

Sustainability Appraisal of London Borough of Brent's Local Development Framework Proposed Submission Core Strategy and Site Specific Allocations Development Plan Documents

Sustainability Appraisal Report Part B: Appraisal of the Core Strategy

Incorporating an Environmental Report under the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633



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Prepared for London Borough of Brent
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ABBREVIATIONS

AAP	Area Action Plan	HOU	Housing
AMR	Annual Monitoring Report	I & O	Issues and Options
AQMA	Air Quality Management Area	IEA	Industrial Employment Area
BAP	Biodiversity Action Plan	IIF	Infrastructure and Investment Framework
BEA	Borough Employment Area	IMD	Index of Multiple Deprivation
BERR	Department for Business, Enterprise and Regulatory Reform	LB Brent	London Borough of Brent
BRE	Building Research Establishment	LBB	London Borough of Brent
BREEAM	BRE (Building Research Establishment) Environmental Assessment Method	LBPN	London Bus Priority Network
BVPI	Best Value Performance Indicator	LCN+	London Cycle Network Plus
CABE	Commission for Architecture and Build Environment	LDA	London Development Agency
CCHP	Combined Cooling Heat and Power	LDD	Local Development Document
CEP	Collingwood Environmental Planning	LDF	Local Development Framework
CHD	Coronary Heart Disease	LDS	Local Development Scheme
CHP	Combined Heat and Power	LEA	Local Education Authority
CO ₂	Carbon Dioxide	LEAP	Local Equipped Area for Play
COM	Community	LES	Local Employment Site
CP	Core Policy	LGA	Local Government Association
CS	Core Strategy	LIP	Local Implementation Plan
db	Decibels	LNR	Local Nature Reserve
DCLG	Department for Communities and Local Government	LPA	Local Planning Authority
DCMS	Department for Culture Media and Sport	LSDC	London Sustainable Development Commission
Defra	Department for Environment Food and Rural Affairs	LSDF	London Sustainable Development Framework
DETR	Department of the Environment, Transport and the Regions	LTP	Local Transport Plan
DfT	Department for Transport	MIX	Mixed Use
DoH	Department of Health	MOL	Metropolitan Open Land
DP	Development Policy	MUGA	Multi-use Games Area
DPD	Development Plan Document	NCR	North Circular Road
DTI	Department of Trade and Industry	NDC	New Deal for Communities
EA	Environment Agency	NEAP	Neighbourhood Area for Play
EC	European Commission	NO ₂	Nitrogen dioxide
EEA	Energy Action Area	NVQ	National Vocational Qualifications
EEC	European Economic Community	ODPM	Office of the Deputy Prime Minister
EIA	Environmental Impact Assessment	ONS	Office of National Statistics
EMP	Employment	OS	Open Space
ENV	Environment	PCT	Primary Care Trust
EU	European Union	PM10	Particles measuring less than 10 microns
FRA	Flood Risk Assessment	PPG	Planning Policy Guidance
GCSE	General Certificate of Secondary Education	PPP	Policy, Plan or Programme
GIS	Geographical Information System	PPS	Planning Policy Statement
GLA	Greater London Authority	PSA	Public Service Agreement
GOL	Government Office for London	PTAL	Public Transport Accessibility Level
GP	General Practitioner	RES	Regional Economic Strategy
GPD	Gross Domestic Product	RIBA	Royal Institute of British Architects
GQA	General Quality Assessment	RSL	Registered Social Landlords
GWh	Gigawatt Hour	RSS	Regional Spatial Strategy
Ha	Hectare	SA	Sustainability Appraisal
		SAP	Standard Assessment Procedure
		SCI	Statement of Community Involvement
		SD	Sustainable development
		SDC	Sustainable Development Commission

June 2009

SEAs	Strategic Employment Areas	TPO	Tree Preservation Order
SEA	Strategic Environmental Assessment	TRN	Transport
SFRA	Strategic Flood Risk Assessment	UDP	Unitary Development Plan
SIL	Strategic Industrial Location	UHI	Urban Heat Island
SINC	Site of Importance for Nature Conservation	UK	United Kingdom
SO ₂	Sulphur dioxide	UNFCCC	United Nations Framework Convention on Climate Change
SOA	Super Output Areas	VAT	Value Added Tax
SPD	Supplementary Planning Document	WFD	Water Framework Directive
SPG	Supplementary Planning Guidance	WHO	World Health Organisation
SRDF	Sub Regional Development Framework	WLWDA	West London Waste Disposal Authority (known as WestWaste)
SSA	Site Specific Allocation	ZED	Zero Energy Development
SSSI	Site of Special Scientific Interest		
SUDS	Sustainable Drainage Systems		
TfL	Transport for London		

PART B: APPRAISAL OF THE CORE STRATEGY

4. APPRAISAL OF THE CORE STRATEGY VISION AND OBJECTIVES

Introduction

- 4.1 Sections 4 to 7 of the SA Report (Part B) present the findings of the SA of the proposed Submission version of the Core Strategy (June 2009) and in particular Stage B of the SA process – ***Developing and refining options and assessing effects*** (see Section 2 of the SA Report which describes the Stages in the SA process). Sections 4 to 7 broadly cover the different tasks which make up Stage B of the SA process, namely:
- **Section 4:** testing the DPD objectives against the SA objectives (task B1) and comments on the Spatial Vision for Brent;
 - **Section 5:** developing and assessing the DPD options (task B2);
 - **Section 6:** predicting and evaluating the effects of the proposed Submission version of the DPD, including potential overall and cumulative effects (tasks B3 and B4), mitigating the adverse effects and maximising the beneficial effects (task B5);
 - **Section 7:** proposed measures to monitor the significant effects of the DPD implementation (Task B6).
- 4.2 See Sections 1 to 3 (Part A) of the SA Report, the Sustainability Context, for details of the findings of the tasks broadly under Stage A of the SA process, as well as background on the LB Brent LDF and SA.

Comments on the Spatial Vision for Brent

- 4.3 The Core Strategy should be consistent with National and Regional policies, as well as complementing the Borough's other local strategies, and in particular the Brent Sustainable Community Strategy (2006 – 2010). The Sustainable Community Strategy and other important local strategies, such as the Borough's Regeneration Strategy, Housing Strategy, the Children and Young People's Plan and Brent Primary Care Trust's Local Delivery Plan, provide the framework from which the Core Strategy Spatial Vision has evolved. Figure 30 below is reproduced directly from the proposed Submission Core Strategy and indicates where the Core Strategy sits within the hierarchy of local strategies.
- 4.4 The Spatial Vision for Brent has been significantly modified since the previous submission version (November 2007). The previous submission version of the Core Strategy included the following Core Strategy Vision:

In 2016, Brent is a dynamic and sustainable area fully integrated into the City. Its diverse communities are healthy and safe, living in a high quality environment and benefiting from a wide range of homes and community facilities. Its commercial centres, with the iconic Wembley at the heart, are easily accessed by residents and visitors alike, providing a good range of shops, leisure facilities and jobs.

4.5 The proposed Submission Core Strategy (May 2009) Spatial Vision is:

In 2026 Brent will:

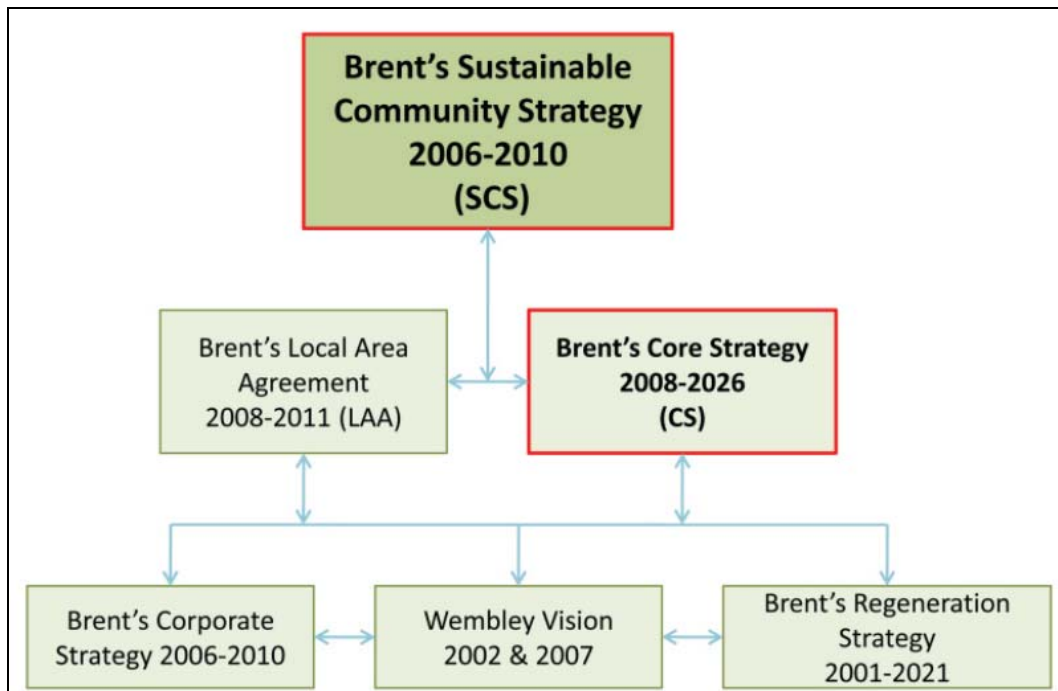
- be a dynamic London Borough, with a new and iconic Wembley at its core providing new jobs, homes, retail & major leisure attractions
- retain its industrial and manufacturing sectors by providing modern, upgraded premises in a quality environment
- be a borough of opportunity, maximising the potential of its youthful population through new and improved education and training facilities
- provide a range of homes that are affordable and meet the needs of its diverse communities
- be a healthy & 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 the global challenge of climate change.

4.6 The new Spatial Vision represents a much more detailed description of the aspirations for the borough in 2026 than that included in the previous submission Core Strategy and sets out a comprehensive statement of intent for development in the borough. Paragraph 3.2 of the proposed Submission Core Strategy notes that the Spatial Vision seeks to address the borough's challenges to help alleviate existing social deprivation as well as building on opportunities to illustrate how the borough will be in 15 years time (2026) when the strategy has been delivered. The Spatial Vision also seeks to address the borough's Local Area Agreement (LAA)

priorities¹. There is also clear overlap in the proposed Submission Core Strategy between the Spatial Vision and the Strategic Objectives, and paragraph 3.3 of the proposed Submission Core Strategy states that the objectives express the pathways through which the Spatial Vision will be achieved.

- 4.7 In principle the Spatial Vision is considered very positive from a sustainability perspective, in particular 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.
- 4.8 In practice, the realisation of many aspects of the Vision will depend on the implementation of the policies included in the Core Strategy and other DPDs, as well as other factors which will influence the realisation of development goals, 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.
- 4.9 In addition, the Vision is relatively long and detailed, and as a result overlaps in content with the Core Strategy objectives (see below), leading to some repetition. As an overarching vision for the Core Strategy, the Spatial Vision might be enhanced by the inclusion of less detail and a focus specifically on a clear and overarching strategic spatial development vision for the borough. Greater detail on specific development aspects, such as housing, are more appropriately included in the Core Strategy objectives.
- 4.10 No further comment on the Vision.

¹ LAA (Local Area Agreements) are three-year partnership agreements between local authorities and other public services, which include locally specific targets and priorities. For more information see: <http://www.lga.gov.uk/lga/core/page.do?pagelid=18894>

Figure 30: Hierarchy of Brent local strategies

Compatibility of the Core Strategy and SA objectives

Purpose of testing the compatibility of the objectives

- 4.11 The Government's SA guidance recommends that the DPD objectives are tested against the SA objectives to ensure they are consistent. Whilst the aim should be to achieve consistency between plan objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, the Borough (including members) should be aware of potential implications and will need to determine where the priorities should lie, although it is the role of the SA to highlight the potential sustainability implications of the objectives.

Objectives of the DPD

- 4.12 As noted above, the proposed Submission Core Strategy includes a number of key Strategic Objectives which aim to express how the Spatial Vision will be achieved (Chapter 3 of the proposed Submission Core Strategy). The Core Strategy objectives are²:

Economic performance and Regeneration

1. To Promote Economic Performance and Regeneration - by

- Creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses, expanding the town centre eastwards into the Stadium area.

² Reproduced from the proposed Submission Core Strategy as made available to CEP April 2009

- 10,000 new jobs within the Wembley Area over 20 years, half of which will be created by 2017.
- Completion of three large scale hotels in the Wembley area and one large regional visitor attraction.
- Increasing newly approved retail floorspace in Wembley by 25%.

2. To Meet Employment Needs and Aid the Regeneration of Industry and Business – by

- Working with developers and end users to offer suitable training and job placement opportunities.
- Ensuring that sufficient sites and premises are available in the borough's main commercial areas such as Park Royal and that industrial/warehousing floorspace is renewed.

3. To Enhance the Vitality and Viability of Town Centres - by

- Maintaining the position of town centres in the retail hierarchy, completing new retail developments in Willesden and Harlesden, and maintaining a range of local services.

4. To Promote the Arts and Creative Industries – by

- Increasing the supply of modern subsidised workplace developments for creative industries in the growth areas and promote new public art to support regeneration in the borough.

Infrastructure & People's Needs

5. To Meet Social Infrastructure Needs – by

- Securing provision arising from new housing development, especially the provision of new education, health and community facilities.
- Constructing at least three new secondary and three new primary schools in the borough.
- Providing community facilities to meet the needs of Brent's diverse community.

6. To Promote Sports and other Recreational Activities – by

- Placing particular emphasis on the provision of new facilities to address existing deficiencies and to meet the needs of new population in the growth areas, creating at least one new swimming pool in the borough in the plan period and eight multi-use games areas.

Housing Need

7. To Achieve Housing growth and Meet Housing Needs - by

- Promoting development that is mixed in use and tenure, so that at least 11,200 additional homes are provided in the period from 2007/08 to 2016/2017, and 85% of the borough's new housing growth is contained within 5 growth areas.
- Ensuring that at least 25% of all new homes built in the borough are family sized (3 bed or more) and 50% (approx.) are affordable.

Transport infrastructure

8. To Reduce the Need to Travel and Improve Transport Choices - by

- Completing first class retail and other facilities in Wembley that reduces the need to travel to other centres. Improving key transport interchanges at Wembley, Alperton, First Central and Queen's Park.
- Promoting access by public transport, bicycle or on foot and reducing car parking standards for growth areas because of their relative accessibility.
- Reducing Modal Share of Car trips to Wembley below 37% baseline by at least 10%.
- Completing at least 5 car free schemes per annum in the plan period.

Open Space & the Environment

9. To Protect and Enhance Brent's Environment – by

- Preserving the borough's open spaces for recreation and biodiversity and creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision.

- Increasing the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value.
 - Enhancing the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development.
- 10. To Achieve Sustainable Development, Mitigate & Adapt to climate change – by**
- Promoting mixed use, mixed tenure development in growth areas integrating infrastructure and housing provision.
 - Reducing energy demand from current building regulation standards, particularly in growth areas and by achieving exemplar low carbon schemes and CCHP plants.
 - Building at least two exemplar low carbon schemes and two district wide CHP plants by 2017.
- 11. To Treat Waste as a Resource – by**
- Collaborating with the other West London waste authorities, ensuring that there is an appropriate network of facilities for integrated waste management and that existing, appropriately located, facilities are protected.
- 12. To Promote Healthy Living and Create a Safe and Secure Environment - by**
- Ensuring that there is sufficient space for Primary Health Care providers, particularly to meet additional need in the growth areas.
 - Ensuring development delivers transport solutions and opportunities for healthy lifestyles (such as walking and cycling).
 - Embracing a design-led approach to reduce crime and the fear of crime by installing new CCTV systems and ensuring that crime levels continue to be reduced.
 - Improving participation rates in sports and leisure through the provision of better quality sporting facilities and open space.

Compatibility of the sustainability and DPD objectives

- 4.13 The results of testing the DPD objectives against the SA objectives are included in Table 11. Note that details of the SA objectives are included in Table 10 in Section 3 of the SA Report (Part A).
- 4.14 The DPD objectives and the SA objectives are predominantly compatible, with a few specific areas of potential conflict. Whether these materialise as conflicts and the significance of any effects that may arise will partly depend on how the objectives are implemented (through policies in the Core Strategy) and whether negative effects are avoided through implementation of other safeguarding policies in the Core Strategy or other DPDs.
- 4.15 The areas of potential conflict identified are mainly between the Core Strategy objectives related to promoting development and growth with the SA objectives relation to the environment. This is due to the potential for effects such as increases in traffic, emissions, resource use and waste generation as a result of both the construction and habitation of new homes and other commercial and employment development. It should be possible to reduce the scale of these potentially negative effects through conditions applied by the Core Strategy policies (as well as other DPDs such as the forthcoming Development Management Policies DPD), for example by promoting sustainable construction practices and access to public transport. However, net increases in emissions, resource use and waste are still

likely compared with the current baseline situation. Such issues will be particularly significant where problems already exist or where standards are already being exceeded (for example existing stresses on the availability of water resources, high levels of noise nuisance in certain areas and poor air quality in AQMAs and close to major roads).

- 4.16 Where some Core Strategy objectives have been identified as being potentially incompatible with a SA objective, this may not cause significant effects in practice as it is only intended to identify an area of potential conflict. For example, whilst Core Strategy *objective 1 – To Promote Economic Performance and Regeneration* and *objective 3 – To Enhance the Vitality and Viability of Town and Local Centres* may result in an increase in local traffic and therefore impacts on air quality and climate change, it may be partly the case that these local journeys replace longer journeys to shopping centres or places of work further afield.
- 4.17 Core Strategy objectives 1 and 2 (*To Promote Economic Performance and Regeneration* and *To Meet Employment Needs and Aid the Regeneration of Industry and Business*) both potentially conflict with some of the environmental objectives, including those relating to traffic, water quality and resources, air quality, climate change, waste management and efficient movement. This is because the growth and development these objectives promote are likely to be associated with an increase in traffic levels, air pollution, water usage, waste production and an increase in greenhouse gas emissions, for example. Whilst it is difficult to reconcile this conflict, it is important that development does occur and seeks to reduce these potential negative impacts insofar as is possible.

Table 11: Compatibility of the Core Strategy and SA objectives

Core Strategy Objectives		SA Objectives																				
		Social							Environment							Economic						
Key:		S1. Prosperity & Social Inclusion	S2. Health and Wellbeing	S3. Education & Skills	S4. Housing	S5. Crime Prevention & Community Safety	S6. Community Identity	S7. Accessibility	EN1. Traffic	EN2. Water Quality & Resources	EN3. Air Quality	EN4. Biodiversity	EN5. Landscape & Townscape	EN6. Historic Environment & Cultural Assets	EN7. Climate Change	EN8. Waste Management	EN9. Land & Soil	EC1. Growth	EC2. Employment	EC3. Regeneration	EC4. Investment	EC5. Efficient Movement
Potential compatibility:	+																					
Neutral:	0																					
Potential conflict:	-																					
1. To Promote Economic Performance and Regeneration	+	0	0	+	0	0	0	-	-	-	0	+	0	-	-	0	+	+	+	+	-	+
2. To Meet Employment Needs and Aid the Regeneration of Industry and Business	+	+	+	0	0	0	0	-	-	-	0	0	0	-	-	0	+	+	+	+	+	-
3. To Enhance the Vitality and Viability of Town Centres	+	0	0	0	+	+	+	-	0	-	0	+	+	-	0	0	+	+	+	+	+	+
4. To Promote the Arts and Creative Industries	0	+	+	0	0	+	0	0	0	0	0	+	0	0	0	0	+	0	0	0	0	0
5. To Meet Social Infrastructure Needs	+	+	+	0	0	+	+	-	-	-	-	0	0	-	-	+	0	+	+	+	+	-
6. To Promote Sports and other Recreational Activities	+	+	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7. To Achieve Housing Growth and Meet Housing Needs	+	-	-	+	0	0	+	-	-	-	-	+	-	-	-	+	+	-	+	+	+	-
8. To Reduce the Need to Travel and Improve Transport Choices	+	+	0	0	0	0	+	+	0	+	0	0	0	+	0	0	+	0	+	+	+	+
9. To Protect and Enhance Brent's Environment	0	+	0	0	0	+	0	0	+	+	+	+	0	+	0	+	0	0	+	0	0	0
10. To Achieve Sustainable Development, Mitigate and Adapt to Climate Change	+	0	0	+	0	0	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+
11. To Treat Waste as a Resource	0	-	0	0	0	0	0	+	0	+	0	-	0	+	+	0	0	0	0	0	0	0
12. To Promote Healthy Living and Create a Safe and Secure Environment	+	+	0	0	+	+	+	+	0	+	0	+	0	+	0	0	0	0	+	0	0	+

- 4.18 The other objectives with the highest number of potential incompatibilities are Core Strategy objectives 5 and 7 (*To Meet Social Infrastructure Needs* and *To Achieve Housing Growth and Meet Housing Needs*). These objectives potentially conflict with environmental objectives also due to construction and population increase implied which will put pressure on environmental resources, lead to increased traffic and have potential negative impacts in relation waste generation, air pollution and water quality. Core Strategy Objective 7, also has potential conflict with some social sustainability objectives, due to increased pressure on (for example) existing health and education facilities.
- 4.19 For a number of Core Strategy objectives, mixed compatibility is identified (both potential compatibility and conflict against the same SA objectives). Examples include Core Strategy objectives 3 and 7 (*To Enhance the Vitality and Viability of Town Centres* and *To Achieve Housing Growth and Meet Housing Needs*). This is due to factors such as housing growth and implied population increase (Core Strategy objective 7) placing pressure on existing health facilities thus potentially conflicting with sustainability objective S2: Health and Wellbeing, however good quality housing is also an important determinant of good health, and thus a potential compatibility is also noted. These mixed effects are indicated by the split cells in the appraisal matrix indicating two different appraisal scores (e.g. + and -) against the same Core Strategy objective.
- 4.20 Core Strategy objective 11 – *To Treat Waste as a Resource*, has some potential incompatibilities with sustainability objectives relating to health and wellbeing and landscape and townscape. These potential incompatibilities relate to the objective's aim to develop a network of facilities for waste management, which could impact on the quality of surroundings local to these sites.
- 4.21 Core Strategy objectives 4, 6, 8, 9, 10 and 12 are all compatible or neutral in relation to the sustainability objectives, with no potential conflicts identified.
- 4.22 Some of the potential conflicts identified are inevitable as delivering some of the objectives of the DPD will involve a trade-off between different aspects of sustainability. In the case of Core Strategy objective 7 – *To Achieve Housing Growth and Meet Housing Needs*, the higher level policy set out in the London Plan requires the Borough to deliver a certain level of growth and therefore the priority for the DPD is to maximise the benefits and mitigate the negative effects.

Recommended changes to and possible omissions from the Core Strategy objectives

- 4.23 Table 12 below includes a summary of specific recommended changes to the Core Strategy objectives. Comments and recommendations on the Core Strategy Objectives included in an earlier version of the proposed Submission Core Strategy (November 2008) were provided to LB Brent November 14th 2008. Some changes

were made to the objectives in the light of these recommendations. Appendix 7 includes a table summarising these previous recommendations and LB Brent responses.

4.24 The Core Strategy objectives encapsulate aspirations in relation to a broad range of issue against which policy and targets within the Core Strategy are intended to deliver. However, a comparison of the Core Strategy objectives with the key sustainability problems for the borough, identified in Part A (Table 9) indicates that there may be some potentially important development objectives not currently included within the Core Strategy objectives. It is recommended that consideration be given to incorporating the following issues into the existing Core Strategy objectives:

- addressing deprivation, inequality and social and economic disparity within the borough, particularly in the most deprived wards;
- encouraging water efficiency and ensuring the availability of water resources to meet current and future demand;
- mitigating and managing flooding and flood risks;
- preserving and enhancing built heritage and protecting the historic environment; and
- addressing noise nuisance, particularly from major road routes, but also domestic noise associated with increased densities

Table 12: Summary of recommended changes to the Core Strategy Objectives

Core Strategy Objective	Recommendations
General and non objective specific comments	<ul style="list-style-type: none"> • The overarching objective of the Core Strategy is / should be sustainable development. As such it is recommended that an objective reflecting this be included as Objective 1. Current Core Strategy Objective 10 (To Achieve Sustainable Development, Mitigate and Adapt to Climate Change) does not clearly encapsulate a sustainable development objective for the borough, focussing primarily on mixed use development and climate change mitigation. • It is recommended therefore that a new objective is included to set out the overarching, holistic aim of sustainable development in the borough and growth areas.
1. To Promote Economic Performance and Regeneration	<ul style="list-style-type: none"> • The objective focuses primarily on Wembley (reflecting its role as the main focus of development in the borough). While the objective does include reference to the five growth areas, it is recommended that clearer description of the role of the growth areas in promoting regeneration and developing sustainable communities is included.
2. To Meet Employment Needs and Aid the Regeneration of Industry and Business	<ul style="list-style-type: none"> • No specific recommendations.
3. To Enhance the Vitality and Viability of Town Centres	<ul style="list-style-type: none"> • No specific recommendations.
4. To Promote the Arts and Creative Industries	<ul style="list-style-type: none"> • No specific recommendations.

Core Strategy Objective	Recommendations
5. To Meet Social Infrastructure Needs	<ul style="list-style-type: none"> It is recommended that consideration be given to the inclusion of additional text to refer to the need to address existing deficits in social infrastructure in certain areas.
6. To Promote Sports and other Recreational Activities	<ul style="list-style-type: none"> No specific recommendations.
7. To Achieve Housing Growth and Meet Housing Needs	<ul style="list-style-type: none"> No specific recommendations
8. To Reduce the Need to Travel and Improve Transport Choices	<ul style="list-style-type: none"> Reference to reducing modal share of car trips in Wembley “below 37% baseline by at least 10%” may benefit from description / clarification in a footnote to the objective text. It is recommended that text is included to emphasise the importance of phasing public transport / walking and cycling infrastructure to precede habitation / occupation of housing (and commercial) development.
9. To Protect and Enhance Brent’s Environment	<ul style="list-style-type: none"> Text is somewhat contradictory within the first bullet of this objective: it seeks to meet open space needs “commensurate with current levels of provision”, and also seeks to “address deficiencies where possible”. While reference to deficiencies is welcomed, we recommend revision to this bullet to improve clarity. Suggestion for the revised wording for the first bullet of this objective: <i>- Preserving the borough’s open spaces for recreation and biodiversity and creating new and enhanced open spaces to address existing deficiencies and meet the needs of additional population.</i>
10. To Achieve Sustainable Development, Mitigate and Adapt to Climate Change	<ul style="list-style-type: none"> See general comment above. This objective seeks to mitigate and adapt to climate change, however text as currently included focuses primarily on energy efficiency, low carbon development and CCHP (Combined Cooling Heat and Power). It is recommended that text is included to address climate change adaptation. The third bullet seeks two exemplar low carbon schemes by 2017. Current Government policy is for the Building Regulations to be tightened, under the Code for Sustainable Homes, such that all new housing development is required to meet zero carbon standards by 2016³. Clarification of whether these low carbon schemes are intended to be commercial development (thus outside the Code) is recommended.
11. To Treat Waste as a Resource	<ul style="list-style-type: none"> It is recommended that this objective include text to encourage development which maximises the reuse of materials, and design which increases ease of and opportunities for residents and businesses to reduce and recycle waste.
12. To Promote Healthy Living and Create a Safe and Secure Environment	<ul style="list-style-type: none"> Whilst this may not be the intention, the third bullet of this objective appears to indicate that installing CCTV is the main aspect of a design-led approach to reducing crime and fear of crime. It is recommended that the text be modified to clarify that a design-led approach to reducing crime and fear of crime encompasses a broad range of measures to create safer communities, and if reference to CCTV is considered necessary that it is noted that it will be only one aspect of this approach.

³ See DCLG (2008) Greener homes for the future:
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/803784.pdf> (accessed 28/04/09)

General comments on the Core Strategy's Spatial Vision and Objectives

- 4.25 A further comment on the Spatial Vision, which also applies to the Core Strategy Objectives and Policies, relates to the use of the terms “sustainable” or “sustainable development”, for example “sustainable” in the Spatial Vision – “Brent is a dynamic and sustainable area”. As suggested in the SA commentary on the pre-submission version, ideally these terms should not be used without clarifications to explain what they mean in the context of how they are being used and what the definition of sustainable development is in the context of Brent.
- 4.26 By including these terms in the vision, policy or objectives it does not automatically make them perform well against the SA objectives and often the best that will be achieved will be a trade-off between different aspects of sustainability rather than fully achieving “sustainable development” which should be presented as an aspiration to work towards. Although it is acknowledge that win-win-win solutions may be sought and on occasions achieved.
- 4.27 Where these terms have been used, it is recommended that they are reviewed to check what meaning was intended – e.g. was the intension to just indicate something would be maintained over a long period of time or was the intention to indicate that truly sustainable development would be realised.
- 4.28 We also recommend that reference in the supporting text to (for example) the Government's sustainable development strategy, the London Sustainable Development Framework, and Policy 2A.1 in the London Plan could be added to put the use of these terms in context.

5. APPRAISAL OF THE CORE STRATEGY ALTERNATIVES

Introduction

- 5.1 This section of the SA Report presents the findings of the SA of the main alternatives considered during the preparation of the proposed Submission version of the Core Strategy (June 2009). The development of options and alternatives⁴ has been ongoing process during the development of Brent's LDF generally which started in 2004, as well as during the development of the Core Strategy more specifically, which started in 2005. LB Brent officers have been central to this process, however the SA has provide input and comment throughout.
- 5.2 The consideration of alternatives during the process is summarised below, including details of those considered and how the SA inputted at the following stages:
- Issues and Options (Autumn 2005)
 - Preferred Options (Autumn 2006) and
 - Initial Submission and proposed Submission (Autumn 2007 and Summer 2009)
- 5.3 Note that as the process started before the revisions to PPS12, previous stages in the LDF process (e.g. Preferred Options etc) are referred to. See sections 1 and 2 (Part A) for further explanation of how the publication of the new PPS12 has influenced the DPD development process and the SA.

Table 13: Outline of alternatives considered at different stages

Stage in developing the Core Strategy	Approach to the appraisal of alternatives
Issues and Options	<ul style="list-style-type: none"> • Initial SA commentary on the sustainability issues raised by the Issues and Options papers available for public consultation and in particular the key challenges and the sustainability strengths and weaknesses raised by the Strategic Planning Objectives and Priorities
Preferred Options	<ul style="list-style-type: none"> • Use of appraisal proformas by policy authors to outline alternatives considered and record potential sustainability strengths and weaknesses • SA commentary on the preferred option policies and the options considered but rejected
Submission / proposed Submission	<ul style="list-style-type: none"> • Appraisal of the five spatial options included in the LBB paper "<i>Growth Strategy Background Paper - Why choose our Growth Areas</i>" and also set out in the proposed Submission Core Strategy using appraisal matrices.

