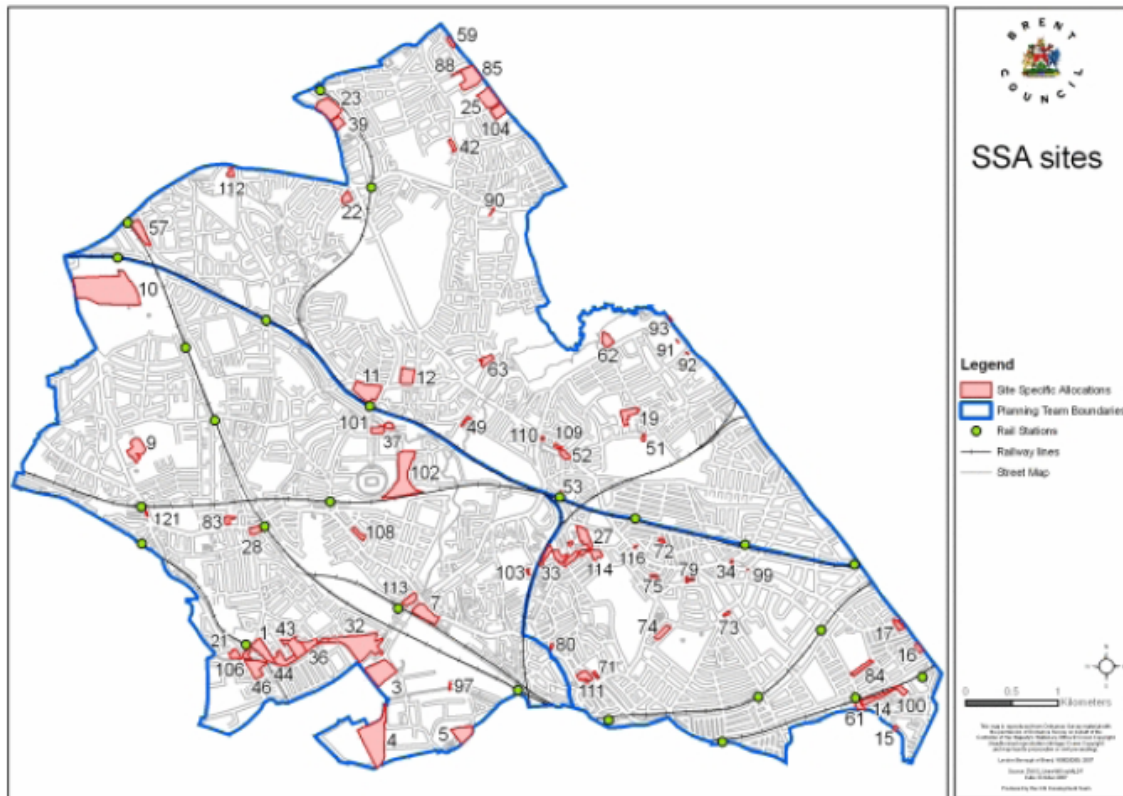
SSA 14: Marshall House, Albert Road Day Centre, and British Legion, Albert Road
 SSA 15: 117-119 Malvern Road
 SSA 16: Kilburn Square, Kilburn High Road
 SSA 17: Former State Cinema/ Mecca Bingo, Kilburn High Road
 SSA 27a: Asiatic Carpets, High Road, Church End
 SSA 27b: Ebony Court, 20a Neasden Lane
 SSA 27c: White Hart PH and Church High Road, Church End
 SSA 27d: Church End local centre, High Road, Church End
 SSA 33: Mayo Road and St Mary's Open Space, Church End
 SSA 34: Queens Parade, Walm Lane, Willesden
 SSA 61: Queen's Park Station Area, Salusbury Road
 SSA 71: Manor Park Road, Acton Lane
 SSA 72: 92a Villiers Road, Willesden
 SSA 73: 103 Mount Pleasant Road, Brondesbury Park
 SSA 75: Hawthorne Road, Willesden
 SSA 80: Former Willesden Court House, St Mary's Road
 SSA 84: Lonsdale Road, Kilburn
 SSA 99: Junction of Sidmouth Road and Willesden Lane
 SSA 100: Canterbury House, Canterbury Road
 SSA 103: Land rear of 12-14 Bridge Road
 SSA 111: Harlesden Plaza
 SSA 114: Homebase, 473 High Road, Church End
 SSA 116: Former Playground, Dudden Hill Lane

Site Allocations West

SSA 1: Atlip site, Ealing Road, Alperton
 SSA 3: Twyford Tip, Abbey Road, Park Royal
 SSA 4: Former Guinness Brewery, Park Royal
 SSA 5: Carey's site, Acton Lane, Park Royal
 SSA 7: Former Unisys Site / Bridge Park Centre
 SSA 9: Vale Farm Leisure Centre
 SSA 10: Northwick Park Hospital
 SSA 21: Alperton House, Bridgewater Road
 SSA 28: Wembley West End, Wembley High Road
 SSA 32: Northfields Industrial Estate
 SSA 36: Abbey Estate, Beresford Avenue
 SSA 37: Durkin site, North End Road, Wembley
 SSA 43: Abbey Manufacturing Estate, Woodside Close, Alperton
 SSA 44: Sunleigh Road, Alperton
 SSA 46: Carlyon Road, Ealing Road, Alperton
 SSA 83: Land adjoining St John's Church, 614 High Road
 SSA 97: Footbridge at Waxlow Road

SSA 101: Shubette House/ Karma House/ Apex House, Olympic Way
 SSA 102: Kelaty House/ Wembley Stadium Industrial Estate
 SSA 106: Minavil House and Unit 7 Rosemont Road
 SSA 108: Land rear of 1-23 Vivian Avenue, Wembley
 SSA 113: Wembley Point, Harrow Road, Wembley
 SSA 121: 721 Harrow Road/ Roundtree Road

Figure 1: Sites included in initial Submission SSA DPD (November 2007)



Source: LBB (Nov 2007) Site Specific Allocations DPD. Submission.

