

**London Borough of
Brent's Local
Development
Framework**

**Proposed Submission
Core Strategy
Development Plan
Document**

Sustainability Appraisal Report

Non-Technical Summary



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This report is a Non-Technical Summary of the Sustainability Appraisal Report of the London Borough of Brent's proposed Submission Core Strategy Development Plan Document. It sets out an overview of the sustainability appraisal process and its findings. It is intended for the lay reader, and although it can be read as a stand-alone document, it is not intended to be a fully comprehensive account of what occurred, or the recommendations made. It only provides a summary of the appraisal process; more detailed information is available in the main Sustainability Appraisal Report. The non-technical summary also provides details on how to comment on the Sustainability Appraisal Report during the public consultation period on Brent's proposed Submission Core Strategy which is taking place during June and early July 2009.

Sustainability appraisal is mandatory for Development Plan Documents under the requirements of the Planning and Compulsory Purchase Act (2004). Sustainability appraisals must also incorporate the requirements of the European Directive 2001/42/EC, known as the Strategic Environmental Assessment Directive, which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations, 2004. The preparation of a non-technical summary of the sustainability appraisal is a requirement of these regulations.

1. Overview of the Core Strategy

Context

The London Borough Brent is located in the north west of London (see Figure 1). Brent commenced the preparation of its Local Development Framework in 2004, which will eventually replace the Unitary Development Plan (2004) which is the borough's current development plan. The local development framework is a collection of documents that together lay out the borough's future intentions for spatial planning in Brent.

Figure 1: Location of Brent



Development plan documents are included in the local development framework, and set planning policies in a local authority's area. They are very important when deciding what development happens where in the borough.

Currently, Brent is preparing two development plan documents:

- Core Strategy; and
- Site Specific Allocations.

The core strategy sets out the council's vision, spatial objectives and key policies for meeting social, economic and environmental development aims for the borough. The Site specific allocations identifies sites which are proposed for development to help deliver the core strategy.

Following various consultations with the local community and interested parties, as they have been developing these two development plan documents, Brent has now reached the stage of publishing "proposed Submission"

versions. People have the opportunity to comment on them before they are submitted to the Secretary of State, who will hold an independent public examination process into the documents. This will provide a further opportunity for anyone who wishes to make their views known.

Contents of the core strategy

The main contents of the core strategy are listed in Box 1.

Box 1: Contents of the core strategy

- **Context and rationale for the strategy**
- **Spatial vision for Brent and core strategy objectives**
- **Brent's spatial strategy: delivering sustainable places**
 - Regeneration and growth and overall spatial change policies
 - Strategic area policies
 - Infrastructure to support development policies
- **Strategic borough wide policies**
- **Delivery and monitoring**

Vision and objectives of the core strategy

The spatial vision for Brent (see Box 2) seeks to address the key challenges the borough



faces by helping alleviate existing social deprivation as well as building on opportunities to illustrate what the borough will be like in 15 years time (2026) when the core strategy has been delivered.

Following on from the spatial vision are a series of strategic objectives. These express the ways that vision will be achieved and are accompanied by specific targets that are required to deliver the vision. The main objectives are included in Table 1.

Box 2: Brent's spatial vision

In 2026 Brent will:

- be a dynamic London Borough, with a new and iconic Wembley at its core providing new jobs, homes, retail & major leisure attractions
- retain its industrial and manufacturing sectors by providing modern, upgraded premises in a quality environment
- be a borough of opportunity, maximising the potential of its youthful population through new and improved education and training facilities
- provide a range of homes that are affordable and meet the need of its diverse communities
- be a healthy and safe place to live, benefiting from high quality urban design, attractive open spaces, first class sports facilities, and green and safe walking and cycling routes
- host inclusive community and cultural facilities which enable the full participation of its diverse communities.
- retain its smaller centres which provide important local services to their immediate area
- be fully integrated into the city with excellent public transport interchanges and connections to other strategic centres in London
- use energy and resources in an efficient & sustainable manner, playing its role in addressing global climate change.

Table 1: Core strategy objectives

Economic performance and regeneration	
1.	To promote economic performance and regeneration
2.	To meet employment needs and aid the regeneration of industry and business
3.	To enhance the vitality and viability of town centres
4.	To promote the arts and creative industries
Infrastructure and people's needs	
5.	To meet social infrastructure needs
6.	To promote sports and recreational activities
Housing need	
7.	To achieve housing growth and meet housing needs
Transport infrastructure	
8.	To reduce the need to travel and improve transport choices
Open Space and the Environment	
9.	To protect and enhance Brent's environment
10.	To achieve sustainable development, mitigate & adapt to climate change
11.	To treat waste as a resource
12.	To promote healthy living and create a safe and secure environment

Core strategy policies

The core strategy policies are designed to set the parameters for the development and regeneration of Brent to 2026, and deliver housing growth targets as set by the Mayor of London. The core strategy seeks to concentrate housing growth in areas that provide opportunities for growth and regeneration, because they already have good access to existing forms of public transport, or where improvements are planned.

The policies are subdivided as follows (see Table 2):

- Regeneration and growth and overall spatial change policies (policies CP1 to CP6)
- Strategic area policies (policies CP7 to CP13)
- Infrastructure to support development policies (policies CP14 and CP15)
- Strategic borough-wide policies (policies CP16 to CP23)

The regeneration and growth policies of the core strategy cover the appropriate level of growth for the borough, which accepts the minimum target of 11,200 new houses by 2017 as required by the Mayor of London. The projected development will be equivalent to a 10% increase to the borough's population.

The strategic area policies focus on regeneration in five growth areas located at Wembley, Alperton, South Kilburn, Burnt Oak / Colindale and Church End, as well as Park Royal and the North Circular Road Regeneration Area.

The core strategy recognises, however, that to support growth the appropriate physical and social facilities, such as schools, nurseries, hospitals, doctors surgeries, parks and community centres, must be provided as well. The policies therefore also aim to ensure that community needs are met and that the elements of successful places are present, including quality design, distinctive character and identity.

Table 2: Core strategy policies

Regeneration and Growth & Overall Spatial Change Policies
Spatial Development Strategy CP1 – Spatial Development Strategy
Appropriate Level of Growth CP2 – Population and Housing Growth
Commercial Regeneration CP3 – Commercial Regeneration
North-West London Coordination Corridor CP4 – North-West London Coordination Corridor
Placemaking CP5 – Placemaking
Development Density, Design Quality and Place Shaping CP6 – Design and Density in Place Shaping
Strategic Area Policies
Wembley Growth Area CP7 – Wembley Growth Area
Alperton Growth Area CP8 – Alperton Growth Area
South Kilburn Growth Area CP9 – South Kilburn Growth Area
Church End Growth Area CP10 – Church End Growth Area
Burnt Oak / Colindale Growth Area CP11 – Burnt Oak / Colindale Growth Area
Park Royal CP12 – Park Royal
North Circular Road Improvement Area CP13 – North Circular Road Improvement Area
Infrastructure to Support Development
Transport Infrastructure CP14 – Public Transport Improvements
Infrastructure to Support Development CP15 – Infrastructure to Support Development
Strategic Borough-Wide Policies
Town Centres and Shopping CP16 – Town Centres and the Sequential Approach to Development
Protection and Conservation CP17 – Protecting and Enhancing the Suburban Character of Brent
Protecting and Enhancing Open Space, Sports and Biodiversity CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity
Tackling Climate Change and Achieving Sustainable Development CP19 – Brent Strategic Climate Mitigation and Adaptation Measures
Maintaining Employment Outside of the Growth Areas CP20 – Strategic and Borough Employment Areas
Planning for More and Better Housing CP21 – A Balanced Housing Stock CP22 – Sites for Nomadic Peoples
Protecting Community and Cultural Facilities CP23 – Protection of existing and provision of new Community and Cultural Facilities

The growth areas are identified to deliver a range of development, from employment, community, and residential use and also combinations of these. Table 3 below summarises what the core strategy expects each of the growth areas to deliver by 2026 in terms of new jobs and new employment.

Table 3: Core strategy housing and employment targets

Growth Area	Housing growth	Employment creation
Wembley	11,500	10,000
Alperton	1,600	-
Church End	800	-
South Kilburn	2,400	-
Burnt Oak / Colindale	2,500	-
Park Royal*	-	4,400**
Rest of Borough	2,410	-

*Park Royal is not a growth area

**2007 – 2017

The strategic borough wide policies seek to complement the policies promoting growth by preserving established neighbourhoods, open spaces or land for industrial uses, as well as maintaining the vitality of the borough's town centres and protecting and enhancing important cultural and community uses that reflect the borough's diversity. These policies also aim to maintain and improve the local environment as well as setting out how development should respond to climate change.