⁴ For the purposes of this SA, "option" and "alternative" are taken to be synonymous, with generally the term alternative used

Main issues and options considered - how they were identified and the key sustainability issues

Developing the issues and options

- 5.4 In autumn 2005 LB Brent produced a series of Issues and Options papers under the title '*A New Plan for a Better Brent – Your Views. Issues and Options Papers*'⁵. These papers sought to help the council make an informed choice as to how suitable land could best be developed, and for which purposes, and how the environment could best be protected through the LDF (by all the LB Brent DPDs, not just the Core Strategy). These papers covered a broad range of topics to be considered within the LDF:
- strategic planning objectives and priorities;
 - a better townscape, by design;
 - environmental protection;
 - planning for more and better housing;
 - transport;
 - employment;
 - town centres and shopping;
 - leisure and tourism;
 - open space and biodiversity;
 - community facilities; and
 - waste.
- 5.5 These Issues and Options papers were available for public consultation through LB Brent's website, and LB Brent attended all of Brent's Area Consultative Forums throughout September 2005. Comments received went towards developing the preferred options for the Core Strategy DPD.
- 5.6 At this stage, the production of the DPD was still at an early stage and the 'options' included in the papers were mainly presented as questions to elicit consultees' priorities for different measures, rather than as clearly discrete alternatives. These, therefore, did not lend themselves easily to a comparison of their sustainability performance. As a result at this stage the SA only provided an initial commentary on the sustainability issues raised by the Issues and Options papers and the key challenges and the sustainability strengths and weaknesses they raised.
- 5.7 The SA commentary only considered alternatives where it was judged to be relevant to do so (e.g. where there were sufficiently distinct and realistic alternatives to appraise and where there were likely to be significant sustainability effects). In

certain policy areas, alternatives may have been foreclosed by higher level decisions, for example by policies in the London Plan, that limit the Borough's scope in considering certain levels of alternatives.

5.8 The SA commentary focused on the Strategic Planning Objectives and Priorities in more detail than the other LDF issues included in the Issues and Options papers. Where possible, options / priorities under the Strategic Planning Objectives and Priorities were compared against each of the SA objectives. The results were presented in matrices (see Appendix 8). Some issues did not have clear options / priorities and thus comparison in matrix format was not possible. In these cases stand-alone comments on the sustainability strengths and weaknesses were included. The Strategic Planning Objectives and Priorities considered included (see Appendix 8):

- Priorities in considering the future development of the Borough.
- The scale and pace of regeneration in the Borough.
- Location of Major Regeneration Areas.
- Priority land uses or themes.
- Spatial expressions of priorities.

5.9 For the other issues, as well as the Strategic Planning Objectives and Priorities, a brief summary was produced on the key sustainability issues they raised (note that many of the Issues and Options papers already include discussion on the sustainability implications of the LDF issues). The SA commentary, including the comparison of the options, was provided to LB Brent to inform the subsequent development of the Preferred Options.

5.10 A summary of the recommendations under each of the Strategic Planning Objectives and Priorities is provided below.

Strategic Planning Objectives and Priorities: Summary of SA recommendations

Priorities in considering the future development of the Borough:

Elements of many of the priorities could be incorporated into an overall strategy and opportunities should be sought to realise the potential offered for "win-win-win" solutions.

The scale and pace of regeneration in the Borough:

As part of developing the DPDs, consideration needs to be given to the scope for securing the necessary facilities and services in advance of new development and any increase in the number of residents. A potentially critical issue in terms of infrastructure, particularly under a changing climate, is the sustainability of water supplies in the South East generally and the ability to meet the growth in demand.

Existing policy and guidance places certain requirements on developers to incorporate environmental improvements and sustainable construction principles into new development proposals. The scope to extend this approach and increase standards is explored elsewhere in the Issues and Options Papers and this SA commentary. It is recommended that further consideration, as part of developing the DPDs, is given to the appropriate scale and pace of regeneration spatially across the Borough and to test

⁵ Refer to Issues and Options section on the LB Brent LDF web-page: <http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-29> [accessed 21/05/09]

options for a differentiated approach whereby the opportunities for mixed, residential led development is limited in certain locations, but promoted elsewhere.

Location of major regeneration areas:

It is suggested that one of the challenges for the DPDs is to translate the spatial implications of the Brent Regeneration Strategy 2001-2021 and two-year Action Plans into policy, although the preparation of the LDF also provides an opportunity to review the strategy if necessary.

Clearly it is important to consider the likely success of regeneration in delivering the types and scale of benefits desired, to those that need it most, in the desired locations and for the anticipated duration.

The Borough has been working on collating information sources to provide the evidence base for regeneration initiatives and it will be important to use this data to monitor progress in the priority areas such as South Kilburn and St Raphael's / Brentfield to inform policy development. It is likely to meet the priorities in the Regeneration Strategy that a combination of the above options / priorities is needed to realise the Borough's vision.

It should also be recognised that environmental improvement is an important part of successful regeneration. It is noted that the environment does not feature explicitly in the Regeneration Strategy as an aim of regeneration programmes. Environmental improvements can contribute to economic and social well-being. There is potential for regeneration activity to deliver a full range of environmental outcomes, and to increase the contribution it makes to sustainable development. The role of environmental improvements should therefore be considered further as policy is developed.

Priority land uses or themes:

By promoting a particular theme in the DPDs, such as promoting sustainable objectives or providing sustainable communities, it would be possible to combine the positive aspects of some of the land use priorities suggested in the Issues and Options Paper. Whilst it may be appropriate to focus on employment generating uses in certain locations, mixed use development with an appropriate emphasis on affordable housing has many sustainability benefits. This should not be done at the expense of protecting important assets of the borough.

Spatial expressions of priorities:

It is likely that a combined strategy to concentrate development in major town centres and at major public transport interchanges will provide the most sustainable solution. But this would need to be coupled with policies to protect some areas / assets and to promote sustainable construction to minimise the resource use and emissions resulting from new development.

Refining the Preferred Options

- 5.11 During the subsequent refinement of the Preferred Options, alternatives were considered which drew on the Issues and Options papers and took into account the responses received upon them, including the feedback given through the SA commentary.
- 5.12 The respective potential sustainability effects of these alternatives were considered as part of the SA during the development of the preferred options. This was done through the use of appraisal 'proformas' (see Appendix 3), which provided a template for those writing policy within LB Brent to consider the alternatives and potential sustainability strengths and weaknesses associated with them. In addition, regular meetings were held with LB Brent to discuss emerging policy alternatives. This included two Assessment Workshops in March and May 2006. At both of these workshops alternative policy approaches were discussed with internal LB Brent

officers and key external stakeholders in the light of the key sustainability issues identified by the SA.

- 5.13 As the draft Core Strategy Preferred Options evolved, details on the alternative options not selected were recorded, along with the reasons why they were rejected and the preferred options were selected. Boxes were included in the Core Strategy Preferred Options document which detailed the final version of the “alternative options not selected”.
- 5.14 In many cases the ‘preferred’ options presented in the emerging Core Strategy were dictated by higher level policies or targets. Thus, for example the Core Strategy has limited options in relation to the provision of the number of new homes, or the location of Strategic Industrial Locations (SILs), as these are dictated by the London Plan. Equally the preferred policy for Sustainable Communities reflected central government policy in this area.
- 5.15 For some policies proposed, the range of alternatives that could be investigated was limited leaving a relatively straightforward choice in sustainability terms. For example, Core Strategy Preferred Options Policy SD1: *Climate Adaptation Infrastructure*⁶ included within the preferred option the proposal to develop a climate adaptation strategy for the Borough. The ‘rejected’ alternative reported in the preferred options version of the Core Strategy was to not develop an adaptation strategy.
- 5.16 There are five tables included in Appendix 8 which summarise the alternatives options considered as part of developing the preferred options version of the Core Strategy and the reasons given by LB Brent why they were not selected. An SA commentary was then provided on each of the Preferred Options policies, the alternative options considered and reasons given why they were not selected. To fully understand the context to these comments it is necessary to read them alongside the policies in the preferred options version of the Core Strategy, which is available to download from LB Brent’s website: http://www.brent.gov.uk/tps.nsf/Planning_policy/LBB-31 [link correct as at 21/05/2009].

Developing the Submission Core Strategy

- 5.17 In October 2008, LB Brent produced a paper “*Growth Strategy Background Paper - Why chose our Growth Areas*”. This paper set out the LB Brent’s reasons for the choice of the council’s Core Strategy Housing Growth Areas and the other possible options considered and rejected.
- 5.18 This took a more strategic approach than perhaps those options presented at the Issues and Options stage and certainly the Preferred Options stage when the

⁶ Refer to the Preferred Options section on the LB Brent LDF web-pages:
<http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-31> [accessed 21/05/09]

appraisal considered more individual policies within the Core Strategy rather than the growth strategy as a whole.

- 5.19 The paper included what it considered were the realistic choices, stating that housing growth was set in the form of targets in the London Plan and given that in Brent there is very little vacant land and housing development has to come from other mostly brownfield uses. To be in conformity with the London Plan the borough has to find ways to accommodate housing growth to exceed its London Plan targets.
- 5.20 The council considered five main spatial options for Brent which are reported in the paper:
- **Option 1** - spread growth around all of its existing town centres and key public transport infrastructure nodes;
 - **Option 2** - disperse growth across all areas of the borough;
 - **Option 3** - concentrate growth on 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 development on specific land use types (e.g. industrial land or on areas of poor quality public housing) to achieve the target.
- 5.21 The five options were considered in bringing forward housing growth in the most sustainable locations and in order to secure other planning objectives such as employment growth, physical and social regeneration and to minimise the negative impact of such housing growth. Each option was assessed against a number of key tests that reflect the objectives in the Core Strategy and also assess the deliverability of each option.
- 5.22 The key tests LB Brent used in order to assess the benefits and drawbacks of each option were:
1. Opportunities of bring forward land for housing
 2. Sustainable transport location
 3. Regeneration benefits
 4. Employment benefits
 5. Infrastructure provision
 6. Compatibility with other plans and programmes
 7. Environmental and social sustainability
 8. Viability
 9. Deliverability

5.23 In making the assessment against these criteria, the council concluded that Option 3 remained their preferred option in terms of approach to growth area spatial strategy. The benefits and drawbacks that LB Brent identified in the Growth Strategy Background Paper are listed in the table below.

Table 14: LB Brent's analysis of spatial options

Spatial options	Planning benefits / drawbacks
Option 1: Spread Growth around all existing town centres and public transport nodes	<p>Benefits</p> <ol style="list-style-type: none"> 1. Spreads growth in up to 16 main centres-needs only 700 homes per centre 2. Development in areas with good PTAL scores 3. Helps small scale regeneration of local centres, gradual improvements in town centres 4. maintains employment in all centres 5. Reduces transport impact on one centre: may allow expansion of existing infrastructure 6. Mixed use development compatible with London Plan and current borough policy 7. Reduces environmental impact on any one centre 8. Requires range of smaller sites 9. Risk is spread over a number of smaller sites <p>Drawbacks</p> <ol style="list-style-type: none"> 1. Opportunities to develop in available sites are limited so will need to acquire and build on well used town centre sites. 2. Many transport interchanges/stations are not available to locate development e.g. Queens Park , Kilburn Park (listed) or have been built over (Wembley Central) 3. Misses opportunities from large scale regeneration 4. Unlikely to get employment benefits with retail expansion such as at Wembley 5. Cost of new infrastructure will be high if needed as lack of nearby development sites 6. Some town centres, e.g. Willesden, Harlesden have conserved cores which we wish to preserve 7. May be economically disruptive and affect social cohesion as existing retail/residential high street frontage is redeveloped at higher density. 8. Costs of acquisition in centres that have residential development above shops likely to be costly and time consuming 9. Unlikely to meet housing targets in time scale with significant intervention required
Option 2: Disperse Growth across all areas of the borough	<p>Benefits</p> <ol style="list-style-type: none"> 1. Need to find around 500 homes in each ward 2. Even pressure on transport infrastructure 3. All parts of borough get new housing investment 4. Allows areas like Wembley to be reserved for employment uses 5. May be able to expand existing infrastructure rather than provide new as impact of new housing is spread. 6. Residential development suitable in residential areas 7. Less integration of new population needed 8. Less reliance on large scale developers 9. Reduce risk as many small sites <p>Drawbacks</p> <ol style="list-style-type: none"> 1. Sites are not readily available 2. Increase Car use as sites may not have high PTALs - no encouragement to provide new public transport to dispersed population 3. Many more purely residential sites of existing quality so less regeneration benefit 4. Will not stimulate employment growth 5. Difficult to deliver infrastructure if existing infrastructure cannot be expanded 6. Many areas will be inappropriate for residential development 7. Less sustainable sites 8. Small sites often less viable re. infrastructure 9. Difficulty in delivering more smaller sites
Option 3: Core Strategy Growth Areas Strategy	<p>Benefits</p> <ol style="list-style-type: none"> 1. Land supply identified to meet approx. 85% of housing target. 2. Growth areas well located for public transport-can improve as concentration of housing increases business case

Spatial options	Planning benefits / drawbacks
	<ol style="list-style-type: none"> 3. Can only change character of areas with large scale change 4. Wembley growth seeks 1 job per dwelling 5. Scale and concentration of housing triggers infrastructure need 6. Wembley supported in London Plan as opportunity area 7. Allows provision of community facilities and Area based energy systems 8. Scale of change delivers infrastructure 9. Land identified; permissions given <p>Drawbacks</p> <ol style="list-style-type: none"> 1. Dependent on some individual land owners 2. Concentration may cause traffic congestion problems 3. Does not deal with worst parts of borough 4. Early housing delivery could overload infrastructure 5. Growth in Wembley may affect other town centres 6. May not support development of other town centres 7. New population may concentrate air pollution/traffic congestion 8. Public transport demands from new development may be unaffordable 9. High risk if one area does not deliver
<p>Option 4: Growth concentrated in the Wembley Area</p>	<p>Benefits</p> <ol style="list-style-type: none"> 1. Sufficient Land available 2. High PTAL scores 3. Wembley is Economic driver 4. Wembley will deliver most jobs from all growth areas 5. Concentration of population makes infrastructure provision easier 6. GLA support growth of Wembley 7. Higher densities can deliver most sustainable form of development 8. Evidence of development already in area 9. Large Landowners with history of bringing forward land for development <p>Drawbacks</p> <ol style="list-style-type: none"> 1. Not all land is commercially available for development 2. Traffic congestion possible with level of development 3. Regeneration benefits in other parts of borough 4. Similarly, job creation in other areas limited 5. Population may overload infrastructure 6. Does not assist multi-centre approach to suburbs 7. Over concentration of air pollution/congestion 8. May need to develop some areas of SEL if all development concentrated in Wembley 9. May not be deliverable on time scale-risk of reliance on big landowners
<p>Option 5: development on specific land uses such as industrial land or poor quality Brent housing estates</p>	<p>Benefits</p> <ol style="list-style-type: none"> 1. Stock of land that may have low values 2. Development of estate of industrial area could encourage provision of new public transport infrastructure 3. Renewal of some of worst areas of the borough 4. Some industrial land is surplus to need 5. May be possible to provide infrastructure as difference in value between industrial land/poor housing estate land and new housing development significant 6. Local and Borough industrial sites unprotected in London Plan-allows some loss of SEL 7. Clean up areas of poor environmental quality 8. viable because of capture of 'value difference' 9. Land owners incentivised to bring land forward to realise increase in value <p>Drawbacks</p> <ol style="list-style-type: none"> 1. Require the loss of a third of Brent's industrial stock. Insufficient poor estate stock left. 2. Industrial land mostly has poor public transport accessibility. 3. Large poor quality former council estates already redeveloped such as Church End, Chalkhill & Stonebridge 4. loss of jobs would be significant

Spatial options	Planning benefits / drawbacks
	5. Need wholesale improvement in public realm and social facilities as both poor in industrial areas 6. Development of SEL is contrary to London Plan 7. Lack of existing social and community infrastructure 8. Difficult to assemble because of fractured land ownership 9. Difficult to justify loss of industrial land: support unlikely to be forthcoming to develop estates to much higher densities in most areas.

Source: "Growth Strategy Background Paper - Why chose our Growth Areas" (LBB, 2008)

5.24 These five main spatial options were appraised as part of the SA and their potential effects against the SA objectives identified and described using a matrix (see Table 15).

Table 15: Appraisal of Brent’s five main spatial options

Objective	Option					Comments
	1	2	3	4	5	
Social						
1. To reduce poverty and social exclusion	-	-	+	-	+/-	<p>1 – focussing development in existing centres may mean that opportunities to regenerate some of the most deprived areas are lost.</p> <p>2 – dispersed development unlikely to provide opportunities to achieve regeneration in the most deprived areas.</p> <p>3 – growth concentrated in regeneration areas likely to provide opportunities to reduce poverty and social exclusion. However some deprived areas will remain so.</p> <p>4 – concentrated growth in Wembley only will not provide opportunities to tackle poverty and exclusion in other areas.</p> <p>5 – development in poor-quality housing areas may provide opportunities to reduce poverty and exclusion, however in some areas, especially industrial land social infrastructure likely to be lacking.</p>
2. To improve the health and wellbeing of the population	-	-	+	-	+/-	<p>1 – development in existing centres is likely to restrict opportunities to improve health and other community facilities, due to lack of available land / space for development. In turn this will increase pressure on existing facilities. Limited opportunities to provide additional open, sport and play space also.</p> <p>2 – small-scale dispersed development unlikely to offer opportunities for contributions to new health / sport facilities.</p> <p>3 – aim is to use concentrated development to facilitate additional social infrastructure provision, including health facilities. Opportunities may also arise to increase provision of / access to open space.</p> <p>4 – see Objective 1. Concentrated population growth is likely to put significant pressure on existing health infrastructure and sport facilities / open spaces. This is likely to impact negatively on health and wellbeing.</p> <p>5 – see Objective 1. Low land values may enable provision of additional facilities, such as health. However significant lack of social infrastructure including health facilities and open space in industrial areas.</p>
3. To improve the education and skills of the population	?	?	+?	-	?	<p>1 – unclear from option how / where education facilities may be sought.</p> <p>2 – as 1.</p> <p>3 – see Objective 2. Uncertain effect as unclear from option how / where education facilities will be sought.</p> <p>4 – infrastructure “overload” is likely with population growth focussed in Wembley alone. May not be possible to meet additional education need.</p> <p>5 – as 1.</p>
4. To provide everybody with the opportunity to live in a decent	+?	+?	+	-?	+	<p>1 – aim of option is to accommodate housing development. Uncertain positive effect predicted as availability of land suitable for development in existing centres likely to</p>

Objective	Option					Comments
	1	2	3	4	5	
home						<p>be limited.</p> <p>2 – aim of option is to accommodate housing development. Uncertain effect as availability of suitable sites is limited in some areas.</p> <p>3 – LBB has indicated (see Table 14) that land has been identified in growth areas to meet approx 85% of housing target.</p> <p>4 – aim is to provide new homes, however concentrating development in Wembley alone will not provide opportunities to improve housing stock elsewhere in the borough.</p> <p>5 – aim is to provide new homes. LBB has indicated that land is available through this option (see Table 14).</p>
5. To reduce crime and anti-social activity	-?	?	?	?	+?	<p>1 – increased density in town centres may exacerbate crime and fear of crime in these areas (which already tend to be crime “hot spots” – refer to baseline, section 3 in Part A).</p> <p>2 – uncertain effect, a will depend on how development is achieved.</p> <p>3 – as 2.</p> <p>4 – as 2.</p> <p>5 – as 2. Potential positive effect where option leads to improvements in poor quality housing estates.</p>
6. To encourage a sense of local community; identity and welfare	?	-	+	-	+/-	<p>1 – uncertain effect as this will depend on nature of development, design etc. Potential negative effect as may place pressure on existing established communities in and around town-centres</p> <p>2 – dispersing development is unlikely to provide opportunities to enhance local communities (e.g. through social infrastructure provision).</p> <p>3 – concentrated development in identified regeneration / growth areas may provide opportunities to generate new and enhance existing communities, especially where infrastructure contributions are forthcoming.</p> <p>4 – positive effect possible in Wembley, however no opportunity to improve other areas. Overall minor negative effect predicted.</p> <p>5 – potential positive effect where option leads to improvements in poor quality housing estates. However industrial locations likely to require significant public realm improvements.</p>
7. To improve accessibility to key services especially for those most in need	-	-	+	-	-	<p>1 – see Objective 2. Although focussing development in existing centres may mean development is close to existing facilities and services, there may be limited opportunity to expand essential services (due to land availability) which is likely to increase pressure on existing services.</p> <p>2 – see Objective 2. Pressure will be increased on existing services and amenities, however opportunities to provide new social infrastructure may be limited where</p>

Objective	Option					Comments
	1	2	3	4	5	
						development is dispersed. 3 – see Objective 2. 4 – See Objectives 2 and 3. In addition concentrating development in Wembley will mean opportunities to improve facilities / access in other areas will not arise. 5 – See Objective 2.
Environmental						
8. To reduce the effect of traffic on the environment	-	--	-	--	-	1 – locating development in areas of high PTAL may help reduce additional traffic, however overall impact predicted to be negative. 2 – Major negative effect predicted as dispersing development will lead to significant proportion being in areas of very poor PTAL. Also opportunities to improve public transport infrastructure will be limited. 3 – as 1. Effect may be mitigated where significant contributions to improving public transport, walking and cycling infrastructure are made. 4 – significant traffic and congestion likely in Wembley if development concentrated there alone. While Wembley has relatively high PTAL scores, scale of development likely to lead to major negative effect. 5 – industrial areas typically have relatively poor PTAL. Development in these areas therefore likely to increase car traffic and associated impacts.
9. To improve water quality; conserve water resources and provide for sustainable sources of water supply	?	?	?	-?	?	1 – uncertain effect as will depend on standards used in development. 2 – as 1. 3 – as 1. 4 – as 1. However concentrated development in Wembley alone may lead to increased surface water run-off and pressure on sewage infrastructure. 5 – as 1.
10. To improve air quality	-	-	-	-	-	1 – may exacerbate air quality in existing problem areas. Also, see Objective 8. 2 – as 1. 3 – as 1. 4 – Wembley is already within an AQMA, concentrating development in the area is likely exacerbate existing air quality problems. Also, see Objective 8. 5 – as 1.
11. To conserve and enhance biodiversity	+?	-	+?	+?	?	1 – focussing development in existing centres may reduce pressure on sites with biodiversity value elsewhere in the borough. 2 – dispersing development is likely to put pressure on sites with conservation value, especially in areas where there are limited suitable sites available. 3 – focussing development in identified growth areas may help ease pressure from

Objective	Option					Comments
	1	2	3	4	5	
						development on sites with biodiversity value elsewhere in the borough. 4 – concentrating development in Wembley may reduce pressure on sites with biodiversity value elsewhere in the borough. 5 – uncertain effect as will depend on the biodiversity value in existing industrial sites. Public realm enhancements may provide opportunity to provide additional biodiversity space.
12. To maintain and enhance the character and quality of landscapes and townscapes	?	?	+	-	+	1 – see Objective 6. 2 – uncertain effect as will depend on how development is achieved. 3 – see Objective 6. 4 – concentrating development in Wembley will not provide opportunities to maintain / enhance landscape and townscapes elsewhere in the borough. 5 – development in poor quality housing estates and industrial areas likely to provide opportunities to improve landscapes and townscapes.
13. To conserve and where appropriate enhance the historic environment and cultural assets	-?	?	?	+	?	1 – uncertain effect as will depend on how development is achieved. Potentially negative effect especially in town centres with conserved cores (e.g. Willesden, Harlesden). 2 - uncertain effect as will depend on how development is achieved. 3 – as 2. 4 – uncertain effect as will depend on how development is achieved. Outside Wembley lack of development pressure may reduce impacts on historic environment. 5 – as 2.
14. To reduce contributions to climate change and reduce vulnerability to climate change	-	--	-	-	-	1 – see Objective 8. 2 – see Objective 8. 3 – see Objective 8. Area based energy schemes sought in this Option, may help mitigate this effect, however overall a minor negative effect still predicted. 4 – see Objective 8. 5 – see Objective 8.
15. To minimise the production of waste and use of non-renewable materials	?	?	?	?	?	1 – uncertain effect predicted as will depend on how development is achieved. 2 – as 1. 3 – as 1. 4 – as 1. 5 – as 1.
16. To conserve and enhance land quality and soil resources	+/-	+/-	+	+	+	1 – focussing development in town centres may help preserve open space / land quality elsewhere in borough. However opportunities to remediate potentially

Objective	Option					Comments
	1	2	3	4	5	
						<p>contaminated land in areas outside town centres may be lost.</p> <p>2 – dispersing development may offer opportunities to remediate previously contaminated land on certain sites. However in some areas sites with conservation / open space value may be lost due to lack of availability of suitable sites.</p> <p>3 – development in growth areas will require the remediation of potentially contaminated land.</p> <p>4 – may lead to remediation opportunities in Wembley, however elsewhere limited opportunities to remediate contaminated land. Reduced pressure on sites with biodiversity value outside of Wembley may help conserve land quality.</p> <p>5 – development in industrial areas likely to necessitate remediation of potentially contaminated land.</p>
Economic						
17. To encourage sustainable economic growth	+/-	-	+	+	--	<p>1 – focussing development in town centres would mean limited pressure on existing employment areas. However, would also limit opportunities for new mixed use development, and housing development in existing centres likely to put pressure on employment uses.</p> <p>2 – dispersed development unlikely to provide opportunities to provide mixed-use and employment uses alongside housing development.</p> <p>3 – aim is to achieve “critical mass” of development in growth areas to facilitate mixed-use development, including employment uses.</p> <p>4 – concentrated development in Wembley may enhance and supports it role as an economic and employment centre.</p> <p>5 – development in industrial areas will lead to loss of commercial development opportunities. LBB have indicated (see Table 14) that this option would require the loss of a third of Brent’s industrial stock.</p>
18. To offer everybody the opportunity for rewarding and satisfying employment	+/-	-	+?	+?	--	<p>1 – see Objective 17.</p> <p>2 – see Objective 17.</p> <p>3 – see Objective 17. Uncertain whether jobs created will be suitable and/or accessible to local people.</p> <p>4 – as 3.</p> <p>5 – see Objective 17.</p>
19. To reduce disparities in economic performance and promote regeneration	+/-	-	++	-	-	<p>1 – see Objective 1 and Objective 17.</p> <p>2 – see Objective 1 and Objective 17.</p> <p>3 – see Objective 1 and Objective 17.</p> <p>4 – see Objective 1 and Objective 17.</p> <p>5 – see Objective 1 and Objective 17.</p>

Objective	Option					Comments
	1	2	3	4	5	
20. To encourage and accommodate both indigenous and inward investment	+?	+/-	+	+?	+/-	<p>1 – development will require additional investment, however focussing development in existing centres may limit opportunities.</p> <p>2 – development will require inward investment, however, dispersed development likely to limit opportunities for employment / commercial investment.</p> <p>3 – development will require inward investment. Concentrating development in growth areas intended to facilitate and encourage investment in infrastructure.</p> <p>4 – development will require inward investment. Benefits would be concentrated in Wembley area only.</p> <p>5 – development will require inward investment. However loss of industrial land will impact negatively on investment opportunities.</p>
21. To encourage efficient patterns of movement in support of economic growth	+/-	-	+/-	-	-	<p>1 – see Objective 8. In addition limited opportunities for new employment generating uses as part of mixed-use development (see Objective 17) may encourage commuting.</p> <p>2 – see Objective 8. Limited additional employment opportunities may also encourage commuting.</p> <p>3 – mixed-use development, and development which facilitates public transport infrastructure provision may help promote efficient patterns of movement. However overall commuting and congestion are predicted to increase.</p> <p>4 – see Objective 8. Although Wembley has relatively high PTAL, the scale of development proposed, concentrated in one area is likely to exacerbate congestion and increase commuting.</p> <p>5 – see Objective 8. Loss of industrial land in Brent may also necessitate and increase in commuting, especially in the long-term.</p>
<p>Key to potential effect scores:</p> <p>Major positive: Minor positive: Neutral: Minor negative: Major negative: Uncertain?: Mixed: </p> <p>Key to the spatial options:</p> <p>Option 1: Spread Growth around all existing town centres and public transport nodes</p> <p>Option 2: Disperse Growth across all areas of the borough</p> <p>Option 3: Core Strategy Growth Areas Strategy</p> <p>Option 4: Growth concentrated in the Wembley Area</p> <p>Option 5: development on specific land uses such as industrial land or poor quality Brent housing estates</p>						

- 5.25 The appraisal of options indicates that Option 3 (LB Brent's preferred option) may also provide the greatest opportunities for sustainability benefits. Option 3 is predicted to have minor positive effects in relation to many social SA objectives, such as reducing poverty and social exclusion and improving health and wellbeing, as well as encouraging a sense of community and local identity. A major positive effect is predicted for Option 3 in relation to reducing disparities in economic performance and promoting regeneration (SA Objective 19). This is a result of the combination of positive social and economic effects predicted.
- 5.26 Generally the options are predicted to have mixed sustainability effects (i.e. the potential for both positive and negative effects), reflecting the environmental, resource use and traffic generating impacts of development aiming to housing needs. All options are predicted to have potentially negative effects in relation to the effects of traffic on the environment (SA Objective 8), air quality (SA Objective 10) and contributions to climate change (SA Objective 14). Potential major negative effects are predicted in relation to Option 2 and Option 4. This reflects in the case of Option 2 the fact that dispersed development will lead to significant new population in areas with relatively poor public transport accessibility, and in the case of Option 4 that concentrating development in Wembley alone is likely to overload existing infrastructure and lead to significant concentrated traffic and congestion problems.
- 5.27 Option 5 is predicted to have potentially major negative impacts in relation to economic SA Objectives, due to development on industrial land leading to a loss in Brent's industrial stock (LB Brent have indicated a third of industrial would be lost if this option were implemented, see Table 14).