New and modified sites

3.4 The new allocations that have been identified since the Submitted DPD was withdrawn include:

- 1) Chesterfield House, Wembley
- 2) Brent House and Elizabeth House, Wembley
- 3) Wembley High Road
- 4) Chancel House, Church End
- 5) The former Willesden Social Club and St Joseph's Court
- 6) Stonebridge Schools

3.5 Existing allocations that have been modified since the Submitted DPD was withdrawn include:

- 1) Brent Town Hall, Wembley
- 2) Oriental City, Burnt Oak/Colindale
- 3) Sarena House, Grove Park / Edgware Road
- 4) Former Playground, Dudden Hill Lane

3.6 The modifications in three of the four cases relate to the extensions to the site boundaries.

3.7 Further details on the ten new or modified sites are included in Tables 3 and 4 respectively. The location of these sites is illustrated in Figure 2.

Table 3: New sites included in pre-Submission SSA DPD

Site Name	Ref.	Growth Area	Ward	Area (Ha)	Proposed allocation
Chesterfield House, Wembley	W7	Wembley	Tokington	0.33	Hotel development expressed through the highest standard of architecture, having regard for the impact of development on existing surrounding dwellings.
Brent House and Elizabeth House, Wembley	W8	Wembley	Wembley Central	1.0	Mixed use development including residential, retail on ground floor, office and amenity space. The Council prefers a comprehensive approach but will consider phased proposals across the site. Indicative development capacity/phasing: 110 units (2011-12), 205 units (2019-20)
Wembley High Road	W9	Wembley	Wembley Central	2.0	Mixed use development including residential, retail, food and drink, returning a proportion of space as offices. Development should help to create a retail link with the White Horse Bridge and Wembley Stadium retail development. Indicative development capacity/phasing: 100 units (2013-14), 100 units (2015-16), 200 units (2017-18), 200 units (2019-20)
Chancel House, Church End	CE6	Church End	Dudden Hill	0.8	Mixed use development including residential units (of which a significant proportion should be family sized), managed affordable artist studios (which could be provided alongside a Community Arts centre). Development proposals should include pedestrian links through the site to help connect Church End with Neasden Station. Indicative development capacity/phasing: 135 units (2013-14)
The former Willesden Social Club and St Joseph's Court	12	Elsewhere in Brent	Kensal Green	0.2	Comprehensive mixed use development including residential and a new community facility or contributions to its replacement elsewhere. Indicative development capacity/phasing: 22 units (2011-12)
Stonebridge	19	Elsewhere in	Stonebridge	3.8	In line with the outline planning permission,

Site Name	Ref.	Growth Area	Ward	Area (Ha)	Proposed allocation
Schools		Brent			<p>mixed use redevelopment to deliver 2 new primary school schools and a new public open space and residential development. Needs comprehensive approach to redevelopment to phase housing and schools together.</p> <p>Indicative development capacity/phasing: 122 units (2011-12), 123 units (2013-14)</p>

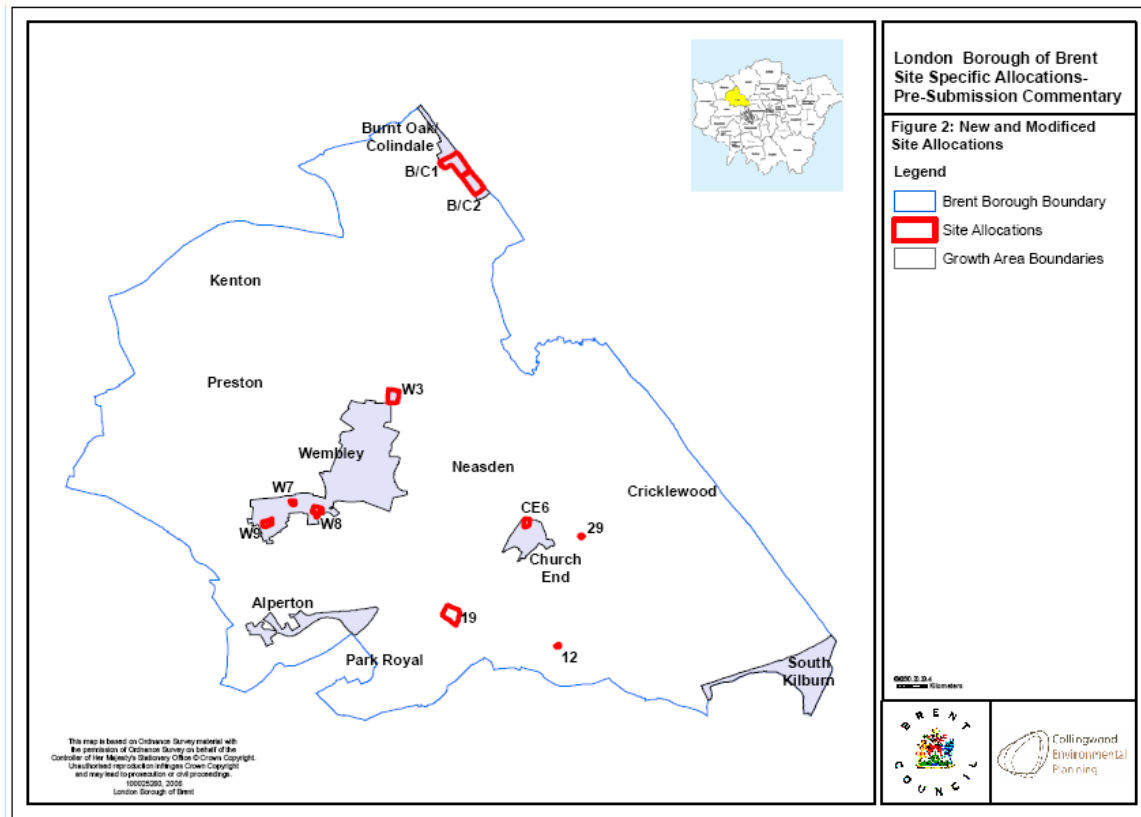
Table 4: Modified sites included in pre-Submission SSA DPD

