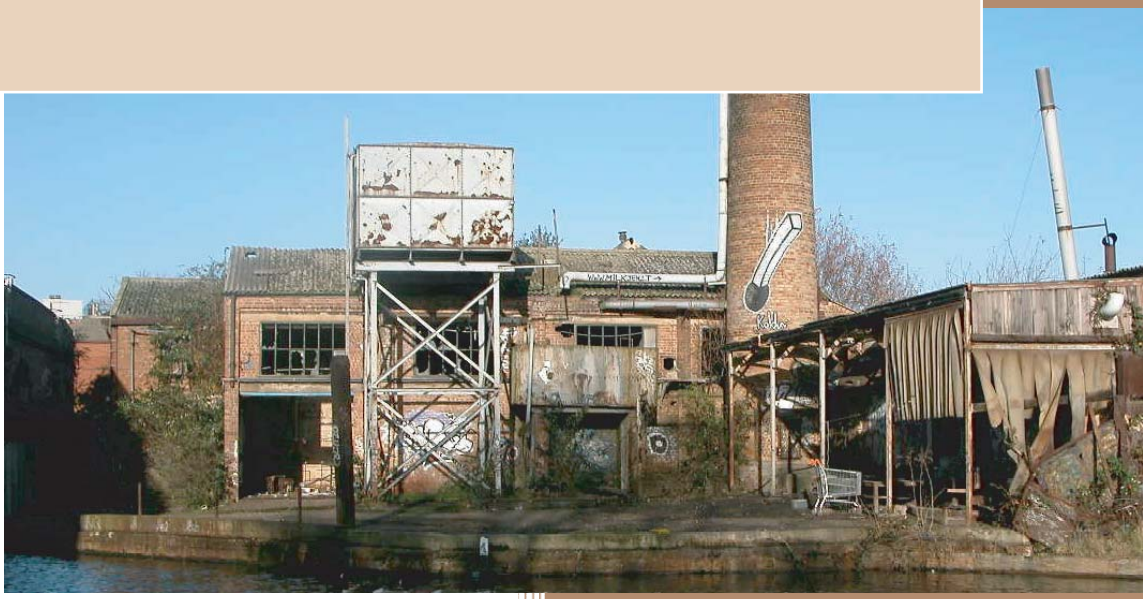
London Borough of Brent's Local Development Framework

Proposed Submission Site Specific Allocations Development Plan Document

Sustainability Appraisal Report
Non-Technical Summary



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Contents

The Non Technical Summary includes the following sections:

This report is a Non-Technical Summary of the Sustainability Appraisal Report of the London Borough of Brent's proposed Submission Site Specific Allocations 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 Site Specific Allocations 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 Site Specific Allocations

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 set 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 document identifies sites 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 site specific allocations

The main contents of the site specific allocations are listed in Box 1.

Box 1: Contents of the Site Specific Allocations

- **Introduction and Site Specific Allocations Map**
- **Site Specific Allocations**
  - Wembley Growth Area
  - Alperton Growth Area
  - South Kilburn Growth Area
  - Burnt Oak / Colindale Growth Area
  - Park Royal
  - Rest of Borough
  - Transport

Aims and objectives of the site specific allocations

The site specific allocations document identifies sites which Brent council consider suitable for particular types of use. The document covers the period to 2026. It includes background information on each site, the council's justification for the allocated use and any particular requirements which will need to be considered in developing the site. It should be noted that even though a site is included in the document, it will still have to go through the appropriate planning approval process prior to any development actually taking place.

These sites, and their preferred uses, have been identified to assist in delivering the borough's spatial strategy and regeneration and growth objectives in the core strategy.

The site specific allocations document objectives are included in Box 2.

Box 2: Objectives of the site specific allocations document

- To identify locations for development opportunity, particularly within the five designated growth areas, Wembley, Alperton, South Kilburn, Church End and Burnt Oak / Colindale.
- To establish broad principles of development and appropriate conditions that may be applied in respect of social, economic and environmental factors.
- To qualify opportunities for land-use and mixes of use.
- To identify sites which may require new or improved community facilities or services as a result of development.
- Where appropriate, to demonstrate the advantage of comprehensive land parcel assembly for the best disposition of land-use to create higher quality places.
- To identify and manage the political impacts of development upon the natural and built environment, residents, workers, businesses and visitors.

Site allocations

The site specific allocations document is structured around the growth areas identified within the core strategy. These are located in Wembley, Alperton, South Kilburn, Burnt Oak / Colindale and Church End. Sites are also identified in Park Royal and outside the growth areas, which are described as Rest of Borough sites. There are also several transport sites identified.

To demonstrate how each site will contribute to achieving the regeneration and growth objectives of the core strategy, each site allocation includes an estimated development capacity (number of dwellings) and the projected timing of the development.

There are a total of 32 sites contained within growth areas, three within Park Royal, six transport sites and 31 in the rest of the borough identified in the site specific allocations document. Figure 2 shows the location of the growth areas and all the allocated sites.

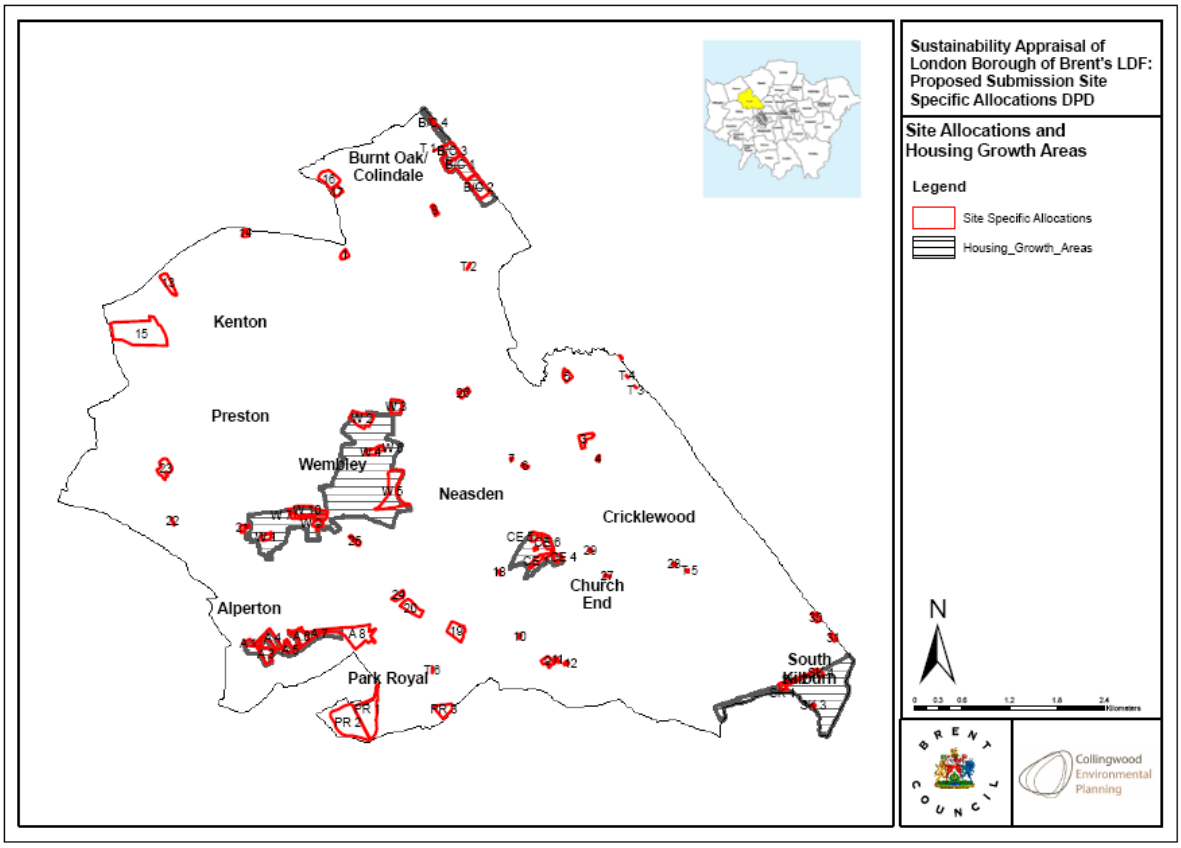
The site specific allocations document sets out the location, and a description, of each site. It also provides a summary of existing planning guidance and history, the proposed use and its justification, and also the indicative development capacity. In addition, the site specific allocations document details any constraints, such as flood risk, which the site might face and any infrastructure improvements which may be required to support the proposed use of the site.