Developing the proposed Submission Core Strategy

- 5.28 Following the withdrawal of the Submission version of the Core Strategy in May 2008, the Core strategy was revised to reflect recommendations made by the Inspector and to take account of the new Planning Policy Statement (PPS) 12 published in 2008. The key change made was to map out implementation in more detail and provide a more "Brent" focus to the overall spatial strategy and policies for the borough. This was reflected particularly in the inclusion of strategic area policies (Policies CP7 – CP13) for the growth areas, Park Royal and the North Circular Road improvement area, and infrastructure targets included within these policies.
- 5.29 In addition, the five spatial options presented in the Growth Strategy Background Paper were explicitly included in the proposed Submission version of the Core Strategy (they were not specifically referred to in the previous submission version), although the wording was slightly altered and the number of the options changed. The options as presented in the proposed Submission Core Strategy are as follows:
- Dispersal across all areas of the borough.
 - Focusing development around all of Brent's town centres and modes of public transport.

- Centre growth only in Wembley.
 - Allow growth on industrial land and redevelop former council estates in need of regeneration.
 - Concentrate growth within areas that have good public transport access, that have the capacity to accommodate growth, are in need of regeneration and can deliver jobs and infrastructure.
- 5.30 The last of these options as presented in the proposed Submission Core Strategy is LB Brent's preferred spatial option, and the one which is reflected in the objectives and policies of the Core Strategy DPD.
- 5.31 As there was no substantive change to the overall spatial strategy between the previous submission and the proposed Submission versions of the Core Strategy there was no need for the SA to revisit the appraisal of the main spatial options.
- 5.32 The proposed Submission version of the Core Strategy does include considerably more detail in relation to infrastructure delivery, and development proposed within the growth areas. As noted above these new policies reflect the new PPS12 and comments from the appointed inspector on the previous submission Core Strategy that it should include policies which are more "Brent specific". Different levels of infrastructure provision were not appraised in detail, however the SA provided input and comments throughout the development of these more detailed policies, specifically in relation to options in terms of type, levels or provision and phasing of infrastructure and how this related to the potential sustainability of development in the growth areas.

6. APPRAISAL OF THE PROPOSED SUBMISSION CORE STRATEGY POLICIES

Introduction to the appraisal of the proposed Submission Core Strategy Policies

- 6.1 The methodology adopted for the SA of the proposed Submission Core Strategy Policies is described in Section 2 of this SA Report (Part A). A summary of the findings of the appraisal of the version of the proposed Submission Core Strategy for public consultation (June 2009) is presented in this section. During the development of the proposed Submission policies, the SA process has led to a series of changes being made to earlier drafts of the Core Strategy and therefore some measures to improve the sustainability performance of the policies have already been incorporated. Consequently, what is presented here is a description of the residual effects and proposed mitigation and enhancement measures relevant to the latest version of the Core Strategy and any outstanding SA recommendations. Appendix 7 includes a table which sets out SA recommendations and LB Brent Responses based on policies as included in the pre-Submission Core Strategy dated November 2008, and the draft proposed Submission Core Strategy dated April 2009. SA comments and recommendations and LB Brent responses on earlier versions of the Core Strategy, including the Preferred Options, are available from the Core Strategy web-pages of LB Brent's website: http://www.brent.gov.uk/tps.nsf/Planning_policy/LBB-26.
- 6.2 A detailed appraisal was undertaken of each policy, in the proposed Submission Core Strategy document. Each of the SA objectives and criteria were considered (see Section 3). The results were presented in a series of matrices, see Appendix 9 (also see Figure 31 for an example of a blank appraisal matrix), these matrices included:
- a score based on a five point scale against each criteria (for more information see section 2, Part A and Appendix 6);
 - a commentary on the potential positive and negative effects of the policy under each objective;
 - recommended enhancement and mitigation measures under each objective; and
 - an overall summary commentary on the potential effects of the policy and proposed enhancement and mitigation measures, including recommendations on improving or clarifying the policy or supporting text from a sustainability perspective, mitigating the potential negative effects and enhancing the potential positive effects of the policy.

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6.3 These matrices have been summarised below, but for a more detailed commentary and explanation on the predicted effects, reference should be made to the detailed appraisal matrices included in Appendix 9. The scores have been brought together here to allow summary conclusions to be drawn, to make cross-policy comparisons and to help assess policy compatibility and cumulative impacts.

6.4 The proposed Submission Core Strategy policies have been subdivided in this Section to follow the structure of the Core Strategy:

- Regeneration and Growth and Overall Spatial Change Policies (Policies CP1 – CP6)
- Strategic Area Policies (CP7 – CP13) and Infrastructure to Support Development Policies (CP14 & CP15)
- Strategic Borough-Wide Policies (Policies CP16 – CP23)

Figure 31: Example appraisal matrix

Policy Number and Title			
SA objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?		Effects: Mitigation / Enhancement:
	Will it improve affordability of essential services?		
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?		Effects: Mitigation / Enhancement:
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it improve physical and mental health?		
	Will it reduce noise levels and concerns?		
etc			
etc			
etc			
Key:			
Major positive: ++ Minor positive: + Neutral: o Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+			
Overall Summary			
Effects:			
Mitigation / Enhancement:			

6.5 For each section of the Core Strategy, a summary matrix of the appraisal of the potential effects is included with a separate table summarising the potential mitigation and enhancement measures and SA recommendations.

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- 6.6 The policies included in the Core Strategy, subdivided by section, are listed in Table 16. The full wording of the policies is included in Appendix 9, as well as in the proposed Submission Core Strategy itself.

Table 16: Policies included in the proposed Submission Core Strategy

Regeneration and Growth & Overall Spatial Change Policies
<p>Spatial Development Strategy CP1 – Spatial Development Strategy</p> <p>Appropriate Level of Growth CP2 – Population and Housing Growth</p> <p>Commercial Regeneration CP3 – Commercial Regeneration</p> <p>North-West London Coordination Corridor CP4 – North-West London Coordination Corridor [Note, no matrix completed – see Appendix 9]</p> <p>Placemaking CP5 – Placemaking</p> <p>Development Density, Design Quality and Place Shaping CP6 – Design and Density in Place Shaping</p>
Strategic Area Policies
<p>Wembley Growth Area CP7 – Wembley Growth Area</p> <p>Alperton Growth Area CP8 – Alperton Growth Area</p> <p>South Kilburn Growth Area CP9 – South Kilburn Growth Area</p> <p>Church End Growth Area CP10 – Church End Growth Area</p> <p>Burnt Oak / Colindale Growth Area CP11 – Burnt Oak / Colindale Growth Area</p> <p>Park Royal CP12 – Park Royal</p> <p>North Circular Road Improvement Area CP13 - North Circular Road Improvement Area</p>
Infrastructure to Support Development
<p>Transport Infrastructure CP14 – Public Transport Improvements</p> <p>Infrastructure to Support Development CP15 – Infrastructure to Support Development [Note, no matrix completed – see Appendix 9]</p>
Strategic Borough-Wide Policies
<p>Town Centres and Shopping CP16 – Town Centres and the Sequential Approach to Development [Note, no matrix completed – see Appendix 9]</p> <p>Protection and Conservation CP17 – Protecting and Enhancing the Suburban Character of Brent</p> <p>Protecting and Enhancing Open Space, Sports and Biodiversity CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity</p> <p>Tackling Climate Change and Achieving Sustainable Development CP19 – Brent Strategic Climate Mitigation and Adaptation Measures</p> <p>Maintaining Employment Outside of the Growth Areas CP20 – Strategic and Borough Employment Areas</p> <p>Planning for More and Better Housing CP21 – A Balanced Housing Stock CP22 – Sites for Nomadic Peoples</p> <p>Protecting Community and Cultural Facilities CP23 – Protection of existing and provision of new Community and Cultural Facilities</p>

Detailed appraisal of the significant potential social, environmental and economic effects of the proposed Submission Core Strategy policies

- 6.7 The following sections provide a description of findings of the appraisal of the significant potential social, environmental and economic effects of the proposed Submission Core Strategy DPD. The version that was appraised was dated June 2009, and made available to CEP on 21st May 2009. No significant changes to the text or policies were expected to be made between this version and the version produced for public consultation starting on the 2nd June 2009.

Regeneration and Growth and Overall Spatial Change

- 6.8 The *Regeneration and Growth* and *Overall Spatial Change* policies 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. These policies provide the strategic context for the rest of the Core Strategy, as well as the SSA DPD and the forthcoming Development Management Policies DPD.

Summary of potential effects

- 6.9 Policies CP1 – CP6 are generally predicted to have positive effects against the SA objectives. Given the strategic nature of these policies, the significance of some effects will depend on the implementation of other policies in the Core Strategy, SSA DPD or forthcoming Development Management Policies DPD. In addition in general the effects of these strategic policies are predicted to be permanent and long-term in nature.
- 6.10 Table 17 summarises the appraisal of each policy to enable comparison of policies by SA objective and an overview of the effects of all the *Delivering Sustainable Development* and *Overall Spatial Change* policies together (see Appendix 9 for further details).
- 6.11 The key potentially positive sustainability effects arising from the *Delivering Sustainable Development* and *Overall Spatial Change* policies include:
- Seeking mixed-use regeneration of key Growth Areas is predicted to have positive social and economic effects, particularly in relation to **improving quality of life, reducing social inequality and alleviating poverty** in some of the most deprived areas in the borough;
 - Focussing development and growth in locations with generally good public transport accessibility is likely to lead to significant social, and economic benefits, especially in terms of **improving access to services, amenities and employment opportunities**;

- Where the focus of growth leads to **modal shift from the car to public transport, walking and cycling**, there may be social, health and environmental benefits due to reduced air and noise pollution, although these are likely to be outweighed by the negative effects of increased construction, housing and population, see below;
 - **Increasing the supply of new homes, and in particular affordable housing**, is predicted to have major positive effects by alleviating current need and helping provide the opportunity to live in a decent home;
 - **Ensuring development takes place on previously developed land and derelict or underused sites**, and providing opportunities for the remediation of potentially contaminated land;
 - Encouraging high quality design and the creation of distinctive places is predicted to have positive effects under a number of social and environmental objectives, especially in relation to **public realm enhancement, the quality of townscapes and promoting a sense of place and pride in neighbourhoods**; and
 - Commercial regeneration, the protection and enhancement of employment areas the encouraging employment opportunities which benefit local people, together with training and skills development and placement opportunities is predicted to have significant economic and social benefits, particularly in **enhancing the image of Brent as a location for business**, generating **employment opportunities for local people**, and **encouraging inward and indigenous investment**.
- 6.12 All of the potential positive effects related to economic growth, investment and development facilitating infrastructure delivery will be dependent on the health of the wider economy. If the current economic downturn continues during the first years of implementing the plan this may negate, or delay any positive effects predicted.
- 6.13 Whilst the majority of potential effects arising from implementing the *Delivering Sustainable Places* and *Overall Spatial Change* policies are likely to be positive, there is the potential for some significant negative effects. These effects are likely to arise mostly as a consequence of the level of growth and development being proposed in the Borough. Clearly given the role of the London Plan in setting the respective levels of growth within each Borough, the options for LB Brent in this regard are limited and as a consequence they have sought to focus on, where possible, minimising the negative effects through the “safeguarding” policies proposed in the proposed Submission Core Strategy.
- 6.14 Policy CP2, which sets out the proposed level of population and housing growth in the borough and Growth Areas, is predicted to have the largest number of major negative potential effects of all the *Delivering Sustainable Places* and *Overall Spatial Change* policies. These effects are particularly on the environmental objectives, and are caused by both the construction and habitation / operation of the new

development proposed and are therefore likely to give rise to both short term and long term and temporary and permanent effects. These effects include increased resource use, energy and water consumption, air and noise pollution and vehicle traffic and congestion.

- 6.15 The other policies (CP3 – CP6) are also predicted to have some negative effects, though these are, in general minor in significance and related to the scale of development proposed in CP2.
- 6.16 The potential negative effects arising from the *Delivering Sustainable Places* and *Overall Spatial Change* policies, as an inevitable consequence of the level of population increase and economic regeneration proposed, include:
- An increase in **vehicle traffic and congestion, and associated pollution**. Other policies (especially CP14 – Public Transport Improvements, and the Strategic Area policies (CP7 – CP13) seek to manage this as far as possible, through the promotion of public transport, walking and cycling and concentrating housing, employment, retail and leisure facilities in the Growth Areas to reduce the need to travel. However, this is set against the context of a trend of increasing traffic (between 1997 and 2006 Brent recorded an 8% increase in traffic flows).
 - An increase in **noise pollution and nuisance**. These effects are predicted in the long-term and will be both temporary (due to increased construction activity) and permanent (due to increased traffic and high density development and mixed use development). Other more detailed policies seek to manage this as far as possible, for example the Design and Density in Place Shaping (CP6). These impacts will also depend on the success of managing traffic and promoting public transport, walking and cycling.
 - An increase in **resource use and consumption, green house gas emissions and construction and household waste generation**. The level of growth proposed will result in an approximate 10% increase in the number of households over the first 10 years of the plan period (to 2017). Whilst Policy CP19 – Brent Strategic Climate Change Mitigation and Adaptation seeks to mitigate this by encouraging new development to minimise water and energy use, waste production (both construction and domestic), emissions from transport and energy generation, there will be an inevitable net increase. The sub-section *Cumulative and Overall Effects* below provides an approximate quantification of the amount of carbon dioxide, aggregates, waste and water and sewage that would be used / emitted during the construction and / or occupancy from the number of new homes proposed.
- 6.17 Further details are included below on the mitigation and enhancement proposed for each *Delivering Sustainable Places* and *Overall Spatial Change* policy, and other recommendations arising from the Sustainability Appraisal. Overall, given the strategic nature of these policies, most of the mitigation requirements will be met

either by other policies in the Core Strategy or are recommended to be included in the forthcoming Development Management Policies DPD.

Table 17: Delivering Sustainable Development and Overall Spatial Change policies –appraisal summary

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
Social							
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	++	++	+	+	+	The policies are predicted to have generally positive effects, due to the focus on regeneration (CP1 and CP3), provision of affordable housing (CP2), community amenities and services to meet local needs (CP5 and CP6). These effects are predicted to be long-term and permanent. Policies CP1 and CP2 are predicted to have major positive long-term effects in relation to reducing poverty and social exclusion as they seek to deliver the majority of the borough's housing and new development, and regenerate some of the most deprived areas. Uncertain effects for affordability of essential services for CP5 and CP6 as increased supply to meet demand arising from new development will not necessarily improve affordability, especially where existing deficits remain.
	Will it improve affordability of essential services?	+	+	0	+?	+?	
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	+	+?	0	+	0	The policies are likely to have generally positive effects in relation to health and wellbeing. Positive long-term effects are predicted in relation to the intention to improve social infrastructure, public realm and open space (CP1 and CP5). These effects are minor or uncertain however, as new provision is intended to meet increased need associated with proposed population growth over the plan period and thus may not address existing deficiencies.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	0	0	+	0	
	Will it reduce health inequalities?	+	+	+?	+?	0	
	Will it improve physical and mental health?	+	+?	+?	+	+?	
	Will it reduce noise levels and concerns?	-	-	-	-	-?	Some negative effects are predicted as the scale of development proposed is likely to lead to increased noise nuisance both in the short and medium-term during construction and in the long-term through habitation, especially where densities are high.
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	0	+	+?	0	CP1 specifically seeks skills training and placement opportunities for local people, thus positive effects are predicted. Supporting text to CP3 seeks to enhance links between schools and employment as well as training opportunities, which has potential long-term positive effects. CP5 emphasises the need to consider provision of education facilities in consideration of major development schemes, and may result (in conjunction with other policies, in particular the Growth Area policies and the IIF) in long-term
	Will it improve access to high quality educational facilities?	+	+?	0	+	0	
	Will it help fill key skill gaps?	+	+?	+	0	0	

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
							positive effects on access to high quality facilities.
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	++	0	+	0	Central aim of CP2 is the provision of significant new housing, in line with London Plan targets for Brent. Reflecting London Plan policy 50% of new housing is expected to be affordable. Major positive effects are predicted therefore. Other positive effects are predicted as CP1 seeks to promote housing led, mixed use regeneration in the Growth Areas, and CP5 sets out criteria for development including being mixed in use and tenure. CP6 explicitly seeks a "reasonable proportion" of family housing. Other effects uncertain as these will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
	Will it encourage a range of dwelling type, size and tenure?	+	++	0	+	+	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	+	+	0	?	0	
	Will it reduce homelessness?	?	+	0	0	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	?	+	+	+	In the long-term regeneration, where it reduces poverty and social exclusion (CP1) and the creation of mixed, well designed communities with improved public realm (CP5 and CP6) may help reduce crime and the fear of crime. Uncertain effects in relation to CP2 / CP3 as increased population and economic growth per se will not directly affect crime or fear of crime.
	Will it reduce the fear of crime?	+	?	0	+	+	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	0	0	+	0	Positive long-term effects on sense of pride in the local area predicted against policies CP1, CP2, CP5 and CP6 due to regeneration, creation of mixed communities and public realm improvements. CP1 and CP5 seek explicitly to increase provision of community facilities (through housing-led development). This is predicted to have positive long-term effects on engagement in community activities. Other effects generally uncertain, as the effects of regeneration, commercial and housing development on community identity, welfare and relations are complex.
	Will it foster a sense of pride in local area?	+	+	+	+	+	
	Will it increase the ability of people to influence decisions?	0	0	0	?	0	
	Will it improve ethnic relations?	0/+	0	0	+	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0/+	0	0	+	0	
	Will it encourage people to respect and value their contribution to society?	0	+	+	?	0	
7. To improve accessibility	Will it improve the level of investment in key community	+	+	0	++	0	Positive effects are predicted. CP1, CP2, CP5 and CP6 seek to improve provision of community services and

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
to key services especially for those most in need	services?						facilities, linked with housing development. Focussing provision in Growth Areas, and within housing developments is predicted to improve accessibility, and affordability. Uncertain effect predicted in relation to CP6, as affordability will depend on how facilities proposed are delivered in practice.
	Will it make access more affordable?	+	+	0	+?	+	
	Will it make access easier for those without access to a car?	+	+	0	+	+	
Environmental							
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	-	-/--	-	+	+	Mixed effects are predicted. One major positive effect is predicted for increased proportion of journeys made using modes other than the car (CP1) due to the focus of this policy on linking development with areas of high public transport accessibility and the creation of new orbital public transport links, as set out in the Key Diagram). CP1, CP2 and CP3 however are predicted to have negative effects on traffic volumes and congestion as population and employment growth on the scale proposed will generate additional traffic, over the plan period. These negative effects are predicted regardless of mitigation measures taken. Positive effects predicted in relation to CP5 and CP6 due to the focus of these policies on creating mixed and accessible places, which may help reduce the need to travel and encourage the use of public transport, in the long-term. High quality developments / communities which may also encourage walking and cycling.
	Will it increase the proportion of journeys using modes other than the car?	++	+/-	+/-	+	+	
	Will it encourage walking and cycling?	++	0	?	+	+	
9. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of surface and ground water?	?	-?	-	0	-?	None of the policies explicitly addresses water use or quality, however negative effects are predicted for policies CP1 – CP3 due to the scale of development, population increase and employment generation proposed. These factors will lead inevitably to increase water demand, as well as the possibility for increased run-off and water pollution. In the long-term effects may be exacerbated by climate change impacts.
	Will it reduce water consumption and improve water efficiency?	-	-	-	0	0	
10. To improve air quality	Will it improve air quality?	-/+	--	-	+	+	Mixed effect predicted. CP2 and CP3 predicted to have negative or major negative effects on air quality due to the increased traffic associated with in the short-term construction and in the medium to long-term employment
	Will it help achieve the objectives of the Air Quality Management Plan?	+	--	-	+	+	
	Will it reduce emissions of key	+	--	-	?	0	

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
	pollutants?						and population growth on the scale proposed. Minor positive effects predicted in relation to CP1 and CP6 as they seek to focus the highest density development in areas with relatively good public transport accessibility, and CP5 which seeks to improve public transport, walking and cycling infrastructure. These positive effects will depend on a relative reduction in road traffic.
11. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	?	+/-	0	0	0	Generally Policies CP1 – CP5 are not predicted to have significant direct effects on biodiversity. CP5 is predicted to have a positive effect on trees, as supporting text stresses the importance of tree planting. Mixed and uncertain effects are predicted due to the tension between regeneration of areas, with the intention of creating high quality “sustainable” neighbourhoods, which would be expected to have potential positive effects, with the pressure on green and open spaces as well as biodiversity of development and house building on the scale proposed. The large number of uncertain effects reflects that the scale and nature of effects will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	?	0/-?	0	0	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	?	-?	0	0	0	
	Will it protect and enhance woodland cover and trees and promote their management?	+/?	-/+?	?	+	?	
	Will it improve access to and promote the educational value of sites of biodiversity value?	0	0	0	0	0	
12. To maintain and enhance the character and quality of landscapes and townscapes	Will it improve the landscape character and visual amenity of open spaces?	+/?	-?	0	+	+	CP1, CP2, CP5 and CP6 are predicted have positive or major positive effects on enhancing the quality of townscapes and the public realm, particularly in the long-term. These policies are concerned with developing growth areas and also seek to ensure that development provides appropriate physical and social infrastructure.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	++	+?	+	++	
	Will it protect and enhance local	+	+/-	0	+	+	

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
	distinctiveness and sense of place?						Other positive effects are associated with improving landscape character, visual amenity and local distinctiveness (CP5 and CP6). Mixed / uncertain minor negative effects predicted in relation to Policy CP2 as housing development on the scale proposed has the potential to have negative impacts on landscape and townscape depending on location, design etc. Other effects uncertain as these will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
	Will it minimise visual intrusion and protect views?	+/?	-?	?	?	?	
	Will it decrease litter in urban areas and open spaces?	0	0	0	?	0	
13. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	0/+?	+/-?	0	+	?	Potential positive effect predicted in relation to Policy CP5 as it specifically seeks consideration to be given to the heritage of areas and the reuse and restoration of "buildings of merit". Other effects uncertain as the policies do not explicitly address the historic environment and cultural assets, and the potential effects of development on the scale proposed will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
	Will it protect listed buildings and their settings?	0/+?	?	0	+?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	?	0	0	?	
14. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption and the need to travel?	-	--	-	+	+	CP1 – CP3 predicted to have potential negative effects, particularly in relation to the generation of greenhouse gas emissions and increased flood risks. These effects are due in the short-term to construction activity associated with the scale of development proposed and in the long-term energy use and traffic generation associated with population growth. Increased flood risk is predicted due to increases in run-off associated with new development, as well as potential pressure for development in flood risk zones. Given the scale of development proposed, negative effects are predicted regardless of mitigation measures taken. Potential positive effects in relation to CP5 and CP6 due to emphasis on linking higher density development with public transport accessibility as well as policy text seeking to provide green space and open areas (with potential to reduce private car use). Policy CP5 refers to the IIF, which
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	-	?	+	?	
	Will it reduce emissions of ozone depleting substances?	0	0	0	0	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	-	-	0	-?	
	Will it reduce the risk of damage to property from storm events?	?	?	0	0	?	
	Will it help reduce the impact of increased urban temperatures on people and property?	?	?	0	+?	?	

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
							seeks the incorporation of Combined Heat and Power within development at Wembley. Other effects uncertain as these will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	--	-	-?	0	Negative and major negative effects predicted in relation to Policies CP1 – CP3, due, in the short term to increased resource use and waste associated with construction and development on the scale proposed, and in the long-term to increased consumption and waste generation arising from population growth and increased commercial activity proposed. Positive effect predicted in relation to reducing waste in the construction industry (CP6) as this policy seeks to encourage exemplary design and the use of CABE design guidance, which is likely to encourage the minimisation of wastage in construction. Uncertain and uncertain-positive effects in relation to waste recovery and facilities, as development may offer opportunities to improve facilities and increase recycling, however this will depend on implementation of other policies in the Core Strategy (e.g. CP19) as well as the forthcoming Development Management Policies DPD and the proposed West London Waste DPD.
	Will it reduce household waste?	-	--	0	0	0	
	Will it increase waste recovery and recycling and improve facilities?	?	+?	?	?	+?	
	Will it reduce hazardous waste?	?	0	?	0	0	
	Will it reduce waste in the construction industry?	-	--	-	-?	+	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	+	+	0	+	Generally positive effects are predicted in relation to this objective. Policies CP1, CP2, CP3 and CP6 seek to promote the use of previously developed sites and focus development in areas in need of regeneration. As large areas of the borough (and the Growth Areas) are historic industrial land, redevelopment will require that potentially contaminated land is remediated. Other effects uncertain as these will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	++	+	0	+	
	Will it ensure contaminated land is remediated as appropriate?	+	?	+?	0	0	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	?	?	0	0	0	
	Will it reduce the risk of subsidence and heave?	?	-?	0	0	?	

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
Economic							
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	+	++	+	0	<p>Policies CP1 – CP6 predicted to have positive and major positive long-term effects in relation to encouraging economic growth, with no significant negative effects predicted.</p> <p>CP1 – CP3 predicted to have the potentially most significant effects, particularly as regeneration, supply of new housing (and associated infrastructure) and the promotion of strategic industrial locations are likely to enhance the image of the borough as a business location.</p> <p>CP3 is predicted to have major positive effects against three criteria, due to its focus on promoting commercial regeneration by protecting industrial locations from inappropriate development, and targeting significant growth in employment over the plan period.</p> <p>Policies CP5 and CP6 predicted to have uncertain and minor positive effects. Due to their emphasis on creating well designed, mixed use developments with appropriate infrastructure, their effects on economic growth are predicted to be predominantly indirect.</p>
	Will it improve business development and enhance productivity?	+	+	++	+	0	
	Will it improve the resilience of business and the local economy?	+	+	+	+	+	
	Will it promote growth in key sectors?	+	+	+	0	0	
	Will it promote growth in key clusters?	+	+	+	0	0	
	Will it enhance the image of the area as a business location?	++	++	++	+	+	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	+	++	+	0	<p>Overall positive effects predicted with no potential negative effects.</p> <p>CP1 and CP3 are likely to have major positive effects due to their specific focus on providing new, and ensuring local peoples have access to, employment opportunities. The focus of policies CP1 – CP3 on regenerating the borough is also predicted to contribute to employment generation (see Objective 17).</p>
	Will it provide job opportunities for those most in need of employment?	++	+	+	+	0	
	Will it help to improve earnings?	+	+	+	0	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	++	++	+	+	<p>Regeneration of Brent is the key aim of Policies CP1, CP2 and CP3, and these are therefore predicted to have major positive effects.</p> <p>CP5 and CP6 are predicted to have minor positive effects, as ensuring provision of appropriate physical and social infrastructure, and high quality design, are likely to contribute to reducing disparities.</p>

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	+	+/-?	+?	0	<p>The delivery of housing and commercial development on the scale proposed (and associated infrastructure) as set out in Policies CP2 and CP3 will require a considerable amount of inward investment over the short and long-term.</p> <p>Local construction companies (indigenous businesses) may benefit from work on development in the borough (CP2) in the short and medium term.</p> <p>A central aim of CP3 is to make land and property available for commercial development, and by directing / focussing development in key Growth Areas, CP1 and CP2 seek to reduce pressure on employment land from residential development.</p> <p>Potentially mixed, but uncertain, effect predicted in relation to the impact of CP3 on indigenous business, as significant external business investment could increase competition pressure and/or increase premises costs for local businesses, especially in the long-term.</p>
	Will it encourage inward investment?	+	++	++	+	0	
	Will it make land and property available for business development?	+	+	++	0	+?	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-/+	+/-	+/-	+?	?	<p>All policies are predicted to have significant positive effects in terms of improving accessibility to work by public transport, walking and cycling, particularly in the long-term.</p> <p>CP1 seeks to locate development in areas of good public transport accessibility, and create new public transport links as indicated on the Key Diagram. Providing appropriate facilities and services alongside new development (CP5) and linking density to relative public transport accessibility (CP6) is also predicted to have potential significant positive effects.</p> <p>However, mixed effects are predicted in relation to reducing commuting (CP1, CP2 and CP3) as the scale of development proposed is predicted to result in an increase in commuting by private car, over-and-above beneficial effects of locating growth in areas of relatively good accessibility.</p> <p>Other effects uncertain as these will depend on the implementation of other policies in the Core Strategy, the SSA DPD, the forthcoming Development Management Policies DPD, and other policy / strategy documents.</p>
	Will it improve accessibility to work by public transport; walking and cycling?	++	+	+	+	++	
	Will it improve access between key employment areas and key transport interchanges?	++	0	+/-	+?	+	
	Will it encourage rail and water based freight movement?	?	0	-?	0	0	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: +/-							
Overall Comments							

SA objective	Criteria	Policy Number					Comments
		CP1	CP2	CP3	CP5	CP6	
<p>Generally, the spatial strategy policy are predicted to have potentially positive effects against the SA objectives. There are a significant number of effects that are uncertain, or the effects are unknown, and this is generally as the Delivering Sustainable Places and Overall Spatial Change policies are relatively strategic, and thus effects will depend on the implementation of other policies in the Core Strategy and forthcoming Development Management Policies DPD. Potential positive effects are to some extent expected to be felt across the borough and will benefit the wider community, however the focus of the potential positive effects is expected to be greatest in the Growth Areas, which are the strategic focus for development and regeneration.</p> <p>Potentially major positive effects are particularly predicted in relation to economic objectives (Objectives 17 – 20). However, it should be noted that the realisation of these economic effects will depend on development in line with policy expectations. These expectations are to a large extent dependent on the health of the wider economy. If the current economic downturn continues during the first years of implementing the Core Strategy this may negate, or delay any positive effects predicted.</p> <p>Policy CP2 has the greatest potential to cause significant negative effects, particularly when taken in isolation from the other Core Strategy “safeguarding” policies. These potential negative effects are particularly predicted against environmental objectives, and are a result of the potential impacts of the level of growth proposed and the associated construction and occupation effects on resource use, energy consumption, emissions, waste generation, traffic generation etc. Other policies are predicted to have some potentially negative effects, however these are all likely to be minor in significance and generally linked to the level of growth proposed in Policy CP2.</p> <p>Where a potential negative effects is predicted, the mitigation and enhancement comments provided in the table below suggests how these effects may be mitigated.</p>							