2. The Sustainability Appraisal Approach

Overview of the approach adopted

The proposed Submission core strategy was assessed for its potential impact on sustainability – wider environmental, economic and social effects on the borough – using a process known as sustainability appraisal.

The purpose of the sustainability appraisal was to consider the implications of the core strategy, from a broad sustainability perspective, by assessing options and the proposed Submission core strategy against the current and likely future situation in the borough and sustainability appraisal objectives (see below).

The sustainability appraisal was conducted to meet the requirements of the relevant regulations, and Government guidance was followed.

Sustainability appraisal stages and tasks

The sustainability appraisal of the core strategy will be undertaken in five main stages:

1. Setting the context and objectives, establishing the baseline and deciding the scope
2. Developing and refining options and assessing effects
3. Preparing the sustainability appraisal report
4. Consultation on the draft core strategy and sustainability appraisal report
5. Monitoring implementation of the core strategy

So far, the sustainability appraisal has reached the end of the third stage.

One of the first tasks undertaken as part of the appraisal was to analyse and describe the current and future environmental, social and economic situation in Brent, where possible using mapped information. This, combined with a review of other relevant policies, plans and programmes, assisted in the identification

of sustainability issues faced by the borough, and existing objectives and targets set at national, regional or local levels. A summary of this context information is included in section 3, below. The issues and targets identified fed into the appraisal process.

Sustainability appraisal objectives

The sustainability appraisal objectives sought to address all aspects of a healthy environment, society and economy. They were developed through discussions with officers at Brent council, and consultation with interested parties.

The objectives provided a structure to describe, assess and compare the sustainability effects of the core strategy. They were sub-divided under the three themes

of environmental, social and economic, although many issues and effects are likely to cut across these themes. Table 4 overleaf contains a list of the sustainability appraisal objectives used.



The appraisal of the core strategy

To help promote positive sustainability outcomes, there was a continuous exchange of advice and comment between the appraisal process and the Brent planning team who were preparing the core strategy.

The sustainability appraisal adopted a variety of approaches to consider the sustainability implications of different elements of the core strategy.

Table 4: Sustainability appraisal objectives

Social
Prosperity and Social Inclusion
S1. To reduce poverty and social exclusion
Health and Wellbeing
S2. To improve the health and wellbeing of the population
Education and Skills
S3. To improve the education and skills of the population
Housing
S4. To provide everybody with the opportunity to live in a decent home
Crime Prevention and & Community Safety
S5. To reduce crime and anti-social activity
Community Identity
S6. To encourage a sense of community; identity and welfare
Accessibility
S7. To improve accessibility to key services especially for those most in need
Environmental
Traffic
EN1. To reduce the effect of traffic on the environment
Water Quality & Resources
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply
Air Quality
EN3. To improve air quality
Biodiversity
EN4. To conserve and enhance biodiversity
Landscape & Townscape
EN5. To maintain and enhance the character and quality of landscapes and townscapes
Historic Environment & Cultural Assets
EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets
Climate Change
EN7. To reduce contributions to climate change and reduce vulnerability to climate change
Waste Management
EN8. To minimise the production of waste and use of non-renewable materials
Land and Soil
EN9. To conserve and enhance land quality and soil resources
Economic
Growth
EC1. To encourage sustainable economic growth
Employment
EC2. To offer everybody the opportunity for rewarding and satisfying employment
Regeneration
EC3. To reduce disparities in economic performance and promote sustainable regeneration
Investment
EC4. To encourage and accommodate both indigenous and inward investment
Efficient Movement
EC5. To encourage efficient patterns of movement in support of economic growth

This included reviewing and providing comments on the spatial vision and strategic objectives, comparing the likely sustainability effects of the main spatial options considered by Brent to deliver the core strategy's vision and appraising each of the policies in detail. The sustainability appraisal also assessed the overall and cumulative effects of the core strategy.

Sustainability appraisal report

The sustainability appraisal report sets out the findings of the appraisal process and provides information on the sustainability implications of implementing the core strategy. It is one of the key outputs from the appraisal process and must be made available for consultation at the same time as a draft plan, in this case the proposed Submission core strategy. It is also required that a non-technical summary of the report is produced, which is this report.

The sustainability appraisal report for the proposed Submission core strategy and site specific allocations has been combined into a single report, but divided into separate parts. Part A of the report provides the sustainability context to the borough and the evidence base for the both appraisals. Part B details the appraisal of the core strategy and Part C the appraisal of the site specific allocations. Separate non-technical summaries have been produced for the appraisals of the core strategy and site specific allocations.

3. Sustainability Context

Relevant policies, plans and programmes

A review of other policies, plans and programmes was completed to identify guidance, priorities, objectives and targets across a wide range of policy areas, which it was considered should be reflected in the sustainability appraisal and that the core strategy should seek to incorporate or contribute towards. More than 100 policies, plans and programmes at the national, regional (London) and local (Brent) level were reviewed. A summary is provided below.

At the highest level the core strategy should be developed in line with the **principles of sustainable development**, as set out in the *UK Government Sustainable Development Strategy* (Department for environment food and rural affairs (Defra) 2005), and reflected in *planning policy statement 1: Delivering Sustainable Development* (Department of communities and local government (DCLG) 2005). At the London level, the *Sustainable Development Framework for London* (London sustainable development commission 2003) sets the overarching objective that environmental, economic and social development goals should be achieved simultaneously and that unavoidable trade-offs should be transparent and minimised.

As a local spatial plan the core strategy needs to be developed in line with the legal framework for regional and local spatial planning in England and Wales as set out in the *Planning and Compulsory Purchase Act* (2004). The core strategy should also reflect the guidance included in planning policy statements and planning policy guidance, in particular *planning policy statement 12: Local Spatial Planning* (DCLG 2008).

In London, the *London Plan* (Greater London Authority (GLA) 2008) sets the high-level policy framework which Brent's local development framework and core strategy

should be in line with, for example setting housing growth targets.

Other topics covered by policies, plans and programme areas which are particularly relevant to the core strategy include:

- **Transport planning and infrastructure:** in particular the Mayor of London's *Transport Strategy* (GLA 2004) and implementation targets and in Brent the *Local Implementation Plan* (London Borough of Brent (LB Brent) 2005) which sets transport planning priorities and needs in the borough.
- **Housing and regeneration:** the *London Plan* (GLA 2008), the *London Housing Strategy 2005-2016* (GLA 2005) and the *London Plan Supplementary Planning Guidance on Housing* (GLA 2005) provide the policy framework, targets and priorities which the core strategy should seek to deliver. In particular the *London Plan* sets the target that Brent should deliver at least 11,200 new homes by 2016, and that 50% of this target should be affordable.
- **Sustainable design and construction:** the way development is delivered in the borough will have a significant effect on environmental, social and economic outcomes. The core strategy should promote the principles of sustainable design and construction as set out in the *Code for Sustainable Homes* (DCLG 2006), and the *Decent Homes and Decent Communities Programme* (DCLG 2006), as well as the *London Plan Supplementary Planning Guidance on Sustainable Design and Construction* (GLA 2006). The core strategy should also promote *Brent Supplementary Planning Guidance 19: Sustainable Design, Construction and Pollution Control*.
- **Energy use and climate change mitigation:** it is critical that the core strategy seeks to deliver the borough's commitments in relation to climate change.

The *Climate Change Act* (2008) sets the national target of reducing UK greenhouse gas emissions by at least 26% by 2020, and 80% by 2050, against a 1990 baseline. In addition the *UK Climate Change Programme* (Defra 2006) and the Mayor's Climate Change Action Plan (GLA 2007) set targets for reductions in greenhouse gas emissions, which the core strategy should seek, through policy, to help the borough meet.

- **Climate change adaptation:** the core strategy should also help to ensure development and infrastructure in the borough has been located, designed and constructed in line with the principles of climate change adaptation, as set out in the Mayor's draft *Climate Change Adaptation Strategy* (GLA 2008) and *Adapting to Climate Change: a checklist for development* (GLA 2005). Flood risk is another key issue, which is likely to become worse under the impact of climate change. It is important that the core strategy reflects the conclusions and recommendations of the *Brent Strategic Flood Risk Assessment* (LB Brent 2007).
- **Protection and enhancement of the natural environment:** A large number of national, regional and local plans and programmes provide targets, policy and priorities in relation to the natural environment. The core strategy should seek to protect and enhance habitats and species, as set out in national, regional and local Biodiversity Action Plans, and provide publicly accessible open and green space in line with, for example, the *Brent Parks Strategy* (LB Brent 2004) which seeks to reduce open space deficiency in the Borough and the London Plan sets a target of no net loss of open space. Air pollution should be minimised and water quality and resources should also be protected reflecting the Mayor's *Air Quality Strategy: Cleaning London's Air* (GLA 2002), and the *Brent Air Quality Action Plan 2005 – 2010* (LB Brent 2005) together with the *National Water Strategy*

(Defra 2008), and the draft *Water Strategy for London* (GLA 2007).