Table 1 indicates the housing targets to 2026 as included in the core strategy, the number of sites identified in the site specific allocations document and the indicative housing numbers expected to be delivered on these sites.

Table 1: Contribution of allocated sites to housing targets in Core Strategy

Growth Area	Housing growth in core strategy	Number of allocated sites	Housing delivered by sites
Wembley	11,500	10	3,646
Alperton	1,600	8	1,434
Church End	800	6	616
South Kilburn	2,400	4	808
Burnt Oak / Colindale	2,500	4	2,496
Rest of the Borough	2,410	31	1,655

Figure 2: Location of growth areas and sites in Brent



2. The Sustainability Appraisal Approach

Overview of the approach adopted

The proposed Submission site specific allocations 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 site specific allocations, from a broad sustainability perspective, by assessing options and the proposed Submission site specific allocations 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 site specific allocations 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 site specific allocations and sustainability appraisal report
5. Monitoring implementation of the site specific allocations

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 site specific allocations. 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 2 overleaf contains a list of the sustainability appraisal objectives used.

The appraisal of the site specific allocations

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 site specific allocations.

The sustainability appraisal adopted a variety of approaches to consider the sustainability implications of different elements of the site specific allocations.

Table 2: 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 objectives, comparing the likely sustainability effects of the alternative uses for sites considered by Brent and appraising each of the sites in detail. The sustainability appraisal also assessed the overall and cumulative effects of the site specific allocations.

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 site specific allocations. 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 site specific allocations. 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 broad range of policy areas, which it was considered should be reflected in the sustainability appraisal and that the site specific allocations 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 site specific allocations, by supporting the core strategy strategic vision and objectives, should seek to encourage development in accordance 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 site specific allocations document 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).

As the site specific allocations document supports proposed developments for housing, commercial and community uses, as well as mixes of these, it is important that sites and proposed allocations reflect the broad range of advice and guidance included in national planning policy statements and planning policy guidance. Of particular importance are: planning policy statement 3: *Housing* (DCLG 2006); *planning policy guidance 4: Industrial and Commercial Development and Small Firms* (DCLG 1992); *planning policy statement 6: planning for town centres* (DCLG 2005); *planning policy statement 9: Biodiversity and Geological Conservation* (DCLG 2005); *planning policy statement 12: Local Spatial Planning* (DCLG 2008); *planning policy guidance 15: Planning and the Historic Environment* (DCLG 1994); *planning policy guidance 16: Archaeology and Planning* (DCLG 1990); *planning policy guidance 17: Planning for Open Space; Sport and Recreation* (DCLG 2002); *planning policy statement 23: Planning and Pollution Control* (DCLG 2004); *planning policy statement 24: Planning and Noise* (DCLG 1994); and, *planning policy statement 25: Development and Flood Risk* (DCLG 2006).

It will also be important for proposed development on the sites to support strategic objectives and reflect guidance and best practice in the following key areas:

- **Area and site specific guidance and master-planning**: for a large number of the sites included in the site specific allocations document, Brent has developed site or area specific guidance to ensure development meets objectives and priorities, as well as reflects area specific constraints and opportunities (such as flood risk, or high levels of deprivation). These include formally adopted supplementary planning documents for individual sites, as well as informal site development guidance. In addition, the following will be key in setting the framework for development in certain areas: the *draft Wembley Masterplan* (London Borough of Brent (LB Brent) 2008); the *South Kilburn Supplementary Planning Document* (LB Brent 2005); the *Queens Park Station Area Supplementary Planning Document* (LB Brent 2007); *Park*

Royal Opportunity Area Planning Framework (Greater London Authority (GLA) 2008).

- **Transport planning and infrastructure**: the site specific allocations should ensure that they assist the borough meet the Mayor's *Transport Strategy* and implementation targets (GLA 2004), which will also be reflected in the Brent *Local Implementation Plan* (LB Brent 2005).
- **Sustainable design and construction**: the site specific allocations should seek to ensure development on the proposed sites is in line with sustainable design and construction principles, such as those included in the *Code for Sustainable Homes* (DCLG 2006), as well as reflecting specific guidance such as that included in *Making Design Policy Work: how to deliver good design through your local development framework* (Commission for Architecture and the Built Environment, 2005) and in London by the London Plan supplementary planning guidance on *Sustainable Design and Construction* (GLA 2006), and in Brent, *supplementary planning guidance 19: Sustainable Design, Construction and Pollution Control*.
- **Energy use and climate change mitigation**: in order that new development supports Brent in the achievement of its greenhouse gas reduction commitments, development outlined in the site specific allocations document should reflect carbon reduction targets as proposed in *Building a Greener Future: Policy Statement* (DCLG 2007) which sets out the Government's intention to reduce carbon emissions associated with housing, including gradual tightening of the Building Regulations to require new housing to meet zero carbon standards by 2016. The London Plan expects new developments to achieve 20 per cent reduction in carbon dioxide emissions by using on-site renewable energy generation.
- **Flood risk and climate change adaptation**: as well as reflecting sustainable design and construction principles, it is important that new development on the proposed sites is designed and built to be resilient to predicted changes in climate. The Mayor's draft *Climate Change Adaptation Strategy* (GLA 2008) and *Adapting to Climate Change: a checklist for development* (GLA 2005) provide policy and development guidance. All development should also reflect *planning policy statement 25: Planning and Flood Risk* (DCLG 2006), as well as the *Brent Strategic Flood Risk Assessment* (LB Brent 2007).
- **Protection and enhancement of the natural environment**: development on the sites should seek to maximise the protection of and enhancement of the natural environment, habitats and biodiversity, as well as minimising contributions to air and water pollution. Biodiversity and habitat protection objectives are included in national, regional and local *Biodiversity Action Plans*, and the *Brent Parks Strategy* (LB Brent 2004) seeks to reduce open space deficiency in the Borough. The London Plan sets a target of no net loss of open space. Air pollution should be minimised and water quality and resources should 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).
- **Meeting the needs of families, children and young people**: the development of the sites should help meet the objectives of the Brent *Children and Young People's Plan* (LB Brent 2006) and the Brent *School Organisation Plan 2005-2010* (LB Brent 2006). The London Plan also includes expectations in relation to provision for children and young people, and the Mayor has developed a London Plan supplementary planning guidance:

Providing for Children and Young People's Play and Informal Recreation (GLA 2008).

The summary presented here is not exhaustive, and the review of other policies, plans and programmes identified a large number of issues that the site specific allocations should reflect and incorporate. The sustainability appraisal, as part of the assessment of the site specific allocations, 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 site specific allocations 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.

Mapping of information was particularly important in supporting the appraisal of the site specific allocations. This enabled all sites to be viewed on maps showing how they related to key constraints and opportunities, such as areas at risk of flooding, or relative access to public transport.

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 3). In addition, the rate of unemployment in Brent is above the average for London.