Site Name	Ref.	Growth Area	Ward	Area (Ha)	Proposed allocation
Brent Town Hall, Wembley	W3	Wembley	Barnhill	2.1*	<p>Mixed use development including offices, residential and community facilities ensuring the retention of use of the Listed Building. The Council will consider other forms of employment generating use, such as a hotel. Any change of use and/or development should enhance and not detract from the character and importance of the Town Hall, and have regard for existing traffic problems to surrounding residential areas and seek to improve these conditions.</p> <p>Indicative development capacity/phasing: 78 units (2015-16), 78 units (2017-18)</p> <p>Modification: include the text "<i>The Council will consider other forms of employment generating use, such as a hotel.</i>"</p>
Oriental City, Burnt Oak/Colindale	B/C1	Burnt Oak / Colindale	Queensbury	5.7	<p>Mixed use development including residential, retail (food store and bulky goods), food and drink and community facilities (in particular for a primary school) and leisure and re-provision Chinese and Far eastern commercial floor space and community facilities, as per the planning permission. Proposals should have regard for potential conflicts between uses and should configure development to mitigate against these, in particular for the school use. Proposals should include the re-provision of shopping and restaurant facilities. Proposals will be required to include a cycle lane running north and south along the Edgware Road.</p> <p>Indicative development capacity/phasing: 250 units (2013-14), 250 units (2015-16), 250 units (2017-18), 225 units (2019-20)</p> <p>Modification: extending the site boundary to include the existing Asda supermarket site.</p>
Sarena House, Grove Park / Edgware Road	B/C2	Burnt Oak / Colindale	Queensbury	4.5	<p>Mixed use development including residential and workspace, including a proportion of managed affordable workspace The design must have regard to, and not detract from neighbouring uses, including that of the adjacent primary school. The Council will consider the inclusion of the existing school into a comprehensive redevelopment subject to the satisfactory relocation or re-provision on-site. Proposals should include the provision of amenity/open space. Improvements will be sought to public</p>

Site Name	Ref.	Growth Area	Ward	Area (Ha)	Proposed allocation
					transport as part of any proposal to develop the site. Indicative development capacity/phasing: 250 units (2013-14), 250 units (2015-16), 250 units (2017-18) Modification: extending the site boundary to include the existing retail warehouse development to the south.
Former Playground, Dudden Hill Lane	29	Elsewhere in Brent	Willesden Green	0.16	Mixed use development with community, leisure or retail use on the ground floor with residential above. Financial contributions will be sought towards provision of a new play area and open space improvements in the vicinity, namely Learie Constantine Open Space on Villiers Road, and Willesden Communal Gardens, Dudden Hill Lane. Indicative development capacity/phasing: 20 units (2011-12) Modification: extending the site boundary to include the adjacent community centre along Dudden Hill Lane.

Notes: * 0.5 assumed developable

Figure 2: New and modified sites included in pre-Submission SSA DPD



Key:

New Sites

- W7 Chesterfield House
- W8 Brent House and Elizabeth House
- W9 Wembley High Road
- CE6 Chancel House
- 12 The former Willesden Social Club and St Joseph's Court
- 19 Stonebridge Schools

Modified Sites

- W3 Brent Town Hall
- B/C1 Oriental City
- B/C2 Sarena House, Burnt Oak/Colindale
- 29 Former Playground, Dudden Hill Lane

4. COMMENTARY ON THE NEW AND MODIFIED SITES

Introduction to the appraisal of the new and modified sites

- 4.1 The methodology adopted for the appraisal of the new and modified sites follows that adopted at the Preferred Options stage and to appraise the changes to the sites between the Preferred Options stage and the previous Submission (November 2007).
- 4.2 An appraisal was undertaken of each new / modified site against a series of issues / constraints and opportunities using information collated on each site by LBB, GIS information¹⁰ also provided by LBB and the previous SA work¹¹. The appraisal criteria varied depending on the proposed use of the site (i.e. Housing, Mixed- Use, Economic and Community – see Appendix 1) but included:
- Access to most deprived areas
 - Location of sites in growth/ strategic employment areas
 - Location of site areas that are a priority for regeneration
 - Sites that will result in the loss of open space
 - Sites that are located in areas of open space deficiency
 - Accessibility by public transport (PTAL)
 - Sites located in the proximity of nature conservation importance sites/ SSI's
 - Sites located in flood risk areas
 - Sites that affect listed buildings or are within a Conservation Area
 - Sites located within an existing Metropolitan Open Land (MOL) boundary
 - Sites within an Air Quality Management Area (AQMA)
 - Noise levels
 - Sites located in Greenfield land

Appraisal of the new and modified sites

- 4.3 The information on the above criteria for each of the new / modified site has been summarised in Tables 5, 6 and 7. Some criteria were not appropriate to the site / proposal, in these circumstances N/A represents this.