- **Development plans in adjacent boroughs:** development plans and major developments in adjacent boroughs will have effects on Brent, and it is important that the core strategy is developed with consideration of these potential effects.

The summary presented here is not exhaustive, and the review of other policies, plans and programmes identified a large number of issues that the core strategy should reflect and incorporate. The sustainability appraisal, as part of the assessment of the core strategy, made specific comments and recommendations reflecting targets, objectives and priorities identified in the review of other policies, plans and programmes.

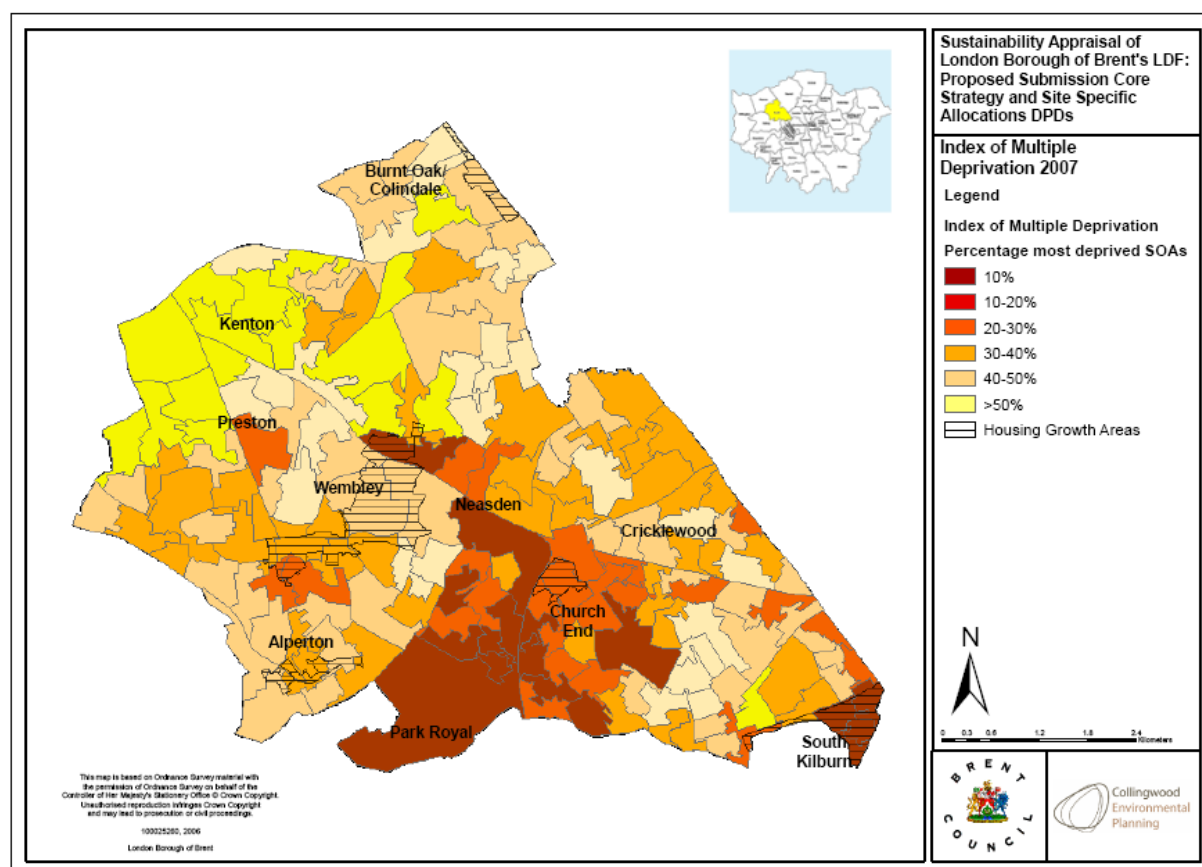
The current situation in Brent

The assessment of the current situation in Brent was structured around the sustainability appraisal objectives, with information also gathered on the characteristics of each of the growth areas and Park Royal, which are the key locations for change proposed in the core strategy. Alongside the assessment of the current situation, the potential future situation without the core strategy was considered. This was done by analysing trend data, in combination with existing strategic targets and objectives which could help shape the borough in the future. A summary is provided below.

Prosperity, social inclusion and employment

Although on average the London borough of Brent is less deprived than many inner London boroughs, deprivation is still a significant issue, and some of the most deprived areas in the UK are located in Brent. The deprived areas are unevenly distributed, and are concentrated in the central and southern parts of the borough (see Figure 2). In addition, the rate of unemployment in Brent is above the average for London.

Figure 2: Index of Multiple Deprivation in Brent, 2007



Health, wellbeing and accessibility

There are a number of significant health related issues in Brent, such as differences in life expectancy between wards, although the majority of residents consider themselves to be in good health. Some health issues are related to environmental pollutants, such as levels of noise and air pollution. Road traffic generates considerable noise, and several parts of the borough exceed recommended maximum day and night time noise levels.

Public transport accessibility is a factor in accessing services, and Brent is generally well connected, with major public transport improvements having been completed recently. However, several areas of the borough still have poor access to public transport (see Figure 4).

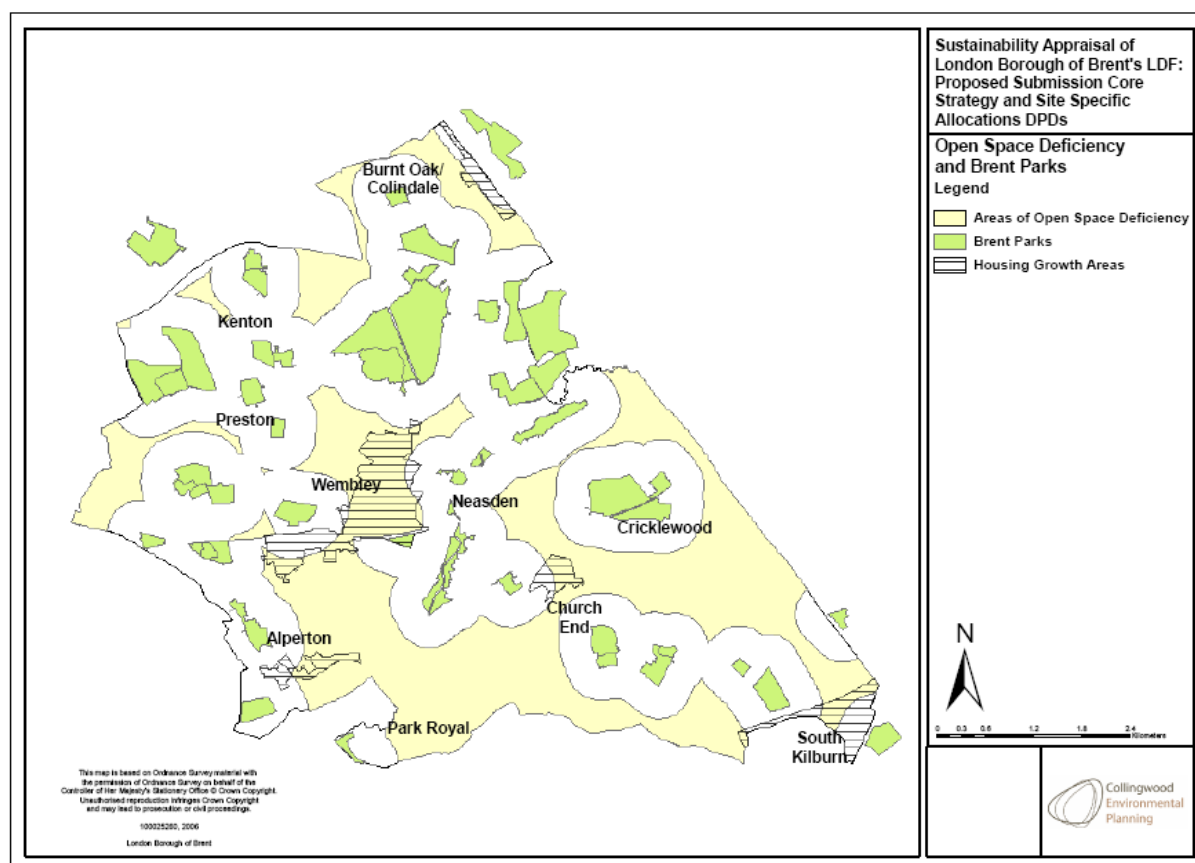
Much of the borough is deficient in open space, illustrated in Figure 3. The map shows that while local open spaces are relatively evenly distributed within Brent, there is a shortage in the southern parts of the borough,

with the majority of people living more than 1200 metres from a public open space larger than 20 hectares.