Health, wellbeing and accessibility

There are a number of significant health related issues in Brent, such as differences in life expectancies 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 5).

Much of the borough is deficient in open space, illustrated in Figure 4. 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: Index of Multiple Deprivation in Brent, 2007

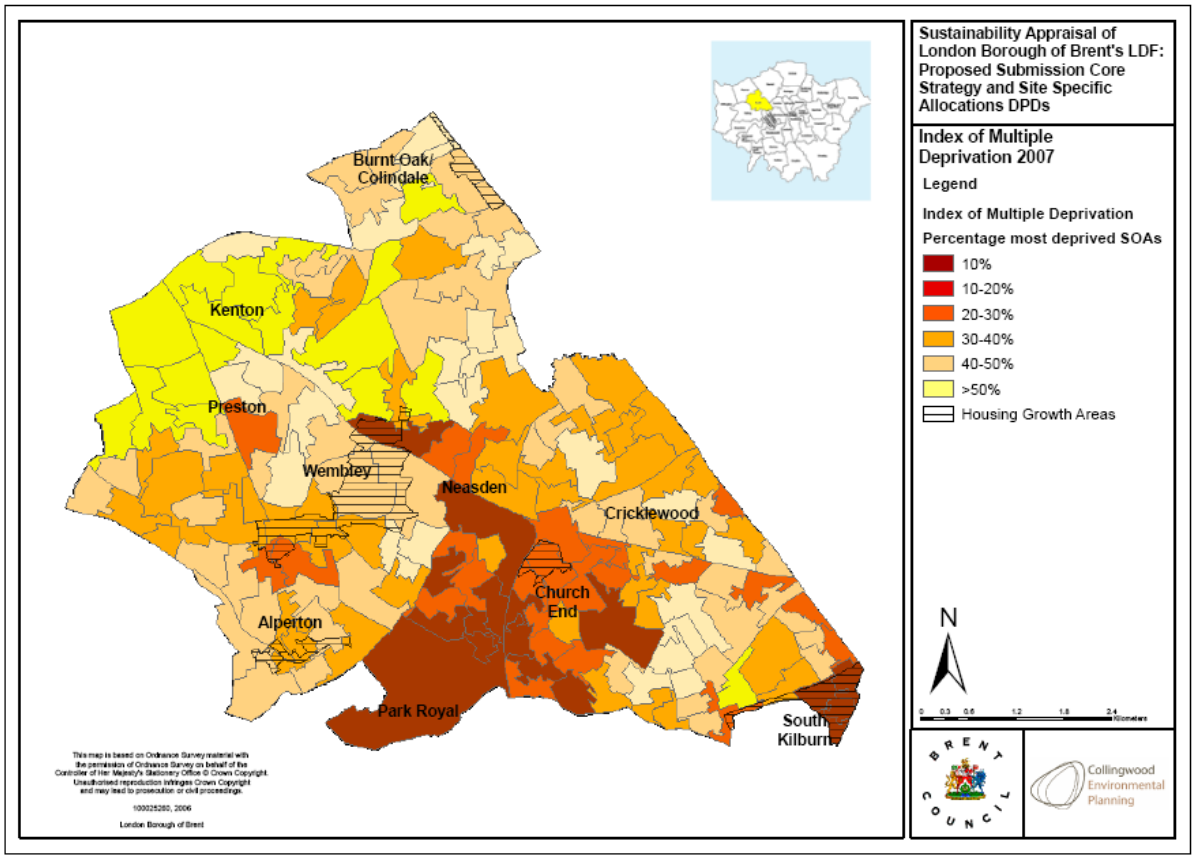
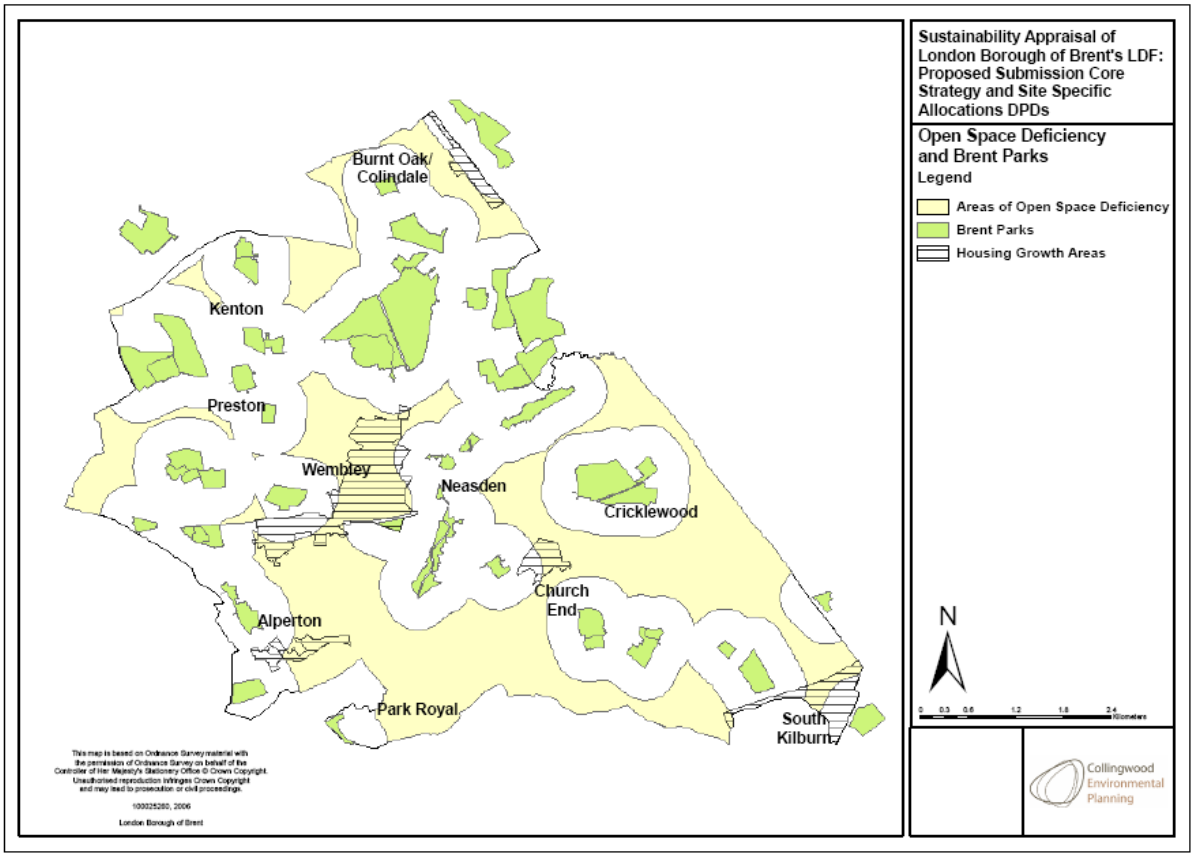


Figure 4: Areas of open space deficiency



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 5).

A large part of Brent is designated an Air Quality Management Area indicating that national pollution objectives are breached. Figure 6 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%. Carbon emissions 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 7). Ensuring sufficient water resources to accommodate current and future needs with a growing population and increasing demand is a key issue for the borough

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.