¹⁰ The majority of the GIS data used was the same as that used for the SA of the preferred options in June 2007. However, updates of three datasets were available from LBB, namely Index of Multiple Deprivation (IMD), Open Space Deficiency (OSD) and Air Quality Management Area, and were used for this analysis.

¹¹ SA of the SSA DPD Referred Options (June 2007) and the SA Annex (November 2007)

Table 5: New and modified sites – performance against economic criteria, constraints and opportunities

Site Name	Growth Area	Recommended use	Is the site in or within easy access of the most deprived wards?	Is the site in an area that is a priority for regeneration or within a Strategic Employment Area?	If the site includes retail: is the site located in a town centre or edge of centre location?
New sites					
Chesterfield House, Wembley	Wembley	Hotel	Within 10 -20% most deprived Super Outputs Areas (SOA)	Within Wembley Regeneration Area	May include retail. Within Wembley Town Centre.
Brent House and Elizabeth House, Wembley	Wembley	Mixed use (residential, retail on ground floor, office and amenity space)	Within 20 -30% most deprived SOA	Within Wembley Regeneration Area	Within Wembley Town Centre.
Wembley High Road	Wembley	Mixed use (residential, retail, food and drink, returning some offices)	Within <10% most deprived SOA	Within Wembley Regeneration Area	Within Wembley Town Centre.
Chancel House, Church End	Church End	Mixed use development (residential, artist studios, possibly a community centre)	Within <10% most deprived SOA	On the periphery of a Strategic Employment Area, and within the Church End Growth Area.	N/A
The former Willesden Social Club and St Joseph's Court	Elsewhere in Brent	Mixed use (residential and a new community facility or contributions elsewhere)	Within <10% most deprived SOA	N/A	N/A
Stonebridge Schools	Elsewhere in Brent	Mixed use (2 new primary school schools, public open space and residential)	Within <10% most deprived SOA	N/A	N/A
Modified sites					
Brent Town Hall, Wembley	Wembley	Hotel	Within 20 -30% most deprived SOA	Adjacent to the Wembley Growth Area.	N/A
Oriental City, Burnt Oak/Colindale	Burnt Oak / Colindale	Mixed use development (residential, retail, food and drink and community facilities (in particular for a primary school) and leisure and commercial)	Within 20 -30% most deprived SOA	Within the Burnt Oak/Colindale Growth Area	No
Sarena House, Grove Park / Edgware Road	Burnt Oak / Colindale	Mixed use development (residential and workspace)	Within 20 -30% most deprived SOA	Within the Burnt Oak/Colindale Growth Area	N/A
Former Playground,	Elsewhere in	Mixed use development	Within 10 -20% most	No	Edge of Willesden Green

Site Name	Growth Area	Recommended use	Is the site in or within easy access of the most deprived wards?	Is the site in an area that is a priority for regeneration or within a Strategic Employment Area?	If the site includes retail: is the site located in a town centre or edge of centre location?
Dudden Hill Lane	Brent	(community, leisure or retail use and residential)	deprived SOA		Town Centre

Table 6: New and modified sites – performance against social criteria, constraints and opportunities

Site Name	Growth Area	Recommended use	Will the site result in the loss of open space?	Is the site within an area of open space deficiency?	Is the site within 200m of a bus stop / 400m from train station?	PTAL score of site	Distance to a GP	Is the site within the catchment of a school
New sites								
Chesterfield House, Wembley	Wembley	Hotel	No	No	Within 200m of numerous bus services. Within 400m of a Wembley Stadium station and 260m from Wembley Central Station.	5	N/A	N/A
Brent House and Elizabeth House, Wembley	Wembley	Mixed use (residential, retail on ground floor, office and amenity space)	No	Yes, more than 400m from a public open space of 2ha of more and more than 1200m from a public space of more than	Within 155m of a Wembley Stadium station and 435m from Wembley Central station.	5	500m	Yes

Site Name	Growth Area	Recommended use	Will the site result in the loss of open space?	Is the site within an area of open space deficiency?	Is the site within 200m of a bus stop / 400m from train station?	PTAL score of site	Distance to a GP	Is the site within the catchment of a school
Wembley High Road	Wembley	Mixed use (residential, retail, food and drink, returning some offices)	No	20ha. Yes, part of the site is more than 400m from a public open space of 2ha or more and all of the site is more than 1200m from a public open space of 20ha or more.	Within 155m of a Wembley Stadium station and 435m from Wembley Central station.	5	500m	Yes
Chancel House, Church End	Church End	Mixed use development (residential, artist studios, possibly a community centre)	No	Yes, more than 400m from public open space of 2ha or more.	Close to numerous bus services and is 275m within 400m from Neasden underground station	3	700m from existing surgery, new surgery will be 250m away.	Yes
The former Willesden Social Club and St Joseph's Court	Elsewhere in Brent	Mixed use (residential and a new community facility or contributions elsewhere)	No	Yes, more than 400m from public open space of 2ha or more and more than 1200m from public open space of 20ha or more.	800m from Willesden Junction. Adjacent to numerous bus services.	4	2 surgeries within 500m	Yes