Summary of mitigation and enhancement

6.18 Table 18 includes all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 18: Delivering Sustainable Development and Overall Spatial Change Policies – summary of proposed mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
CP1 – Spatial Development Strategy	<p>General mitigation and enhancement comments:</p> <p>Due to the nature of Policy CP1 the scale of effects predicted will depend on the implementation of other policies in the Core Strategy, as well as site specific implementation provided in the SSA DPD.</p> <p>It is recommended that the forthcoming Development Management Policies DPD provide more detailed policies to mitigate for negative and enhance positive effects identified. These recommendations are set out in Table 25.</p> <p>Other policy documents such as the Local Implementation Plan (LIP), Brent Air Quality Action Plan and existing SPG / SPDs, are likely to, and future reviews / updates of these documents should seek to, include requirements which will help avoid or mitigate negative effects or help deliver enhancements. For example, improving facilities at key transport interchanges, supporting improvements to public transport, walking and cycling infrastructure, and seeking to promote development / initiatives which help reduce the need to travel.</p> <p>Reference in the supporting text paragraph 4.3 to the background paper describing how and why the preferred spatial strategy was selected is welcomed.</p>
CP2 – Population and Housing Growth	<p>General mitigation and enhancement comments:</p> <p>The only way to avoid the potential negative effects predicted from the implementation of Policy CP2 would be to limit the scale of growth. However, this is not possible if the London Plan housing targets are to be met.</p> <p>Mitigation and enhancement will be provided by the other policies in the Core Strategy which seek to minimise environmental effects of development and provide the infrastructure necessary to support it, as well as policies / guidance in the SSA DPD. In particular, the Growth Area Policies (CP7 – CP12) set out development aims and infrastructure needs in the context of each Growth Area. Environmental mitigation is helped by policies such as CP19 - Brent Strategic Climate Mitigation and Adaptation Measures.</p> <p>In addition, the Core Strategy infrastructure needs are underpinned by the Infrastructure and Investment Framework, which provides detailed information on area specific infrastructure needs.</p> <p>The phasing of proposed development will be critical to both manage potential negative effects during construction, including cumulative effects such as noise and dust on local people from several development sites within a small area, and ensure that the infrastructure necessary is in place at the appropriate time. This is dealt with in Policy CP15 – Infrastructure to Support Development.</p> <p>Other policy documents such as the Local Implementation Plan (LIP), Brent Air Quality Action Plan and existing SPG / SPDs, are likely to, and future reviews / updates of these documents should seek to, include requirements which will help avoid or mitigate negative effects or help deliver enhancements. For example, promoting sustainable construction methods, and in relation to transport: reducing the impact of traffic on air quality and noise pollution; improving facilities at key transport interchanges; supporting improvements to public transport, walking and cycling infrastructure; and, seeking to promote development / initiatives which help reduce the need to travel.</p> <p>As noted in the Core Strategy (paragraphs 5.36 – 5.41) LB Brent is working with other West</p>

Policy	Proposed mitigation and enhancement and SA comments
	<p>London boroughs to develop a Joint Waste DPD – the West London Waste Plan (WLWP). It is recommended that the WLWP should explicitly include policy and / or guidance in relation to waste associated with construction and population growth proposed.</p> <p>It is recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate for negative and enhance positive effects identified. These recommendations are set out in Table 25.</p>
<p>CP3 – Commercial Regeneration</p>	<p>General mitigation and enhancement comments:</p> <p>Mitigation of the predicted potential negative environmental effects of development for business and industry are partly addressed by other policies in the Core Strategy, in particular CP6 – Design and Density in Place Shaping, CP15 – Infrastructure to Support Development, CP17 – Protection and Enhancement of Open Space, Sports and Biodiversity, and CP18 – Brent Strategic Climate Mitigation and Adaptation Measures.</p> <p>It is recognised that storage and distribution is predicted to be a growth industry nationally, and for the Borough, and protecting industrial land restricts opportunities for high value uses particularly residential development, however caution is recommended against it being encouraged as a focal industry for Brent (supporting text paragraph 4.20). Distribution is likely to create disproportionately less employment relative to the land take of buildings, as well as generate traffic and associated noise and air pollution.</p> <p>Phasing of infrastructure will also be important, and this is addressed explicitly in Policy CP15 – Infrastructure to Support Development.</p> <p>It is recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate for potential negative and enhance potential positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • Use of the term “sustainable development” in this policy: “...new <i>sustainable development</i> for business and industry will be encouraged” is somewhat ambiguous. It is recommended that the term sustainable or sustainable development should only be used where it is defined / explained within the context of its use. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • It is recommended that consideration be given to removing the emphasis of supporting text (paragraph 4.20) on encouraging distribution businesses to locate in the borough. It is recognised that distribution is considered an aspect of a diverse local economy, however in sustainability terms, distribution business may contribute disproportionately to congestion, noise and air pollution while providing relatively low levels of low-skilled employment comparative to floorspace. • It is recommended that supporting text includes a cross-reference to Policy CP20 – Strategic and Borough Employment Areas, which encourages business / freight use of rail and water (in line with London Plan policy 3C.25).
<p>CP4 – North West London Coordination Corridor</p>	<p>Recommended changes to policy / supporting text</p> <ul style="list-style-type: none"> • It is recommended that the supporting text identify significant development elsewhere (in adjacent boroughs) in the North West London Co-ordination Corridor which is expected to be the focus of co-ordination.
<p>CP5 – Placemaking</p>	<p>General mitigation and enhancement comments:</p> <p>More detailed implementation will be provided by other policies in the Core Strategy (in particular Growth Area Policies (CP7 – CP12), Policy CP15 – Infrastructure to Support Development, CP23 – Protection of existing and Provision of New Community and Cultural Facilities).</p> <p>The Infrastructure and Investment Framework and existing and proposed supplementary planning guidance, such as the Wembley Masterplan, South Kilburn SPD and proposed SPDs/SPGs in the other Growth Areas, together with Public Realm Strategies, proposed for each Growth Area, will also enhance effects, particularly in relation to quality of townscape.</p> <p>It is recommended that the forthcoming Development Management Policies DPD includes</p>

Policy	Proposed mitigation and enhancement and SA comments
	<p>more detailed policies to mitigate for negative and enhance positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • Within Policy CP5, it is recommended that the current text: “regard shall be had to the following” be replaced with a stronger requirement, such as “major development schemes will be required to show how they will contribute to delivery of the following” because such policy text is more likely to support the use of the criteria in practice. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • Paragraph 4.22 under Placemaking heading should make reference to environmental infrastructure, in addition to physical and social, which is currently included. For definition and explanation of the importance of environmental infrastructure see Environment Agency (2007) <i>Hidden Infrastructure, the pressures on environmental infrastructure</i>. Available at: http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf [accessed 26/05/09] • It is recommended that the supporting text includes reference to the need to protect and enhance habitats and species, perhaps through a cross-reference to Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity. • It is recommended that the supporting text includes reference to the need to protect enhance Listed Buildings and Conservation Areas.
<p>CP6 – Design and Density in Place Shaping</p>	<p>General mitigation and enhancement comments:</p> <p>Detailed conditions and requirements on how this policy would be implemented are provided in other Policies in the Core Strategy, such as CP2, the Growth Area Policies (CP7 – CP12), CP15, CP19, CP21 and CP23.</p> <p>Existing and proposed area specific guidance, in the form of SPDs and SPGs, the proposed Growth Area Public Realm Strategies, together with the SSA DPD should also provide more detailed policy, support implementation and mitigate / enhance the potential negative and positive effects identified.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • It is recommended that the Policy (or supporting text) explicitly encourages the use of Secured by Design guidance and designing out crime principles. See for example: http://www.securedbydesign.com/. If this is considered too detailed for the Core Strategy, it is recommended that this requirement be included in the forthcoming Development Management Policies DPD. • It is recommended that clarification is provided for the statement “highest and exemplary standard” in design (first bullet) so it is clearer what is required in this regard. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • It is recommended that specific reference be made in the supporting text of the important role good quality design can play in relation to environmental factors, such as water use efficiency, energy efficiency, climate change adaptation, flood resilience etc. If this is considered too detailed for the Core Strategy, it is recommended that this requirement be included in the forthcoming Development Management Policies DPD.

Strategic Area Policies and Infrastructure to Support Development

- 6.19 The *Strategic Area policies* (CP7 – CP13) set out development and infrastructure priorities in each of the Core Strategy Growth Areas: Wembley; Alperton; South Kilburn; Church End; and, Burnt Oak / Colindale, as well as Park Royal and the North Circular Road Regeneration Area.
- 6.20 The *Infrastructure to Support Development* policies set out LB Brent policy intentions in relation to public transport (CP14) and the delivery of infrastructure in relation to development in the borough (CP15). CP15 simply sets out the Council's intention to develop an Infrastructure and Investment Framework and how infrastructure is intended to be funded. It is considered not appraisable for sustainability effects, as it is the implementation of other policies in the Core Strategy (in particular the Strategic Area Policies), the Infrastructure and Investment Framework, the SSA DPD, and policies included in the forthcoming Development Management Policies DPD which will dictate the scale and type of effects.
- 6.21 As a result the appraisal summary of CP14 – Public Transport Improvements is included with the *Strategic Area policies*, in Table 19 below. Mitigation and enhancement comments for policies CP14 and CP15 are included in Table 21.

Summary of potential effects

- 6.22 The *Strategic Area policies* and *Infrastructure to Support Development* policies are predicted to have generally positive effects in relation to social and economic sustainability objectives, due to their shared goal of facilitating housing led regeneration in the Growth Areas and supporting this development with appropriate infrastructure. The *Strategic Area policies* are, however, predicted to have some potentially significant negative effects in relation to environmental objectives. These potential negative effects relate in particular to the impacts of construction and population growth on the scale proposed.
- 6.23 Table 19 summarises the appraisal of each policy to enable comparison of policies by SA objective and an overview of the effects of the *Strategic Area policies* and *Infrastructure to Support Development* policies (see Appendix 9 for further details).

Strategic Area Policies

- 6.24 The key potentially positive sustainability effects arising from the *Strategic Area policies* include:
- As housing-led mixed-use development is the central aim of the *Strategic Area policies*, potentially permanent major long-term positive effects are predicted in relation to **reducing the number of unfit homes and improving the quality of the housing stock.**

- The policies' shared aim of facilitating regeneration, housing provision and enhanced / increased social infrastructure is predicted to have potentially positive long-term effects on **reducing poverty and social exclusion, improving health and quality of life**. However, the potential for both positive and negative effects under a single SA objective or minor positive effects are predicted in many cases, as the social infrastructure targets included in the policies, even where delivered, are only intended to address additional demand arising from development, and as such existing deficits may remain, and in some cases be exacerbated.
 - Significant potential long-term positive economic effects are predicted, as the *Strategic Area policies* promote new commercial premises and economic activity, which is likely to **encourage new start ups, and provide business opportunities and employment**, some of which is likely to benefit local people. Potential economic effects are predicted to be particularly strong in Wembley (CP7), Alperton (CP8) and Park Royal (CP12) where economic regeneration and the provision of improved industrial / commercial units are a particular focus of policy.
 - Regeneration, provision of social infrastructure and improvements to the quality of public realm are also likely to **enhance the image of the area as a business location**, especially in the long-term.
 - The focussing of development and growth in the Growth Areas is predicted to have a positive effect in **ensuring development occurs on derelict, vacant or underused previously developed land and buildings**, as well as requiring the remediation of potentially contaminated land.
- 6.25 The potential positive effects predicted depend, to a large extent, on the ability of housing development to enable / provide contributions to improvements to social infrastructure, such as health facilities, open space, sport facilities etc. The provision of all infrastructure types is dependent on development of a sufficient cumulative scale to achieve "critical mass" in order to facilitate infrastructure investment. There is therefore a risk that the infrastructure will not be delivered, if a critical mass is not achieved. This would clearly reduce the scale of the potential positive effects identified, or even mean that they are not realised at all.
- 6.26 The likelihood of infrastructure needs arising from new development and population in Brent being met will depend on how successful, in practice, the policies and the Infrastructure Investment Framework are in ensuring development includes or finances the infrastructure requirements identified. For certain types of infrastructure, for example schools and health services, the likelihood of delivery is considered to be relatively high. However, for other types of infrastructure, such as open space provision and informal sports and play area provision, the appraisal identified that there is a risk that sufficient supply provision may not be delivered. Strong guidance in the Infrastructure Investment Framework, forthcoming Development Management

Policies DPD and site or area specific guidance could help avoid for this potential shortcoming.

- 6.27 Equally the delivery of development as set out in the *Strategic Area policies* will be dependent to a large extent on the health of the wider economy. If the current economic downturn continues during the first years of implementing the plan this may negate, or delay any positive effects predicted.
- 6.28 As noted, while significant potential positive effects are predicted in relation to social and economic objectives, the *Strategic Area policies* are also predicted to have some potentially significant negative effects, due in large part to the impacts of construction and population growth on the scale proposed.
- 6.29 Key potentially negative sustainability effects arising from the *Strategic Area policies* include:
- Permanent **increases in travel need and traffic generation** arising in the long-term from residential, commercial, retail and leisure development on the scale proposed, particularly in Wembley – CP7, and associated **negative effects on air quality, noise pollution and congestion**.
 - Significant **increase in the use of materials, waste generation and potential noise nuisance** associated both in the short-term with construction, and in the long-term with the occupation of new homes, retail and commercial buildings.
 - Potentially permanent, long-term and **significant increases in greenhouse gas emissions and energy use**, associated with construction, population growth and commercial activity due to increased traffic, use of energy during construction and habitation of homes, emissions associated with commercial activity and transport etc.
 - Increased short and long-term **water demand** and potential **negative effect on water quality**, especially associated with possible increases in run-off.
 - Potential long-term increase in the **risk of flooding to people and property** associated with 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.
 - In some areas new development and increased population is predicted to **exacerbate existing deficits in social infrastructure and open space / sports facilities**, as proposed provision is expected to fall short of new demand associated with population increases. Specific cases are highlighted in Table 20 – summary of mitigation and enhancement, below.

Infrastructure to Support Development

- 6.30 As noted, due to the nature of Policy CP15, a detailed appraisal matrix was not completed. Policy CP14 – Public Transport Improvements is predicted to have predominantly positive effects with only one minor potential negative effect predicted.
- 6.31 Potentially positive effects arising from Policy CP14 – Public Transport Improvements include:
- Beneficial effect in helping to **reduce social exclusion**, especially in the long-term where ease and affordability of access to essential services is improved for households without access to a car.
 - The aim of the policy is to improve public transport provision. In the long-term this should **increase the proportion of journeys made by modes other than the car**. However, the impact on overall traffic volumes and congestion is uncertain given the increases in traffic volumes predicted in relation to Policy CP2 and the *Strategic Area policies*.
 - Improving public transport infrastructure within the Borough is likely to lead in the long-term to the **improved access to employment opportunities and between public transport interchanges** and the **enhancement of the image of Brent as a business location**.
- 6.32 Only one potential minor negative effect is predicted:
- Enhanced public transport provision may lead to the **encouragement of additional commuting**, however where this is by public transport the environmental and social effects will be less than commuting by private car.
- 6.33 Details are included below on the mitigation and enhancement proposed for each *Strategic Area policy* (Table 20) and *Infrastructure to Support Development* policies (Table 21), and other recommendations arising from the Sustainability Appraisal.

Table 19: Strategic Area Policies and Public Transport Improvements – appraisal summary

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
Social										
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	+	+	+	+	+	+	+	<p>All policies are predicted to have a positive long-term effect on reducing poverty and social exclusion. The Growth Area Policies (CP7 – CP11) and Park Royal (CP12) seek to regenerate these areas, while providing appropriate infrastructure to support development.</p> <p>CP13 specifically seeks to improve quality of life for Brent residents living in close proximity to the North Circular Road (NCR), and this is predicted to have positive effects in these areas.</p> <p>By seeking to improve public transport facilities in the borough CP14 is predicted to help improve access, especially for those without access to a car, and thus have a positive effect on social exclusion.</p> <p>Effects on affordability uncertain, as increased provision will not necessarily improve affordability, and new infrastructure is intended specifically to meet new demand, rather than address existing deficiencies.</p>
	Will it improve affordability of essential services?	+	+	+	+	+	+	0	+	
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	0	0	0	0	0	0	0	<p>For policies CP7 – CP12 mixed effects are predicted. While the policies do include targets for the provision of health and sport / open space facilities as there are existing deficits in provision in many areas, the overall effect is predicted to be neutral in relation to access to health care, and uncertain in relation to opportunities for healthy lifestyles. There is the potential for negative effects on healthy lifestyles and physical and mental health, where increased population with insufficient additional provision of open space / sport facilities may reduce opportunities.</p> <p>Regeneration (CP7 – CP12) predicted to have positive effects on health inequalities, particularly in the long-term.</p> <p>Construction associated with development on the scale proposed is predicted to have significant temporary short / medium-term negative effects in relation to noise pollution. Increased residential densities and population may also have long-term impacts on noise concerns.</p> <p>CP13 is predicted to have major positive effects in relation to physical and mental health and reducing noise concerns for</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	-?	-?	-?	-?	-?	-?	0	0	
	Will it reduce health inequalities?	+	+	+	+	+	+	0	0	
	Will it improve physical and mental health?	-/+	-?	-?	-?	-?	-?	++	0	
	Will it reduce noise levels and concerns?	-	-	-	-	-	-	++	+	

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
										those living close to the NCR.
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	0	0	0	0	0	Mixed effects predicted. Policies CP7 – CP12 seek to increase provision of education facilities. However in some areas deficiencies already exist, and population increase is predicted to outweigh new provision, and thus long-term deficits in school places are possible.
	Will it improve access to high quality educational facilities?	-	+	+	-	+	-	0	0	
	Will it help fill key skill gaps?	0	0	0	0	0	0	0	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	+	+	+	+	+	0	0	Significant positive effects predicted for all Strategic Area Policies. A central aim of Policies CP7 – CP12 is increased provision of housing, and (in line with CP2) 50% of this is intended to be affordable. CP9 and CP10 specifically seek mixed tenure and family housing provision. CP13 seeks the re-housing of those moved from dwelling adjacent to the NCR.
	Will it encourage a range of dwelling type, size and tenure?	+	+	++	++	+	0	0	0	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	++	+	+	+	+	0	+	0	
	Will it reduce homelessness?	?	0	0	0	0	0	0	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	++	++	++	+	++	++	0	0	Regeneration and public realm improvements (CP7 – CP12) may have a beneficial effect on crime and fear of crime in the long-term, however these effects are uncertain. Minor positive effects predicted for CP10 as supporting text emphasises the benefits of 'natural surveillance' and aims to create a safe and secure village centre.
	Will it reduce the fear of crime?	++	++	++	+	++	++	0	0	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	++	++	++	++	++	++	0	0	Generally positive but uncertain effects predicted. Provision of new facilities as targeted in Policies CP7 – CP12 may encourage engagement, however this is uncertain. Regeneration and redevelopment may foster a sense of pride in local areas. CP7 – Wembley is intended to create "Destination Wembley" and be a source of pride for those living in Wembley and wider Brent. By addressing specific concerns over quality of life and visual amenity along the along the NCR, CP13 is also predicted to have a positive effect on pride in the local area. Supporting text to CP13 states that local communities will be fully involved in proposals for change. This is likely to minimise distress and disruption and increase the ability of people to influence decisions which affect them.
	Will it foster a sense of pride in local area?	+	++	++	++	++	++	+	++	
	Will it increase the ability of people to influence decisions?	0	0	0	0	0	0	+	0	
	Will it improve ethnic relations?	0	0	0	0	0	0	0	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	0	0	0	0	0	0	0	
	Will it encourage people to respect and value their contribution to society?	0	0	0	0	0	0	0	0	
7. To improve accessibility to key	Will it improve the level of investment in key community services?	+	+	++	+	++	?	0	0	Specific targets in policies CP7 – CP12 seek improved provision of community facilities, which is predicted to

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
services especially for those most in need	Will it make access more affordable?	-	-	-?	-?	-	?	0	+?	improve the level of investment. Effects on ease of access and affordability potentially negative however, especially in Wembley (CP7), Alperton (CP8) and Burnt Oak / Colindale (CP11) as in these areas there is an apparent shortfall in proposed provision (in policy targets) and demand associated with increased population. CP14 predicted to have positive effects on access, and potentially affordability, as improved public transport facilities are predicted to make access easier, especially for those without access to a car.
	Will it make access easier for those without access to a car?	-	-	-?	-?	-	?	0	+	
Environmental										
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	--	-	-	-	-	-/+	+/-	+?	Significant negative and mixed effects are predicted in relation to traffic volumes and congestion as increased development, population and economic activity, which are the central aims of CP7 – CP12, are all likely to increase the need to travel, even where development is in areas accessible by public transport and where other mitigation measures are taken. CP13 predicted to have mixed effects as junction improvements may help reduce congestion in the short-term and encourage some additional car travel, especially in the long-term. Generally uncertain effects in relation to increasing proportion of journey using modes other than the car and encouraging walking and cycling. While Policies CP7 – CP12 seek to improve provision of public transport infrastructure, the scale of development and population increases are predicted to outweigh these benefits. Minor positive effects in relation to CP8 and CP13 as these policies specifically seek to provide walking and cycling routes / infrastructure. Major positive effect in relation to CP14, as the policy is explicitly seeking to improve public transport infrastructure in the borough.
	Will it increase the proportion of journeys using modes other than the car?	+?	?	?	?	?	?	-?	++	
	Will it encourage walking and cycling?	+?	+	+?	+?	+?	?	+	0	
9. To improve water quality; conserve water resources and provide for	Will it improve the quality of surface and ground water?	-	-?	-?	-?	-?	-?	+?	0	Negative or uncertain negative effects predicted for policies CP7 – CP12 due to the impacts of development / construction on the scale proposed and the increased demand for water associated with population growth / increased economic activity.
	Will it reduce water consumption and improve water efficiency?	-	-	-	-	-	-	0	0	

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
sustainable sources of water supply										CP13 may have a positive effect on surface water, where environmental improvements along the NCR provide opportunities to mitigate polluted run-off from the NCR.
10. To improve air quality	Will it improve air quality?	--	-	-	-	-	-/+	+/-	+?	Major negative effect predicted in Wembley (CP7) and negative effects predicted in other areas (CP8 – CP11) due to the impacts in the short / medium term of construction on the scale proposed, and in the long-term due to traffic increases associated with new population and economic activity. Mixed effects in relation to CP12 due to objective of policy to significantly improve public transport infrastructure and CP13 as while environmental improvement along the NCR may lead to some air quality mitigation, reduced congestion in the short-term (associated with junction improvements) may encourage increased car traffic in the long-term. Uncertain positive effects in relation to CP14, as increased public transport provision may encourage some reduction in car traffic, with air quality benefits, however this is likely to be outweighed by the scale of population growth / development in the borough.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	-	-	-	-	-/+	+/-	+?	
	Will it reduce emissions of key pollutants?	-	0	0	0	0	0	+/-	+?	
11. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	+?	+	?	?	?	0	0/+	0	Limited significant effects predicted. There are areas of local nature conservation importance, or other designation in all Growth Areas (see Figure 34, Part A), except South Kilburn (CP9), however biodiversity and habitat are not explicitly addressed in any of the policies. Supporting text to Policy CP8 – Alperton seeks the introduction and enhancement of areas of biodiversity. Policies CP7 – CP12 include targets relating to tree planting and CP13 seeks to plant trees / promote greening of the NCR corridor. Therefore positive effects are predicted in relation to the protection and enhancement of trees.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	0	0	0	0	0	0	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	0	0	0	0	0	0	0	0	
	Will it protect and enhance woodland cover and trees and promote their management?	+	+	+	+	+	+	+	0	
	Will it improve access to and promote the educational value of sites of biodiversity value?	0	0	0	0	0	0	0	0	
12. To maintain and enhance the character	Will it improve the landscape character and visual amenity of open spaces?	+	-/+	+	+	-/+	?	0	0	Generally positive effects predicted, as Policies CP8 – CP12 seek to promote regeneration, improve public realm and

SA objective	Criteria	Policy Number								Comments		
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14			
and quality of landscapes and townscapes	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	+	+	+	+	+	+	+	+	+?	significantly redevelop the Growth Areas and CP13 seeks to improve the image / environment along the NCR corridor. The creation of distinctive quarters in South Kilburn (CP9) is predicted to have a major positive effect on sense of place and local distinctiveness, particularly in the long-term. Potentially mixed effects in relation to CP8 – Alperton and CP11 – Burnt Oak / Colindale as in these areas, while provision of new open space is proposed, there are potentially significant shortfalls due to existing deficits and increased demand (see Appendix 9). Impact on visual intrusion / views uncertain.
	Will it protect and enhance local distinctiveness and sense of place?	+	+	++	+	+	+	+	0	0	+?	
	Will it minimise visual intrusion and protect views?	?	?	?	?	?	?	?	0	0	0	
	Will it decrease litter in urban areas and open spaces?	0	0	0	0	0	0	0	0	0	0	
13. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	?	?	?	?	?	?	?	0	0	0	Uncertain or neutral effects predicted. Policies CP7 – CP12 due to the scale of change they seek to facilitate have the potential for significant positive and negative effects on the historical, cultural and archaeological heritage of the borough, particularly in the long-term. However these aspects are not addressed specifically in any of the policies, and the effects are therefore uncertain.
	Will it protect listed buildings and their settings?	?	?	?	?	?	?	?	0	0	0	
	Will it help preserve, enhance and record archaeological features and their settings?	?	?	?	?	?	?	?	0	0	0	
14. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption and the need to travel?	--	-	-	-	-	-	-	+/-	+	+	Generally negative or mixed effects predicted. A major negative effect in relation to increased greenhouse gas emissions is predicted for CP7, and minor negative effects for CP8 –CP12, due to the energy consumption, and greenhouse gas emissions associated with in the short / medium term construction on the scale proposed, and in the long-term increased traffic and energy consumption associated with proposed population increase over the plan-period. Mixed effect on greenhouse gas emissions predicted in relation to CP13, as the policy aims to provide improved cycling facilities, which may reduce emissions in the short-term, but junction improvements, where they reduce congestion, may, in the long-term encourage some increased car traffic. One minor positive effect predicted for CP7 – Wembley, as the policy specifically seeks to include combined heat and power schemes within development.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	+	?	?	?	?	?	?	0	0	0	
	Will it reduce emissions of ozone depleting substances?	0	0	0	0	0	0	0	0	0	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	-	-?	-?	-?	-	-	0	0	0	
	Will it reduce the risk of damage to property from storm events?	0	0	0	0	0	0	0	0	0	0	
	Will it help reduce the impact of increased urban temperatures on people and property?	-	-	-	-	-	-	-	0	0	0	

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
										Other negative effects predicted in relation to flood risk, as increased development may lead to a rise in impermeable surfaces, leading to increase run-off and surface water flooding, and increased urban temperatures, as increased residential densities have the potential to exacerbate the urban heat island effect.
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	-	-	-	-	-	-	0	Significant negative effects are predicted in relation to policies CP7 – CP13 due to the level of material use and waste associated in the short / medium term with construction on the scale proposed, and in the longer term with the increase in population and related consumption / waste generation. Uncertain effects in relation to waste recovery, as construction / increased waste generation / redevelopment may offer opportunities to increase recycling / improve facilities, however this is not addressed in the policies.
	Will it reduce household waste?	-	-	-	-	-	-	0	0	
	Will it increase waste recovery and recycling and improve facilities?	+?	?	?	?	?	?	0	0	
	Will it reduce hazardous waste?	0	0	0	0	0	0	0	0	
	Will it reduce waste in the construction industry?	-	-	-	-	-	-	-	0	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	+	+	+	+	+	+?	0	Significant long-term and permanent positive effects predicted in relation to Policies CP7 – CP12. These policies central aim is to regenerate underused and previously developed areas, vacant / derelict land and buildings. Development on historic industrial land, which makes up a significant portion of the Growth Areas (see Figure 27 Part A), will necessitate remediation of any existing contamination.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	+	+	+	+	+	+?	0	
	Will it ensure contaminated land is remediated as appropriate?	+	+	+	+	+	+	0	0	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	0	0	0	0	0	0	0	
	Will it reduce the risk of subsidence and heave?	0	0	0	0	0	0	0	0	
Economic										
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	++	+	++	+	++	0	0	Major and minor significant positive effects predicted for policies CP7 – CP12. All of the Strategic Area Policies seek to bring about regeneration and the creation of mixed-use communities. CP8, CP10 and CP12 in particular include target specifically aimed at providing premises suitable for local / small / start-up businesses, hence potentially major long-term positive effects are predicted.
	Will it improve business development and enhance productivity?	+	+	0	+	0	+	0	0	
	Will it improve the resilience of business and the local economy?	?	?	?	?	?	?	0	0	

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
	Will it promote growth in key sectors?	0	?	?	?	?	?	0	0	Where good quality housing is available, regeneration is achieved (CP7 – CP12) and where transport and access is improved (CP13 and CP14) the image of the area as a business location is also likely to be enhanced, especially in the long-term. Effects on resilience of the economy, and growth in key sectors / clusters uncertain. This reflects the strategic nature of Policies CP7 – CP12. These positive economic effects will depend on development in line with policy expectations. These expectations are in turn also dependent on the health of the wider economy. If the current economic downturn continues during the first years of implementing the plan this may negate, or delay any positive effects predicted.
	Will it promote growth in key clusters?	0	?	?	?	?	?	0	0	
	Will it enhance the image of the area as a business location?	++	++	+	+	+	++	+	+	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	++	+	+	+	+	+	0	0	As in relation to Objective 17, significant positive effects are predicted, as regeneration and employment generation are key aims of policies CP7 – CP12. As noted under Objective 17 these positive effects will depend on development in line with policy expectations. Given current economic conditions there is a real risk that the goals of Policies CP7 – CP12 will be delayed, certainly in the early years of implementation.
	Will it provide job opportunities for those most in need of employment?	+	+	+	+	+	+	0	+	
	Will it help to improve earnings?	+	+	+	+	+	+	0	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	++	++	++	++	++	+	+	Key aim of policies CP7 – CP12, therefore major positive long-term effects predicted. CP13 is predicted to have positive effects by reducing exclusion and improving living conditions in proximity to the NCR. CP14 is likely to help reduce disparity and promote regeneration by improving accessibility to jobs and services through improvements to public transport infrastructure.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	++	+	++	+	+	0	0	As with Objectives 17 and 18, Policies CP7 – CP12 are generally predicted to have significant positive effects. Policies CP8 and CP10 specifically seek the provision of affordable / small workspaces and facilities for small and medium sized enterprises, which are likely to encourage indigenous businesses. However there is some uncertainty in relation to encouraging indigenous business in Wembley CP7, as small / affordable units are not sought, and the scale
	Will it encourage inward investment?	++	+	+	+	+	+	+	+	
	Will it make land and property available for business development?	+	++	+	+	+	++	0	0	

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
										of investment required may make it difficult for local businesses to benefit / invest. Development on scale proposed will necessitate inward investment in all Growth Areas.
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	-/+	-/+	-/+	-/+	-/+	-?	-	Mixed effects predicted. While aim of Strategic Area Policies is to focus development in relatively accessible areas, development / increased population on the scale proposed is likely to generate traffic and commuting. Specific improvements to public transport (CP14) / walking and cycling infrastructure (CP8) are predicted to have positive effects in improving accessibility to work by means other than the car. Mixed effects in relation to CP7 and CP12 reflect the scale of employment creation proposed in Wembley and Park Royal, which is likely to generate road traffic and commuting regardless of improvements to walking / cycling and public transport infrastructure. Supporting text to CP13 states that junction improvements on the NCR should provide better and safer facilities for pedestrians and cyclists. This may make it easier for people to travel to work by foot or bike. One significant negative effect is predicted in relation to CP14, as enhanced provision of public transport may encourage additional commuting. However where this is by public transport the environmental and social effects will be less than commuting by private car.
	Will it improve accessibility to work by public transport; walking and cycling?	+/-	++	+	+	+	-/+	+	++	
	Will it improve access between key employment areas and key transport interchanges?	+	+	0	0	0	-/+	+	++	
	Will it encourage rail and water based freight movement?	0	0	0	0	0	+	0	0	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-										
Overall comments <i>Strategic Area Policies (CP7 – CP13)</i> Policies CP7 – CP12 have the shared aim of facilitating regeneration, housing provision and enhancing social infrastructure. This is predicted to have positive effects on reducing poverty and social exclusion, improving health and providing the opportunity to live in a decent home. The provision of all infrastructure types is dependent on development of a sufficient cumulative scale to achieve “critical mass” in order to facilitate infrastructure investment. There is therefore a risk to the actual delivery of the infrastructure, if a critical mass is not achieved. This would clearly undermine the potential positive effects identified. These effects are also dependent on the health of the wider economy. If the current economic downturn continues during the first years of implementing the Core Strategy this may negate, or delay any positive effects predicted. Mixed potential positive and negative effects or minor positive effects are predicted in many cases, as the targets included in the policies, even where delivered, are only intended to address additional demand arising from development, and as such existing deficits may remain, or even be exacerbated. Significant potential long-term positive economic effects are predicted, from the encouragement and support for new commercial and economic activity, which is likely to										

SA objective	Criteria	Policy Number								Comments
		CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	
										<p>encourage new start ups, and provide opportunities and employment.</p> <p>Potentially significant negative effects are predicted in relation to the noise, resource use and waste generated through construction on the scale required to deliver housing and other development proposed. Construction, and habitation of residential / use of commercial premises will also increase energy use, water use, pollution risk (e.g. run-off) and waste generation. These potential negative effects are predicted even where mitigation measures are taken, due to the scale of change proposed. Flood risk is also identified as a potentially significant issue, particularly where significant development leads to more people / property being exposed to flood risk.</p> <p>New and increased population as well as employment / economic activity is also expected to increase travel need, and associated air pollution, noise and disruption.</p> <p>Policy CP13 is predicted to have mainly positive effects, including in relation to poverty and social exclusion, health and mental health and reduced noise concerns due to the relocation of homes adjacent to the North Circular Road and landscaping of the space left by this relocation.</p> <p>Both potentially positive and negative effects are predicted in relation to traffic and travel. This is because improved cycling / walking facilities as noted above are expected to have positive effects in encouraging people to walk and cycle, however an improved image for, and enhancements at junctions may also encourage more private car travel. There are only two minor potential negative effects predicted, relating to construction and demolition waste and the use of materials in construction. This is related to the demolition and relocation of homes proposed by the policy.</p> <p><i>Infrastructure to Support Development</i></p> <p>Policy CP14 is predicted to have some potentially major positive effects and no major negative effects. Major positive effects are predicted where public transport infrastructure improvements could lead to an increased proportion of journeys by modes other than the car, and due to the focus of the policy on improving access to work by public transport and the improvement of links between key transport interchanges and employment areas. One potentially minor negative effect is predicted, due to the fact that improved public transport provision may encourage additional commuting.</p> <p>Where a potential negative effects is predicted, the mitigation and enhancement comments provided in the table below suggests how these effects may be mitigated.</p>

Summary of mitigation and enhancement

- 6.34 Table 20 includes all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.
- 6.35 Before the policy specific comments and recommendations in Table 20 some overall comments and mitigation and enhancement recommendations, relevant to all Strategic Area policies are provided.