Education and skills

The average primary and secondary school attainment across the Borough is comparable with national figures at the same levels (key stage 2 primary and level 2 secondary). However, further (National Vocational Qualification equivalents) and adult education attainment in the borough are below national and London averages. There are also significant differences in educational attainment between wards in the borough. A key issue for Brent is a current and predicted shortfall in school places, with predicted shortfalls in both primary and secondary age ranges.

Figure 3: Areas of open space deficiency in Brent



Housing

The population of Brent has increased in recent years, and if the trend continues it will mean increased pressure on existing amenities and facilities, such as schools, health services, housing and transport. The cost of housing in Brent is relatively high compared to that national average, and it is estimated that there is a shortfall of affordable housing in the borough of over 3,000 homes per year.

Crime prevention, community safety and community identity

A significant number of residents in Brent (66%) feel threatened a 'great deal' by crime in their area, and as such, fear of crime is a major issue which has the potential to affect local quality of life. Crime levels in the borough are relatively similar to national averages, although there are pockets of high street crime in certain areas within the

borough. Brent residents' levels of satisfaction with their neighbourhood have decreased by 15% over the period 2002 – 2007. There are initiatives underway, such as increasing the provision of green space, which might reverse this decline.

Traffic, efficient movement and air quality

Road traffic is a major source of noise nuisance, vibration and air pollution in Brent, and poor air quality is a key issue for the borough. Over the long term there has been an increase of 8% in estimated traffic flows, but this increase has slowed in recent years. Public Transport Accessibility Levels are generally good in the borough, but there are areas that face accessibility problems (see Figure 4).

Figure 4: Public transport accessibility and location of stations

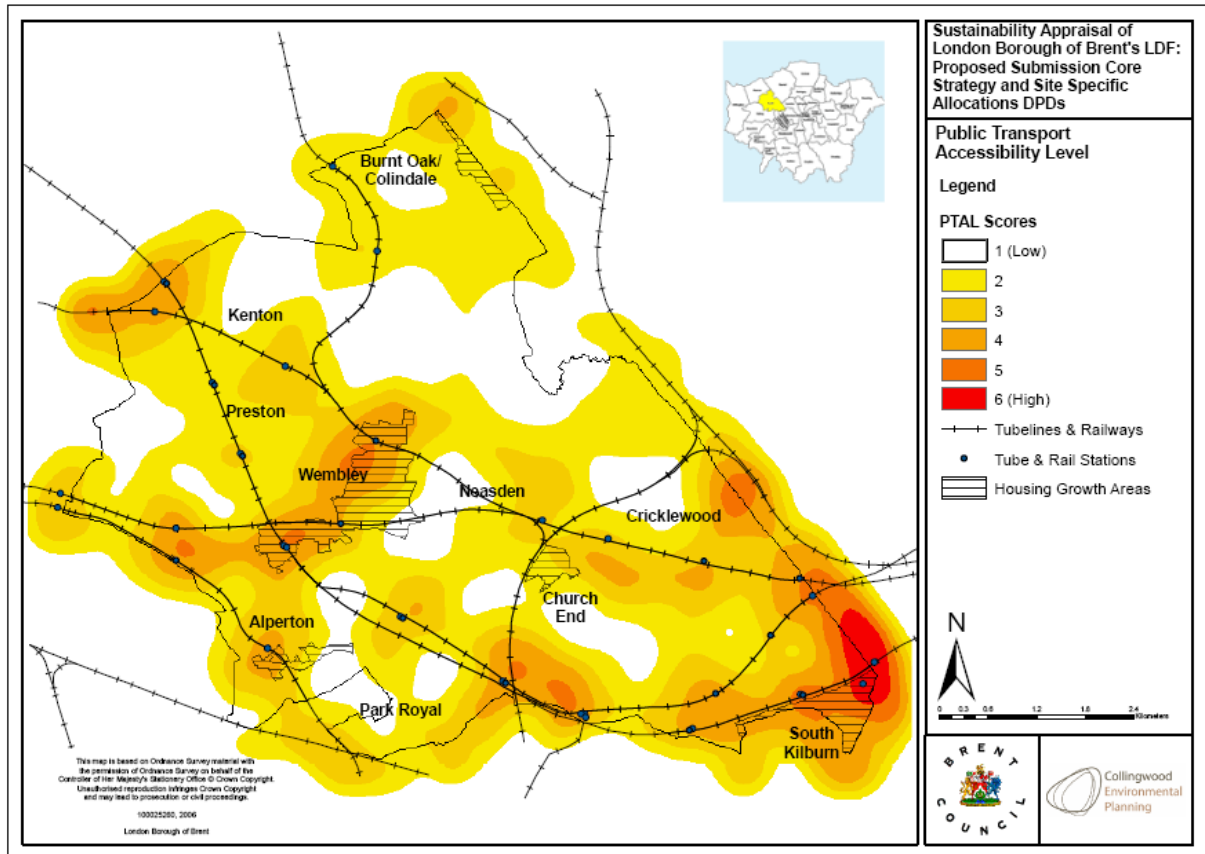
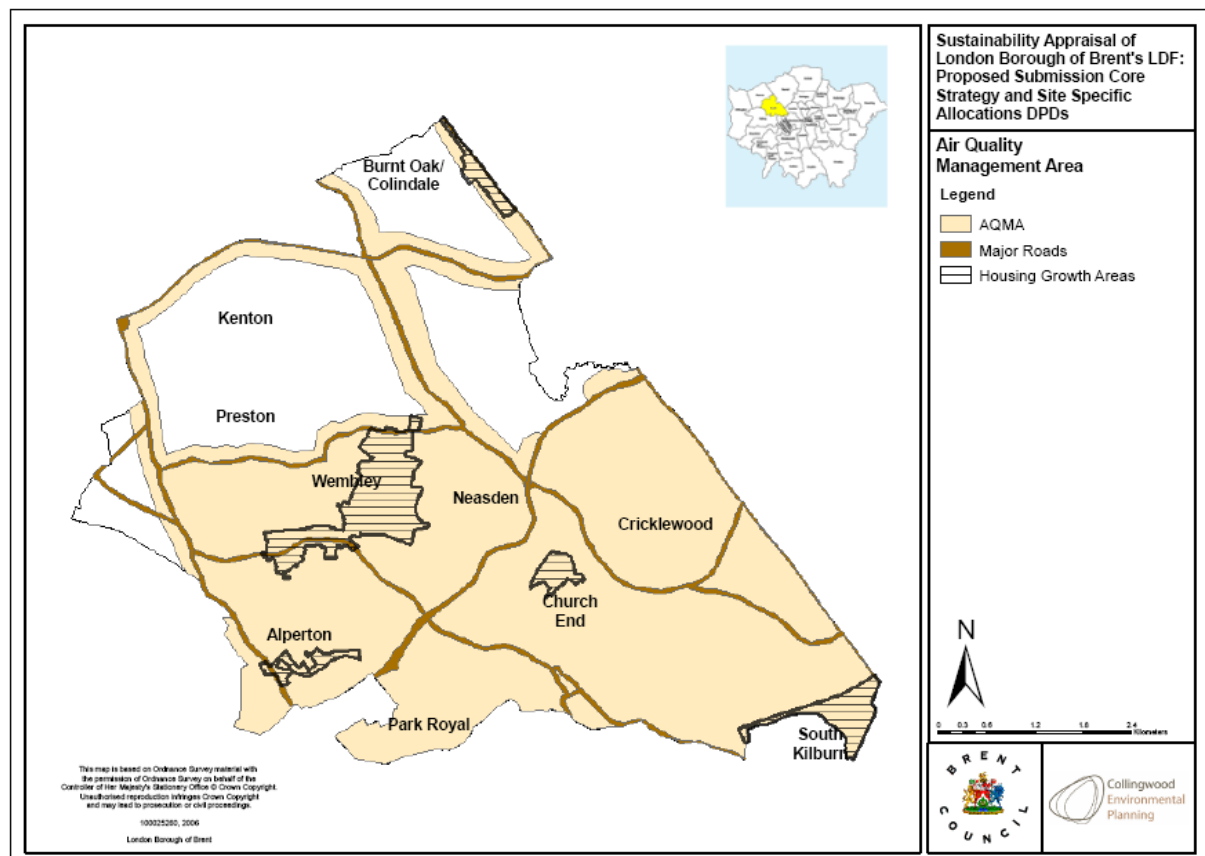


Figure 5: Air Quality Management Areas and major roads



A large part of Brent is designated an Air Quality Management Area indicating that national pollution objectives are breached. Figure 5 illustrates the extent of the air quality management area in the borough. During 2007 annual mean air pollution targets related to several pollutants were exceeded across Brent (including particulates, nitrogen dioxide, ozone and sulphur dioxide). The primary source of the air pollutants in the borough, and other pollutants, is road traffic.

