

# 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 Appendices to Part B

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

by

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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	LBPB	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 <sub>2</sub>	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 <sub>2</sub>	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

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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 <sub>2</sub>	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		



**APPENDIX 7**

**SA COMMENTS ON PREVIOUS VERSIONS OF THE CORE  
STRATEGY**





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The tables below include:

- Overall SA comments and recommendations on the Core Strategy, as well as comments on the objectives and policies as included in an earlier version of the pre-submission Core Strategy (made available to CEP, 5<sup>th</sup> November 2008) as provided to LB Brent 14<sup>th</sup> November 2008, and LB Brent responses.
- SA recommendations on the draft proposed Submission Core Strategy (made available to CEP, 18<sup>th</sup> March 2009) as provided to LB Brent 4<sup>th</sup> April 2009, and LB Brent responses.

Note – Objective and Policy numbers and titles correspond to those included in Core Strategy DPD dated 5<sup>th</sup> November 2008, and may differ from those included in the proposed Submission Core Strategy DPD, May 2009

### SA comments and recommendations 14<sup>th</sup> November 2008, and LB Brent responses

Comment	LB Brent Response
<b>Comments on Objectives</b>	
The objectives as they are written are potentially confusing objectives, with aims, goals and/or targets. We recommend that a clear distinction between them with clear aspirational objectives at the start would add clarity to the document (see comments below on the changes since the pre-submission version with the addition of examples of how the objective will be achieved). One simple change would be express objectives with “to” at the start e.g. “To achieve housing growth and meet housing needs”.	In light of guidance from PINs more detail in the form of targets has been included in the objectives to illustrate how the objectives are locally distinctive. The recommended revised wording will also be incorporated.
<b>Regenerating Wembley into Brent’s Premier Town Centre</b>  The previous text in the second objective, Regenerating Run-down parts of the Borough, which focussed on all the Growth Areas and their role in promoting regeneration and developing sustainable communities is preferred to the new text and focus solely on Wembley. Note, however, previous comments in the SA Commentary (August 2008) on the term “run-down”.	This objective has been revised to ‘Economic Performance & Regeneration’ and focuses on all growth areas and Wembley in particular. Reference to ‘run-down’ areas has been removed.
<b>Meeting Social Infrastructure Needs</b>  The text in the previous sixth objective which had the same title is preferred to the new text from a sustainability perspective with its references, for example, to provision of health facilities and the need for provision in areas of deficit.	This objective has been expanded to refer to education, health and community facilities.
<b>Achieving Housing growth and meeting housing needs</b>  This objective refers to ensuring “at least 40% are affordable”, whilst Policy CP 2 on Population and Housing Growth states that the “Borough will aim to achieve the London Plan Target that 50% of new homes should be affordable”. Whilst setting a lower limit of 40% is potentially beneficial, the aim to achieve 50% should ideally be the aim.	This has already been changed (ie) 50%

Comment	LB Brent Response
<p><b>Achieving Sustainable Development</b></p> <p>The previous text in the first objective which had the same title is preferred to the new text from a sustainability perspective with its reference to how sustainable development in the Growth Areas will be achieved. The new text gives the impression that sustainable development is just about managing energy demand and low carbon homes. We strongly recommend that this objective is revised to present a more holistic view of sustainable development and that it is included as the first objective as in the pre-submission version to provide the overarching context to the rest of the objectives.</p>	<p>This objective has been revised to include the overarching principles of sustainable development by stating: "Promoting mixed use, mixed tenure development in growth areas, integrating infrastructure and housing provision." The objectives are not ordered in any order of priority and in light of the need for local distinctiveness, the objective on creating five main growth areas has been placed first to emphasise the key spatial development strategy for the borough.</p>
<p><b>Reducing the Need to Travel and Improved Transport Choices</b></p> <p>The deletion of the reference to focussing development in the growth areas and the other amendments to the text which change the meaning compared with the previous text which is preferred from a sustainability perspective. A reference to access by cycle as well as foot in the second sentence is also suggested.</p>	<p>This objective has been revised to include the reference to focussing retail and other facilities in Wembley to reduce the need to travel to other centres. Recommendation to include also access by cycle is accepted and text will be changed accordingly.</p>
<p><b>Protecting and Enhancing Public Open space</b></p> <p>The previous title of this objective and the focus it provided on broader natural and heritage protection and enhancement is preferred from a sustainability perspective, rather than just a focus on open space. The reference to providing open space commensurate with current levels of provision does not acknowledge that there is a current deficit in open space in many parts of the borough and therefore provision should exceed rather than equal it in many places. We recommend that the wording is amended accordingly.</p>	<p>The objective title has been revised to 'Protecting and Enhancing Brent's Environment' which provides for the wider remit of this objective as recommended. Whilst opportunities to alleviate existing deficiencies will be limited the objective will be revised to include the provision of new and enhanced open space to address deficiencies where possible.</p>
<p><b>Meeting Employment Needs and Aiding the Regeneration of Industry and Business</b></p> <p>Part of the previous text has been deleted which stated that there should be an increase in the number of jobs available locally. The reinstatement of this text is recommended from a sustainability perspective.</p>	<p>Refer to new objective 1 <i>Economic Performance &amp; Regeneration</i> which now incorporates jobs provision in Wembley. Also new wording of objective 2 <i>Meeting Employment Needs...</i> includes reference to suitable training and job placement opportunities.</p>
<p><b>Revitalising other Town and Local Centres</b></p> <p>This objective is now relating to "other" town centres, presumably apart from Wembley which has been pulled out to be the focus of the new first objective. See comments on the new first objective and also consider whether the scope of this objective is clear. The reinstatement of the reference to "improving accessibility", which was in the previous version, is recommended from a sustainability perspective.</p>	<p>This objective has been revised to 'Enhancing the vitality and viability of Town and Local Centres' and refers to maintaining the centres place in the retail hierarchy. Improving accessibility is addressed in the objective on 'Reducing the need to travel...' by focusing retail and other facilities in Wembley.</p>
<p><b>Promoting the Arts and Creative Industries</b></p> <p>The focus of the arts and creative industries is welcomed (the previous objectives also included tourism). However, the reinstatement of the previous text in the ninth objective which referred to the role of the arts in regeneration would be welcomed from a sustainability perspective.</p>	<p>Agreed. Add text '...to support regeneration in the borough'.</p>