Table 20: Strategic Area Policies – summary of proposed mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
<p>General comments</p>	<p><i>Relationship between Policies</i></p> <p>The potential negative effects associated with, for example, increased construction activity in the Growth Areas to meet housing targets are assessed in the context of the Growth Areas themselves – e.g. impacts within Wembley – as well as considering their contribution to the overall effects in the borough. The appraisal of Policy CP2 – Population and Housing Growth includes an assessment of overall housing development targets, which is the combination of the Growth Area targets plus housing growth in the Rest of the Borough. The potential effects relating specifically to housing and population growth should not be considered cumulatively therefore between Policy CP2 and the Growth Area policies as they are partly appraising the same effects.</p> <p>Similarly the appraisal of Policy CP3 – Commercial Regeneration assessed the job growth targets in Wembley and Park Royal, therefore potential effects against these targets should also not be viewed cumulatively.</p> <p>Specific recommendations relevant to all Strategic Area policies</p> <ul style="list-style-type: none"> • It is recommended that a clearer link is made between the Strategic Area policies and the Infrastructure to Support Development policies. Consideration should be given to re-ordering the policies such that current policies CP14 and CP15 <i>precede</i> the Strategic Area policies. • It is recommended that consideration be given to moving supporting text paragraphs 4.72 – 4.77 “Delivery of Growth” to before the Growth Area policies. • Some infrastructure will be required to meet specific needs at a “local” level (e.g. GPs, play areas, certain types of community facility), however others (notably schools, sports halls and swimming pools and larger open spaces), will need to meet, and will attract, demand from a much wider catchment. The emphasis of policy in the Core Strategy is to use “critical mass” of development to facilitate infrastructure delivery. It is recommended that a clear description, perhaps in supporting text, of how locally set targets for infrastructure provision are expected to contribute to Borough wide need be included. • There remain some inconsistencies among the infrastructure targets included in the different Growth Area policies. For example, targets for Wembley include transport (road / junction improvements) but no mention of other transport infrastructure, while Alperton mentions need for cycling and pedestrian infrastructure improvements. It is recognised that public transport improvements are the focus of a specific policy (CP14), however it is recommended that text is included within each Growth Area policy setting out high-level public / cycling / walking infrastructure expectations. • It is unclear from the current supporting and policy text what the policy position would be where proposed growth in new housing provision is not met. This eventuality would

Policy	Proposed mitigation and enhancement and SA comments
	<p>mean that agreed housing targets were not met, but would also undermine the basis of assumptions about the delivery of necessary infrastructure in the Borough. It is recommended that cross-reference is included to paragraph 6.5 (Delivery and Monitoring) which indicates proposals in the case of housing and commercial development not being achieved in line with targets.</p> <ul style="list-style-type: none"> In addition, given current uncertainty over the viability of significant housing development, it is recommended that consideration is given to a more gradually phased approach to development in the Borough. While the Core Strategy needs to reflect targets set out in the London Plan, an alternative approach could be for the Growth Area policies to outline a clear, and realistic first phase of growth (perhaps to 2016) and specific infrastructure requirements to meet these. For this to be an effective alternative strategy, consideration would need to be given to development and infrastructure priorities based on an assumed slower pace of growth and housing development.
<p>CP7 – Wembley Growth Area</p>	<p>General mitigation and enhancement comments:</p> <p>The infrastructure targets included within Policy CP7 seek to summarise the much more detailed infrastructure requirements included in the IIF for Brent. The IIF seeks to set out ‘the foreseeable infrastructure requirements that will arise from anticipated new housing and commercial development’. If these requirements are met, as set out in the IIF, this will enhance many of the potential positive effects and mitigate potential negative effects related to this policy.</p> <p>The likelihood of the identified infrastructure needs being met will depend on how successful Policy CP7 and the IIF are in encouraging / requiring development to include and / or finance infrastructure appropriate to need. Additional detail on the expected requirements and strong guidance in the IIF and the proposed site / area specific guidance could potentially help mitigate for this concern. The proposed Area Action Plan for Wembley would also be expected to provide a clear policy framework for the provision of infrastructure in Wembley.</p> <p>The draft Wembley Masterplan includes a number of core objectives and specific guidance / strategic direction in relation to the regeneration of Wembley (the Masterplan area is not identical geographically to the Growth Area, but the two significantly overlap). If the Masterplan is successful in encouraging, for example, sustainable construction practices, the inclusion of flood risk management measures, and significant environmental / green space improvements, this will also provide enhancement of potential positive and mitigation of potential negative effects identified in the appraisal.</p> <p>Brent SPG19: Sustainable Design, Construction and Pollution Control is a material consideration in relation to large developments and should provide some mitigation for potential negative effects associated with development on the scale proposed.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate / enhance specific negative / positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> It is recognised that the Council has made a judgement of the level of provision it considers can reasonably be expected to be delivered by development, without rendering schemes unviable. However, from a sustainability perspective where insufficient social infrastructure, open space and play facilities etc are provided for the population increases proposed, negative effects are very likely on the health, quality of life and wellbeing of residents, as well as other socio-demographic factors such as crime, education and perceptions of the borough as a place to live and work. In Wembley, the appraisal identified a potential shortfall in targeted provision of open space in the Growth Area. It is recommended that the target within Policy CP7 is increased to match that identified in the LBB Social Infrastructure Model⁷, which identifies, over the plan period, need for: 3.8ha outdoor open space; 7.8ha outdoor sports space; 4.8ha Child and Young People play space; 235 Local Areas for Play (LAPs) (min size 100m²); 38 Local Equipped Area for Play (LEAPs) (min size 400 m²);

⁷ The Social Infrastructure Model is an Excel spreadsheet based tool used by LBB to calculate the social infrastructure needs (e.g. health facilities, school places, sport and open space) arising from housing development and associated population increase. It uses accepted / agreed ratios (e.g. of area of open space required per 1000 people) to calculate additional demand arising from population increases proposed in the Growth Areas.

Policy	Proposed mitigation and enhancement and SA comments
	<p>and, 10 Neighbourhood Area for Play (NEAPs) / Multi-Use Games Areas (MUGAs) (min size 1000 m²).</p> <ul style="list-style-type: none"> The supporting text (paragraph 4.46) sets out clear public transport, walking and cycling intentions. However, in relation to transport, the policy itself only states the need for “new road connections”, and, “junction improvements”. It is recommended that public transport, walking and cycling infrastructure need is included within the policy, perhaps through a cross-reference to policy CP14 – Public Transport Improvements, and Core Strategy Objective 8.
CP8 – Alperton Growth Area	<p>General mitigation and enhancement comments:</p> <p>More detailed infrastructure requirements are set out in the IIF. If these requirements are delivered this is likely to help mitigate for potential negative and enhance positive effects, particularly in relation to social objectives.</p>
CP9 - South Kilburn Growth Area	<p>Existing area specific guidance is in place in South Kilburn and Park Royal. The South Kilburn SPD (April 2005) and the draft Park Royal Opportunity Area Planning Framework (February 2008) provide much more detailed information, guidance and policy in relation to these two areas, and are likely in many cases to help mitigate potential negative and enhance potential positive effects of the relevant Core Strategy Policies. Proposed Growth Area specific guidance in the other Growth Areas could draw upon the example of the South Kilburn SPD, for example in relation to Development and Design Principles.</p>
CP10 - Church End Growth Area	
CP11 - Burnt Oak / Colindale Growth Area	
CP12 – Park Royal	<p>Brent SPG19: Sustainable Design, Construction and Pollution Control is a material consideration in relation to large developments and should provide some mitigation for potential negative effects associated with development on the scale proposed.</p> <p>LB Brent has published and updated annually a Contaminated Land Inspection Strategy. Guidance to help developers meet planning requirements in relation to contaminated land has also been produced in collaboration with other London Boroughs, and is available through the LB Brent website. These are likely to enhance the potential positive effects in relation to the remediation of contaminated land.</p> <p>Supporting text to the Growth Area policies indicates that LB Brent intends to produce Growth Area specific guidance (such as Area Action Plans) for all the Growth Areas. This guidance will provide an important opportunity to include requirements which could mitigate for potential negative and enhance potential positive effects identified in this appraisal.</p> <p>All development in the Growth Areas should take account of guidance included in the Brent SFRA, and any subsequent revisions.</p> <p>The Mayor's forthcoming Water Strategy for London is also likely to provide targets, policy and guidance in relation to water use, quality and management in development which should be considered as part of preparing the forthcoming Development Management Policies DPD, future updates of documents such as Brent SPG19 and in determining applications in the Growth Areas.</p> <p>Future revisions to the LIP should also specifically consider public transport infrastructure improvements and promote cycling and walking infrastructure in the Growth Areas.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate / enhance specific potential negative / positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> It is recommended that an increased level of detail and quantification is included in targets relating to key social infrastructure needs such as nursery school places, play areas, sports provision etc. and that where included this may be more likely to encourage their provision. It is recognised that the Council has made a judgement of the level of provision it considers can reasonably be expected to be delivered by development, without rendering schemes unviable. However, from a sustainability perspective where insufficient social infrastructure, open space and play facilities etc are provided for the population increases proposed, negative effects are very likely on the health, quality of life and wellbeing of residents, as well as other socio-demographic factors such as

Policy	Proposed mitigation and enhancement and SA comments
	<p>crime, education and perceptions of the borough as a place to live and work. In the case of Policies CP8 – CP12, the appraisal identified potential shortfalls as set out below, and it is recommended that the policies should seek to target provision in line with, or exceeding predicted demand in relation to the following:</p> <ul style="list-style-type: none"> ○ Potential shortfalls in provision of sport facilities and play areas (e.g. MUGAs) in Alperton, South Kilburn, Burnt Oak / Colindale and Park Royal. ○ Potentially significant shortfalls Identified in Alperton, Burnt Oak / Colindale and Park Royal in the provision of open space. ○ Potential shortfalls in the provision of primary and secondary school places in Church End and Park Royal. Shortfall in secondary places only in Alperton and Burnt Oak / Colindale ○ Shortfalls in provision of community facilities in Alperton, Church End and Burnt Oak / Colindale. <ul style="list-style-type: none"> • It is recommended that the public transport, walking and cycling aspirations are included within the policy targets for all Growth Areas. • It is recommended that all policies could include specific targets seeking the introduction and enhancement of areas of habitat and biodiversity value, in line with the Brent Local Biodiversity Action Plan. • It is recommended that Policy CP8 – Alperton could seek to maximise opportunities for transport / freight movement by water on the Grand Union Canal (in line with London Plan policy 3C.25), perhaps through cross-reference to Policy CP20 – Strategic and Borough Employment Areas, and in particular supporting text paragraph 5.62.
<p>CP13 - North Circular Road Improvement Area</p>	<p>General mitigation and enhancement comments:</p> <p>Requirements which will mitigate or enhance the potential effects predicted for this policy are generally included in other policies in the Core Strategy. The SSA DPD also includes specific implementation details relating to the two specific sites mentioned in the policy for relocation of homes.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • It is recommended that the critical need for, and importance of, mitigating poor air quality could be given greater prominence in the policy. This issue is particularly important given the announcement in January 2009 by the European Commission that it is to commence legal proceedings against the UK for breaches in PM10 targets in London⁸. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • Supporting text stating that every effort will be made to manage demand and reduce car traffic associated with development in Brent is welcomed. It is recommended that reference also be made to the need to work in partnership with adjacent boroughs and other organisations (e.g. TfL) to coordinate efforts across North London to seek to reduce traffic volumes on the NCR. This may be appropriate both in this policy and in Policy CP4 – North-West London Coordination Corridor. • Landscaping / planting adjacent to the NCR could explicitly seek to maximise opportunities to manage run-off from the road, and provide natural pollution prevention, using techniques such as SUDS. The supporting text could include reference to this.

⁸ <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/09/174&type=H> and http://ec.europa.eu/environment/air/quality/legislation/pdf/pm10_exceedances_2005_07.pdf

Table 21: Infrastructure to Support Development Policies – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
CP14 – Public Transport Improvements	<p>General mitigation and enhancement comments:</p> <p>Other policies in the Core Strategy provide more detailed implementation requirements in relation to transport infrastructure and development, in particular the Growth Area Policies (CP7 – CP12) and CP15 – Infrastructure to Support Development. The <i>Local Implementation Plan</i> will also be important in delivering this policy.</p>
CP15 – Infrastructure to Support Development	<p>General mitigation and enhancement comments:</p> <p>Policy CP15 sets out the Council's intention to develop an Infrastructure and Investment Framework (IIF) and sets out how infrastructure is intended to be funded. The detail provided in supporting text to Policy CP15 is welcomed, however it is the implementation of other policies in the Core Strategy (in particular the Growth Area policies) and the IIF itself which will dictate the potential effects of infrastructure development associated with development.</p> <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • It is recommended that supporting text is added under sub-heading "Open space, sport and green infrastructure" to recognise the importance and value of small open spaces and pocket parks. • It is recommended that consideration be given to including within the supporting introductory or concluding text which expresses the multiple benefits and "win-wins" relating to certain types of infrastructure. For example, improved open space, green space, sport facilities and walking and cycling infrastructure will have potential positive effects on health and wellbeing, and in the long-term potentially reduce pressure on health facilities.

Strategic Borough-Wide Policies

- 6.36 The *Strategic Borough-Wide* policies (CP16 – CP23) 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.
- 6.37 The policies were appraised in detail and a matrix prepared for each policy separately (see Appendix 9), with the exception of policy CP16 – Town Centres and the Sequential Approach to Development. As CP16 simply sets out a hierarchy of town centres, together with the designation of Wembley as the principle centre of the Borough, it was not been felt necessary to complete a full appraisal matrix for this policy.

Summary of potential effects

- 6.38 The *Strategic Borough-Wide* policies are predicted to generally perform well against the SA objectives and potentially have predominantly positive effects, with a limited number of potential negative effects. The potential positive effects generally relate to the policies which aim to protect and enhance specific environmental and social

features and aspects of development. The potential negative effects predicted relate mainly to Policy CP20 – Strategic Borough and Employment Areas, and are associated with the potential environmental effects of increased commercial activity and traffic.

6.39 Table 22 provides a summary of the appraisal of all of the *Strategic Borough-Wide* policies to enable comparison of all policies against the SA objectives and provide an overall summary of potential effects predicted. See Appendix 9 for more detail.

6.40 Key potentially positive sustainability effects arising from the *Strategic Borough-Wide* policies include:

- Protection and provision of community facilities, a good quality natural and build environment, provision of a mix of housing size and tenure and the protection of employment areas are all predicted to contribute, in the long-term to permanent positive effects on **regeneration and reducing important aspects of poverty and social exclusion, such as affordability of homes and access to essential services**;
- Permanent, long-term improvements to the **visual amenity and the quality of landscape, townscape and the public realm**, through the **protection and enhancement of open spaces and suburban character**, as well as specific policy seeking to protect land for employment and town-centre uses in appropriate areas;
- Protecting open space, habitats and waterways from inappropriate development, protecting back gardens and suburban character are likely to help **protect biodiversity and enhance species diversity**;
- These effects, together with provision and protection of sports and recreation facilities are likely to lead to long-term **benefits in terms of physical and mental health and wellbeing of the population**, for example by providing increased opportunities for physical activity, or improving visual amenity and quality of surroundings.
- The protection of land for employment uses and the enhancement of commercial areas is predicted, in the long-term to **improve the image of the borough as a location for business**, as well as helping to **provide business opportunities for local people and reducing unemployment**. Improved quality of life, enhanced public realm and provision of appropriate community facilities are also likely to contribute to;
- Requirements on major development to submit Sustainability Statements and to meet Code for Sustainable Homes / BREEAM standards, together with the creation of carbon and pollution sinks in the form of enhanced and protected green and open spaces are likely to **help mitigate and adapt to climate change**, however it should be noted that a reduction in the *rate of growth* of emissions from new development will not bring about a net reduction in CO₂

across the Borough, which is necessary if the Borough's own climate change target is to be met.

6.41 Key potentially negative sustainability effects related to the *Strategic Borough-Wide* policies include:

- Policies seeking to protect suburban character (CP17), open space (CP18) and promote housing development (CP19) may, in the short and long-term **limit the availability of land for business development**, however policy CP20 seeks specifically to protect land for employment uses and this effect is expected to be of minor significance;
- Increased industrial activity and associated traffic generation is predicted to have potential permanent negative long-term environmental effects associated with **increased resource use, greenhouse gas emissions, air-pollution and noise disturbance**.

6.42 Further details are included below on the mitigation and enhancement proposed for each *Strategic Borough-Wide* policy, and other recommendations arising from the SA. Overall, most of the mitigation requirements will be met either by other policies in the proposed Submission Core Strategy or the forthcoming Development Management Policies DPD. However, some specific textual changes and amendments are proposed for some of the policies and their supporting text.

Table 22: Strategic Borough-Wide Policies - appraisal summary

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
Social									
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	0	+	+	+	+	+	++	Policies CP18 – CP23 are predicted to have positive effects relation to this objective, with no negative effects predicted. One major positive effect is predicted in relation to CP23 which seeks to protect existing community facilities and ensure that new facilities are provided as part of the development process. Increased provision of such facilities may also help improve affordability.
	Will it improve affordability of essential services?	0	0	0	0	0	0	+	
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	0	0	0	0	0	+	Predominantly positive effects predicted, with major positive effects identified in relation to providing opportunities for sport and recreation, and improving physical and mental health. CP18 seeks to enhance and protect open space with will potentially provide opportunities for and encourage healthy, active lifestyles. Policy CP23 seeks the provision of a range of community facilities, including meeting and cultural spaces and space for community gatherings which could have potentially significant positive effects on the health and wellbeing of individuals and the community. One minor negative effect is predicted in relation to CP20, as some industrial uses may have noise impacts, and freight traffic will also create noise disturbance.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	++	0	+	0	0	+	
	Will it reduce health inequalities?	0	+	+	+	+	0/+	+	
	Will it improve physical and mental health?	+	+	+	+	+	0/+	++	
	Will it reduce noise levels and concerns?	0	0	+	-	0	0	-?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	+	0	0	+	Limited significant effects predicted. Minor positive effects are predicted in relation to CP20 and CP23. CP20 seeks opportunities for skills development and training, which should improve skills and help fill key skill gaps in the long-term. The key aim of CP23 is the protection and provision of multi-use community facilities which are likely to provide opportunities
	Will it improve access to high quality educational facilities?	0	0	0	+	0	0	+	
	Will it help fill key skill gaps?	0	0	0	+	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
									for informal education, evening classes and cultural learning / development.
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	0	?	-?	++	+	0	Major positive effects predicted in relation to CP21, which seeks to provide a balanced, appropriate and sufficient housing stock in Brent, and notes that this includes a range of tenure, size and type of housing to meet the needs of different groups. CP19 and CP22 are predicted to have minor positive effects. CP19 seeks to promote sustainability standards in new developments which is likely to have a positive effect on the quality of the housing stock. CP22 aims to protect and provide appropriate sites for nomadic peoples, and is thus seeking to provide specialist "housing" accommodation. Uncertain potential negative effects are predicted in relation to CP20, as protecting employment land uses may, in some cases, restrict the availability of land for affordable / other housing development.
	Will it encourage a range of dwelling type, size and tenure?	0	0	0	-?	++	0	0	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	0	0	+	0	+	0	0	
	Will it reduce homelessness?	0	0	0	0	+	0/+	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	+	0	+	0	0	+	Limited significant effects predicted. Enhancement of open spaces (CP18) improvements to employment areas, and employment opportunities (CP20) and improved access to community facilities (CP23) may have indirect, long-term positive effects on crime and anti-social behaviour.
	Will it reduce the fear of crime?	0	+	0	+	0	0	+	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	+	0	0	0	0	+	Only positive effects predicted in relation to this objective.
	Will it foster a sense of pride in local area?	0	+	+	+	+	0	++	Positive effects are particularly predicted in relation to fostering a sense of pride in the local area, with positive effects from all policies except CP22.
	Will it increase the ability of people to influence decisions?	0	0	0	0	0	0	+	
	Will it improve ethnic relations?	0	0	0	0	0	0	+	CP23 predicted to have major positive effect on local pride and positive effects against all other criteria, as access to and quality of community facilities is likely to play an important role in
	Will it improve understanding between different communities of their respective needs and	0	+	0	0	0	0	+	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
	concerns?								residential amenity, neighbourhood satisfaction, sense of place and vibrant working communities.
	Will it encourage people to respect and value their contribution to society?	0	+?	0	+?	+	0	+	
7. To improve accessibility to key services especially for those most in need	Will it improve the level of investment in key community services?	0	0	0	0	+	0	++	Only CP21 and CP23 predicted to have significant effects. As the focus of CP23 is to protect and enhance provision of community facilities, major positive effects are predicted in relation to investment in and access to community services. Minor positive effect in relation to CP21 as it seeks provision of appropriate accommodation, including care and support accommodation for those unable to live independently.
	Will it make access more affordable?	0	0	0	0	0	0/+	+	
	Will it make access easier for those without access to a car?	0	0	0	0	0	0/+	++	
Environmental									
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	0	0	+?	-	0	0	+	Generally positive effects predicted with some minor negative effects in relation to policy CP20. Positive effects from potential encouragement of walking and cycling in relation to CP18, CP20 and CP23 these effects are predicted due to improvements to open space (CP18), maximising access to employment areas by non-car means (CP20) and providing community facilities to meet local demand (CP23). Minor negative effects predicted on traffic volumes and the proportion of journeys made by car in relation to CP20, as development of industrial and employment uses is likely to generate additional trips / car travel, which are considered likely to outweigh any shift to non-car means achieved. Uncertain effects in relation to CP19, as transport and travel not explicitly addressed by policy.
	Will it increase the proportion of journeys using modes other than the car?	0	0	+?	-	0	0	+	
	Will it encourage walking and cycling?	0	+	+?	+	0	0	+	
9. To improve water quality;	Will it improve the quality of surface and ground water?	0	+ / ++	+	-?	0	0	0	One potentially major positive effect in relation to CP18 as policy explicitly protects waterways

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
conserve water resources and provide for sustainable sources of water supply	Will it reduce water consumption and improve water efficiency?	0	0	+	-?	0	0	0	from inappropriate development in the same way it does open space. In addition open space plays an important role in the regulation of the water cycle. CP19 seeks development to high Code for Sustainable Homes / BREEAM excellent standards, which will necessitate high levels of water efficiency in new development. Minor positive effects predicted as influence limited to new development.
10. To improve air quality	Will it improve air quality?	0	+	+	-	0	0	+	Minor positive effects are predicted due to protection of open space and vegetation (CP18), encouraging construction to sustainability standards (CP19) and potential reduction in travel need due to local community facilities (CP23) However, minor negative effects predicted in relation to CP20, due to the employment related traffic and commercial transport generation. While the policy / supporting text seeks to maximise opportunities for freight movement by non-road means / maximise pedestrian accessibility, potential negative effects are considered likely to outweigh any benefits achieved.
	Will it help achieve the objectives of the Air Quality Management Plan?	0	+	+	-	0	0	0/+	
	Will it reduce emissions of key pollutants?	0	0	0	-	0	0	0	
11. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	0	+	+	0	0	0	0	Limited significant effects predicted. Protecting back gardens (CP17), protecting and enhancing open spaces and habitats (CP18) and construction to sustainability standards are predicted to have minor positive effects in relation to biodiversity. Minor positive effects predicted for CP18, even given focus on protection and enhancement of open space and biodiversity as protected sites, species and habitats are not actually included in policy text. Some uncertain effects predicted in relation to tree protection / promotion in relation to policies
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	+	+	0	0	0	0	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	0	+	0	0	0	0	0	
	Will it protect and enhance woodland cover and trees and promote their management?	0	+	+	+	0	0	0	
	Will it improve access to and	0	?	0	0	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
	promote the educational value of sites of biodiversity value?								CP18 – CP20, as these policies seek environmental / green-space enhancements, however tree planting and protection are not specifically included.
12. To maintain and enhance the character and quality of landscapes and townscapes	Will it improve the landscape character and visual amenity of open spaces?	+	++	+	0	0	0	0	Significant positive effects predicted in terms of landscape character and visual amenity, maintaining and enhancing the character and quality of landscapes and townscapes in Brent, and enhancing local distinctiveness. Policy CP18 is predicted to have major positive effects as open space and the natural environment are important factors in the amenity of residential areas, the quality of townscapes and the public realm, and the creation of neighbourhoods which are good to live in. CP17 seeks to protect distinctive suburban areas, and CP19, in requiring sustainability standards in new development is predicted to have beneficial effects on townscape, landscape and sense of place, particularly in the long-term. CP20 and CP21 seek specific improvements in relation to employment areas and the quality of housing provision.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	++	+	+	+	0	0	
	Will it protect and enhance local distinctiveness and sense of place?	+	+	+	+	+	0	+	
	Will it minimise visual intrusion and protect views?	+?	+	0	0	0	0	0	
	Will it decrease litter in urban areas and open spaces?	0	0	0	0		0	0	
13. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	0	+?	0	0	0	0	0	No significant effects predicted. Uncertain positive effects in relation to CP18, as the protection and enhancement of parks and open spaces may provide opportunities to enhance the setting / quality of some listed buildings, historical / cultural sites and Conservation Areas.
	Will it protect listed buildings and their settings?	0	+?	0	0	0	0	0	
	Will it help preserve, enhance and record archaeological features and their settings?	0	0	0	0	0	0	0	
14. To reduce contributions to climate change and reduce vulnerability to climate	Will it reduce emissions of greenhouse gases by reducing energy consumption and the need to travel?	0	+	++	-	0	0	+	Predominantly positive effects, with one minor negative effect predicted. CP18 and CP19 predicted to have significant positive effects. CP18 – vegetation and open space play an important “carbon-sink” role, as well as providing mitigating flood risk and urban
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	0	++	0	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
change	Will it reduce emissions of ozone depleting substances?	0	0	0	0	0	0	0	heat island effect. CP19 specifically seeks to promote measures to mitigate and adapt to climate change, by requiring major new development schemes to submit sustainability statements and meet Code for Sustainable Homes / BREEAM standards. Major positive effects are therefore predicted. These effects are likely to be most significant in the Growth Areas and the Wembley Energy Action Area. However, it should be noted that reduction in the rate of growth of emissions from new development will not bring about a net reduction in CO2 across the Borough – which is necessary if the Borough’s own target is to be met. Minor negative effect predicted in relation to CP20 as increased industrial and business activity is likely to increase energy use and greenhouse gas emissions associated with commercial and employee traffic.
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	+?	+	+	0	0	0	0	
	Will it reduce the risk of damage to property from storm events?	+	+	+	0	0	0	0	
	Will it help reduce the impact of increased urban temperatures on people and property?	0	+	+	0	0	0	0	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	0	0	+	-	0	0	0	Significant effects only predicted in relation to policies CP19 and CP20. Minor positive effects predicted in relation to CP19 as the requirement of Sustainability Statements for major schemes and construction to Code / BREEAM standards likely to lead to more efficient construction methods and reduced construction waste. Minor negative effects predicted in relation to CP20 as increased industrial and business activity is likely to generate waste and increase resource use.
	Will it reduce household waste?	0	0	0	0	0	0	0	
	Will it increase waste recovery and recycling and improve facilities?	0	0	0	0	0	0	0	
	Will it reduce hazardous waste?	0	0	0	-	0	0	0	
	Will it reduce waste in the construction industry?	0	0	+	-?	0	0	0	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	++	0	+	0	0	0	Policies CP17, CP18 and CP20 predicted to have significant positive effects in relation to ensuring development occurs on previously developed land / vacant buildings and protecting Greenfield land from development CP18 specifically aims to protect open and
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	+	0	+	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
	Will it ensure contaminated land is remediated as appropriate?	0	0	0	+	0	0	0	greenspace from development, thus a major positive effect is predicted. The protection of suburban character and gardens (CP17), and the protection of existing employment and industrial land use (CP20) are both predicted to encourage development on brownfield land, and help ease pressure on Greenfield.
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	+	0	+	0	0	0	0	
	Will it reduce the risk of subsidence and heave?	0	+	+	0	0	0	0	
Economic									
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	0	0	++	0	0/+	+	Significant positive effects predicted, in particular in relation to policy CP20. CP20 has as its key aim the protection and enhancement of industrial and employment land and premises, which is predicted to have major positive effects on these economic criteria. Other policies predicted to have minor positive effects through protecting open and greenspaces (CP18) which will have a positive effect on the image of the borough, promoting sustainable construction practices (CP19) which is likely to lead to enhance resilience of the economy (particularly to climate change) and enhance the image of the borough as a business location. CP21 and CP23 also predicted to have positive effects, associated with the provision of appropriate, good quality housing and community facilities – which have potentially beneficial direct and indirect economic effects.
	Will it improve business development and enhance productivity?	0	0	0	++	0	0	0	
	Will it improve the resilience of business and the local economy?	0	0	+	++	+	0	0	
	Will it promote growth in key sectors?	0	0	0	+	0	0	0	
	Will it promote growth in key clusters?	0	0	0	+	0	0	0	
	Will it enhance the image of the area as a business location?	0	+	+	++	+	0	+	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	0	0	+	0	0/+	+	See Objective 17. CP20 has key aim of protecting and enhancing industrial and employment land and premises, positive and major positive effects therefore predicted. CP23 is predicted to have significant positive effects in the long-term as the provision of appropriate and sufficient community facilities may generate some employment themselves, and are also an important aspect of
	Will it provide job opportunities for those most in need of employment?	0	0	0	++	0	0/+	+	
	Will it help to improve earnings?	0	0	0	+	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
									communities which enhance the wellbeing, education and health of residents may support and encourage local businesses and start-ups.
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	0	+	+	+	+	0	++	The policies each address specific aspects which are important to promoting regeneration and reducing disparities: open space (CP18); construction to high standards (CP19); employment (CP20); and, sufficient and appropriate housing (CP21) and they are therefore predicted to have positive effects. A major positive effect is predicted in relation to CP23, as community facilities and the impact they have on the health and well being of local communities is a key aspect in long-term regeneration.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	0	0	+	0	0/+	0/+	Mixed effects predicted. CP20 is predicted to have significant positive effects, particularly in relation to making land and property available for business development, as this is its key aim. Other positive effects relate to inward investment due to enhancement of the image of Brent as a place to live and work and as a business location (see Objective 17). Policies CP17, CP18 and CP21 have potentially minor negative effects, as they seek to protect suburban character (CP17), open space (CP18) and provide for housing development (CP21). These aspects have the potential to conflict with / restrict the availability of land for business development.
	Will it encourage inward investment?	0	+	+	+	+	0	0	
	Will it make land and property available for business development?	-	-	0	++	-	0	0	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	0	0	-	+	0	+	Limited significant effects predicted.
									Minor positive effect relating to CP18 as protecting and enhancing parks and open spaces may encourage more people to walk and cycle.
	Will it improve accessibility to work by public transport; walking and cycling?	0	+	+?	+?	0	0	0	CP20 specifically seeks to encourage non-road freight.
	Will it improve access between key employment areas and key	0	0	0	+?	0	0	0	