Site Name	Growth Area	Recommended use	Will the site result in the loss of open space?	Is the site within an area of open space deficiency?	Is the site within 200m of a bus stop / 400m from train station?	PTAL score of site	Distance to a GP	Is the site within the catchment of a school
Stonebridge Schools	Elsewhere in Brent	Mixed use (2 new primary school schools, public open space and residential)	Yes, although new open space will be provided.	more. Yes, more than 400m from public open space of 2ha or more and more than 1200m from public open space of 20ha or more.	730m to Stonebridge Park station. Adjacent to numerous bus services.	2	500m	Yes
Modified sites								
Brent Town Hall, Wembley	Wembley	Mixed use development (offices, residential and community facilities)	No	No	Local bus routes: 430m to Wembley Park station	4	N/A	N/A
Oriental City, Burnt Oak/Colindale	Burnt Oak / Colindale	Mixed use development (residential, retail, food and drink and community facilities (in particular for a primary school) and leisure and commercial)	No	No. Less than 400m to public open space of more than 2ha, but within 1200m of public open space of more than 20ha	Burnt Oak Station is 600m away. 2 bus stops within 100m walk.	3	550m	Yes
Sarena House, Grove Park / Edgware Road	Burnt Oak / Colindale	Mixed use development (residential and workspace)	No	No, the site is within 400m of open space more than		2-3	400m	Yes

Site Name	Growth Area	Recommended use	Will the site result in the loss of open space?	Is the site within an area of open space deficiency?	Is the site within 200m of a bus stop / 400m from train station?	PTAL score of site	Distance to a GP	Is the site within the catchment of a school
Former Playground, Dudden Hill Lane	Elsewhere in Brent	Mixed use development (community, leisure or retail use and residential)	Yes. Loss of part used / part disused play area.	2ha. Yes, more than 400m from public open space of 2ha or more.	Numerous adjacent bus stops. 350m of to Dollis Hill station	4	450m	Yes

Table 7: New and modified sites – performance against environmental criteria, constraints and opportunities

Site Name	Growth Area	Recommended use	Will the site affect an SSSI or other site of nature conservation importance?	Is the site within Zone 2 or Zone 3 of the floodplain?	Is the site located within an existing MOL boundary?	Is the site within an Air Quality Management area?	Estimated maximum noise levels in vicinity	Is the site on previously developed land?	Is the site contaminated / does it require remediation?	Does the site affect a listed building, conservation area?
New sites										
Chesterfield House, Wembley	Wembley	Hotel	No	No	No	Yes	-	Brownfield	No	No
Brent House and Elizabeth House, Wembley	Wembley	Mixed use (residential, retail on ground floor, office and amenity space)	No	No	No	Yes	69db	Yes	There is a petrol station on the Elizabeth House site that is likely to raise ground contamination issues.	The adjacent St. Joseph's RC Church is locally listed.
Wembley High Road	Wembley	Mixed use	No	No	No	Yes	69db	Most of the	Some of the	Close

Site Name	Growth Area	Recommended use	Will the site affect an SSSI or other site of nature conservation importance?	Is the site within Zone 2 or Zone 3 of the floodplain?	Is the site located within an existing MOL boundary?	Is the site within an Air Quality Management area?	Estimate d day time maximum noise levels in vicinity	Is the site on previously developed land?	Is the site contaminated / does it require remediation?	Does the site affect a listed building, conservation area?
		(residential, retail, food and drink, returning some offices)						site is previously developed. To the rear of the site are some railway cuttings that have not been developed.	activities on the site, such as vehicle repairs suggest that some form of contamination might exist.	proximity to St. Josephs RC Church which is locally listed.
Chancel House, Church End	Church End	Mixed use development (residential, artist studios, possibly a community centre)	No	No	No	Yes	59db	Brownfield	No	No
The former Willesden Social Club and St Joseph's Court	Elsewhere in Brent	Mixed use (residential and a new community facility or contributions elsewhere)	No	No	No	Yes	64db	Brownfield	Contaminated on possible as a result of demolished social club. However, this is inconclusive to date.	Close to Harlesden Conservation Area
Stonebridge Schools	Elsewhere in Brent	Mixed use (2 new primary school, public open space and residential)	No	No	No	Yes	54db	Undeveloped and previously developed land	Inconclusive	No
Modified sites										

Site Name	Growth Area	Recommended use	Will the site affect an SSSI or other site of nature conservation importance?	Is the site within Zone 2 or Zone 3 of the floodplain?	Is the site located within an existing MOL boundary?	Is the site within an Air Quality Management area?	Estimate d day time maximum noise levels in vicinity	Is the site on previously developed land?	Is the site contaminated / does it require remediation?	Does the site affect a listed building, conservation area?
Brent Town Hall, Wembley	Wembley	Mixed use development (offices, residential and community facilities)	No	No	No	Yes	45-70 db	Brownfield	Unlikely	Town Hall is grade 2 listed
Oriental City	Burnt Oak / Colindale	Mixed use development (residential, retail, food and drink and community facilities (in particular for a primary school) and leisure and commercial)	No	No	No	Yes	Up to 69db on road frontage.	Brownfield	Possibly	No
Sarena House, Grove Park / Edgware Road	Burnt Oak / Colindale	Mixed use development (residential and workspace)	No	No	No	Yes	50-55, 55-65 db	Brownfield	It is possible that the site is contaminated from building materials	No
Former Playground, Dudden Hill Lane	Elsewhere in Brent	Mixed use development (community, leisure or retail use and residential)	No	No	No	Yes	54db	Brownfield	No	No

Overall comments on the new sites

- 4.4 Table 8 summaries the results of the appraisal of the new sites against the criteria. Please note that some of the recommendations for mitigation could be included in planning briefs and other guidance document that LB Brent has prepared or is preparing for some of the sites¹².