Climate change

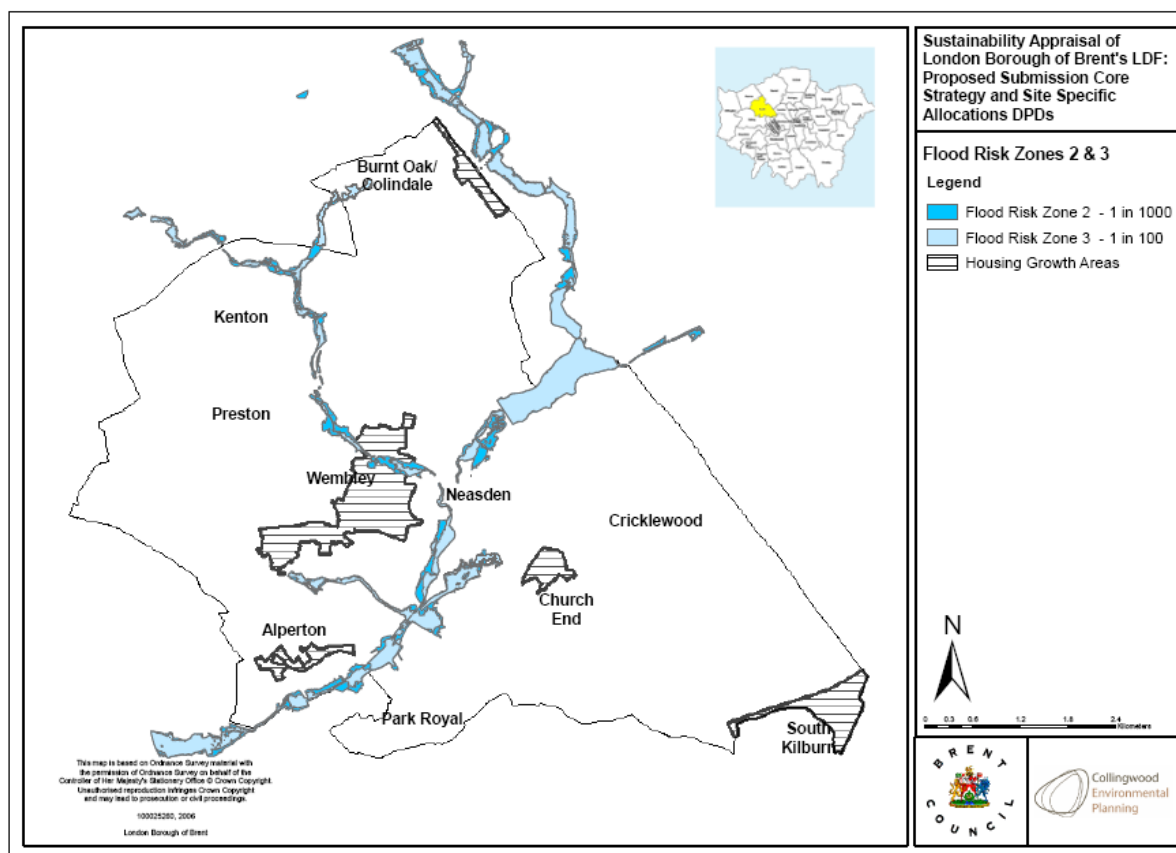
Between 1996 and 2008 Brent achieved an improvement in domestic energy efficiency of almost 30%. The carbon emissions per person in the borough were lower than the London and UK average during 2006. An increasing number of new developments in Brent are meeting high sustainability criteria, which include strict targets for energy and

water efficiency. However, the ability of Brent to meet its carbon reduction targets is a key issue for the borough.

Water quality and resources and flooding

The Environment Agency has classified the River Brent and its tributaries as having 'fair' or 'poor' water quality. The main causes of water pollution in the borough are sewerage misconnections, urban runoff and pollutants from industrial processes and sewage works. In addition, localised surface flooding is an issue in the borough, especially at times of increase run-off, with several areas in the borough at risk of flooding from rivers or streams (Figure 6). Ensuring sufficient water resources to accommodate current and future needs with a growing population and increasing demand is a key issue for the borough.

Figure 6: Flood risk zones



Biodiversity

Several sites in the borough have significant nature conservation value, including Sites of Special Scientific Interest, sites of Metropolitan (Grade I) importance, as well as sites of borough (Grade II) and local importance and Sites of Importance for Nature Conservation. Pressure on biodiversity and habitats from development, is a key sustainability issue in Brent.

Landscape, townscape and historic environment and cultural assets

Townscape quality varies across the borough, with significant areas of low townscape quality clustered in particular areas. Brent has several listed buildings and sites of archaeological interest, some of the listed buildings are classified as at risk by English Heritage. There are 22 conservation areas in Brent, most of which have restrictions on what development can be undertaken.

Waste management

The amount of waste generated per head has decreased slightly in Brent during the period 2000/01 – 2005/06. During the same period Brent has significantly increased the percentage of municipal waste that is recycled, with an increase of almost 100% to 11%, but this increased rate falls short of the target of 30% by 2010.

Land and soil

A quarter of the land area in Brent is considered to be contaminated. There are several priority sites in Brent which require investigation to assess the levels of contamination present, to ensure that the land does not pose a risk to groundwater, and so that it's full development potential can be realised.

Growth, regeneration and investment

There is a trend towards a reduction in the amount of land set aside for industrial, warehousing and retail use in Brent, and an increase of residential use of land. Between 2000 and 2006 the area of vacant premises and vacant land increased. The shift towards residential use of land has the potential to reduce economic opportunities in the borough, thus preventing regeneration.

Key problems and opportunities

Many sustainability problems and issues, as well as opportunities, within Brent were identified from the review of the current and potential future situation in the borough, existing policies, plans and programmes. Table 5 summarises the key sustainability problems as identified through the sustainability appraisal process.

Table 5: Key sustainability problems and opportunities

Social	
•	Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London
•	Disparity in social and economic conditions both between wards within Brent and with other areas
•	Health inequalities and access to health facilities
•	Education attainment and projected shortfall of school places
•	Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards
•	High incidence of crime and fear of crime
•	Provision of and access to essential services and amenities
Environmental	
•	Mixed quality of the built environment and the need for improved architectural design quality
•	Pressure on biodiversity and habitats and lack of green space, particularly in southern wards
•	Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner
•	Contaminated land and soils present a potentially significant restriction / cost in developing brownfield / derelict sites
•	Water quality and pollution are key issues for the watercourses running through Brent.
•	Availability of water resources to meet current and future demand
•	Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent

- Quality of and access to open spaces and parks, including open air sport grounds
- The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment
- Energy use, energy efficiency and renewable energy, and carbon dioxide emissions
- Poor air quality along major roads and in the south of Brent, with much of southern Brent an Air Quality Management Area
- Noise nuisance, both from domestic and industrial sources as well as from noise and vibration from major road routes in the Borough

Economic

- Unemployment and job opportunities for local people
- Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership
- The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space
- The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal
- The need to support development in existing centres and ensure the health of town-centres

4. Appraisal of the Core Strategy

Introduction

The sustainability appraisal assessed various elements of the core strategy, including the spatial vision, strategic objectives, the potential spatial options to deliver the strategy and the individual policies, as well as the core strategy overall. The findings of these assessments are summarised in this and the following section.

Core strategy vision and objectives

The sustainability appraisal considered the spatial vision in the core strategy and concluded that in principle it was very positive from a sustainability perspective. In particular, the positive aspects include: the focus on maximising the potential of the borough's young people; meeting diverse community needs; providing a safe and healthy environment; promoting walking and cycling routes; developing excellent public transport interchange and connections; and seeking the efficient use of energy and resources.

In practice, the sustainability appraisal pointed out that the achievement of many aspects of the vision will depend on many other factors. These include the effective implementation of the policies in the core strategy and other development plan documents, as well as other factors beyond the borough's control, such as the health of the national and global economy, and the willingness or ability of the private sector to contribute to development and regeneration in the borough.

The sustainability appraisal tested the compatibility of the strategic objectives in the core strategy with the sustainability appraisal objectives to identify potential conflicts. Overall it was concluded that the objectives were mostly compatible, with a few specific areas of potential conflict. It was highlighted that these conflicts may not arise, and that this

is partly dependant on how the objectives are implemented and whether potential negative effects are avoided through the implementation of other policies in the core strategy or other development plan documents aimed at protecting and safeguarding important features and assets in the borough.