SA objective	Criteria	Policy Number							Comments
		CP17	CP18	CP19	CP20	CP21	CP22	CP23	
	transport interchanges?								By providing housing and community facilities within the borough, CP21 and CP23 are predicted to have potential positive, long-term effects on commuting. One minor negative effect is predicted (CP20), in relation to the potential increase in commuting as development of industrial and employment uses is likely to generate additional trips / car travel.
	Will it encourage rail and water based freight movement?	0	0	0	+	0	0	0	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain:? Mixed: -/+									
Overall Comments The Strategic Borough-Wide policies are predicted to have predominantly positive effects in relation to the SA objectives, however some potential significant negative effects are also predicted. Potentially major positive effects are predicted in relation to: promoting regeneration, reducing poverty and social exclusion and improving access to key services (CP23); improving health and wellbeing (CP18, CP23); providing the opportunity to live in a decent home (CP21); encouraging community identity and welfare (CP23); maintaining and enhancing the character of landscapes and townscapes (CP18); contributing to climate change mitigation (CP19); minimising development on Greenfield (CP18); and in relation to economic objectives (CP20). Some potential negative effects are predicted, although these are all considered to be minor in significance. CP20 has the highest number of potential negative effects, particularly in relation to the environmental objectives, due to its aim to protect and enhance employment areas which has the potential to create additional traffic (commercial and employee) and associated noise disturbance, air pollution, congestion and greenhouse gas emissions, as well as the increased resource use associated with industrial activity. The other significant potential negative effect is related to the potential for policies CP17, CP18 and CP21 to restrict the availability of land for business development. There is the potential, therefore, that these policies may conflict with and restrict the availability of land for business development as they seek to protect land to maintain suburban character (CP17), protect and enhance open spaces (CP18), and to provide for housing development (CP21). Where a potential negative effects is predicted, the mitigation and enhancement comments provided in the table below suggests how these effects may be mitigated.									

Summary of mitigation and enhancement

6.43 Table 23 includes all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 23: Strategic Borough-Wide Policies – summary of proposed mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
CP16 – Town Centres and the Sequential Approach to Development	<p>General mitigation and enhancement comments:</p> <p>It is important that the sequential ordering of town-centres does not lead to the neglect / abandonment of existing small and local town centres, as these may provide important local services and support local businesses and communities in a way that major retail centres, containing national / international retail outlets are unable to do.</p> <p>The inclusion of supporting text to ensure that accessibility is a key consideration in the consideration of new retail floorspace proposals is welcomed.</p>
CP17 – Protecting and Enhancing the Suburban Character of Brent	<p>General mitigation and enhancement comments:</p> <p>The supporting text states that the criteria that will be used to protect key suburban neighbourhoods are set out in detail in the saved policies of the UDP 2004, and that “further detailed guidance on how development should fit in within existing neighbourhoods will be provided in detailed SPD”. The UDP 2004 criteria and guidance proposed will therefore dictate the implementation / delivery of Policy CP17.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • An earlier draft version of Policy CP17 (as included in December 2008 version of Draft Core Strategy) included text which sought to ensure development made positive contributions to the distinctive character of Brent and its built and natural heritage, including Conservation Areas, Listed Buildings and Ancient Monuments. This was considered to potentially have major positive sustainability effects and it is recommended that consideration be given to reinstating this text, and the broader focus of this policy. If this is considered too detailed for the Core Strategy it should be included within the forthcoming Development Management Policies DPD. • It is recommended that specific text aiming to protect front gardens from inappropriate development or conversion (e.g. conversion into parking space) be included within this policy. In September 2008 the Government produced guidance on the permeable surfacing of front gardens (CLG 2008), and in October 2008 changes were made to the General Permitted Development Order making the hard surfacing of more than 5 square metres of domestic front gardens permitted development only where the surface in question is rendered permeable. If this is considered too detailed for the Core Strategy it should be included within the forthcoming Development Management Policies DPD.
CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity	<p>General mitigation and enhancement comments:</p> <p>The implementation of other Core Strategy policies will support / enhance this policy. The supporting text refers to the Brent Strategy for Sports Facilities Improvement, and other Brent plans will also support implementation and help mitigate potential negative and enhance potential positive effects predicted, such as the Brent Children and Young People’s Plan, Brent Parks Strategy and the Brent BAP.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD include more detailed policies to mitigate / enhance specific potential negative / positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • It is recommended that consideration be given to the inclusion of nature conservation and biodiversity in a separate policy, particularly given the importance of the green grid, blue ribbon, wildlife corridors and other green spaces. If this is considered to be too detailed for the Core Strategy it is important greater detail is provided in the forthcoming Development Management Policies DPD.

Policy	Proposed mitigation and enhancement and SA comments
	<ul style="list-style-type: none"> • It is recommended that the policy should seek explicitly to ensure no net loss of open space in the Borough. • London Plan Policy 3D.14 states that DPDs should include policy to protect and enhance key species included in the Biodiversity Action Plan. While it is noted that supporting text refers to the BAP and London Plan Policy 3D.13, it is recommended that text to this end should be included in policy CP18 itself. If this is considered to be too detailed for the Core Strategy it is important greater detail is provided in the forthcoming Development Management Policies DPD. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> • The Draft London Climate Change Adaptation Strategy (GLA, 2008) includes specific recommendations in relation to the greening of London as an important aspect in climate change adaptation (countering the urban heat island effect, providing shade etc.). Supporting text (paragraph 5.23) refers to the role of greening in mitigation, however reference to the important role the protection and provision of green space can play in adaptation is recommended. • Given the poor air quality in the borough, it is recommended that the role of tree planting along roads in helping mitigate air pollution could be included within supporting text. If this is considered to be too detailed for the Core Strategy it is important greater detail is provided in the forthcoming Development Management Policies DPD.
<p>CP19 – Brent Strategic Climate Mitigation and Adaptation Measures</p>	<p>General mitigation and enhancement comments:</p> <p>Detailed policy and implementation requirements included in the Brent Climate Change Strategy, when adopted, will be important in supporting this policy. The existing SPG on sustainable design and construction (SPG19) includes principles and guidance in relation to energy efficiency and other aspects of sustainable construction. It does not, however, include any reference to climate change adaptation.</p> <p>While the supporting text refers to the pending LB Brent Climate Change Strategy this also stresses the importance of mitigation. It is recommended that the Climate Change Strategy should address both mitigation <i>and</i> adaptation.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies in relation to climate change mitigation and adaptation in development, and to help mitigate specific negative effects and enhance positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended change to policy text:</p> <ul style="list-style-type: none"> • While it is recognised that the intention of CP19 is to require development to include mitigation and adaptation measures, and that specific issues relating to both mitigation and adaptation may be addressed in the forthcoming Development Management Policies DPD, greater balance could be achieved in the policy text between the need for development to address climate change adaptation as well as mitigation. • While encouragement of adherence with Code for Sustainable Homes standards is welcomed, the promotion of sustainable construction outcomes could be further strengthened by a requirement that Code level 4 could be expected for all large developments (10 or more dwellings and 1,000m² or more floorspace), not just within Growth Areas. • While it is recognised that the policy is intended to apply to all development requiring planning permission (including extensions and refurbishments), it is recommended that policy or supporting text is included to ensure that this is unambiguous. Retrofitting of existing housing stock to high sustainability standards will be necessary to meet emissions targets, however it is recognised this may be outside the scope of the Core Strategy and something to be promoted by the council using other mechanisms and in partnership with other organisations. • Supporting text refers to the target for the Borough of achieving a reduction in CO₂ emissions (against 1990 base) of 25% by 2020 – which is a key target for the borough, and should be a strategic aim of the Core Strategy. In the light of development aspirations in the borough, text <i>within</i> Policy CP19 could reflect fully the scale of the challenge for the borough to reduce carbon emissions. Clear and unambiguous policy (combined with strong implementation) will be necessary if development is to help the borough meet its climate change targets. • It is recommended that the 2nd paragraph of Policy CP19 could be modified / clarified to state that all major proposals in the borough should submit a sustainability statement to

Policy	Proposed mitigation and enhancement and SA comments
	<p>cover <i>all</i> aspects of sustainable construction, including climate change mitigation and adaptation and air quality. The inclusion of text stating that all development should contribute to sustainable development is recognised, however this may not provide sufficient clarity of aim / purpose. It is recognised that detailed requirements relating to sustainability statements may more appropriately be included in the forthcoming Development Management Policies DPD.</p> <ul style="list-style-type: none"> It is recognised that repetition of London Plan policies should be avoided and that cross reference to London Plan policy 4.A.14 – 4.A.20 is included in the supporting text to CP19. However, air quality could be given greater prominence within CP19, or elsewhere in the Core Strategy. Furthermore, given that a large portion of Brent is designated AQMA, it is suggested that air quality management could justify a locally relevant policy and thus be considered through a separate policy. If it is considered to be an issue that would be better addressed through the forthcoming Development Management Policies DPD, it is suggested that clearer policy text is required in relation to air quality in Brent within the Core Strategy. This issue is particularly important given the announcement in January 2009 by the European Commission that it is to commence legal proceedings against the UK for breaches in PM10 targets in London⁹. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> It is recommended that the supporting text should include details on what is to be included in Sustainability Statements referred to within the policy. It is recognised that detailed requirements relating to sustainability statements may more appropriately be included in the forthcoming Development Management Policies DPD.
<p>CP20 – Strategic and Borough Employment Areas</p>	<p>General mitigation and enhancement comments:</p> <p>Other policies in the Core Strategy will provide more detailed implementation requirements and therefore help mitigate and enhance the effects of this policy.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate / enhance specific potential negative / positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> 2nd paragraph of policy – while it is welcomed that the policy requires “necessary transport infrastructure” to be in place before occupation, it is recommended that the policy should emphasise that such infrastructure should maximise access for walking and cycling as well as public transport. 4th bullet in policy – the term “efficient movement” could be clarified. Penultimate bullet in policy – the inclusion of a requirement for “landscaping” in the policy is welcomed, however it is recommended that the inclusion of text which encourages broader environmental improvements be considered. For example, waste minimisation, water and energy efficiency, public transport and the maximisation / creation of green space and planting (e.g. trees) within employment areas and industrial estates. It is recognised this level of detail may be more appropriately included in the forthcoming Development Management Policies DPD. <p>Recommended changes to supporting text:</p> <ul style="list-style-type: none"> Supporting text under heading “Skills” is welcomed, however it is recommended that it sets out more clearly that training and skills development together with placement and apprenticeships will be expected from new business development in the Borough. The current text mainly emphasises school places / education.
<p>CP21 – A Balanced Housing Stock</p>	<p>General mitigation and enhancement comments:</p> <p>Key mitigation and enhancement, will be provided by the detailed implementation requirements of London Plan policies, which are referred to in the supporting text.</p> <p>The SSA DPD. Brent <i>Community Strategy</i> and the Council's <i>Housing Strategy</i> will also support this policy.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate / enhance specific potential negative / positive effects identified. These recommendations are set out in Table 25.</p>

⁹ <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/09/174&type=H> and http://ec.europa.eu/environment/air/quality/legislation/pdf/pm10_exceedances_2005_07.pdf

Policy	Proposed mitigation and enhancement and SA comments
CP22 – Sites for Nomadic Peoples	<p>Recommended changes to policy text:</p> <p>ODPM Circular 01/2006 “Planning for Gypsy and Traveller Caravan Sites” and London Plan Policy 3.A4 require the Core Strategy to include a policy which protects existing sites and sets out criteria for identifying the suitability of potential new gypsy and traveller site(s). Policy 3A.14 also requires site(s) to be identified where there is a known shortfall. However, the supporting text (paragraph 5.83) refers to the need to “set out the criteria for the determination of any application for additional sites” and it could therefore be interpreted that this is a rather more reactive approach than the proactive requirement in the Circular and London Plan policy - consideration should be given to reviewing the supporting text to address this.</p> <p>It is noted that the supporting text does state that the proposed revision of the London Plan will set specific borough targets for sites and pitches, and that this will be addressed in a subsequent Development Plan Document and that this proposed DPD may be further informed by a potential sub –regional (West London) accommodation strategy which would better reconcile current provision, projected future needs and potential capacities. It is recommended that subsequent revisions and/or the forthcoming Development Management Policies DPD include more detailed policies to reflect the borough targets once available. This recommendation is set out in Table 25.</p>
CP23 – Protection of existing and provision of new Community and Cultural Facilities	<p>General mitigation and enhancement comments:</p> <p>The implementation of other policies in the Core Strategy, in particular the Growth Area Policies (CP7 – CP12) and CP15 – Infrastructure to Support Development, will support / enhance this policy. The Infrastructure and Investment Framework, which accompanies the Core Strategy will also have an important role in the implementation of new infrastructure. The SSA DPD also seeks to identify specific sites for community facilities provision.</p> <p>It is also recommended that the forthcoming Development Management Policies DPD includes more detailed policies to mitigate / enhance specific negative / positive effects identified. These recommendations are set out in Table 25.</p> <p>Recommended changes to policy text:</p> <ul style="list-style-type: none"> • The policy text could refer to and set out the need to address existing deficiencies in community facilities more than it currently does. • From a sustainability perspective, it is recommended that loss of community facilities is resisted except in exceptional circumstances, as sufficient and appropriate facilities are an important aspect of vibrant, healthy communities. The addition of text “in exceptional circumstances” before policy text referring to “their loss mitigated” would help to ensure is considered only as a last resort. • The inclusion of a clear ratio of provision is welcomed, however it is recommend that text is also included to emphasise that provision should meet the prevailing recommended rate in the future, in order that the policy is “future proofed”.

Changes to the Core Strategy between previous Submission and current proposed Submission versions

6.44 As noted in section 1 (Part A) a previous version of the Core Strategy DPD was submitted to the Secretary State in November 2007, alongside the Site Specific Allocations DPD. Following an exploratory meeting with the appointed Inspector for the examination of these DPD they were subsequently withdrawn in May 2008. The current proposed Submission Core Strategy DPD includes revisions, which have been made by LB Brent to reflect:

- comments and recommendations made by the appointed Inspector;
- the requirements and expectation of Core Strategy DPDs as set out in the new PPS12, published in June 2008; and,

- the need to avoid repetition or duplication of higher level policies and targets, particularly those included in the London Plan.
- 6.45 The revisions made have resulted in changes to the level of detail, and number of policies, in relation to a number of policy areas. Greater detail has been included in the spatial strategy policies, in particular through the inclusion of growth area policies setting out specific growth, infrastructure and development targets in defined regeneration areas. However, many of the policies included within cross-cutting themes in the previous Submission Core Strategy have been deleted or merged into a much smaller number of policies, now titled “strategic borough-wide policies”.
- 6.46 The SA of the previous Submission Core Strategy predicted that the majority of these policies which have now been deleted or merged in the current proposed Submission Core Strategy had potentially significant positive sustainability effects¹⁰. Due to these potentially significant beneficial effects on development in the borough, where inclusion of these policy areas can be justified on the grounds of them addressing locally specific issues, it is important that they are included in other DPDs, such as the forthcoming Development Management Policies DPD, or potentially future SPDs or AAPs.
- 6.47 The following policy areas performed particularly well in the early stages of the SA, and it is recommended that these should be considered for coverage in the forthcoming Development Management Policies DPD:
- Promoting nature conservation and the natural environment.
 - Addressing locally specific waste management issues.
 - Promoting and ensuring housing development seeks to enhance the quality of the natural environment.
 - Maximising the contribution, and providing detail on how, development can provide infrastructure to promote walking, cycling and encourage more active lifestyles.
 - Protecting the historic environment and built heritage of the borough.
 - Maximising the contribution development can have on local culture.
- 6.48 Table 24 below summarises the key differences between the two versions of the Core Strategy in terms of policies.

¹⁰ The previous SA Report is available through the LB Brent LDF webpages:
<http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-121>

Table 24: Key policy differences between previous Submission and proposed Submission Core Strategy DPDs

Policies included in previous Submission Core Strategy (November 2007)	Policies included in proposed Submission Core Strategy (June 2009)
Biodiversity and open space	
CP SS9: Protecting and enhancing the natural and built environment CP OS1: Protection and enhancement of open space and biodiversity CP OS2: Promotion of biodiversity and nature conservation CP ENV2: Protecting and enhancing Brent's environment	CP18: Protection and enhancement of open space, sports and biodiversity Reference in individual Strategic Area Policies to open space
Climate change, environmental enhancement and sustainable construction	
CP SD1: Sustainable design and construction – mitigation CP ENV1: Climate change adaptation	CP19: Brent strategic climate change mitigation and adaptation measures
Waste management	
CP W1: Waste management	No specific policy
Employment and industry	
CP BIW1: Strategic employment areas and borough employment areas CP BIW2: Office development CP BIW3: Principles of business, industrial and warehousing development CP BIW4: Regeneration of designated employment areas	CP20: Strategic and borough employment areas Reference in Strategic Area Policies to employment space provision
Town centres and retail development	
CP TC1: Network of town centres CP TC2: Brent retail need allocations and town centre opportunity sites CP TC3: Principal retail location CP TC4: Preferred locations CP TC5: Exceptional locations	CP16: Town centres and the sequential approach to development
Housing development	
CP H1: Housing provision CP H2: Sustainable housing development CP H3: A balanced housing stock CP H4: Affordable housing provision	CP21: A balanced housing stock CP22: Sites for nomadic peoples
Transport	
CP TRN1: Prioritising investment CP TRN2: Reducing the need to travel CP TRN3: Parking and traffic restraint CP TRN4: Transport links in London	CP14: Public transport improvements Reference in some Strategic Area Policies to specific transport improvements
Culture, sport and community facilities	
CP CST1: Promoting culture, sport and tourism CP CF1: Meeting the needs of the community	CP18: Protection and enhancement of open space, sports and biodiversity Reference in individual Strategic Area Policies to community infrastructure (e.g. schools) and sports

Policies included in previous Submission Core Strategy (November 2007)	Policies included in proposed Submission Core Strategy (June 2009)
	facilities CP23: Protection of existing and provision of new community and cultural facilities

Recommended mitigation and enhancement to be included in the forthcoming Development Management Policies DPD

6.49 Table 25 sets out recommendations where the appraisal of the proposed Submission Core Strategy has identified that mitigation and / or enhancement would be best addressed through the inclusion of more detailed policies in the forthcoming Development Management Policies DPD. This is because they are considered too detailed for the Core Strategy. Table 25 also indicates which policy in the Core Strategy the recommendation is relevant to.

Table 25: Recommendations for issues to be addressed through more detailed policies in the forthcoming Development Management Plan DPD

Issue to be addressed	Policies in proposed Submission Core Strategy this recommendation is relevant to
Ensuring development plays a key role in promoting regeneration and reducing disparities , particularly in the most deprived areas	CP1, CP2, CP3, CP5, CP6, CP7 – CP12, CP18, CP19
Ensuring development delivers, and is phased, to meet existing and future needs for appropriate physical, social and community infrastructure (related also to IIF)	CP7 – CP12, CP23
The provision / delivery of a balanced housing stock – including mixed type, size and tenure to meet diverse needs, a sufficient provision of affordable dwellings and homes that are adaptable to meet needs in the long-term, and the provision of appropriate sites for nomadic peoples	CP2, CP6, CP7 – CP12, CP13, CP21
Delivering borough targets for sites and pitches for nomadic peoples , once available	CP22
Ensuring design and development, layout and inclusion of sufficient open and play space can help contribute to improving health and wellbeing	CP1, CP3, CP5, CP6, CP7 – CP12, CP17, CP18, CP19, CP21
Ensuring noise pollution are mitigated in new development, particularly where densities are high	CP2, CP7 – CP12, CP13, CP14
Designing out crime and encouragement of secured by design standards in order to reduce crime and fear of crime	CP2, CP6, CP7 – CP12, CP18, CP19
Creating communities , going beyond the physical construction of homes and facilities to encourage a sense of community identity, welfare and pride in local areas	CP2, CP6, CP7 – CP12, CP17, CP21, CP23
Ensuring development contributes to delivering on the commitment to reduce the need to travel, encourage efficient	CP1, CP2, CP3, CP5, CP6, CP7 – CP12, CP14, CP17, CP19,

Issue to be addressed	Policies in proposed Submission Core Strategy this recommendation is relevant to
patterns of movement , and encourage a modal shift to walking, cycling and public transport	CP20
Promoting the role that design can play in relation to environmental factors, such as water use efficiency, energy efficiency, climate change adaptation, flood resilience etc	CP1, CP2, CP6, CP7 – CP12
Enhancing air quality through design and development, and protecting new and existing residents from poor air quality	CP1, CP3, CP6, CP7 – CP12, CP19
Ensuring front gardens are protected from inappropriate development or conversion (e.g. conversion into parking space)	CP17
Delivering improved water quality, efficiency and water conservation , as well as enhancing riparian areas throughout the borough	CP1, CP2, CP3, CP6, CP7 – CP12, CP18, CP19, CP20
Reducing greenhouse gas emissions associated with development, maximising energy efficiency and the use of renewable sources of energy	CP2, CP3, CP6, CP7 – CP12, CP19
Ensuring development delivers adaptation to the impacts of climate change , including managing risks such as of increased subsidence / heave	CP2, CP5, CP7 – CP12,
Setting out detailed requirements expected to be included in sustainability statements which are a requirement for all major proposals and proposals for sensitive uses	CP19
Managing flood risks , minimising risk to people and property and mitigation measures such as SUDS	CP7 – CP12
Ensuring biodiversity, habitat and species diversity are protected and enhanced, as well as promoting tree planting	CP2, CP5, CP7 – CP12, CP17, CP18, CP19
Encouraging the provision of opportunities for environmental education , for example through signage and information boards in parks and open spaces	CP18
The remediation of potentially contaminated land , the protection of land and soil quality	CP2, CP3, CP7 – CP12, CP13, CP19
Supporting waste minimisation, recycling, reduced use of resources and the use of renewable materials as well as compliance with standards and protocols such as the ICE demolition protocol	CP1, CP2, CP3, CP5, CP6, CP7 – CP12, CP13, CP19
Ensuring enhancement of landscape, townscape and the public realm is delivered, and the impact of development on skylines and views in the borough is managed	CP1, CP2, CP3, CP6, CP7 – CP12, CP18, CP20, CP21
Setting out details of how redevelopment in Strategic and Borough Employment Areas will be expected to improve the landscape and environment in these areas. For example waste minimisation, water and energy efficiency, public transport and the maximisation / creation of green space and planting (e.g. trees)	CP20
Ensuring the conservation and enhancement of the built historic and cultural environment is promoted	CP1, CP2, CP3, CP5, CP6, CP7 – CP12, CP18, CP19
Ensuring economic development and employment / business	CP1, CP2, CP3, CP7 – CP12,

Issue to be addressed	Policies in proposed Submission Core Strategy this recommendation is relevant to
opportunities are accessible to local people, and encouraging indigenous and inward investment	CP19, CP21

Summary of the overall and cumulative effects of the proposed Submission Core Strategy

6.50 This section provides a summary of the most significant potential effects, both positive and negative, which are predicted to arise from the implementation of both the individual policies included in the proposed Submission Core Strategy and the proposed Submission Core Strategy taken as a whole. It also considers the effects of the proposed Submission Core Strategy in combination with the key developments proposed in adjacent borough's Development Plan Documents. This is not intended to be an exhaustive list of potential effects, as predicting the interactions and additive effect of policies and development is complex and has many associated uncertainties, however the potential effects identified are considered to be potentially some of the most significant.

Overall effects of the individual policies in the proposed Submission Core Strategy

6.51 Overall the policies in the proposed Submission Core Strategy are predominantly predicted to have positive sustainability effects, as the above sections on the potential effects of the various groups of policies indicated (i.e. Regeneration and Growth and Overall Spatial Change policies; Strategic Area Policies and Infrastructure to Support Development policies; and Strategic Borough-Wide policies). In particular, they are predicted to have positive effects against the social and economic objectives within the SA framework. However, the predicted effects in relation to the environmental objectives are more mixed with the potential for both potential positive and negative effects.

6.52 The overall potential positive social effects are predicted to include improvements to: poverty and social exclusion; the location, access and provision of community facilities and services; affordable housing, and improvements to public transport infrastructure benefiting accessibility. The proposed concentration of development within the Growth Areas is predicted to enhance these effects by, for example, enabling the pooling of development contributions (both financial, e.g. S106, and in kind) to community, social and transport infrastructure.

6.53 The overall potential positive environmental effects are predicted to include improvements to: the public realm and townscape; standards of design and construction; and where successful, management and reduction of the need to travel. Policies which seek explicitly to protect the character of Brent, as well as those to

protect and enhance biodiversity and open space are also predicted to have potential positive environmental effects.

- 6.54 Positive economic effects are expected from the protection and enhancement of employment land, and the effects that improvements to the public realm and amenities will have on the image of the borough as a location for business and investment. The scale and ambition of the proposed regeneration of Wembley, along with the economic and commercial development proposed within all Growth Areas, should bring significant economic benefits. The predicted increase in the borough's population (and therefore potential workforce and consumers) and improved housing provision are also predicted to contribute to potential positive economic effects. Improved transport infrastructure which aims to reduce car use and congestion and increases access to jobs and services by public transport, walking and cycling should have considerable potential long-term economic benefits. To realise these benefits, however, policies to manage and minimise road transport will need to be strongly implemented, particularly within Wembley Growth Area.
- 6.55 However, there are also some overall potential negative effects predicted from the proposed Submission Core Strategy. Some of these are highlighted in the cumulative effects discussion below, however three key areas of potential negative effects are: resource use (materials, waste, water and energy); traffic generation; and land use.
- 6.56 An increase in the borough's population, and the associated demand for goods, services transport and utilities (e.g. water, sewerage and energy), along with construction and business activity, will use natural resources, increase demand for energy and water and generate both household and construction waste. Travel generation from an increase in population of 28,000 (as identified by Policy CP2) over the period to 2017 will potentially offset efforts made in other policies and supporting text which seek to manage the negative effects of growth and where possible reduce the need to travel.
- 6.57 The proposed Submission Core Strategy has ambitious aims in terms of the regeneration of Growth Areas and associated housing development, revitalisation of town centres and the protection and enhancement of the Borough as a business location, particularly through the transformation of Wembley as the '*economic engine for Brent*'¹¹. These factors will all put pressure on the use of land, including on existing open spaces, and infrastructure which will need to be managed to ensure the current level of provision and access is not worsened and is ideally improved.