Table 8: Summary of key issues for all new sites

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
Access to most deprived areas (for employment/ community/ mixed use including employment or community uses)	Wembley Growth Area Wembley High Road is within a Super Outputs Area (SOA) that is in the <10% most deprived. Chesterfield House is within an SOA that is within the 10% most deprived. Brent House and Elizabeth House is within an SOA that is in the 20% most deprived. Church End Growth Area Chancel House is within an SOA that is in the <10% most deprived. Elsewhere in Brent The former Willesden Social Club and St Josephs Court, and Stonebridge Schools are both within SOAs that are in the <10% most deprived.	Promoting growth and regeneration in the most deprived parts of the borough is an important objective underpinning the Core Strategy. This is particularly important factor for the employment and community allocations. The appraisal found that the all the new the employment (including retail) or community sites or mixed sites that include either use were within or close to SOAs that are in the 10 or 20% most deprived.	None identified
Location of sites in growth/ strategic employment areas & areas that are a priority for regeneration (for employment/ community/ mixed use including employment or community uses)	Wembley Growth Area Chesterfield House, Brent House and Elizabeth House and Wembley High Road are all within the Wembley Growth Area. Church End Growth Area Chancel House is located on the periphery of a strategic employment area, and is contained within the Church End Growth Area. Elsewhere in Brent Stonebridge Schools is in the vicinity of a Strategic Employment Area.	The majority of the relevant new sites are within strategic employment and/or growth areas. The sites outside these areas are proposed for community uses (e.g. schools).	None identified
Sites that will result in loss of open space	Wembley Growth Area Development of Chesterfield House, Brent House and Elizabeth House and Wembley High Road will not result in the loss of open space. Church End Growth Area Development of Chancel House will not result in the loss of open space. Elsewhere in Brent The development of Stonebridge Schools will result in the loss of open	Open space should be protected in all but exceptional circumstances. The re-Submission Core Strategy Policy CP17 Protection and Enhancement of Open Space and Biodiversity states that 'All open space will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well	In the cases of Stonebridge Schools, the circumstances would appear to justify the loss of open space if a suitable replacement is provided within elsewhere on the site.

¹² In the pre-Submission SSA, LBB indicate they intend to prepare planning guidance for Oriental City and Sarena House.

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
	space, but new open spaces will be created. The development of the former Willesden Social Club and St. Joseph's Court will not result in the loss of open space.	being of Brent's residents, visitors and wildlife.'	
Sites that are located in areas of open space deficiency (for housing/ mixed use including residential sites)	Wembley Growth Area Chesterfield House is not located in an area of open space deficiency. Brent House and Elizabeth House, and part of Wembley High Road, are in an area of open Space Deficiency; both are more than 400m from a public open space of 2ha or more and more than 1200m from a public space of more than 20ha. Church End Growth Area Chancel House is located in an area of Open Space Deficiency; it is more than 400m from public open space of 2ha. Elsewhere in Brent Stonebridge Schools is located and the former Willesden Social Club and St Joseph's Court are in an area of Open Space Deficiency; both are more than 400m from public open space of 2ha or more and more than 1200m from public open space of 20ha or more.	Many of the sites are within area of open space deficiency. Within these areas, opportunities to improve or contribute to public and private outside space should be sought as part of the development of any of these sites.	Contributions to new open, amenity and sports space should be sought as part of the development of those sites that are in areas of open space deficiency. This requirement should ideally be included in the description of the preferred use of sites that are located in areas of open space deficiency.
Accessibility by public transport / PTAL score	Wembley Growth Area The sites in this area are generally well served by public transport. Chesterfield House, Brent House and Elizabeth House and Wembley High Road all have PTAL scores of 5. Church End Area Chancel House has a PTAL score of 3. Elsewhere in Brent Stonebridge Schools and the Former Willesden Social Club and St. Joseph's Court have a PTAL score of 2 and 4 respectively.	Development should generally occur in locations that are accessible by public transport, walking and cycling. Where a site is not accessible by public transport, walking and cycling contributions to improvements should be sought from developments.	Where accessibility by public transport is an issue, improvements should be provided as part of the development of a site or group of sites. Additionally, other forms of transport, namely walking and cycling should be facilitated. The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores.
Sites located in the proximity of nature conservation importance sites / SSSIs / MOL	None of the sites are located within an existing MOL boundary or site of nature conservation importance.	As none of the sites are located within an existing MOL boundary or site of nature conservation importance. With is unlikely to be a significant issue.	None necessary
Sites located in flood risk areas	None of the sites are located within flood risk zones 2 or 3.	In accordance with Government and London Plan policy, flood risk assessments (FRA) will be required for applications in flood risk zones 2 and 3 and	Relevant applications should be accompanied by a Flood Risk Assessment and should include provisions for