The sustainability appraisal made various recommendations for slight amendments to the core strategy's strategic objectives.

Appraisal of alternatives

The consideration of alternative approaches and policies in the core strategy was an ongoing process during its development by the borough's officers, with the sustainability appraisal providing input and comment throughout, for example through meetings and workshops.

Written appraisal commentaries on the sustainability strengths and weaknesses of the emerging alternatives and draft versions of the core strategy were produced at key stages in the process. The commentaries included recommendations for amendments to the wording of policies, and were used by Brent to develop and refine the document.

Many of the 'alternatives' which could have been considered were already excluded by higher level policy decisions. For example, the London Plan contains minimum housing and employment targets which Brent must meet by 2016/17.

However, the council did consider five high level spatial options as part of deciding the best approach to deliver the vision for Brent. The assessment of these options was an important part of the sustainability appraisal process. The five spatial options were:

- **Option 1** - spread growth around all existing town centres and key public transport infrastructure interchanges;

- **Option 2** - disperse growth across all areas of the borough;
- **Option 3** - concentrate growth in areas of opportunity that have good public transport access, are in need of regeneration and that can deliver jobs and infrastructure;
- **Option 4** - centre main housing growth on the Wembley area only; and
- **Option 5** - allow growth on industrial land and redevelop former council estates in need of regeneration to achieve the target.

Each of the options was assessed against the sustainability appraisal objectives to identify and compare their potential sustainability effects. The sustainability appraisal concluded that option 3 should provide the greatest opportunity for sustainability benefits. This was also Brent council's preferred option and provided the basis of the approach set out in the core strategy.

Some of the key potential positive effects predicted for option 3 included:

- Reducing poverty and social exclusion;
- Improving health and wellbeing;
- Encouraging a sense of community and local identity; and
- Reducing disparities in economic performance and promoting regeneration.

Generally, all the strategic growth options were predicted to have some negative effects, reflecting the potential environmental, resource use and traffic generating impacts associated with development to meet housing targets.

A summary of the results of the appraisal is presented in Table 6. This shows the scores that were assigned for each option against each sustainability appraisal objective based on whether the potential effects were predicted to be positive or negative and of major or minor significance. The main sustainability appraisal report includes more details on the effects predicted and the justification for the scores.

Appraisal of the policies

During the development of the core strategy policies, the recommendations from the sustainability appraisal process led to a number of changes being made to earlier drafts of the core strategy. As a result, some measures to improve the sustainability of the policies had been incorporated prior to the appraisal of the policies in the proposed submission version. What is presented below, therefore, is a description of the key remaining potential effects identified along with associated mitigation and enhancement measures that were recommended to potentially reduce the negative effects and enhance the positive ones.

Regeneration and growth, and overall spatial change policies

These policies (CP1 to CP6 – see Table 2) set out the overarching development principles for the borough, the scale and location of housing development and the high-level criteria which are intended to set the framework for development in Brent.

The policies were predicted to have generally positive effects against a number of the sustainability appraisal objectives. All of the potential positive effects related to economic growth, investment and development making the delivery of infrastructure possible. The sustainability appraisal also identified several potential negative effects of the regeneration and growth, and overall spatial change policies. The negative effects identified were particularly against the environmental objectives, and were caused by the predicted impacts of the scale of construction as well as the occupation / operation of the new development proposed in the borough.

Table 6: Appraisal of spatial options for Brent

Sustainability Appraisal Objectives	Option				
	1	2	3	4	5
Social					
1. To reduce poverty and social exclusion	-	-	+	-	+/-
2. To improve the health and wellbeing of the population	-	-	+	-	+/-
3. To improve the education and skills of the population	?	?	+	-	?
4. To provide everybody with the opportunity to live in a decent home	+	+	+	-	+
5. To reduce crime and anti-social activity	-	?	?	?	+
6. To encourage a sense of local community; identity and welfare	?	-	+	-	+/-
7. To improve accessibility to key services especially for those most in need	-	-	+	-	-
Environmental					
8. To reduce the effect of traffic on the environment	-	--	-	--	-
9. To improve water quality; conserve water resources and provide for sustainable sources of water supply	?	?	?	-	?
10. To improve air quality	-	-	-	-	-
11. To conserve and enhance biodiversity	+	-	+	+	?
12. To maintain and enhance the character and quality of landscapes and townscapes	?	?	+	-	+
13. To conserve and where appropriate enhance the historic environment and cultural assets	-	?	?	+	?
14. To reduce contributions to climate change and reduce vulnerability to climate change	-	--	-	-	-
15. To minimise the production of waste and use of non-renewable materials	?	?	?	?	?
16. To conserve and enhance land quality and soil resources	+/-	+/-	+	+	+
Economic					
17. To encourage sustainable economic growth	+/-	-	+	+	--
18. To offer everybody the opportunity for rewarding and satisfying employment	+/-	-	+	+	--
19. To reduce disparities in economic performance and promote regeneration	+/-	-	++	-	-
20. To encourage and accommodate both indigenous and inward investment	+	+/-	+	+	+/-
21. To encourage efficient patterns of movement in support of economic growth	+/-	-	+/-	-	-
Key to potential effect scores: Major positive: ++ Minor positive: + Neutral: o Minor negative: - Major negative: -- Uncertain: ? Mixed: +/- Key to the spatial options: Option 1: Spread Growth around all existing town centres and public transport nodes Option 2: Disperse Growth across all areas of the borough Option 3: Core Strategy Growth Areas Strategy Option 4: Growth concentrated in the Wembley Area Option 5: development on specific land uses such as industrial land or poor quality Brent housing estates					

Key potential sustainability effects of these policies are summarised in Table 7. It was recommended that to mitigate many of the negative effects will require the inclusion of specific policies in the forthcoming Development Management Policies development plan document. In addition, it was noted that other policies in the core strategy will help to enhance or mitigate the

positive / negative effects of the regeneration and growth, and overall spatial change policies, particularly the growth area and infrastructure to support development policies.

Several recommendations were made for changes to the text of the policies, to strengthen the requirements that they contain, or to mitigate negative effects they may cause.

Table 7: Key sustainability effects – regeneration and growth, and overall spatial change policies

Potentially significant positive effects	Potentially significant negative effects
<ul style="list-style-type: none"> Improving local quality of life, reducing social inequality and alleviating poverty in some of the most deprived areas by focussing mixed-use regeneration of key growth areas. Improving access to services, amenities and employment opportunities by focussing development in locations with generally good public transport accessibility. Social, health and environmental benefits due to reduced air and noise pollution associated with reduced car use. Increasing opportunities to live in a decent and affordable home by increasing the supply of new homes. Ensuring the efficient use of land by requiring development takes place on previously developed land and derelict or underused sites, and providing opportunities for the remediation of potentially contaminated land. Enhancement of the public realm, the quality of townscapes and promoting a sense of place and pride in neighbourhoods by encouraging high quality design and the creation of distinctive places. Enhancing the image of Brent as a location for business and encouraging inward and indigenous investment by commercial regeneration and the protection and enhancement of employment areas. 	<ul style="list-style-type: none"> An increase in vehicle traffic and congestion, and associated pollution, due to the level of growth and underlying trend of increasing traffic. An increase in noise pollution and nuisance due to increased construction activity, increased traffic and high density and mixed use development. An increase in resource and energy use and consumption, green house gas emissions and construction and household waste generation due to the level of growth proposed which will result in an approximate 10% increase in the number of households to 2017.

Strategic area policies and infrastructure to support development policies

The *strategic area policies* (CP7 to CP13 – see Table 2) set out the development and infrastructure priorities in each of the core strategy growth areas, as well as Park Royal and the North Circular Road Regeneration Area. The *infrastructure to support development policies* (CP14 and CP15 – see Table 2) set out Brent's policy intentions in relation to public transport and the delivery of infrastructure to support development in the borough.

These policies were predicted to have generally positive effects in relation to social and economic sustainability objectives, due to their shared goal of housing led regeneration in the growth areas and supporting this development with appropriate infrastructure. However, the strategic area policies are predicated to have some significant potential

negative effects in relation to environmental objectives, related particularly to the impacts of construction and population growth on the scale proposed.

Key potential sustainability effects of the strategic area policies are summarised Table 8.

It was recommended that to mitigate the negative effects, there should be some changes to the wording of the policies to emphasise opportunities for improving their impact on Brent. For example, there were inconsistencies among the infrastructure targets included in the different growth area policies, and it was recommended that text be included within each policy to systematically address all the key infrastructure expectations.