Cumulative effects of the proposed Submission Core Strategy

- 6.58 There are different types of cumulative effects, but what we are principally concerned with in this section is the total effects of different elements and policies in the

¹¹ Resubmission Core Strategy supporting text to Policy CP7 – Wembley Growth Area, paragraph 4.43

proposed Submission Core Strategy on a single ‘receptor’. This could be a certain group within the population or people living in a particular locality, the water environment or flora and fauna, for example. Many of the effects arising from the proposed Submission Core Strategy are likely to be cumulative (e.g. emissions of air pollutants and greenhouse gases). Note that this section is concerned with the “internal” cumulative effect of the Core Strategy itself, whereas the cumulative effects of the Core Strategy with adjacent boroughs Development Plan Documents is considered in a section below.

- 6.59 From the summary of the appraisal of the groups of policies above, many effects which have already been identified are cumulative in character. This is potentially illustrated where several policies are predicted to effect the same SA objective, or where different minor effects arising from a number of policies combine to create a significant effect. Key cumulative effects predicted are included in Table 26.

Table 26: Key cumulative effects of the proposed Submission Core Strategy

Cumulative effects	Receptor	Causes / comments
Potential positive effects		
Provision and increase accessibility to services and facilities	Communities in deprived areas, particularly those without a car	Throughout the proposed Submission Core Strategy, and in particular the Growth Area policies, there is an emphasis on providing appropriate social infrastructure, amenities and services in accessible locations and improving non-car infrastructure. This is likely to have a potential positive cumulative impact on deprived communities in the long term.
Reduced crime and fear of crime	General population, especially vulnerable groups (youth, deprived, elderly etc)	Policies which seek to promote regeneration, improve public realm, encourage walking, provide community facilities and training opportunities are likely to have a beneficial effect on crime and fear of crime. Passive surveillance, pedestrian traffic and the feeling of pride / sense of identity can be contributing factors.
Enhanced townscape and public realm	General population especially in areas of low townscape / public realm quality	Many policies seek to improve the public realm directly or indirectly. While this is addressed explicitly in policies such as CP5 – Placemaking and CP6 – Design and Density in Place Shaping, as well as the Growth Area policies, the potential cumulative effect across the proposed Submission Core Strategy is also likely to be positive. Many of the areas of low townscape / public realm quality are in the more deprived parts of the borough and therefore these enhancements will potentially benefit on the more deprived communities.
Enhanced image of Brent as a location for business	Businesses Local population	Potential positive effects are predicted from almost all the policies against SA objective EC1 (Economic Growth). Although (as noted in appraisal and below) there are negative effects associated with increased economic activity, the likely effects of policies to improve public realm, enhance non-car transport infrastructure and connectivity, and improve facilities for residents are likely to act cumulatively in the long term to enhance the image of Brent as a location for business and investment.
Increased provision of employment opportunities	Local population (including working age population)	As above. Development which enhances the image of Brent as a location for business, and proposed economic / commercial regeneration and employment creation across the Growth Areas is likely to have a cumulative effect on employment opportunities in the long term.
Improved public transport	Local population, particularly those without access to	The proposed Submission Core Strategy Growth Area policies, together with specific policies seeking infrastructure to support development (CP15) and the enhancement of public transport infrastructure (CP14) are likely to

Cumulative effects	Receptor	Causes / comments
	a car	have positive cumulative effect on provision of public transport and related interchanges.
Potential negative effects		
Increased pressure on existing amenities and facilities	General population, especially vulnerable groups, particularly in areas of current deficit	The appraisal of the Growth Area policies indicates that in some cases proposed social infrastructure delivery may fall short of predicted new demand arising from the additional population / housing growth. This may particularly be the case for amenities such as informal outdoor play areas, open space, and community facilities, including schools.
Reduced affordability of housing	Existing Brent residents, especially those economically and socially deprived	<p>Although the proposed Submission Core Strategy explicitly seeks to provide affordable housing (Policy CP2 – Population and Housing Growth), there is a risk that the cumulative effects of regeneration and flagship projects (such as Wembley), improved public realm, improved transport links and more business activity may lead to an increase in the average ratio of house prices to earnings in the Borough. Even given recent house price fluctuations, affordability is likely to remain a significant issue in Brent.</p> <p>This highlights the importance of delivering on the affordable home target and ensuring the housing delivered is suitable and affordable to those in greatest need.</p>
Increased pressure on open space, biodiversity and habitats	<p>Flora and fauna</p> <p>Local people using open space particularly in areas of existing deficit</p>	<p>There is considerable pressure on existing land resources within Brent. Pressure from the proposed level of growth and the demand for land from business and industry, housing, retail and leisure is likely to combine to put significant additional pressure on existing open space (historically a large area of open space has been lost in the Borough). Greenfield sites have a more attractive development potential than brownfield sites.</p> <p>The proposed Submission Core Strategy emphasises throughout the requirement to develop previously developed land, however the cumulative impact from competing demands is likely increase the pressure to release open space for development.</p>
Increased noise and nuisance	General population, but especially vulnerable groups and those living close to main roads and in the Growth Areas such as Wembley	<p>Increased activity associated with the construction (short – medium term / temporary) and habitation (long term / permanent) of new homes (22,000 new homes and 28,000 increase in population proposed in Policy CP2 – Population and Housing Growth), increased housing density (in town centres), development of a regional centre at Wembley and expansion of certain business activities are likely to have cumulative impact on those living (and working) in these locations and will potential reduce their quality of live / wellbeing due to disturbance from neighbourhood noise and nuisance.</p> <p>The forthcoming Development Management Policies DPD, as well as relevant development briefs, SPDs, Area Action Plans etc., will need to provide further guidance / policy to seek to mitigate this potential effect.</p>
Increased traffic and congestion	<p>Air and general population, especially those living close to main roads and in the Growth Areas such as Wembley</p> <p>Other road users, in particular cyclists and pedestrians</p>	<p>Similar in combination effect with increased noise and nuisance described above. Several aspects of the proposed Submission Core Strategy are likely to lead to increased traffic and congestion, with knock-on effects on air quality, health, climate change etc. Increased road traffic, and potential road / junction changes required may also impact negatively on cyclists and pedestrians.</p> <p>There are policies and supporting text throughout the proposed Submission Core Strategy which seeks to minimise traffic and trip generation, and ensure access to essential services and jobs is made easier by modes other than the car. However, in conflict with this is the potential cumulative effect of the development proposed. Constructing new homes, with an increase of population, increased economic activity (such as freight storage</p>

Cumulative effects	Receptor	Causes / comments
		and distribution), tourism and leisure / Wembley may cumulatively generate significant transport pressures. Management and minimisation efforts may be outweighed by this.
Increased greenhouse gas emissions	Global environment (as well as vulnerable parts of the population affected by climate change impacts such as flooding and the urban heat island)	<p>There are many sources of greenhouse gas emissions which will potentially increase as a result of the proposed Submission Core Strategy – additional transport / vehicle emissions, construction of new homes and other development, habitation of additional homes etc. Development in adjacent boroughs, like Brent Cross, for example is likely to add to this increase due to trip generation within the borough and traffic crossing the borough (see section below).</p> <p>This potential cumulative effect is likely to present a significant challenge for the Borough which will be seeking to reduce overall emissions to meet London / Government targets.</p> <p>Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures is intended to help mitigate these effects, and states that LB Brent is preparing a Climate Change Strategy. This should set out in more detail how the Borough intends to mitigate for increased greenhouse gas emissions.</p> <p>See more details below on the quantified key overall effects of the proposed Submission Core Strategy.</p>
Climate change adaptation: Increased risk of flooding, pressure on drainage and sewerage infrastructure, urban heat island effect	Land and water environment, general population, especially vulnerable groups likely to be particularly affected by flooding and the urban heat island effect	<p>Increased pressure for development to meet housing and regeneration objectives is likely in some cases to result in the development or areas currently at risk of flooding, or likely to be at risk in future due to climate change</p> <p>In addition local increases in development density is likely to put pressure on drainage and sewerage infrastructure and increase the area of impermeable surfaces is predicted to increase risks of surface water flooding, especially due to storms. Climate change is predicted to lead to increased frequency and intensity of storms, which will exacerbate this effect, especially in the long-term.</p> <p>Increased development densities, combined with hotter summers predicted due to the effects of climate change, are also predicted to exacerbate the urban heat island effect.</p>
Increased resource use and waste generation	Land, air, water environment (within and outside borough) – pollution and water prices for example can differentially effect vulnerable groups	<p>As above for greenhouse gas emissions, these activities will also consume resources, generate waste, use energy and water during both the construction and operational phases.</p> <p>See more details below on the quantified key overall effects of the proposed Submission Core Strategy.</p>

Quantification of selected key cumulative and overall effects

- 6.60 It is not possible to estimate accurately the overall resource use of fully implementing the proposed Submission Core Strategy and the policies it contains. Much will depend on its detailed implementation over the plan period and external influences beyond the control of the Core Strategy or the Borough. However, an attempt can be made to estimate some of the overall effects predicted.

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- 6.61 An increase in population in the borough of up to 28,000 over the ten year period to 2017 is significant as it represents an increase in the Borough's population of almost 10%. An overall population growth target for the period to 2026 is not included in the proposed Submission Core Strategy.
- 6.62 This population figure of 28,000 is to be enabled by the proposed provision over the same period of 10,146 new homes¹². However, the proposed Submission Core Strategy proposes an overall supply of new homes of 22,000 over the plan period 2007 – 2026. If a similar ratio of population to new housing is assumed for the additional new homes over the period 2017 – 2026 this would imply an additional increase in population of approximately 33,000 people¹³, and a total increase in population over the plan period of 61,000. This represents an increase in the Borough's population of over 20%.
- 6.63 The amount of housing provision proposed (10,146 new homes to 2017 and 22,000 to 2026) represents an increase on the current stock of 105,000 homes of approximately 10% to 2017 and an increase of approximately 20% over the whole plan period (to 2026).
- 6.64 An estimate of the potential effects, divided into construction and operation, (on Carbon Dioxide emissions, waste production, aggregate use and water use) of the overall home-building target (22,000 new homes) is presented below, however it should be emphasised that these are just very approximate estimates. Based on the housing numbers discussed above, approximately half of these quantified effects would occur in the period 2007 – 2017.

Effects on resource use and emissions of proposed level of growth in LB Brent

A study by CPRE¹⁴ estimated the building of one new home¹⁵ as being responsible for:

- Emissions of climate changing greenhouse gas emissions equivalent to 35 tonnes of CO₂.
- The Production of 11.25 tonnes of solid waste.
- Consumption of 60 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled).

In addition the occupation of each additional house will:

- Generate emissions to the equivalent of 4.05 tonnes of CO₂ gas per year through burning fossil fuels (note, this does not include fossil fuel consumption associated with transport of residents).
- Produce 1.25 tonnes of solid wastes a year.
- Consume 180,000 litres of water per year while producing a roughly equivalent quantity of

¹² Overall housing totals as included in Submission Core Strategy Policy CP2 are 11,200 over period to 2016/17 (to include 1,030 re-occupied vacant homes) and a total of 22,000 additional homes by 2026.

¹³ Calculated by estimating the ratio of new population (28,000) to proposed new homes (10,146) over period 2007 – 2017 = approx 2.8, and multiplying by proposed additional new homes over the period 2017 – 2026: 11,854 x 2.8 = 33,191 people

¹⁴ CPRE (2005), *Building on Barker - How we can continue to improve housing for everyone without damaging the environment and sprawling over the countryside*

¹⁵ These figures are based on a typical 90 square metre new home meeting current Building Regulations and occupied by three people.

sewage effluent.

In addition, BRE has collected waste data based on minimum reporting requirements, established as part of a Defra funded study¹⁶. The requirements cover construction, refurbishment and demolition waste. The latest figures (August 2008¹⁷) show that the average amount of construction waste generated for a new residential unit is 15.2m³/100m². Using CPRE's estimate of an average new home being 90m², this would equate to 13.68m³ per unit.

Construction:

Based on these figures an estimated overall impact of the housing figures proposed by the proposed Submission Core Strategy for construction would be:

- Approximate emissions equivalent to 770,000 tonnes of CO₂. Assuming that the housing figures are delivered evenly over the plan period (20 years from 2007 to 2026), the annual equivalent CO₂ emissions will be 38,500 tonnes. Annual CO₂ emissions from all sources totalled approximately 1,400,000 tonnes in Brent (2006)¹⁸, so additional emissions from building new homes could account for an approximate 2.75% annual increase in CO₂ emissions.
- The production of 247,500 tonnes of solid waste or 12,375 tonnes per year. Although no data are available in relation to construction waste production in Brent, for comparison in 2004-5 the total municipal waste arisings in Brent were 131,000 tonnes, so this extra waste produced by construction would constitute the equivalent to a 10% increase in municipal waste each year. In terms of volume, based on BRE's estimates, approximately 15,048m³ of construction waste would be generated and thus require disposal annually.
- The consumption of 66,000 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled) per year.

Occupation:

In occupation, assuming the homes are constructed evenly over the plan period, each year would see the occupation of approximately an additional 1100 homes and a population increase of approximately 1% of total population each year between 2007-2026:

- In 2005/06 an average of 412kg¹⁹ of waste was collected per capita, and in 2003 the total household waste produced in the Borough 117,000 tonnes²⁰. Based on CPRE's estimates, the waste produced by the occupation of 1100 homes per year will produce approximately an extra of 1375 tonnes of household waste which is more than 1% additional household waste per year.
- Based on the percentage increase in population / homes, water (and equivalent sewage) of approximately an additional 1% per year. Domestic water use in London has been estimated at 165 litres per day per capita²¹. The introduction of Code for Sustainable Homes level 3 would require new homes to achieve water use of 105 litres per person per day.
- Road transport and CO₂ emissions: there were 284,000 tonnes of CO₂ emissions in Brent associated with road transport in 2006²², an annual increase of 1% in the population might be

¹⁶ BRE (2007) Smartwaste, Understanding and Predicting C&D waste Accessed online:

<http://www.smartwaste.co.uk/wastebenchmarking/about.jsp>

¹⁷ BRE (2008) Waste Benchmarking Data. Accessed online:

http://www.smartwaste.co.uk/filelibrary/benchmarks%20data/Waste_Benchmarking_Data_for_new_build_projects_only_updated_31_Aug_2008_by_project_type.pdf

¹⁸ Based on calculation using estimated per capita CO₂ emissions in 2006 (5.2 tonnes / capita) multiplied by 2006 mid-year estimate of population (276,849). Per capita CO₂ emissions from Local Government Performance Framework – NI 186 Per capita CO₂ emissions in the LA area: Accessed online - <http://www.defra.gov.uk/environment/localgovindicators/ni186.htm>

¹⁹ Audit Commission Area Profile for Brent: [http://www.areaprofiles.audit-commission.gov.uk/\(wdnci545jkvobp55afcu45\)/DetailPage.aspx?entity=10004879](http://www.areaprofiles.audit-commission.gov.uk/(wdnci545jkvobp55afcu45)/DetailPage.aspx?entity=10004879)

²⁰ West London Waste Authority and Constituent Boroughs (2005) Draft Joint Municipal Waste Management Strategy

²¹ SA Scoping Report of the London Plan (GLA, 2005)

²² Local Government Performance Framework – NI 186 Per capita CO₂ emissions in the LA area: Accessed online - <http://www.defra.gov.uk/environment/localgovindicators/ni186.htm>

expected to lead to an increase emissions by approximately 1% per year and 20% over the plan period.

- Domestic CO₂ emissions: 4.05 tonnes per house per year, equivalent to an additional 4,455 tonnes extra per year, or 89,100 tonnes over the plan period.

The proposed compulsory phased introduction of the Building Regulations in line with higher Code for Sustainable Homes levels, if realised, will help mitigate some of these effects. For example Code level 3 requires a 25% reduction in dwelling emission rates, and Code level 4 a 44% reduction.

Cumulative effects of the proposed Submission Core Strategy with development plans in adjacent boroughs

6.65 For comparison Table 27 presents a summary of proposed housing provision and job creation in Brent (and its Growth Areas) as well as development proposed in adjacent boroughs. Although there are gaps in the data, this represents data as available from a review completed in January 2009, and was compiled from both the London Plan²³ and existing / emerging borough spatial planning documents (e.g. draft Core Strategies, Areas Acton Plans, Site Specific Allocations etc), as referenced in the table. Figure 32 shows where this growth is proposed in adjacent boroughs. On this map green discs indicate proposed development for the period 2007/08 – 2026 and purple discs denote areas identified as growth areas, but for which information on allocated housing/job numbers are not currently available.

Table 27: Proposed housing and employment in Brent / adjacent boroughs²⁴

Borough	2007/8 - 2016		2016 – 2026/27		Total to 2026/27	
	Homes	Jobs	Homes	Jobs	Homes	Jobs
Brent²⁵	11,200	-	10,800	-	22,000	14,400²⁶
Wembley	5,000	-	6,500	-	11,500	10,000
Alperton	1,500	-	100	-	1,600	-
Burnt Oak / Colindale	1,400	-	1,100	-	2,500	-
Church End	700	-	100	-	800	-
South Kilburn	1,400	-	1,000	-	2,400	-
Park Royal	-	-	-	-	-	4,400 ²⁷
Barnet	20,550*	-	-	-	20,550*	-
Colindale Regeneration Area ²⁸	-	-	-	1,000	10,000	1,000
Mill Hill East ²⁹	-	500	2,000	-	2,500	500

²³ The Mayor's London Plan: Spatial Development Strategy for Greater London; consolidated with alterations since 2004, GLA 2008

²⁴ Note - Targets / totals included here were correct at the time of this report being drafted (11th February 2009)

²⁵ Figures as included in LB Brent Resubmission Core Strategy DPD Policy CP3 – Commercial Regeneration

²⁶ This is considered a minimum estimate, as it represents only specific targets included in the Submission Core Strategy. In addition to this figure economic and commercial development (and thus job creation) is proposed in all Growth Areas.

²⁷ Based on approximate contribution of 40% of overall Park Royal target of 11,000 jobs in London Plan, as included in Resubmission Core Strategy

²⁸ LB Barnet (2008) Colindale Area Action Plan Preferred Options. Accessed online: <http://www.barnet.gov.uk/colindale-aap-preferred-options-report-oct2008.pdf>

²⁹ LB Barnet (2008) Mill Hill East Area Action Plan Submission Version. Accessed online: <http://www.barnet.gov.uk/index/council-democracy/consultations/planning-consultations/mill-hill-east-consultation-documents-may-2008.htm>

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Borough	2007/8 - 2016		2016 – 2026/27		Total to 2026/27	
	Homes	Jobs	Homes	Jobs	Homes	Jobs
Cricklewood, Brent Cross and West Hendon Regeneration ³⁰	-	-	-	-	10,000	20,000
Camden	5,950*	-	-	-	5,950*	39,500 ³¹
West Hampstead Interchange, Swiss Cottage & Surrounds ³²	-	-	-	-	2,000	500
Kilburn High Road	-	-	-	-	-	-
Westminster	6,800*	-	-	-	6,800*	-
Paddington Special Policy Area / Paddington Opportunity Area	-	-	-	-	3,000	23,200*
Northwest Economic Development Area	-	-	-	-	-	-
Kensington & Chelsea	3,500*	-	-	-	3,500*	-
Kensal Area ³³	-	-	-	-	-	-
Harrow	4,000*	2000-3000*	-	-	4,000*	2000-3000*
Harrow Central Growth Corridor ³⁴	-	-	-	-	-	-

*These totals are as included in the London Plan (February 2008) and where shown at the Borough level only may include housing in areas not directly adjacent to Brent.

³⁰ LB Barnet (2008) Core Strategy Issues and Options Consultation Paper. Accessed online: <http://www.barnet.gov.uk/core-strategy-consultation>

³¹ Sum of the growth areas in the Borough of Camden (King's Cross, Euston, Tottenham Court Road (part in Westminster, Holborn, West Hampstead Interchange, Farringdon/Smithfield (mainly in City of London/Islington), see footnote 10, below.

³² LB Camden (2008) Site Specific Allocations Issues and Options. Accessed online:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/development-plans-and-policies/site-allocations-development-plan-document.en>

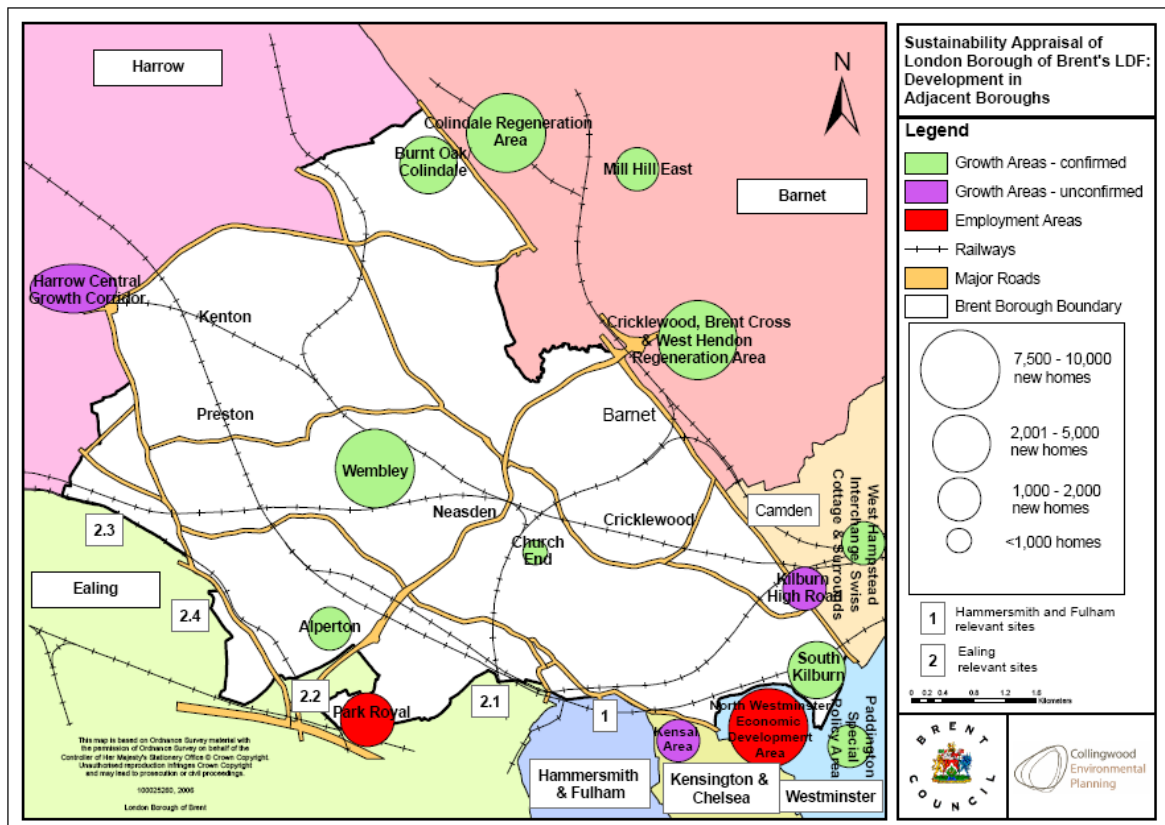
³³ LB Kensington and Chelsea (2008) North Kensington Area Action Plan Issues and Options

<http://www.rbkc.gov.uk/Planning/general/completedoc.pdf>

³⁴ LB Harrow (2006) Preliminary Issues and Options Consultation Paper

http://www.harrow.gov.uk/site/scripts/documents_info.php?documentID=1502&pageNumber=4

Figure 32: Location and scale of development in adjacent boroughs



6.66 Key developments in adjacent boroughs proposed over the Core Strategy plan period as summarised in Table 27 and Figure 32 includes:

- Considerable development proposed to the east of Brent in London Borough of Barnet, most significantly the Colindale Regeneration Area where 10,000 new homes and 1,000 new jobs are proposed, and the Cricklewood, Brent Cross and West Hendon Regeneration Area where 10,000 new homes and 20,000 new jobs are proposed. The development proposed in Cricklewood, Brent Cross and West Hendon Regeneration Area is also proposed to include the creation of a new town centre at Brent Cross. The Brent Cross / Cricklewood area has also been identified as an Opportunity Area in the London Plan.
- Also to the east of Brent, within London Borough of Camden, 2,000 new homes and 500 new jobs are proposed in the West Hampstead Interchange, Swiss Cottage and Surrounds regeneration area.
- To the south of Brent, two Growth Areas are close to the Brent boundary within the London Borough of Kensington and Chelsea: the Paddington Special Policy Area, where 3,000 new homes and 23,200 new jobs are proposed, and the North Westminster Economic Development Area.

- Significant employment generation and commercial development is proposed within the areas of Park Royal located in London Borough of Ealing, directly to the south west of Brent.
 - To the north west of Brent significant development is proposed in the Harrow Central Growth Corridor within the London Borough of Harrow.
 - A number of other specific sites allocated for regeneration and development are located close to the borough boundary in the London Boroughs of Hammersmith and Fulham and Ealing.
- 6.67 Although these proposals have not been appraised in detail, the scale of planned development in the adjacent boroughs has potentially significant implications for the Brent. For example, significant housing development close to the Brent borough boundary (or further slightly away but well connected by transport links) could increase the number of people seeking to access community services and amenities, for example placing additional pressures on open spaces, health services and education facilities. Such development is also likely to significantly increase travel need and pressure on Brent's roads and public transport infrastructure, as well as having related environmental effects (such as air and noise pollution).
- 6.68 Significant economic and commercial development in adjacent boroughs (such as that proposed at Brent Cross / Cricklewood) also has the potential to undermine or compete with economic goals in Brent. For example, a major retail centre created in Brent Cross could impact upon the success and viability of existing town centres, as well as proposed expansion at Wembley. This may particularly be the case given current economic circumstances.
- 6.69 However, there will also be benefits arising from development close to Brent's boundaries. Commercial development in accessible locations is likely to increase access to employment opportunities for Brent residents, and community facilities development in adjacent boroughs may improve access for Brent residents. Other benefits may arise from upgrading of transport interchanges and improved provision of environmental assets, such as open and green spaces in locations accessible for Brent residents.
- 6.70 Table 28 identifies some of the key cumulative effects predicted from development in adjacent boroughs, both positive and negative. The table identifies where development in adjacent boroughs is considered to improve (positive effects) or worsen (negative effects) overall the overall and cumulative effects arising within the borough (from the proposed Submission Core Strategy itself). To ease comparison with Table 26 all overall and cumulative effects predicted to arise from the Submission Core Strategy are included. Where no additive or cumulative effect is predicted from development proposed in adjacent boroughs this is noted.

Table 28: Cumulative effects from development proposed in adjacent boroughs

Cumulative effects with adjacent boroughs	Receptor	Causes / comments
Potential positive effects		
Provision and increase accessibility to services and facilities	Communities in deprived areas, particularly those without a car	Where facilities are provided as part of development in areas identified for growth in adjacent boroughs, and particularly in accessible locations, this is could potentially enhance this cumulative effect.
Reduced crime and fear of crime	No significant cumulative effect from development in adjacent boroughs predicted	
Enhanced townscape and public realm	No significant cumulative effect from development in adjacent boroughs predicted	
Enhanced image of Brent as a location for business	Businesses Local population	Improvements to transport interchanges (such as those proposed in Brent Cross / Cicklewood, and likely in the Harrow Central Growth Corridor) may contribute to the enhancement of Brent's image as a location for business, by improving travel times and convenience to / from the borough. This has been explicitly recognised through the development of the <i>North West London to Luton Corridor – Prospectus for Sustainable Growth</i> , published collaboratively in January 2009 by the London Boroughs of Brent, Barnet, Harrow and Camden, together with the GLA and the North London Strategic Alliance.
Increased provision of employment opportunities	Local population (including working age population)	Proposed commercial developments and employment creation proposed in adjacent boroughs, such as that at Brent Cross / Cricklewood (where 20,000 jobs are proposed over the period to 2026), are likely to provide employment opportunities for Brent residents. As above, where transport improvements in adjacent boroughs enhance the image of Brent as a location for business, this is also likely to have a potential positive cumulative effect.
Improved public transport interchange	Local population, particularly those without access to a car	Development in Barnet (in particular at Brent Cross / Cricklewood), as well as the Harrow Central Growth Corridor may provide significant cumulative opportunities to improve public transport provision and interchange. See comments on <i>North West London to Luton Corridor – Prospectus for Sustainable Growth</i> under Enhanced image of Brent as a location for business, above.
Potential negative effects		
Increased pressure on existing amenities and facilities	General population, especially vulnerable groups, particularly in areas of current deficit	In some areas of the Borough (notably Burnt Oak / Colindale, and areas close to Brent Cross / Cricklewood) significant population growth proposed in adjacent boroughs is likely to exacerbate this negative cumulative effect.
Viability of existing town centres in Brent	Businesses and retailers in town centres General population	Significant economic and commercial development in adjacent boroughs (such as that proposed at Brent Cross / Cricklewood) has the potential cumulatively to undermine or compete with economic goals in Brent. For example, a major retail centre created in Brent Cross may impact upon the success and viability of existing town-centres as well as proposed

Cumulative effects with adjacent boroughs	Receptor	Causes / comments
		expansion at Wembley. This may particularly be the case given current economic circumstances.
Reduced affordability of housing	Existing Brent residents, especially those economically and socially deprived	There is a risk that the cumulative effects of regeneration and flagship projects in adjacent boroughs (such as Brent Cross / Cricklewood in Barnet, Paddington Special Policy Area / Paddington Opportunity areas in Westminster, and Park Royal in Ealing), improved public realm, improved transport links and more business activity in boroughs adjacent to Brent may lead, where in increases demand for homes in Brent to an increase in the average ratio of house prices to earnings in the Borough.
Increased pressure on open space, biodiversity and habitats	Existing Brent residents, local parks and open spaces, habitats and biodiversity	Population increases in adjacent boroughs, particularly where in close proximity to the borough boundary (for example in Barnet and Camden) is likely to increase pressure on the use of open spaces, parks and play areas / sports facilities in Brent.
Increased noise and nuisance	General population, but especially vulnerable groups and those living close to main roads.	Significant development in adjacent boroughs is likely to exacerbate the identified cumulative effect of increased noise nuisance and disturbance from construction, habitation, commercial uses and associated increases in traffic. In particular the scale of development proposed in Barnet associated with Cricklewood, Brent Cross and West Hendon and Colindale Regeneration Areas is likely to lead to significant construction and traffic generation noise.
Increased traffic and congestion	Air and general population, especially those living close to main roads. Other road users, in particular cyclists and pedestrians	Similar in combination with increased noise and nuisance described above. The scale and location of development in adjacent boroughs is likely to have a significant negative cumulative effect on the level of traffic and congestion in Brent. In particular, development near the North Circular Road and Edgware Road associated with the Cricklewood, Brent Cross and West Hendon and Colindale Regeneration Areas in London Borough of Barnet, but also development on the Harrow Central Growth Corridor in London Borough of Harrow.
Increased greenhouse gas emissions	Global environment (as well as vulnerable parts of the population affected by climate change impacts such as flooding and the urban heat island)	See above. Development in adjacent boroughs is likely to add to aspects of increased greenhouse gas emissions related to travel need in particular.
Increased resource use and waste generation		No significant cumulative effect from development in adjacent boroughs predicted.