Figure 5: Public transport accessibility and location of stations

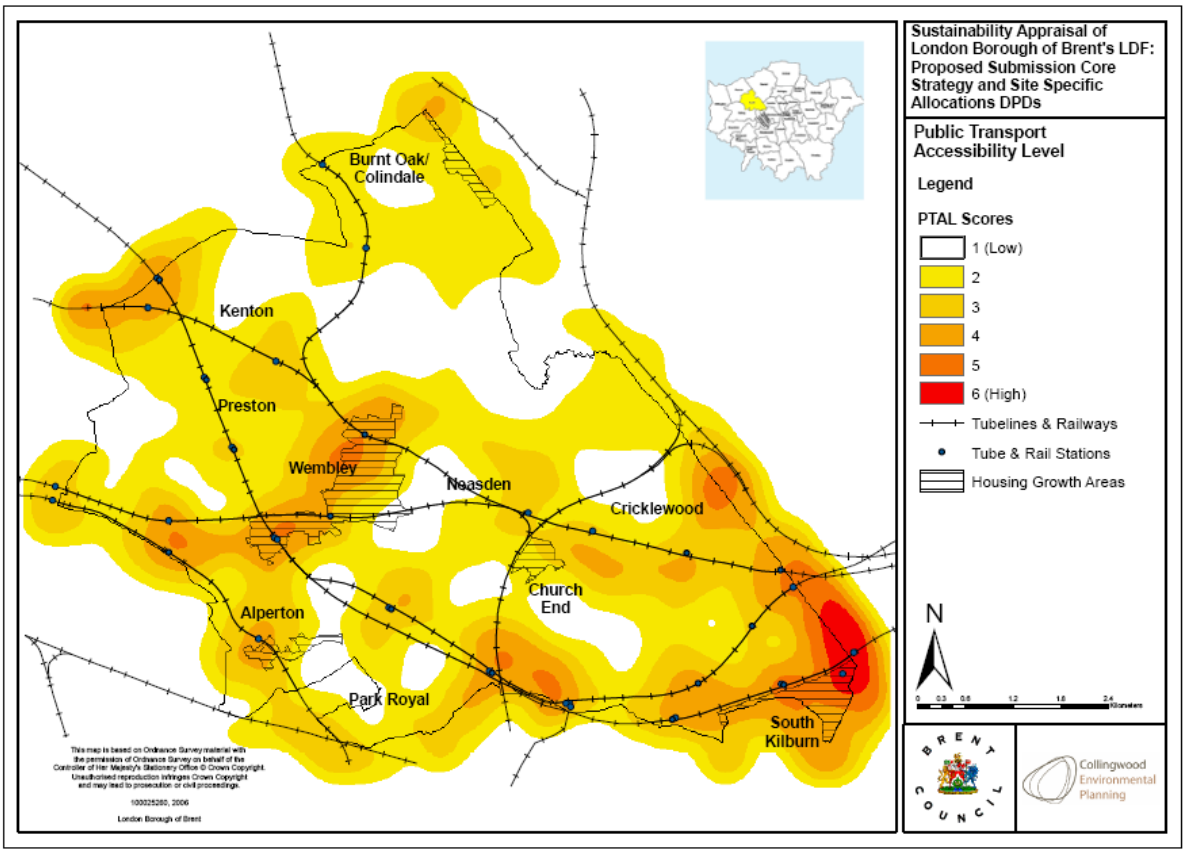


Figure 6: Brent Air Quality Management Areas and major roads

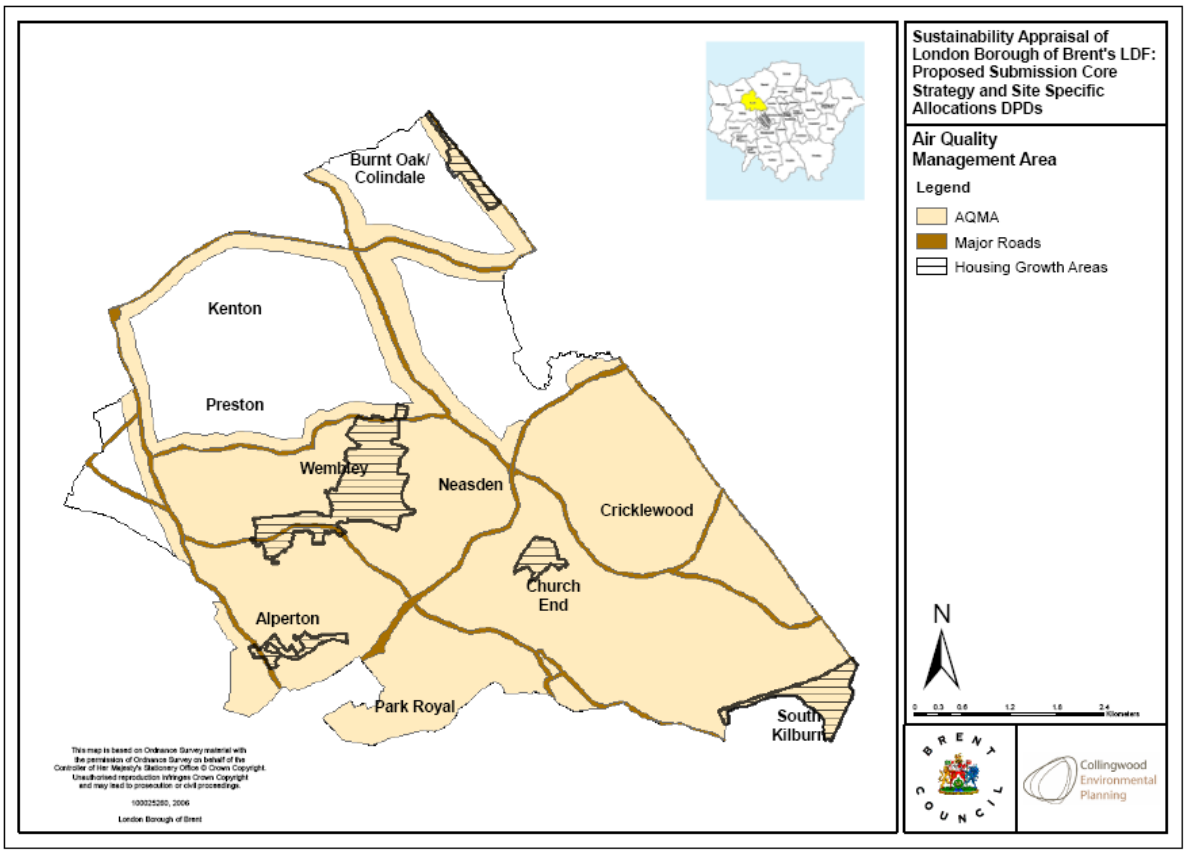
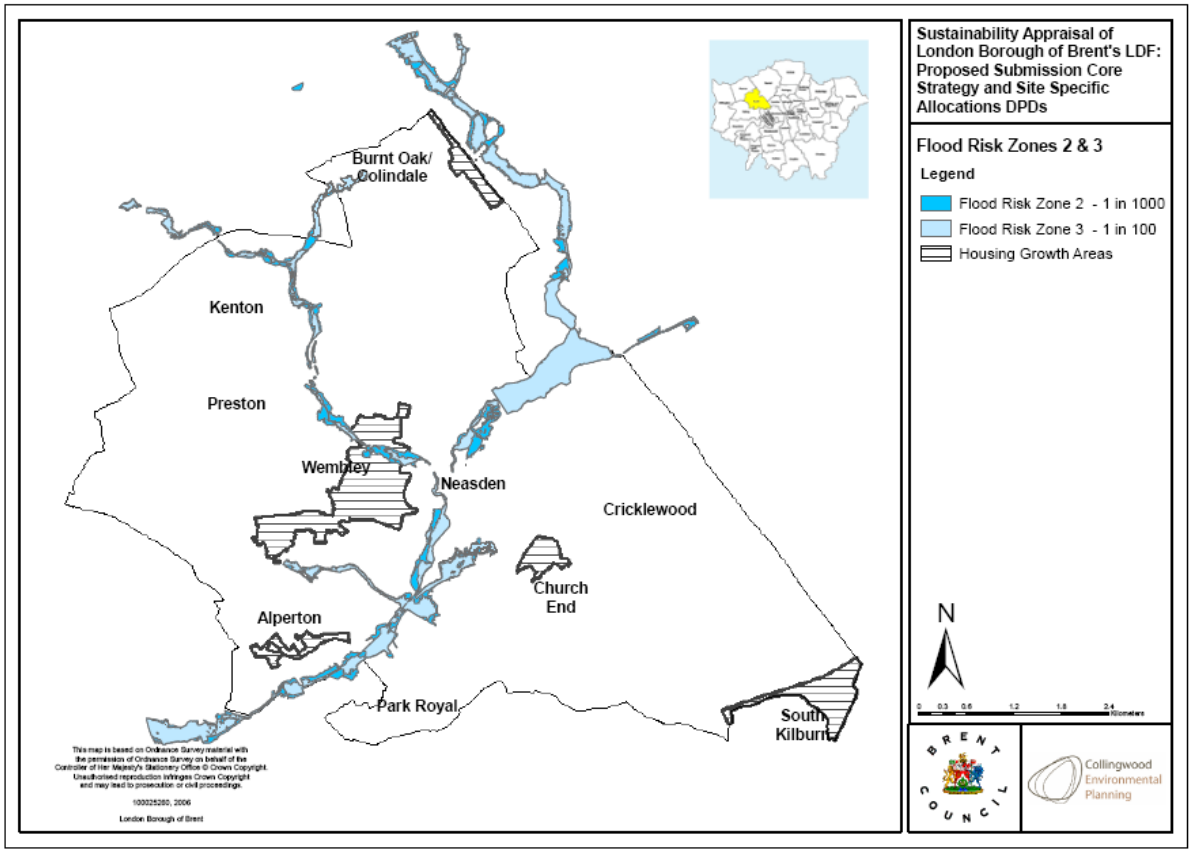