In order to mitigate some of the negative environmental effects predicted (e.g. noise, dust and congestion associated with construction) it was recommended that a more gradually phased approach to development in

the Borough be considered, in tandem with specific infrastructure requirements.

To ensure the positive social and environmental benefits associated with development in the borough are realised, it was recommended that an increased level of detail is included in the targets relating to key social and environmental infrastructure needs.

Other recommendations to mitigate or enhance the negative or positive effects of the policies was to include more specific policies detailing how this would be achieved in the forthcoming Development Management Policies development plan document.

Table 8: Key sustainability effects – Strategic area policies

Potentially significant positive effects	Potentially significant negative effects
<ul style="list-style-type: none"> • A reduction in the number of unfit homes and improving the quality of the housing stock by promoting housing-led mixed-use development. • Reducing poverty and social exclusion and improving health and quality of life by facilitating regeneration, housing provision and enhanced / increased social infrastructure. • Encouraging new start ups, and providing business opportunities and employment by promote new commercial premises and economic activity. • Enhancing the image of the areas as a business location by promoting regeneration, provision of social infrastructure and improvements to the quality of public realm. • Ensuring the efficient use of land by requiring development occurs on derelict, vacant or underused previously developed land and buildings as well as requiring the remediation of potentially contaminated land. 	<ul style="list-style-type: none"> • Increased travel need and traffic generation and associated negative impacts on air quality, noise pollution and congestion arising from the residential, commercial, retail and leisure development on the scale proposed. • Increased use of materials, waste generation and potential noise nuisance associated with construction, occupation of new homes, retail and commercial buildings. • Increased greenhouse gas emissions and energy use due to the scale of development proposed. • Increased water demand and potential negative impact on water quality due to the scale of development proposed and increases in run-off. • Increased risk of flooding to people and property due to increased urban run-off and a reduction in permeable surfaces, and a potential increase in the intensity of the urban heat island effect due to increased densities of development. • Exacerbation of existing deficits in social infrastructure and open space / sports facilities due to new development and increased population.

The *infrastructure to support development* policies were predicted to have predominately positive sustainability effects. One potential minor negative sustainability effect was

identified related to the potential increase in commuting. The sustainability effects are summarised Table 9.

Table 9: Key sustainability effects –Infrastructure to support development policies

Potentially significant positive effects	Potentially significant negative effects
<ul style="list-style-type: none"> • Helping to reduce social exclusion where access to essential services is improved for households without access to a car. • Increasing the proportion of journeys made by modes other than the car, although the impact on overall traffic volumes and congestion is uncertain given the increases in traffic volumes predicted in relation to other policies. • Improved access to employment opportunities and between enhancement of the image of Brent as a business location by improving public transport 	<ul style="list-style-type: none"> • The encouragement of additional commuting due to the provision of enhanced public transport, although where this is by public transport the environmental and social effects will be less than commuting by private car.

Although other policies in the core strategy provide detailed implementation requirements in relation to the infrastructure to support development policies, recommendations from the sustainability appraisal included adding text to the core strategy to acknowledge the multiple benefits that certain types of infrastructure can bring. For example, open space is likely to have positive effects on health and well-being. Including text to this effect would enhance the positive aspects of the policies.

Strategic borough-wide policies

The *strategic borough-wide* policies (CP16 to CP23 – see Table 2) seek to address local planning issues not covered within the *strategic area* and *infrastructure to support development* policies. They aim to maintain and improve environmental quality, protect and promote employment opportunities, ensure access and provision of shops and other facilities, and to provide policy to promote sustainable construction practices and help development mitigate and adapt to climate change.

The sustainability appraisal found that these policies generally performed well against the

sustainability objectives with mostly positive sustainability effects predicted. The potential positive effects generally related to enhancing specific environmental and social features and aspects of development. A limited number of potential negative sustainability effects were predicted too, which were mainly associated with the potential environmental effects of increased commercial activity and traffic. These sustainability effects are summarised in the Table 10.

It was recommended that in order to mitigate or enhance the potential negative or positive effects of the strategic borough wide policies the inclusion of specific policies in the forthcoming Development Management Policies development plan document will be required.

Several recommendations were also made to include text that provided for both mitigation and adaptation to climate change, through (amongst others) the development of buildings that meet higher sustainability standards and the provision of more open and green space. In addition, it was recommended that the loss of community facilities be avoided where possible, and that text in the policy should clearly state this.

Table 10: Key sustainability effects – Strategic borough wide policies

Potentially significant positive effects	Potentially significant negative effects
<ul style="list-style-type: none"> • Regeneration and reduction of poverty and social exclusion by protecting and providing community facilities, a good quality environment, a mix of housing size and tenure and employment areas. • Improvements to the visual amenity and the quality of landscape, townscape and public realm through protecting and enhancing open spaces and suburban character, as well as appropriate employment and town-centre uses. • Protection of biodiversity and enhancement of species diversity by avoiding inappropriate development, and protecting back gardens and suburban character. • Benefits to physical and mental health and wellbeing of population by providing opportunities for physical activity and improving surroundings. • Improvement of the image of the borough as a location for business and providing opportunities and employment for local people by protecting land for employment uses and enhancing commercial areas. • Mitigation of, and adaptation to, climate change by putting requirements on major development and creating carbon and pollution sinks. 	<ul style="list-style-type: none"> • A limitation of the land available for business development through policies seeking to protect suburban character, open space and promote housing development. • Increase resource use, greenhouse gas emissions, air pollution and noise disturbance through increased industrial activity and associated traffic generation.

5. Overall Effects of the Core Strategy

Introduction

This section provides a summary of the most significant potential effects, both positive and negative, which were predicted to arise from the implementation of both the individual policies included in the core strategy and the core strategy taken as a whole.

The sustainability appraisal also considered the effects of the core strategy in combination with the key developments proposed in adjacent borough's development plan documents. The potential effects that were identified and considered to be most significant are also summarised below.

Summary of potential overall effects of the policies

Overall the core strategy policies were predicted to have mostly positive effects, particularly against the social and economic sustainability appraisal objectives.

Overall positive social effects included:

- Reduced poverty and social exclusion;
- Improved access to and provision of community facilities and services;
- Increased supply of affordable housing; and
- Improvements to public transport infrastructure, benefitting accessibility.

Overall positive economic effects included:

- Protection and enhancement of employment land;
- Improvement of the public realm and amenities, and related effect on local pride and the image of the borough as a place to invest;
- Improvements to local economy from increased population and workforce; and
- Improved transport infrastructure increasing access to jobs and services by public transport offering long-term economic benefits.

The situation is expected to be more mixed in relation to environmental objectives. Overall positive environmental effects include;

- Improvements to the public realm and townscape;
- Improved standards of design and construction;
- Management and reduction of need to travel; and
- Protection and enhancement of the character Brent as well as biodiversity and open space.

The overall negative effects predicted from the core strategy fall under three key areas: resource use (materials, waste, water and energy); traffic generation; and land use.

Overall negative effects associated with resource use are predicted due to the increased population, construction and business activity. The increase in population, of 28,000 to 2017, is likely to result in increased traffic and congestion, even taking account of policies designed to reduce the need to travel. Policies in the core strategy which seek to regenerate the growth areas, revitalise town centres and increase housing supply will all put pressure the use of land and open spaces within the borough as well as infrastructure which will need to be managed to ensure the current level of provision and access is not made worse and is ideally improved.

The core strategy, and its sustainability effects, are likely to be affected by economic conditions over the period of the strategy (to 2026). It is likely that if the economy remains in a depressed state the delivery of the growth aspirations may not be realised, which in turn will mean that the infrastructure needed to address both the current deficits and future demand may also not be delivered.

Summary of potential cumulative effects

There are different types of cumulative effects, but of particular concern for this sustainability appraisal was firstly; the total effects of different elements and policies in the core strategy on a single 'receptor' (this could be a certain group within the population or people living in a particular area, the water environment or flora and fauna, for example); and secondly, the cumulative effects of Brent's core strategy in combination with adjacent boroughs' development plan documents which could make worse the effects of Brent's core strategy.

The key cumulative effects of different elements and policies in Brent's core strategy that were identified and the relevant receptors are summarised in Table 11.

Figure 7 provides an indication of the significant developments planned close to the Brent borough boundary, most notably in Barnet, Camden, Kensington and Chelsea and Westminster. Additional developments are also planned close to the borough boundary in Harrow, Hammersmith and Fulham, and Ealing. This was used by the sustainability appraisal to identify potential cumulative effects due to the scale of the development planned in adjacent boroughs in combination with the development proposed in Brent.