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
		a FRA is required for all development proposals over 1ha. Therefore Brent House and Elizabeth House, Wembley; Wembley High Road; and Stonebridge Schools which are 1ha or over will require FRAs.	Sustainable Urban Drainage (SUDs), where appropriate.
Sites that affect listed buildings or are within a Conservation Area	<p>Wembley Growth Area</p> <p>Brent House and Elizabeth House Wembley High Road are adjacent to St. Joseph's RC Church, which is locally listed. Chesterfield House is not within a conservation area, and will not affect a listed building.</p> <p>Church End Growth Area</p> <p>Chancel House is not in a conservation area and does not affect a listed building.</p> <p>Elsewhere in Brent</p> <p>The former Willesden Social Club is located close to the Harlesden Conservation Area. Stonebridge Schools is not in a conservation area or does not affect a listed building.</p>	In taking forward proposals for any of the sites within or adjacent to listed buildings or Conservation Areas, it should be done in accordance with the relevant policies and not cause harm to the character and/or appearance of an area, or have an unacceptable visual impact on Conservation Areas, listed buildings etc.	Development within or adjacent to a Conservation Area or listed building should have regards to the relevant policies and avoid any visual impacts or loss of character.
Sites within Air Quality Management Areas (AQMA)	All of the sites are within Air Quality Management Areas (AQMAs)	The potential impact on air quality should be taken into account in the assessment of planning applications.	<p>Take into account when assessing planning applications, and where significant adverse impacts are predicted which cannot be satisfactorily mitigated, development will not be permitted.</p> <p>This will be an important factor in considering the impact of sites within the AQMA as well as in considering the appropriate use and design of the sites. Exposing additional residents to poor air quality could have significant health implications</p>
<p>Noise levels</p> <p>(Day time levels relevant to all sites, night time relevant to sites that include residential use)</p>	<p>Wembley Growth Area</p> <p>Both Wembley High Road and Brent House and Elizabeth House are in areas where the maximum day time noise levels will not exceed 69db. The night time noise levels are not expected to exceed 59db.</p> <p>Church End Growth Area</p> <p>Chancel House is not expected to exceed 59db during the day and 49db during the night.</p>	Development of any site should have regards to the noise levels in the vicinity of this site and also to the potential increase in noise levels as a result of the development.	<p>Mitigation measures should be incorporated to new developments that may affect noise and vibration levels of existing or new residents.</p> <p>Noise and vibration levels should be an important factor in considering the appropriate use and</p>

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
	<p>Elsewhere in Brent</p> <p>The day time noise levels at the former Willesden Social Club and St Joseph's Court and Stonebridge Schools have an estimated maximum day time noise level of 64db and 54db respectively. The night time levels for the former Willesden Social Club and St. Joseph's Court are 54db.</p>		design of the sites. Care should be taken not to expose additional residents to existing high levels noise pollution in order to avoid health and social implications.
Sites located in greenfield land	<p>Wembley Growth Area</p> <p>Chesterfield House is located on a brownfield site. Wembley High Road is most on brownfield land but there is some land on the site that is undeveloped. Brent House and Elizabeth House is located on a previously developed site.</p> <p>Church End Growth Area</p> <p>Chancel House is on brownfield land.</p> <p>Elsewhere in Brent</p> <p>The former Willesden Social Club and St. Joseph's Court is located on brownfield land. Stonebridge Schools is on both greenfield and brownfield land.</p>	The use of previously developed land and vacant or underused buildings should be optimised. The sites appear to respect this policy.	None identified
Sites within contaminated land	<p>Wembley Growth Area</p> <p>Brent House and Elizabeth House may require remediation due to the presence of a petrol station. Wembley High Road is likely to require remediation, due to historic activities such as vehicle repairs. Chesterfield House does not require remediation.</p> <p>Church End Growth Area</p> <p>Chancel House does not require remediation.</p> <p>Elsewhere in Brent</p> <p>The former Willesden Social Club and St Joseph's Court may require remediation due to old building materials but the data is inconclusive to date. Stonebridge Schools does not require remediation.</p>	Policy seeks suitable remediation and re-use of contaminated land.	Possible contamination of sites should be investigated and remediation appropriate to the use of the site should be undertaken. This needs to be dealt with on a site by site basis.

Overall comments on the modified sites

- 4.5 The main change in the modified sites between the previous Submission version and the current pre-Submission is the extension of the sites boundaries, which is the case in three of the four sites. There have also been some changes to the planned use of some of the sites. Oriental City was previously designated as a mixed use site, to include offices, residential and community facilities. The recommended use for this site is still mixed use, but it now includes residential, retail, food and drink, community facilities (including a primary school), leisure and commercial. The former Playground, Dudden Hill Lane was previously allocated for residential / commercial use, but now includes community, leisure or retail, and residential use. Brent Town Hall was previously allocated as a mixed use site to include residential and employment use, but now includes employment, residential and community facilities. However, these changes have a limited overall effect on their performance against the economic, social and environmental criteria used in the previous Sustainability Appraisal (June 2007) and the Sustainability Appraisal Annex (November 2007). Tables 5, 6 and 7 identify a few key issues for the modified sites which would have to be taken into account during the planning process for these sites.
- 4.6 Some new and updated information has been provided by LBB for the modified sites, which does change their performance slightly in some cases. The Oriental City site has experienced changes to its PTAL score, decreasing from 4 to 3, which indicates a reducing the access to public transport for the site. In addition, the estimated maximum day time noise levels for Oriental City have been revised upwards to 69db (along road frontage) from a previous estimated maximum of between 50-55db. The rest of the modified sites do not have any changes to their social or environmental performance.

Overall findings

How do the new / modified sites affect the previous SA conclusions?

- 4.7 The key overall findings of the June 2007 SA Report on the preferred options SSA DPD was:

Summary of Effects:

The appraisal of the sites as a whole scores positively on several sustainability objectives particularly on those related to reducing poverty and regeneration mainly because the great majority of the sites area located in areas of high deprivation or regeneration areas and also for the potential contribution that the sites could make to new affordable homes. The DPD also has positive effects on the sustainability objectives related to health and living in decent homes due to the potential for providing new affordable homes, living in a decent home and being in employment are two important determinants of health and the development of the sites could provide an important contribution to this.