Figure 7: Site Specific Allocations and Flood Risk Zones



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, the majority 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 the Brent area were identified from the review of the current and potential future situation in the borough, existing documents, strategies and assessments. 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

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4. Appraisal of the Site Specific Allocations

Introduction

The sustainability appraisal assessed various elements of the site specific allocations, including the objectives, the alternative uses for sites and the proposed uses for individual sites, as well as the site specific allocations overall. The findings of these assessments are summarised in this and the following section.

Site specific allocations objectives

The sustainability appraisal tested the compatibility of the objectives in the site specific allocations with the sustainability appraisal objectives to identify potential conflicts. Overall it was concluded that the objectives were mostly compatible, with only 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 development plan documents, such as the core strategy, or other policies aimed at protecting and safeguarding important features and assets in the borough.

Potential areas of conflict were identified between site specific allocations objectives which seek to support built development, and sustainability appraisal objectives relating to the protection and enhancement of the environment. This potential conflict reflects the likely increase in resource use, waste generation and emissions associated with the construction and habitation of new development and increased commercial activity.

It may be possible to reduce these potential conflicts via conditions included in requirements related to the use of the sites. However, net increases in emissions, resource use, and waste generation are considered likely compared with the current situation in the borough. This may be especially significant where problems already exist or where standards are already being exceeded (e.g. poor air quality in some parts of the borough due to existing traffic levels).

Appraisal of alternative site uses

Appraisal of alternative uses for all sites

A broad review of the sustainability implications of the alternative uses for all of the sites was initially undertaken as part of the sustainability appraisal. This broad review concluded that the proposed allocations were largely consistent with meeting the sustainability appraisal objectives. However, there are a number of sites for which the alternative uses also present potentially significant sustainability benefits, and also where the proposed use could result in some negative sustainability effects.

For several of the sites the proposed allocation and the potential alternative uses had the potential to deliver very similar sustainability effects and there was not a clearly preferred option from a sustainability perspective.

Following the appraisal of the alternative uses for all the sites, two aspects were explored in more detail:

- the sustainability strengths and weaknesses of the alternative uses for selected key sites which were considered to require more detailed appraisal; and
- the sustainability considerations around the possible locations of proposed new school development in Brent which is the proposed or alternative use for several sites.

Appraisal of alternative uses for selected key sites

From the initial review of all the sites and through discussions with officers at Brent, nine sites were identified which, due to the sensitivity of their scale, location or proposed use and/or the potential significance (both positive and negative) of the sustainability effects they may cause, warranted more detail appraisal.

These sites, organised by growth area are listed in Box 3.

Box 3: Sited appraised in more detail

- **Wembley Growth Area**
  - W2: Former London Transport Sports Ground
  - W5: Wembley Eastern Lands
- **Alperton Growth Area**
  - A8: Northfields Industrial Estate
- **Burnt Oak / Colindale Growth Area**
  - B/C1 & B/C2: Oriental City (B/C1) and Grove Park / Edgware Road (B/C2) (these sites are adjacent)
- **South Kilburn Growth Area**
  - SK4: Gaumont State Cinema
- **Rest of Borough**
  - Rest of Borough site 9: Harlesden Plaza
  - Rest of Borough site 13: Sainsbury's Superstore
  - Rest of Borough site 19: Stonebridge schools

Overall the more detailed appraisal of the nine selected sites indicated that:

- The proposed allocations generally provided greater opportunities for sustainability benefits compared to their alternative uses;
- There were potentially significant negative sustainability effects which may arise from the proposed allocations, particularly associated with an increase in road traffic, loss of open space, and loss of low-cost industrial / employment spaces;
- Some of the proposed allocations will require careful design and other mitigation measures to minimise negative effects (e.g. impacts of road noise and air pollution);
- There are potential sustainability benefits from alternatives uses compared with all of the proposed site allocations (e.g. the preservation of open space for biodiversity / amenity benefit).
- The "business as usual" option of maintaining sites in their current use, in all cases offered the least sustainability benefits overall, however there are some sustainability benefits of the existing uses.

Appraisal of alternative sites for a school

The identification of potential sites for schools premises in Brent is an important consideration given the current deficit of places in the borough. The potential allocations for school use therefore warranted more in depth appraisal.

A number of sites were originally considered by the borough for potential school use, but these were narrowed down to five possible sites (see Box 4).

Box 3: Possible school sites

- Wembley site W2: Wembley Park – Former London Transport Sports Ground
- Park Royal site PR1: Former Guinness Brewery
- Rest of Borough site 1: Metro House
- Rest of Borough site 20: Former Unisys and Bridge Park Centre
- Rest of Borough site 23: Vale Farm Leisure Centre

The potential sites for school use were assessed against the following criteria:

- Site size (ha);
- Site location and number of new homes proposed;
- Access to most deprived wards;
- Public transport accessibility;
- Open space and sport facilities;
- Whether within an air quality management area; and
- Day time noise levels.

From the appraisal it was apparent that the sites were not generally large enough to accommodate a school, but that the lack of suitably alternative large sites meant that a compromise would be necessary, as additional school places are required in the borough. Existing demand for school places in the borough is predominantly within or close to

Wembley and, from a sustainability perspective, the appraisal concluded that it would be beneficial to provide school places as close as possible to existing and future demand in order to reduce travel to and from a school.

The appraisal proposed that sites with good public transport accessibility would be more suitable for school development, as it is likely that this would serve to minimise the impacts in terms of increased road traffic associated with a school. Where a site has poor public transport accessibility, the appraisal recommended that increased public transport infrastructure should be a requirement on development.

The appraisal highlighted that at several sites use as a school may have the potential to improve the quality of existing open space, or increase public access to open space and sports facilities. However, development of other sites could result in the loss of open space, although this could be off-set if the school provided new or improved open space and sports facilities.