Considerable housing development close to the borough boundary was predicted to potentially increase the number of people seeking to access community services and amenities within Brent. This could increase pressure on open spaces, health services and education facilities. Such development would also be likely to increase travel need and pressure on Brent's roads and public transport infrastructure, with related environmental impacts.

Table 11: Key cumulative effects of the core strategy

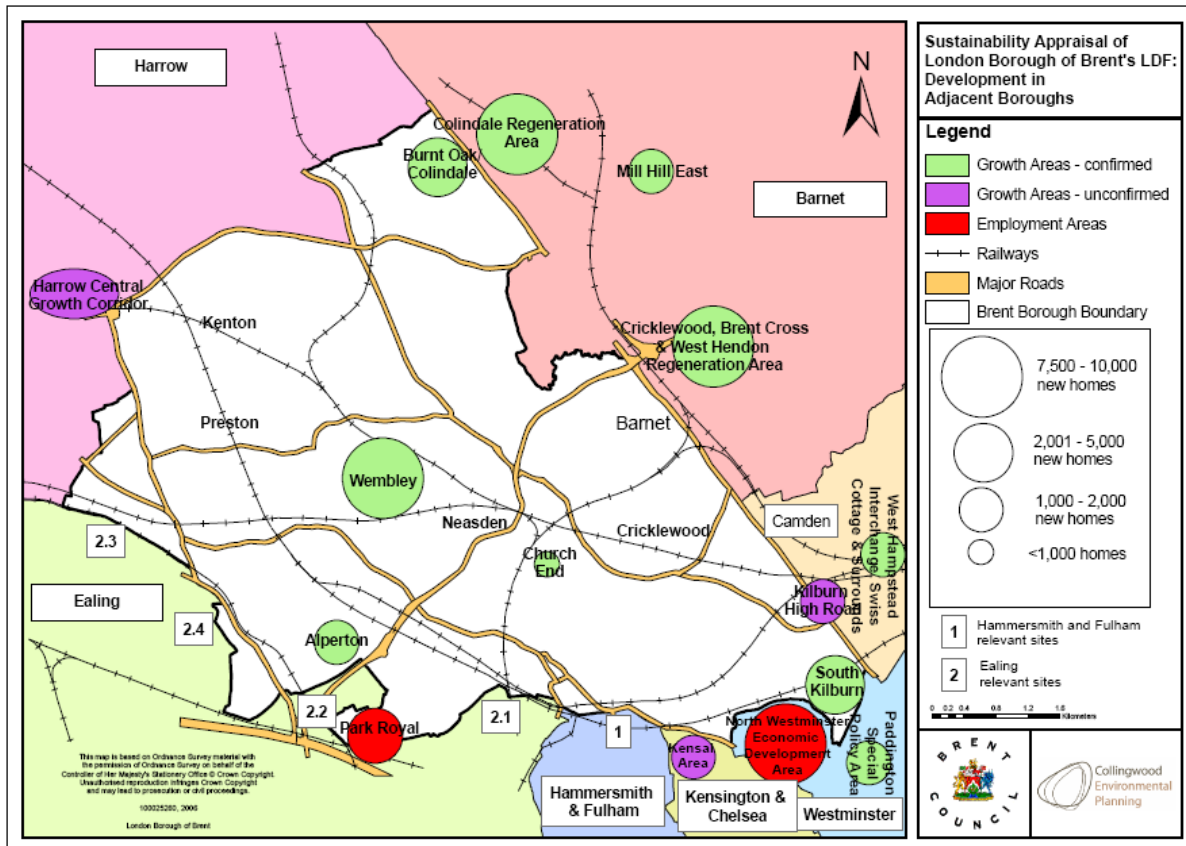
Potential positive effects	Key receptor
Provision and increase accessibility to services and facilities	Communities in deprived areas, particularly those without a car
Reduced crime and fear of crime	General population, especially vulnerable groups such as the young people, deprived, elderly
Enhanced townscape and public realm	General population, especially in areas of low townscape / public realm quality
Enhanced image of Brent as a location for business	Businesses and local population
Increased provision of employment opportunities	Local population, including those of working age population
Improved public transport	Local population, particularly those without access to a car
Potential negative effects	Key receptor
Increased pressure on existing amenities and facilities	General population, especially more vulnerable people living in areas of current deficit
Reduced affordability of housing	Existing Brent residents, especially those economically and socially deprived
Increased pressure on open space, biodiversity and habitats	Flora and fauna and local people using open space particularly living in areas of existing deficit
Increased noise and nuisance	General population, but especially vulnerable groups and those living close to main roads and in the Growth Areas
Increased traffic and congestion	Air environment and general population, especially those living close to main roads and in the growth areas
Increased greenhouse gas emissions	Global environment
Increased risk of flooding, pressure on drainage and sewerage infrastructure, urban heat island effect	Land and water environment, general population and especially people vulnerable to flooding and hot weather
Increased resource use and waste generation	Land, air, water environment and more vulnerable people

Significant economic and commercial development also has the potential to undermine or compete with the goals of Brent's core strategy. For example, the proposed major retail centre created in Brent Cross could impact upon the success and viability of existing town-centres, as well as the proposed expansion of Wembley.

However, there could also be benefits arising from development in accessible boroughs, for

example increasing access to employment for Brent residents. Community facilities in adjacent boroughs may also be more accessible for Brent residents. The upgrading of transport interchanges in adjacent boroughs, and the improvement of open and green spaces, may also offer benefits to residents of Brent.

Figure 7: Location and scale of development in adjacent boroughs



6. Implementation and Next Steps

Implementation and monitoring

Monitoring the significant sustainability effects of implementing the core strategy is an important part of the sustainability appraisal process. It will be used to monitor performance of the core strategy against the sustainability appraisal objectives. Where unacceptable effects are identified through monitoring this should lead to the appropriate action to resolve it by Brent Council.

Currently in Brent, an Annual Monitoring Report is produced which reviews the situation in Brent each year against a series of indicators. This monitoring is conducted to establish how effective policies have been in enabling sustainable development and protecting the environment. As the core strategy and site specific allocations are finished, and other parts of the local development framework are developed, the monitoring of these will be addressed through updates to the annual monitoring report.

Monitoring the significant sustainability effects of implementing the core strategy should be included into the annual monitoring report process. To help do this, the hierarchy of indicators as outlined in government good practice guidelines¹ should be employed. These are:

- **Contextual indicators** – which provide monitoring of the background which the local development framework operates.
- **Output indicators** – which enable monitoring of specific policies included in the local development framework.
- **Significant effects indicators** – which provide monitoring of the important effects of the local development as identified by the sustainability appraisal.

Local output indicators should be developed to reflect local conditions and issues, reflecting

the specific monitoring needs of Brent and the particular effects of core strategy policies.

In addition, the main sustainability appraisal report proposes several potential additional significant effects indicators to monitor the implementation of the core strategy.

Next steps

The key next steps and outputs from the core strategy and sustainability appraisal processes are as follows:

- Publication of the core strategy, and sustainability appraisal report (2nd June 2009), followed by six weeks of consultation to enable representations to be made.
- Amendments to the consultation version of the core strategy in light of consultation responses received.
- Appraisal of any significant changes, leading to either revisions to the sustainability appraisal report, or a supplementary note to the sustainability appraisal report, if changes are minor.
- Submission of the core strategy to the Secretary of State for Independent Examination and the Examination in Public process (intended submission, end July 2009).
- Adoption of the final version of the core strategy.
- Adoption Statement – prepared by London Borough of Brent to notify the public that the core strategy has been adopted. This will include information on the main issues raised during consultation on the strategy and sustainability appraisal and how these were taken into account in developing the final strategy, details on monitoring and other information required as part of the sustainability appraisal.
- Ongoing monitoring and review.

¹ *Local Development Frameworks: A Good Practice Guide*, Office of the Deputy Prime Minister, 2005
<http://www.communities.gov.uk/index.asp?id=1143905>

How to Comment on the Sustainability Appraisal Report

Public consultation on the Proposed Submission Core Strategy DPD and its Sustainability Appraisal Report runs from **2nd June 2009 for six weeks**.

All the comments must be received by **5pm on 13th July 2009**.

Comments can be provided by:

Post: Policy and Research Team
The Planning Service
London Borough of Brent
Brent House
349 High Road
Wembley
Middlesex HA9 6BZ

Email: ldf@brent.gov.uk

Via the web: www.brent.gov.uk/planning.nsf

When you comment please include:

- Your full name
- Full postal address
- Your email address
- Where possible, the pages, section titles and paragraph numbers (and/or appendix numbers) of the Sustainability Appraisal Report your comments / concerns relate to; and
- Any suggested detailed amendments to the Sustainability Appraisal Report to reflect your comments / concerns and any amendments to the preferred options you think should be made as a result.