The DPD also performs well against objectives related to reducing the effects of

traffic, improving accessibility and encouraging efficient patterns of movement as the sites are mostly located in town centres or growth areas relatively well served by public transport. The sites also perform well against the objective of conserving and enhancing land and soil as many of the sites are currently derelict, underused or contaminated and development should help address these issues. Finally, the DPD also performs well against the objectives of sustainable economic growth and encouraging investment in the Borough as it will provide new and improved sites for employment use.

Regarding negative effects, these are mostly inherent to providing new development and are mostly related to resource use, waste and other environmental impacts such as noise, air quality and especially contributions to increasing the risk of flooding and the effects of climate change.

Mitigation / Enhancement:

Many of the recommendations for mitigation and enhancement are dependent on developments complying with the policies in the other DPDs, which will provide conditions and criteria on the type and nature of development on a particular site. However, as a summary, the key areas that will need mitigation are:

- increases in fluvial and surface flood risk;
- resource use, including water use and materials for construction;
- waste production, including construction waste and wastewater;
- minimising emissions from new developments; and
- access improvements for some sites.

4.8 Following the changes between the Preferred Options stage (June 2007) and the previous Submission stage (November 2007) various sites were added, modified and deleted. The SA Annex considered these and drew the following conclusions:

- “12 sites were proposed during/after the Preferred Options consultation; of those,
- four new site allocations will be included in the submission stage.
- The inclusion of these sites does not significantly change the findings of the overall appraisal of the sustainability effects of the Site Specific Allocations DPD Preferred Options included in Table 39 of the SA Report.
- The sustainability appraisal of the new sites has not found that any of those sites should not be included in the submission stage due to their significant sustainability implications.
- General mitigation and enhancement recommendations included in Table 39 of the SA report apply to the new sites included in this Annex. Key areas identified in the SA Report included: flood risk, resource use and waste production, minimising emissions from new developments and improving access to some sites.

- In addition, recommendations for the mitigation and enhancement of specific sites have been included in Table 4 of this Annex.”

4.9 The SA Annex therefore did not identify any key changes to the significance of the sustainability implications between the Preferred Options and the previous Submission stage. Given the results of the appraisal of the new and modified sites included in the pre-Submission SSA DPD, this conclusion is also the main finding of this stage of the SA as reported in this commentary. Therefore the key effects and mitigation / enhancement identified in the SA Report (June 2007), and included above, are likely to be still relevant to the SA of all the sites it is now proposed will be included in the new Submission DPD. Although it should be noted, as well as taking into consideration the results of the current consultation, that more detailed appraisal will be undertaken to confirm this between now and the publication of the new Submission SSA DPD, accompanied by a revised SA Report (see section 5).

5. NEXT STEPS

5.1 The key next steps on the SA of the site allocations and ultimately the Submission DPD will include:

- A more detailed appraisal of the comparative sustainability performance of the key alternative uses for each of the sites;
- An updated appraisal of the sites to be included in the Submission version against the same economic, social and environmental criteria as in the last SA Report but using updated data on the sites and the criteria where available;
- Appraisal of the sustainability implications using the new information on the Indicative development capacity and phasing now available on each sites;
- Appraisal of the sites against the revised Core Strategy policies as necessary; and
- Preparation of a Revised SA Report.

APPENDIX 1 SITE APPRAISAL CRITERIA

	Relevance of criteria to proposed use				
	Employment sites (retail / industrial/ offices, etc)	Housing sites	Mixed sites (including housing and employment)	Community sites	Transport sites
Economic					
Is the site in or within easy access of the most deprived wards? / Is the site in an area that is a priority for regeneration?	Yes	Yes	Yes	Yes	Yes
Is the site in an area that is a priority for regeneration or within a Strategic Employment Location (SEL)/ Industrial Employment Area (IEA)?	Yes	No	Yes	Yes	Yes
If the site includes retail: is the site located in a town centre or edge-of-centre location? If yes, which?	Yes	No	Yes	No	No
Social					
Will the site result in the loss of open space?	Yes	Yes	Yes	Yes	Yes
Is the site within an area of open space deficiency?	No	Yes	Yes	Yes	Yes
Is the site within 200m of a bus stop or 400m from a train station?	Yes	Yes	Yes	Yes	No
PTAL Score of site	Yes	Yes	Yes	Yes	No
Distance to a GP	No	Yes	Yes	No	No
Is the site within the catchment of a primary school?	No	Yes	Yes	No	No
Is the site within the catchment of a secondary school?	No	Yes	Yes	No	No
Environmental					
Will the site affect an SSSIs or other site of nature conservation importance (e.g. metropolitan/borough importance)?	Yes	Yes	Yes	Yes	Yes
Is the site within Zone 2 or Zone 3 of the floodplain? If yes, which?	Yes	Yes	Yes	Yes	Yes
Does the site affect a listed building, conservation area etc?	Yes	Yes	Yes	Yes	Yes
Is the site located within an existing MOL boundary?	Yes	Yes	Yes	Yes	Yes
Is the site within an Air Quality Management Area?	No	Yes	Yes	Yes	Yes
Estimated day time maximum noise levels ¹³ in the vicinity of the site	No	Yes	Yes	Yes	Yes
Estimated night time maximum noise levels in the vicinity of the site	No	Yes	Yes	Yes	Yes
Is the site on previously developed land or greenfield land?	Yes	Yes	Yes	Yes	Yes
Is the site contaminated/ does it require remediation?	Yes	Yes	Yes	Yes	Yes

¹³ See noise maps at <http://www.noisemapping.org/> .

WHO guidelines on community noise in specific environments (cited in the Mayor's Ambient Noise Strategy, 2004) Daytime outdoor living areas max. 55 dB, night time outside bedrooms max. 45 dB