In terms of air and noise pollution, the majority of the sites are located in an air quality management area and also exceed recommended day time noise levels. The appraisal recommended that any school development would require mitigation against poor air quality and excessive noise levels as a condition of development.

The Wembley Park – former London Transport Sports Ground site (site W2) was the site proposed by the borough for a linked primary and secondary school allocation. The comparison across selected criteria above suggested that this site may also present an opportunity to realise the greatest sustainability benefits compared with the other sites.

Appraisal of preferred site uses

Each site allocated sites in the proposed Submission site specific allocations document was appraised against a series of key constraints and opportunities, taking into account the proposed use (for example housing, mixed-use, community facilities etc). The sustainability constraints and opportunities used are listed in the Box 4.

The appraisal identified key issues relating to the constraints and opportunities, and recommendations were made to Brent as to how these issues should be mitigated or enhanced. Details of these key issues are outlined below:

- Some of sites were in or close to areas of flood risk (see Figure 9), and where this was the case, recommendations were made that the allocation mention the specific need for a Flood Risk Assessment.
- As some parts of the borough are deficient in open space (Figure 10) it was recommended that development of sites in these areas should include contributions to new open, amenity and sports space.
- Some sites have relatively poor access to public transport (see Figure 11). Where this was the case, the appraisal recommended that improvements should be provided as part of the development of a site or group of sites.
- Several sites were in close proximity to designated nature conservation sites (Figure 12) or listed buildings / conservation areas. It was recommended that any development at these sites should be required to demonstrate what measures would be taken to protect and enhance nature conservation or heritage value.
- The majority of proposed sites were within an air quality management area, and several were exposed to high noise levels. It was recommended that development proposals should be required to include mitigation measures to protect residents and other users from poor air quality and exposure to high noise levels.

Box 4: Sustainability constraints and opportunities used to assess sites

- Sites that will result in loss of open space
- Sites in areas of open space deficiency
- Access to sport and recreation facilities
- Accessibility by public transport
- Access to schools
- Proximity to or effect on sites of special scientific interest or other sites of nature conservation importance.
- Sites in flood risk areas
- Sites affecting listed buildings or in conservation areas
- Sites in areas designated as low townscape quality
- Sites within existing Metropolitan Open Land boundary
- Sites within air quality management areas
- Sites exposure to noise
- Sites located on greenfield land
- Sites risk of contamination
- Priority areas for regeneration
- Access to most deprived areas
- Sites in designated employment areas or Strategic Industrial Locations
- Sites in town centres

Appraisal of transport sites

There were six sites identified for specific transport allocations in the proposed Submission site specific allocations. Due to their limited size and the small scale of change proposed, the transport allocations were not appraised in detail. Brief sustainability comments were provided and potential mitigation and enhancement measures recommended.