7. IMPLEMENTATION AND MONITORING OF THE CORE STRATEGY

Links to other tiers of plans and programmes and the project level

- 7.1 The Core Strategy is part of a broader hierarchy of plans, which will not be developed nor implemented in isolation. Links and relationships exist at the local (Borough) level, but also at the regional (London) and national level.
- 7.2 The Core Strategy is a key DPD within the Brent LDF, which will replace the UDP as the statutory plan for Brent and will be made up of an evolving suite of DPDs and SPDs (known collectively as Local Development Documents – LDDs). The Core Strategy is the key DPD in that it sets the strategic objectives and policies for the LDF. However, ensuring these objectives are met will depend on the detailed implementation and site-specific expression set out other DPDs, in particular the Site Specific Allocations DPD, which provides detailed guidance for the development of key sites and gives an indication of the likely phasing of development, and the Development Management Policies DPD. Other documents in the LDF include the Proposals Map DPD and Area Action Plans (which the Core Strategy proposes are to be developed for the Wembley and Park Royal). In addition, to provide further guidance or explanation, SPDs for specific issues linked to DPD policy, such as sustainable construction (SPG19) and South Kilburn Housing Regeneration, will be / have been prepared. A list of SPDs which have reached at least the consultation stage is included in Section 1 (Part A).
- 7.3 The Core Strategy has been developed with reference to a large number of national and regional plans and strategies. At the highest level it reflects the broad agenda set out in Securing the Future - UK Government Sustainable Development Strategy, and for specific aspects it has been developed in line with national targets for issues such as housing, waste management, energy and transport. At the regional (London) level the Core Strategy is linked to policies, strategies and targets set out in the Mayor for London's strategies and the London Plan (alterations), which has for example set targets for housing development and affordable housing provision. The Mayor is proposing to review the London Plan, and consultation on proposed revisions commenced in April 2009³⁵.
- 7.4 In addition, the Core Strategy is linked to and must be consider a very large number of local (borough) plans and those developed by neighbouring boroughs, such as Local Implementation Plans (LIPs) which seek to deliver the London Transport Strategy within each borough, Waste Management Strategies, Biodiversity Action Plans and so on.

³⁵ GLA (April 2009), A New Plan for London – Proposals for the Mayor's London Plan:
<http://www.london.gov.uk/mayor/publications/2009/docs/london-plan-initial-proposals.pdf>

Proposals for monitoring

- 7.5 Monitoring the significant sustainability effects of implementing the Core Strategy is a fundamental part of the SA process. It is important to monitor performance against the SA objectives, which form a core part of this appraisal, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken.
- 7.6 The SEA Regulations³⁶ require the significant environmental effects of a plan or programme to be monitored and that the Environment Report (in this case combined with this SA report) should include a description of measures ‘envisaged’ for monitoring the implementation of the plan.
- Regulation 17 (i) of the SEA Regulations states that “*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*”.
 - Schedule 2 (paragraph 9) states that the Environmental Report should include “*a description of the measures envisaged concerning monitoring in accordance with regulation 17*”.
- 7.7 In addition, The Planning and Compulsory Purchase Act 2004 requires the local authority to prepare an Annual Monitoring Report (AMR) which should set out the extent to which the policies and objectives of DPDs and SPDs making up the LDF are being achieved.
- 7.8 Brent has produced an AMR³⁷ for the period 2006 – 2007, which contains a “*review of the developments that have been permitted or undertaken in Brent during the year so as to establish how effective the UDP policies, and emerging LDF policies, have been in enabling sustainable development and protecting the environment*”. As the Core Strategy DPD and Site Specific Allocations DPD are finalised and other documents in the LDF (e.g. Development Management Policies DPD etc) are developed, the monitoring of these will be explicitly addressed through updates to the AMR.
- 7.9 ODPM (now DCLG) has published a good practice guide on monitoring LDFs³⁸, which proposes (though these are not a statutory requirement) three levels of indicators:
- **Contextual indicators** – which provide monitoring of the background against which the LDF operates.
 - **Output indicators** – which enable monitoring of specific policies included in the LDF.

³⁶ The Environmental Assessment of Plans and Programmes Regulations (England) 2004 (Statutory Instrument 2004 No 1633)

³⁷ *Shaping Development in Brent, Annual Monitoring Report 2006/07.*

³⁸ *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005.
<http://www.communities.gov.uk/index.asp?id=1143905>

- **Significant effects indicators** – which provide monitoring of the important ‘effects’ of the LDF as identified by the Sustainability Appraisal.
- 7.10 This hierarchy of indicators provides a practical approach which enables SA monitoring to be incorporated within the wider AMR process required for the LDF. It is proposed that such an approach and indicator hierarchy be considered for monitoring purposes in relation to this SA and the Brent LDF.
- 7.11 Although the significant effects indicators proposed here are in relation to the effects of the Core Strategy DPD it is expected that this framework will be adapted and expanded to meet the monitoring needs of the SAs of other DPDs as these emerge.
- 7.12 Further information and description of these three levels of indicators is provided below, including discussion of the significant effects of the Core Strategy as identified by this SA, and proposed indicators for monitoring them.

Contextual and output indicators

- 7.13 Contextual indicators aim to provide the background information (i.e. set the context) against which the effects of implementation of the DPD can be measured (in the case of Brent’s AMR, this is likely to consider effects of the LDF as a whole). The Government best practice guide on monitoring LDFs suggests that contextual indicators should draw on existing sources of information and be structured to build an environmental, social and economic baseline for the area. Chapter 1 of the existing Brent AMR contains a baseline for the Borough entitled “*Brent: Between Inner and Outer London*”. While it may be necessary to adapt this in light of the emerging LDF, and increase the coverage of environmental indicators, it does cover the majority of key topics for contextual indicators as suggested by the Government guidance:

Key topics for contextual indicators:

<p>Demographic structure: population size, household types, ethnic composition, and social groups</p> <p>Socio-cultural issues: crime rates, unemployment level and deprivation</p> <p>Economy: economic activity rates, household income, house price level, productivity and employment</p> <p>Environment: key assets in the natural environment</p> <p>Housing and built environment: housing stock conditions and quality and assets of the built environment</p> <p>Transport and spatial connectivity: transport accessibility, regional hub, spatial inequality / uneven distribution of activities</p>

- 7.14 Output indicators seek to measure the outcomes of implementation of the plan policies themselves. They are thus directly related to specific policies contained within the DPD / LDF. The guidance on monitoring LDFs suggests that output indicators are subdivided into Core Output indicators and Local Output indicators. In addition the guidance sets out a set of Core Output indicators to be monitored, and these should be reflected within the AMR. These are set out in the box below.

- 7.15 Local Output indicators should be developed to reflect specific local conditions and issues, and the individual policies contained within the DPD / LDF. They can thus be more detailed and focussed than Core Output indicators and reflect more closely the specific monitoring needs of Brent.

LDF Core Output Indicators³⁹:

Business Development

- 1a Amount of land developed for employment by type.
- 1b Amount of land developed for employment, by type, which is in development and/or regeneration areas defined in the local development framework.
- 1c Percentage of 1a, by type, which is on previously developed land.
- 1d Employment land supply by type.
- 1e Losses of employment land in (i) development/regeneration areas and (ii) local authority area.
- 1f Amount of employment land lost to residential development.

Housing

- 2a Housing trajectory showing:
 - (i) net additional dwellings over the previous five year period or since the start of the relevant development plan document period, whichever is the longer;
 - (ii) net additional dwellings for the current year;
 - (iii) projected net additional dwellings up to the end of the relevant development plan document period or over a ten year period from its adoption, whichever is the longer;
 - (iv) the annual net additional dwelling requirement; and
 - (v) annual average number of net additional dwellings needed to meet overall housing requirements, having regard to previous years' performances.
- 2b Percentage of new and converted dwellings on previously developed land.
- 2c Percentage of new dwellings completed at:
 - (i) less than 30 dwellings per hectare;
 - (ii) between 30 and 50 dwellings per hectare; and
 - (iii) Above 50 dwellings per hectare.
- 2d Affordable housing completions

Transport

- 3a Percentage of completed non-residential development complying with carparking standards set out in the local development framework.
- 3b Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.

Local Services

- 4a Amount of completed retail, office and leisure development.
- 4b Percentage of completed retail, office and leisure development in town centres.
- 4c Percentage of eligible open spaces managed to green flag award standard.

Minerals (for minerals planning authority only)

- 5a Production of primary land won aggregates.
- 5b Production of secondary/recycled aggregates.

Waste (for waste planning authority only)

- 6a Capacity of new waste management facilities by type.

³⁹ Based on Table 4.4 of *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005

6b Amount of municipal waste arising, and managed by management type, and the percentage each management type represents of the waste managed.

Flood Protection And Water Quality

7. Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.

Biodiversity

8. Change in areas and populations of biodiversity importance, including:

- (i) change in priority habitats and species (by type); and
- (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional or sub-regional significance.

Renewable Energy

9. Renewable energy capacity installed by type.

Significant effects indicators

- 7.16 The guidance on monitoring LDFs states that significant effects indicators should be linked to the SA objectives and indicators. The monitoring of significant effects is intended to enable a comparison between the predicted effects (as set out in the appraisal) and the actual effects seen during implementation of the policies (as set out in the DPD). Taken with the contextual and output indicators, sufficient numbers of significant effects indicators should be developed to ensure robust assessment of policy implementation.
- 7.17 Table 29 sets out potential indicators for the significant sustainability effects identified through the SA process (each significant effect relates to one or more of the SA objectives). The significant effects reflect the effects identified by the appraisal of the Core Strategy policies (section 6 and Appendix 10) as well as the key cumulative and overall effects identified in paragraphs 6.51 – 6.59, and Table 26. Where they exist, relevant indicators included in the proposed Submission Core Strategy and current AMR (2006/07) are identified against each significant effect. Where a potential gap in monitoring is identified, such as due to a lack of data or the absence of relevant existing indicators this is noted and potential indicators are proposed. Table 29 also identifies relevant existing targets, included in relevant regional (London) and Brent plans and strategies, in particular the London Plan and the Brent Annual Monitoring Report, but also specific local plans such as the Brent Crime Strategy.
- 7.18 It is proposed that the LB Brent consider the inclusion of these potential additional significant effects indicators within the monitoring for the Core Strategy DPD, as well as in the next AMR.
- 7.19 As noted in paragraph 7.6, LB Brent is required to identify unforeseen adverse effects at an early stage and undertake appropriate remedial action. Due to their nature, such effects may not have been predicted by the SA, and it is important that LB Brent regularly review contextual indicators, conduct monitoring discussions with internal and external stakeholders and consider other external sources of research

and information in order to identify unexpected effects and outcomes, and review monitoring requirements as a result.

Table 29: Potential monitoring of significant potential sustainability effects of the proposed Submission Core Strategy

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
Potential positive effects			
Increased housing development (S1, S4, EN7)	Total additional homes (Core Output Indicator 2a) Number of homes completed in defined growth areas (Core Output Indicator 2a) Number of new family homes completed (Core Output Indicator 2a)	London Plan <ul style="list-style-type: none"> Ten year target 2007/08 – 2016/17: 11,200 homes 50% of new homes to be affordable 	Significant effect already monitored, no potential additional indicators proposed.
Reduced social exclusion and inequalities deprivation, including improved access to services and amenities (S1, S2, S3, S7)	Core Output indicators 3a, 3b and 4a – 4c Provision of new or extended community facilities to meet population growth (Local Output Indicator in Core Strategy and AMR 2006/07) Provision of new schools to meet population growth (Local Output Indicator in Core Strategy and AMR 2006/07) Annual S106 financial contributions secured for social infrastructure (Local Output Indicator in Core Strategy and various indicators in AMR 2006/07 covering different types of infrastructure) Amount of new space for health service provision / GPs per population (Local Output Indicator in Core Strategy and AMR 2006/07) Number of new wheelchair adaptable homes (Local Output Indicator in Core Strategy and proposed for inclusion in AMR 2007/08) Number of new homes built to lifetime	AMR 2006/07 <ul style="list-style-type: none"> Sufficient school places to meet future demand No net loss in health care facility floor space All new residential developments should be within 30 minutes public transport time of a: GP; a hospital; a primary school; a secondary school; areas of employment; and major retail centres Core Strategy <ul style="list-style-type: none"> New community facilities provided at a rate of 370 m² per 1000 new population (policy CP23) 	Significant effect already monitored, no potential additional indicators proposed.

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
	home standards (Local Output Indicator and proposed for inclusion in AMR 2007/08) Amount of new residential development within 30 mins public transport time of a GP; a hospital; a primary school; a secondary school; areas of employment; and major retail centre(s) (Core Output Indicator 3b) Other indicators currently measured: Index of Multiple Deprivation Households experiencing fuel poverty		
Improved townscape and public realm (S5, S6, EN5)	Town centre vacancy rates (Local Output Indicator in Core Strategy and AMR 2006/07) Health of town centres – annual rental survey (Local Output Indicator in Core Strategy and AMR 2006/07) Vacancy levels in primary shopping frontages (AMR 2006/07) Percentage retail / leisure floorspace in / adjoining town centres (AMR 2006/07)	AMR 2006/07 <ul style="list-style-type: none"> • Vacant units in primary shopping frontages: National average by 2010 • Net yearly increases in rental values in town centres • Retail composition mix to reflect national average • Net improvements building features and landscape character of Conservation Areas • Reduction of traffic impacts 	Measurement and reduction in areas of low townscape quality proposed as a potential indicator for UDP (2004) monitoring, however it is not included in Core Strategy Local Output Indicators or AMR 2006/07. Consider inclusion in Core Strategy and/or future AMR of indicator to measure: <ul style="list-style-type: none"> • Change in area of low townscape quality recommended
Reduced crime and fear of crime (S5)	Number of applications achieving Secure by Design accreditation (Local Output Indicator in Core Strategy and AMR 2006/07) Incidence of crime (AMR 2006/07)	Brent Crime Strategy <ul style="list-style-type: none"> • Reduce the figure (of residents that feel threatened ‘a great deal’) to 50% by 2007 • Net reduction in criminal offences • Secured-by-Design Standard AMR 2006/07 <ul style="list-style-type: none"> • Net Increase in development to secured-by- 	Brent Crime Audit Questionnaire (2004) surveyed residents for fear of crime, however unclear if updated. Consider inclusion in Core Strategy and/or future AMR of indicator to measure: <ul style="list-style-type: none"> • Fear of crime Incidence of crime already monitored.

Significant effects (most relevant sustainability objective reference)	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
		design standards <ul style="list-style-type: none"> Net reduction in incidence of crime 	
Improved public transport infrastructure (S7, EN1, EN3, EN7, EC5)	Proportion of trips made by public transport (Local Output Indicator in Core Strategy and AMR 2006/07) Amount of contributions pooled within opportunity and growth areas to improve or develop transport infrastructure (Local Output Indicator in Core Strategy) Amount of contributions towards interchange improvements (Local Output Indicator in Core Strategy and AMR 2006/07) Percentage retail / leisure floorspace at moderate PTAL or higher (PTAL 2 – 6) (AMR 2006/07) Public transport accessibility of new housing (AMR 2006/07) Implementation of the London Bus Priority Network (LBPN) (AMR 2006/07)	AMR 2006/07 <ul style="list-style-type: none"> 90% of retail/leisure floorspace approved in areas of very good/good/moderate/low public transport accessibility over period 2000 - 2010 London Plan <ul style="list-style-type: none"> Use of public transport per head to grow faster than use of private vehicle 50% increase in public transport capacity by 2022 	Significant effect already monitored, no potential additional indicators proposed.
Increased walking and cycling (S2, S7, EN1, EN3, EN7, EC5)	Implementation of the London Cycle Network (LCN+) (AMR 2006/07)	T2025 – Transport Vision for a Growing World City <ul style="list-style-type: none"> 400% increase in cycling levels from the year 2000 daily cycle trips. Equivalent to 5% mode share for cycling AMR 2006/07 <ul style="list-style-type: none"> All major developments that abut the LCN+ and LBPN should contribute to improvements and increasing capacities 	Potential gap in relation to monitoring change in walking and cycling. Consider inclusion of indicator in Core Strategy and AMR to measure: <ul style="list-style-type: none"> Number and proportion of trips (e.g. for work, school, leisure) on foot or by bicycle
Increased investment in regeneration areas	No indicators which directly monitor investment identified.	UDP (2004) <ul style="list-style-type: none"> 20Ha of land developed in Park Royal and 	Potential gap in the measurement of business investment in regeneration areas

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
(EC1, EC2, EC3, EC4)	Levels of housing development / infrastructure completion in Growth Areas are proxy indicator for investment, as these outcomes will require investment.	Wembley by 2010 AMR 2006/07 <ul style="list-style-type: none"> No net loss of employment floorspace 	Consider inclusion of indicator in Core Strategy and AMR to measure: <ul style="list-style-type: none"> Percentage change in the total number of VAT registered businesses in each growth area
Reduced unemployment (S1, EC1, EC2, EC3)	Local employment change (Local Output Indicator in Core Strategy) Secure job placements from new development (Local Output Indicator in Core Strategy) Brent unemployment levels (Local Output Indicator in Core Strategy)	AMR <ul style="list-style-type: none"> No net loss of employment land Core Strategy <ul style="list-style-type: none"> 10,000 new jobs at Wembley to 2026 and around 40% of the 11,000 new jobs target for the whole of Park Royal over a 30 year period 	Potential gap in relation to measuring change in incidence of long-term unemployed and people living in workless households. Consider inclusion of indicators in Core Strategy and AMR to measure: <ul style="list-style-type: none"> Change in long-term unemployment (percentage of unemployed who have been out of work for over one year) Percentage of people living in Work-less Households
Improved standards of design and construction in development (EN2, EN3, EN7)	Number, range and quality of design and planning guidelines available to help applicants (AMR 2006/07) Number and quality of design and access statements received (AMR 2006/07) Architectural quality – number of design awards or citations of schemes in Brent (AMR 2006/07) Number of developments meeting ‘fairly positive’ or ‘very positive’ on Brent’s Sustainability Checklist, and/or ‘good’ or ‘very good’ on BREEAM/EcoHomes standards (AMR 2006/07) Number of permitted developments ‘designing in’ the full range of best practice sustainability measures (i.e. water conservation, SUDS, materials efficiency)	AMR 2006/07 <ul style="list-style-type: none"> Net improvement in the number, range and quality of design & planning guidelines available to help applicants Net increase in the number of design awards or citations of schemes in Brent Net increased in the number of developments meeting ‘Fairly Positive’ or ‘Very Positive’ on Brent’s Sustainability Checklist, and/or ‘Good’ or ‘Very Good’ on BREEAM/EcoHomes Standards (As proportion of applications over SPG19 threshold). Net increases in Best Practice Measures (Number of permitted developments ‘designing-in’ the full range of Brest Practice sustainability measures (i.e. Water conservation, SUDS, Materials resource 	Significant effect already monitored, no potential additional indicators proposed.

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
	etc.) (AMR 2006/07)	efficiency, operational waste, etc) <ul style="list-style-type: none"> 100% of schemes by 2010 involving demolition and/or redevelopment which apply the ICE demolition protocol 	
Enhanced perceptions / image of Brent (S5, S6, EC3, EC4)	Best Value Performance Indicators (BVPI) include survey indicators to measure satisfaction of residents with their area as a place to live.	No existing targets identified	Potential gap in understanding perceptions of Brent as a location for business. Consider the inclusion of indicators in Core Strategy and AMR to measure: <ul style="list-style-type: none"> Perceptions of Brent as a location for business Satisfaction of residents with their areas as a place to live Not currently included in AMR or Core Strategy monitoring
Reduced loss of employment land (EC1, EC2, EC3, EC4)	Core Output Indicators 1a – 1f Employment land available by type (Core Output Indicator 1a) No net loss of floorspace in SEAs / BEAs (Core Output Indicator 1e) Amount of employment land lost to residential development (Core Output Indicatory 1f)	AMR 2006/07 <ul style="list-style-type: none"> No net loss of employment floorspace in SEAs / BEAs 	Significant effect already monitored, no potential additional indicators proposed.
Negative effects			
Reduced affordability of housing (S1, S4)	Number of affordable units (Core Output indicator 2d)	London Plan <ul style="list-style-type: none"> Strategic target that 50% of additional homes should be affordable 	Number of units may not be sufficient to monitor affordability in Brent. Important to understand affordability of homes in Brent relative to incomes. Consider inclusion of indicators to measure: <ul style="list-style-type: none"> House prices

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
			<ul style="list-style-type: none"> Income to house price ratio <p>Suggested sources: Joseph Rowntree Foundation (www.jrf.org.uk) Land Registry (www.landregistry.gov.uk)</p>
<p>Increased pressure on open space, biodiversity and habitats (S2, EN4, EN5)</p>	<p>Proportion of new homes completed on brownfield sites / amount of floorspace by employment type on previously developed land (Core Output Indicator 2b)</p> <p>Amount of open space (including MOL / Green Chains) lost to alternative uses (Core Output Indicator 8)</p> <p>Change in public open space, playing fields and allotments to alternative uses (AMR 2006/07)</p> <p>Provision of new or extended public open space (Local Output Indicator in Core Strategy and AMR 2006/07)</p> <p>Improvement of existing public open space / number of parks awarded Green Flag status (Core Output Indicator 4c)</p> <p>Improvement of existing and provision of new areas of nature conservation (Local Output Indicator in Core Strategy and AMR 2006/07)</p> <p>Number of new trees planted in growth areas (Local Output Indicator in Core Strategy)</p> <p>Preservation of trees (AMR 2006/07)</p> <p>Provision for new or improved children's play areas (Local Output Indicator in Core Strategy and AMR 2006/07)</p>	<p>London Plan</p> <ul style="list-style-type: none"> No net loss of open space designated for protection in DPDs due to new development <p>AMR 2006/07</p> <ul style="list-style-type: none"> No net loss of open space to alternative use No net loss of areas of wildlife and nature conservation importance No loss of protected habitats and species Net increase in % population living within 200m of open space Net increase in the number of trees <p>Brent Parks Strategy</p> <ul style="list-style-type: none"> Improve or create parks in areas of open space deficiency Sites of Importance for Nature Conservation (SINCs) / Meeting Brent BAP targets <p>Brent Biodiversity Action Plan Targets:</p> <ul style="list-style-type: none"> A: Maintain, and improving the wildlife status of Sites of Nature Conservation Importance in the Borough. B: Reduce Areas of Wildlife Deficiency in the Borough. <p>Targets to be achieved through management of the Council's own land; encouraging good practice</p>	<p>Potential gap in relation to the monitoring of BAP targets.</p> <p>Consider inclusion of indicators to measure:</p> <ul style="list-style-type: none"> the status and health of habitats and species identified by the Brent BAP (http://www.ukbap.org.uk/lbap.aspx?id=394#5)

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
	Land area lost in areas know for wildlife and nature conservation importance (Core Output Indicator 8ii) Change in habitats, species and water habitats (Core Output Indicator 8i)	by other land managers; and through planning policy	
Increased noise and nuisance (S2)	Intensity changes of dwellings and other properties per ward (Core Output Indicator 2c and AMR 2006/07) Levels of noise complaints by density of development (AMR 2006/07)	AMR 2006/07 <ul style="list-style-type: none"> No net increase in levels of noise complaints by density of development 	Potential gap relating to monitoring changes in road and ambient noise disturbance. Consider inclusion in Core Strategy and AMR of indicator and mapping to monitor: <ul style="list-style-type: none"> Road noise and ambient noise Noise associated with dwelling density already monitored.
Increased energy use, greenhouse gas and CO ₂ emissions (EN1, EN7)	Number of applications including energy and feasibility assessments and applying GLA's energy hierarchy (Local Output Indicator in Core Strategy) Number of schemes incorporating renewable energy generation (AMR) Completion of district wide CCHP in Wembley growth area (Local Output Indicator in Core Strategy) Completion of low carbon exemplar housing schemes (Local Output Indicator in Core Strategy)	AMR 2006/07 <ul style="list-style-type: none"> By 2016, 10% of schemes incorporating renewable energy in Brent (as a proportion of all major applications since 2003). Net increase in number of developments meeting 'Fairly Positive' or 'Very Positive' on Brent's Sustainability Checklist, and/or 'Good' or 'Very Good' on BREEAM/EcoHomes Standards (As proportion of applications over SPG19 threshold). London Plan <ul style="list-style-type: none"> Developments should achieve a reduction in CO₂ emissions of 20% from on site renewable energy generation. Mayor's Climate Change Action Plan <ul style="list-style-type: none"> To reduce CO₂ emissions to 60% below 1990 levels by 2025 Climate Change Bill	Potential gap relating to the monitoring of domestic energy efficiency and CO ₂ emissions and % energy generated from renewable sources. Consider inclusion in Core Strategy and AMR of indicators to measure: <ul style="list-style-type: none"> Domestic energy efficiency Domestic CO₂ emissions Percentage energy generated from renewable sources Possible source: Brent Energy Network

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
<p>Climate change adaptation: Increased risk of flooding, pressure on drainage and sewerage infrastructure, urban heat island effect (EN2, EN7, S2)</p>	<p>Percentage applications approved contrary to Environment Agency advice on flood risk (Core Output Indicator 7)</p> <p>Number of permitted developments 'designing in' the full range of best practice sustainability measures (i.e. water conservation, SUDS, materials efficiency etc.) (AMR 2006/07)</p>	<ul style="list-style-type: none"> To reduce CO₂ emissions to 80% below 1990 levels by 2050 <p>AMR 2006/07</p> <ul style="list-style-type: none"> No permissions granted contrary to EA advice on flood risk or water quality Net increases in Best Practice Measures (Number of permitted developments 'designing-in' the full range of Best Practice sustainability measures (i.e. Water conservation, SUDS, Materials resource efficiency, operational waste, etc)) 	<p>Potential gaps in relation to monitoring changes in urban heat island effect in Brent, and surface water flooding.</p> <p>Consider inclusion of indicators in the Core Strategy and AMR to measure:</p> <ul style="list-style-type: none"> Changes in average day / night-time temperatures in areas of borough with highest densities. Surface water flooding events.
<p>Increased resource use (including water) and waste generation (EN2, EN8, EN9)</p>	<p>Number of schemes involving demolition and redevelopment which apply the ICE Demolition Protocol (Local Output Indicator in Core Strategy and AMR 2006/07)</p> <p>Municipal waste arisings (Core Output Indicator 6b)</p> <p>Percentage of municipal waste recycled or composted (Core Output Indicator 6b)</p>	<p>AMR 2006/07</p> <ul style="list-style-type: none"> 100% of schemes by 2010 involving demolition and/or redevelopment which apply the ICE demolition protocol Reduction in municipal waste arisings of 20% from 1995 levels, by 2015 30% of municipal waste recycled by 2010 <p>London Plan</p> <ul style="list-style-type: none"> exceed recycling or composting levels in municipal waste of: <ul style="list-style-type: none"> 35% by 2010 45% by 2015 Achieve recycling or composting levels in commercial and industrial waste of 70% by 2020 	<p>Potential gaps relating to monitoring water use and use of materials in construction.</p> <p>Consider inclusion in Core Strategy and AMR of indicators to measure:</p> <ul style="list-style-type: none"> Domestic water use per capita. Commercial water use per m² of floorspace. Percentage recycled aggregates and materials in construction.

Significant effects <small>(most relevant sustainability objective reference)</small>	Relevant existing indicators	Existing targets	Potential gaps and additional indicators
		<ul style="list-style-type: none"> Achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 Maximum water use of 105 litres per person per day in residential development, falling to 80 litres per person per day by 2016. 	
Increased traffic volumes and congestion (S2, S7, EN1, EN3, EN7, EC5)	Number of travel plans required as part of S106 agreements (AMR 2006/07) Number of commercial developments complying with car-parking standards (Core Output Indicator 3a) Traffic flows and percentage change (AMR 2006/07)	AMR 2006/07 <ul style="list-style-type: none"> All major planning permissions to have a travel plan 10% reduction of traffic in the Borough between 1997 – 2008 London Plan <ul style="list-style-type: none"> Zero growth in traffic over period 2001 - 2011 Transport modal split Use of public transport per head to grow faster than use of private vehicle. 50% increase in public transport capacity by 2022 	Significant effect already monitored, no potential additional indicators proposed.
Reduced air quality (S2, EN1, EN3, EN7)	Days when air pollution is moderate or higher (AMR 2006/07)	AMR 2006/07 <ul style="list-style-type: none"> To meet national air quality targets in relation to air pollution 	Potential gap in relation to the effects of poor air quality on health. Consider inclusion of indicator in Core Strategy and AMR to measure: <ul style="list-style-type: none"> Number of hospital admissions / premature deaths in the borough attributable to symptoms related to poor air quality.

Next steps

7.20 The key next steps and outputs are as follows:

- “Publication” of the proposed Submission Core Strategy DPD, and this Sustainability Appraisal Report (2nd June 2009) followed by six weeks of consultation to enable representations to be made.
- Amendments to the consultation version proposed Submission Core Strategy DPD in light of consultations to produce the Submission version of the DPD.
- Appraisal of any significant changes, leading to either revisions to the SA Report, or an addendum to the Sustainability Appraisal Report, if changes are minor.
- Submission of the DPD 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 DPD.
- Adoption Statement – prepared by LB Brent to notify the public that the DPD has been adopted. This will include information on the main issues raised during consultation on the DPD and Sustainability Appraisal and how these were taken into account in developing the DPD and other information required as part of the Sustainability Appraisal.
- Ongoing monitoring and review.

7.21 Although not currently being progressed, the intention is for LB Brent to develop a Development Management Policies DPD following adoption of the Core Strategy and Site Specific Allocations DPDs. The SA of this forthcoming DPD will draw on the information and process included in this SA Report.