Figure 9: Flood risk zones

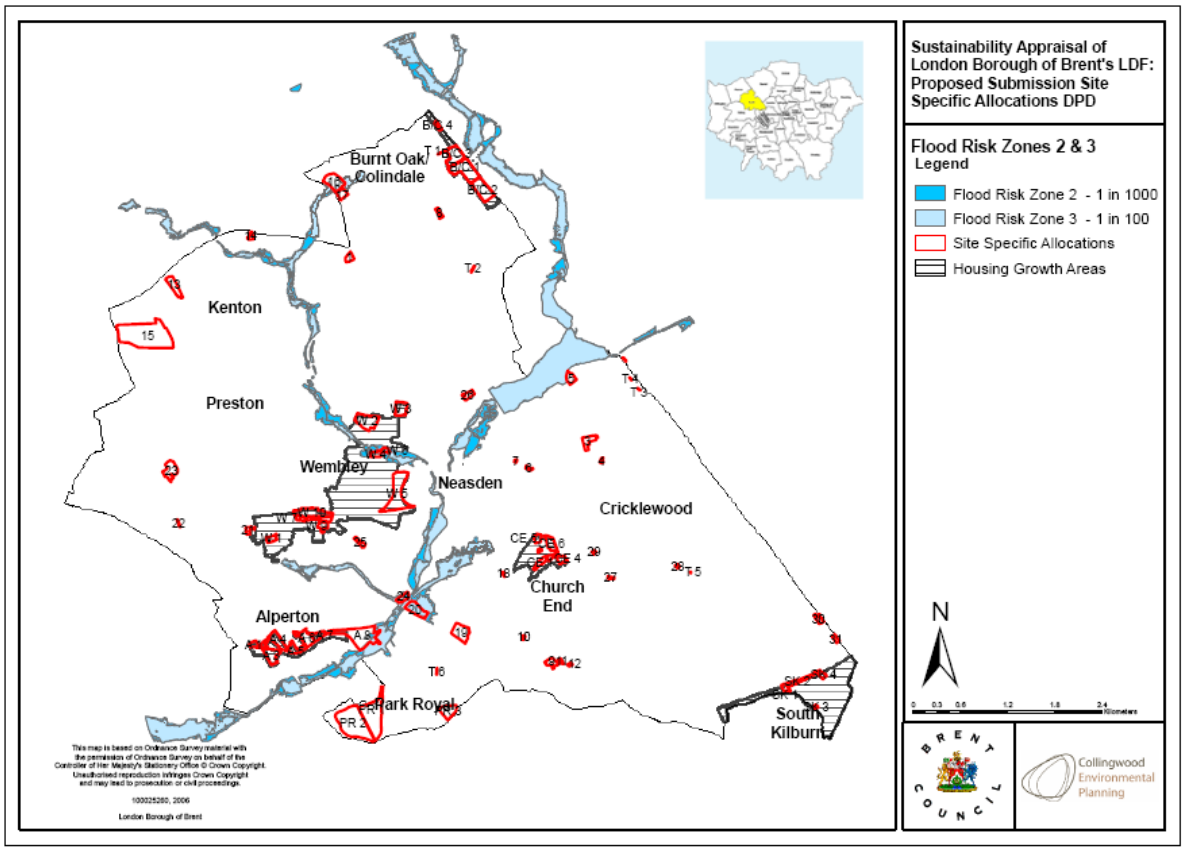


Figure 10: Areas of open space deficiency

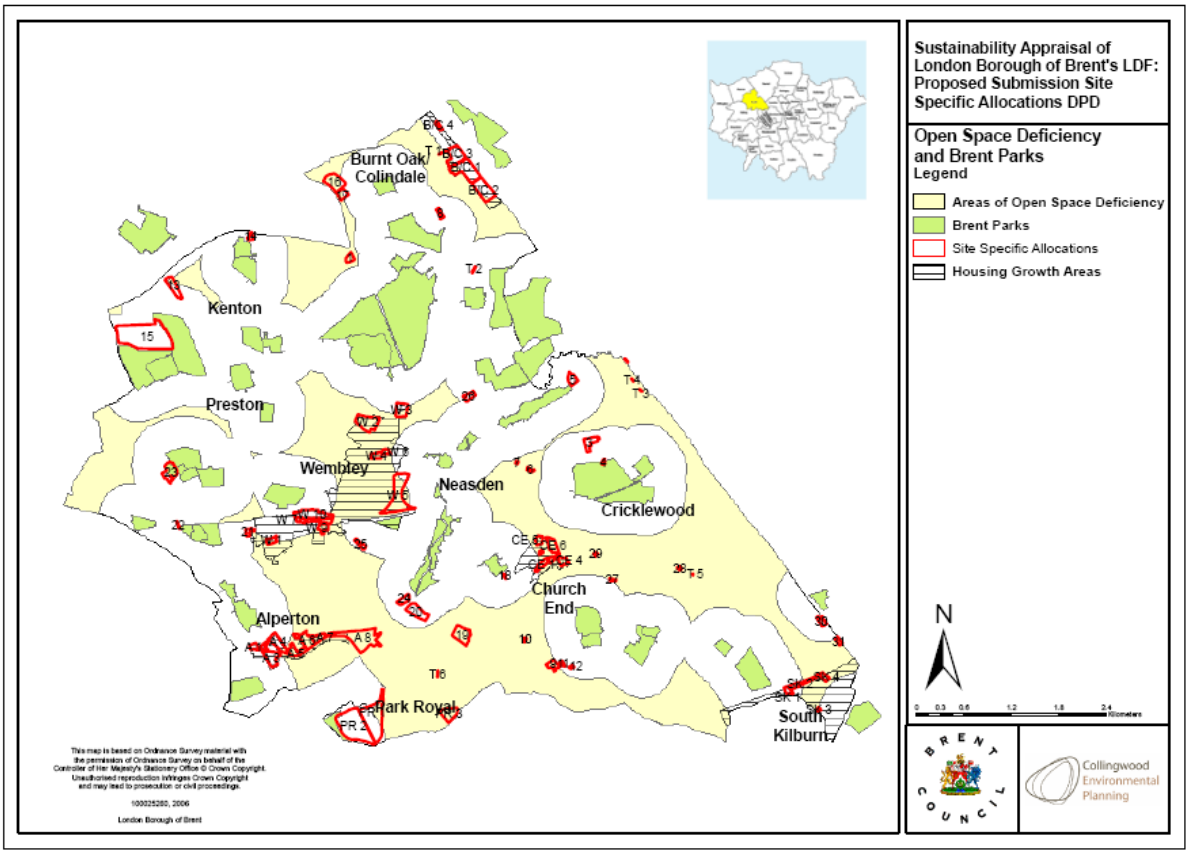


Figure 11: Public transport accessibility and location of stations

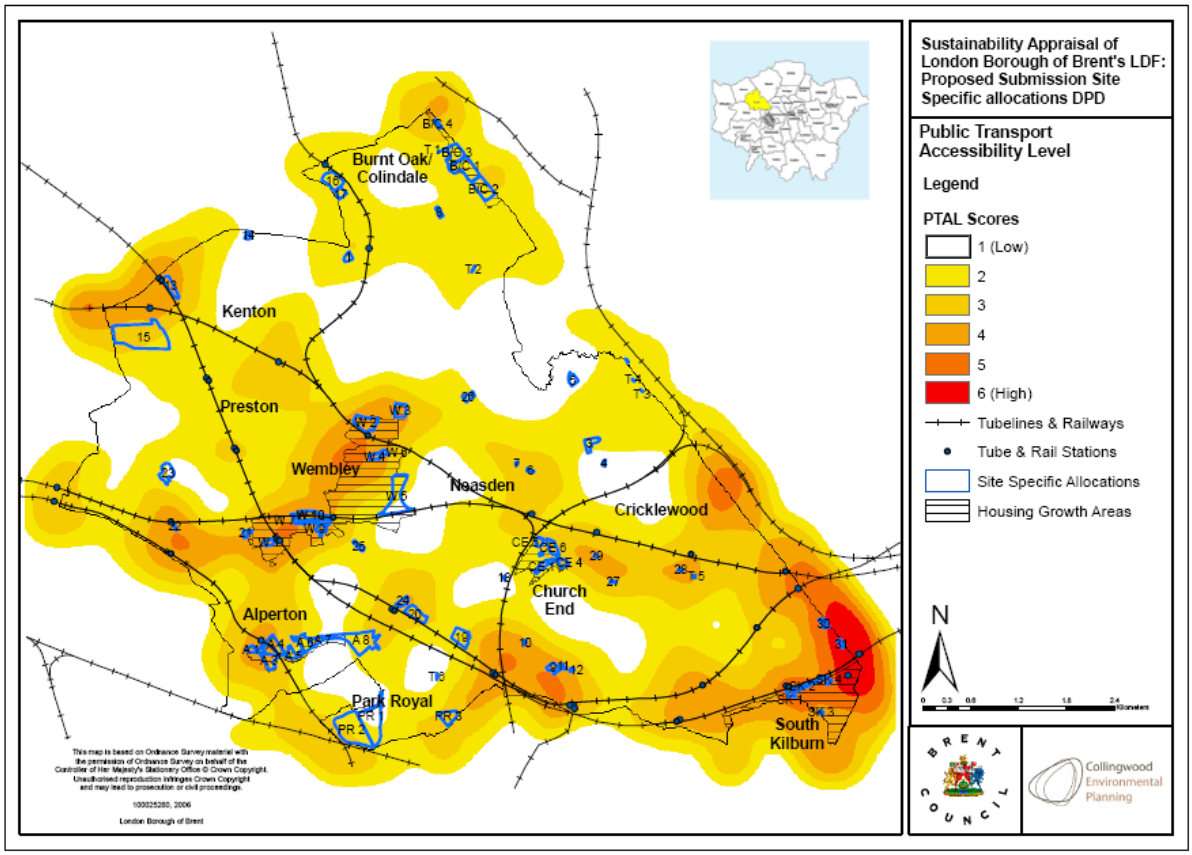
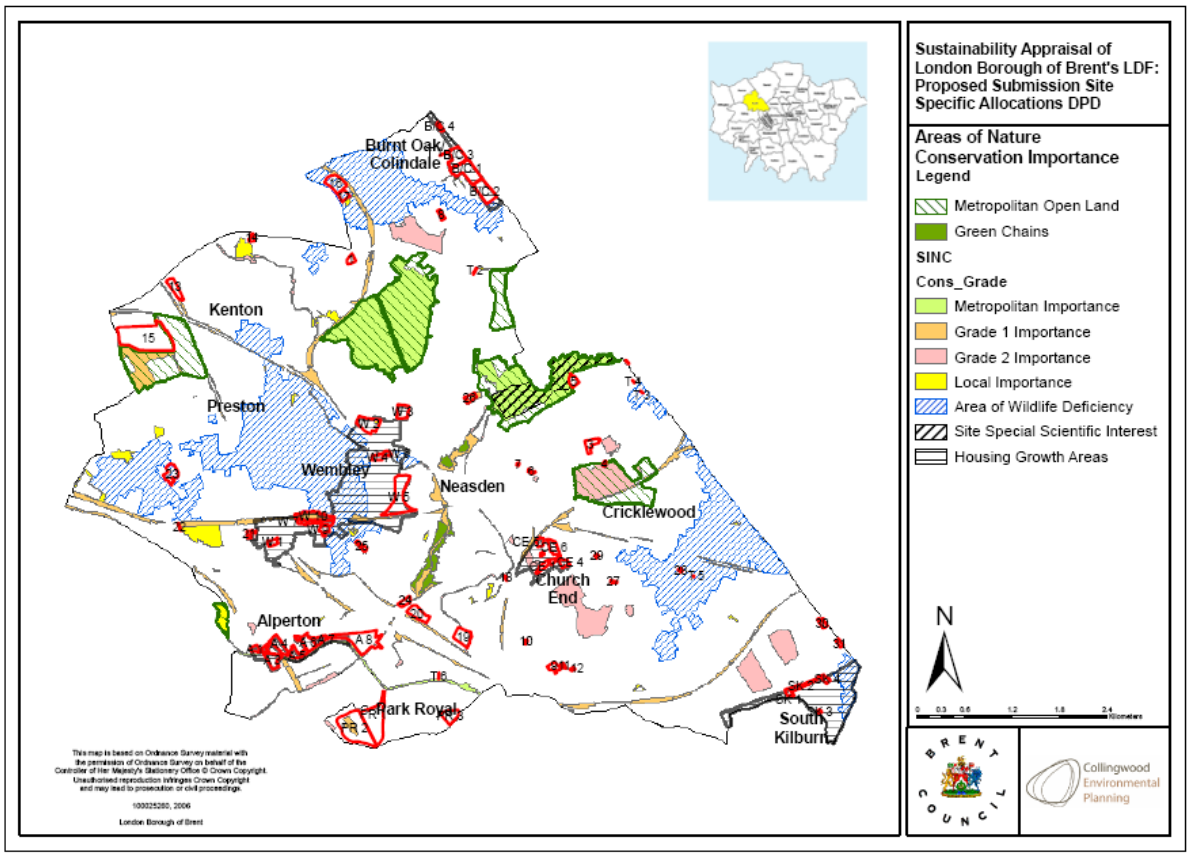


Figure 12: Areas of nature conservation importance



5. Overall Effects of the Site Specific Allocations

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 the site specific allocations taken as a whole. Some key cumulative effects are also identified.

Summary of potential overall effects of the sites

In general, the site specific allocations are expected to deliver significant social benefits, reflecting the regeneration and growth objectives and targets of the core strategy and, in particular the growth area policies included within it.

The key potential sustainability effects of the site specific allocations are summarised in Table 6.

The identification of the potential positive effects was based on the assumption that development is delivered in line with core strategy policies on environmental protection as well as other policies in the core strategy.

A summary of the results of appraisal of the overall effects of the proposed Submission site specific allocations against the sustainability appraisal objectives is presented in Table 7. This shows the scores that were assigned 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.

Table 6: Summary of the key sustainability effects of the site specific allocations

Potentially significant positive effects	Potentially significant negative effects
• Promotion of mixed-use development in and close to some of the most deprived areas is predicted to have positive social and economic effects, particularly in relation to improving quality of life, reducing social inequality and alleviating poverty; • Supporting a significant increase in the number of homes, including affordable homes, and dwellings suitable for families, especially in the growth areas; • Encouraging and helping to ensure increased provision of community facilities in many parts of the Borough; • Requiring development to bring forward improvements, or enhanced access to, public open space and the public realm; and • Providing sites for workspace, industrial uses and commercial developments in the form of retail, office floor space, affordable workspace units, hotel and conference facilities and food and drink outlets supporting business development and employment opportunities, and broader economic regeneration particularly in the long-term.	• Generation of additional traffic from new development and/or changes of use. Residential, retail, office floor space, industrial employment and other commercial uses are all likely to increase the need to travel and encourage additional journeys by car as well as other commercial traffic; • Increased traffic is predicted to lead to potential environmental and social effects relating to air pollution, noise and congestion as well as reduced visual amenity; • Increased resource and materials use and waste generation, both during construction and occupation / habitation of new developments; • Construction, increased commercial activity and additional population are all predicted to contribute to additional water and energy use, and increased greenhouse gas emissions; and • Potential impacts on new residents from development in locations exposed to excessive noise and air pollution.

Table 7: Appraisal of the overall sustainability effects of the site specific allocations

Sustainability Appraisal Objectives	Score
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	0/+
4. To provide everybody with the opportunity to live in a decent home	+
5. To reduce crime and anti-social activity	0/?
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	0/?
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	0/?
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	0
19. To reduce disparities in economic performance and promote regeneration	++
20. To encourage and accommodate both indigenous and inward investment	0
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: +/-	

Overall effects of the housing sites

The development of all the housing sites proposed in the site specific allocations document has the potential to have significant impacts on resource use, waste production and carbon dioxide emissions.

It is possible to estimate overall resource, waste and carbon dioxide implications from the level of housing provision contained in the site specific allocations document. Table 8 summarises the overall effects estimated from implementation of the core strategy, and includes an estimation of the share of these effects which would arise from development of housing as included in the site specific allocations document, where this development is realised in line with the proposed allocations.

Mitigation and Enhancement

The sustainability appraisal suggested possible ways of mitigating the potential negative effects and enhancing potential positive effects associated with site allocations. Comments on individual sites were provided in the main sustainability

appraisal report, but these have not been summarised here as they are too detailed. Many of the mitigation recommendations assumed that forthcoming development management policies, and other proposed area and site specific guidance will provide conditions and criteria on the type and nature of development on a particular site, and that these conditions will help ensure positive outcomes.

Key effects that were identified that will require mitigation included:

- Increases in flood risk from rivers and streams as well as surface water;
- Resource use, including energy use, water use and materials for construction;
- Waste production, including construction waste and wastewater;
- Noise and air pollution from development and the need to protect new and existing residents from noise and air pollution;
- Increased pressure on and demand for open space and sports facilities;
- Increased carbon dioxide emissions from construction and use of new developments; and
- The impact of development on existing transport infrastructure, especially in areas of relatively poor public transport accessibility.

Contribution of site specific allocations to achieving policies in the core strategy

The core strategy includes the target of 11,200 new homes to be developed in the borough by 2017, and a total of 22,000 additional homes by 2026, with over 85% of these to be delivered in the growth areas. The core strategy also sets targets for housing growth in each growth area, as set out in Table 1.

Approximately half of the overall housing growth target included in the core strategy is expected to be delivered through estimated housing development on the site specific allocations identified for residential use.

Table 8: Potential effects on resource use and emissions of proposed housing development in the site specific allocations

Effect	Estimated contribution of residential development included in the site specific allocations	
	Per year (tonnes)	Total (to 2026) (tonnes)
Construction		
CO_2 emissions	18,646	376,335
Waste generation	5,967	119,869
Aggregate consumption	31,965	639,300
Occupation		
CO_2 emissions[1]	2,131	43,153
Waste generation	639	13,319

The largest estimated shortfalls in provision between estimated residential allocations in the site specific allocations document compared to the core strategy targets are in Wembley and South Kilburn growth areas, and the Rest of Borough.

Meeting the overall housing growth targets included in the core strategy, which in turn reflect targets for Brent established by the London Plan, will thus depend heavily upon new sites coming forward over the plan period.

This disparity between housing targets and estimate housing delivery has the potential to undermine assumptions related to the delivery of other services, such as public transport and social infrastructure.

[1] This figure relates to domestic emissions of CO_2 only, and does not include emissions associated with travel.

6. Implementation and Next Steps

Implementation and monitoring

Monitoring the significant sustainability effects of implementing the site specific allocations is an important part of the sustainability appraisal process. It will be used to monitor performance of the site specific allocations 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 site specific allocations should be included into the annual monitoring report process. To help do this, the hierarchy of indicators as outlined in government good practice guidelines[2] 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 site specific allocations.

The site specific allocations document is closely linked to the delivery of the spatial strategy set out in the core strategy. Due to the relationship between the core strategy and the site specific allocation documents, all of the significant effects predicted from implementing the site specific allocation were also identified as potential significant effects predicted from implementing the core strategy. As a result, no specific additional monitoring of significant effects over and above those proposed for the core strategy was identified for the site specific allocations.

Proposals for development on individual sites or groups of sites may, however, require specific monitoring and assessment, for example through Environmental Impact Assessment.

Next steps

The key next steps and outputs from the site specific allocations and sustainability appraisal processes are as follows:

- Publication of the site specific allocations, 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 site specific allocations 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 site specific allocations to the Secretary of State for Independent Examination and the Examination in Public process (intended submission, late summer 2009).
- Adoption of the final version of the site specific allocations.

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

- Adoption Statement – prepared by London Borough of Brent to notify the public that the site specific allocations has been adopted. This will include information on the main issues raised during consultation on the allocations and sustainability appraisal and how these were taken into account in developing the final document, details on monitoring and other information required as part of the sustainability appraisal.
- Ongoing monitoring and review.

How to Comment on the Sustainability Appraisal Report

Public consultation on the Proposed Submission Site Specific Allocations 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.