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Comment	LB Brent Response
<p><b>Treating Waste as a Resource</b></p> <p>The broadening of this objective to include the encouragement of developments which maximise the reuse of materials, and design which increases ease of and opportunities for residents and businesses to recycle waste would be recommended from a sustainability perspective.</p>	<p>Considered level of detail which is not locally distinctive.</p>
<p><b>Promoting Healthy Living, including Creating a Safe and Secure Environment</b></p> <p>The scope of the text under this objective is limited provision of health care space and crime reduction. It is recommended from a sustainability perspective that the text is supplemented to incorporate other aspects of healthy living and creating built environments that sustain positive health and wellbeing and contribute to the reduction in health inequalities.</p>	<p>Accepted. Objective has been expanded to include "Ensuring development delivers transport solutions and opportunities for healthy lifestyles".</p>
<b>Overall comments the Core Strategy and Policies</b>	
<p><b>Flexibility</b></p> <p>The new PPS12 requires plan-makers to demonstrate that their plan is flexible enough to deal with changing circumstances. Current inter-dependencies within the plan may mean it is not sufficiently flexible. For example infrastructure aspirations depend in many cases on meeting 'enabling' residential development targets. We recommend the inclusion of text that demonstrates that while the presented approach is preferred, other robust and deliverable scenarios have been considered and different phasings of growth and infrastructure could be followed if necessary given changes in circumstances over the life of the plan.</p>	<p>A section on adaptability and resilience of the plan will be included in the pre-submission Core Strategy. This sets out how the core strategy is flexible and can deal with adverse conditions such as the current economic downturn and the measures the council will take to ensure delivery.</p>
<p><b>Lifespan of the plan</b></p> <p>We recommend clarifying the lifespan of the plan and targets included within it. The majority of targets included in current draft Core Strategy policies are for the period to 2017. However the new PPS12 states that Core Strategies should have a lifespan of 15 years . A 15 year period from potential adoption in 2009/10 would mean the lifespan of plan should run to 2024/25. Should the Core Strategy be planning for the whole of this period? Are the current targets proposed intended to be sufficient and provide for the just the initial period to 2017 or the whole 15 year period (this does not seem to be clear in the current draft)?</p>	<p>Clarification of lifespan is provided. Adoption will not be until 2010 at the earliest, therefore the plan period has been taken up to 2025. A number of projections (or targets) do not necessarily correspond to the same period however, for example, the housing target is derived from the London Plan and consequentially fixed at 2017 . Whilst floorspace projections are for 5 year periods , many projections are based on 5 year periods from census dates, i.e, 2016, 2021 and 2026. The targets are a means for measuring the progress of the implementation of the strategy, i.e, the success or otherwise of the policies in meeting objectives. It is not necessary for targets to be applied to the same dates.</p>
<p><b>Park Royal</b></p> <p>Given that Park Royal is not a Growth Area, we recommend including specific reference to Park Royal, as well as the Growth Areas, in policies setting out specific requirements where they should equally apply to both. In several places (e.g. 1st sentence of Policy CP6 – Design and Density in Place Shaping) reference is made to specific requirements needing to be met "in Growth Areas" only, but these should also apply to Park Royal.</p>	<p>Agreed, reference to 'growth areas' will be removed from policy text of new CP5 and CP6. Supporting text states policy applies to Park Royal also.</p>

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Comment	LB Brent Response
<p><b>New office development</b></p> <p>There are some inconsistencies between several policies which refer to new office development which should be clarified. Draft policy CP1 – Core Spatial Strategy states that Wembley and Park Royal as the “only” parts of borough suitable for office development, which contradicts policies CP3 – Commercial Regeneration, and CP19 – Strategic Employment Areas and Borough Employment Areas.</p>	<p>Policy CP1 amended to state Wembley will be the 'main' area for office development.</p>
<p><b>Terminology</b></p> <p>We commented previously (SA Commentary on the Pre-Submission Draft Core Strategy, August 2008) that the use of the terms “sustainable” or “sustainable development” 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. This could build upon the UK Government Sustainable Development Strategy which sets out five principles that policy must reflect in order to be sustainable:</p> <ul style="list-style-type: none"> <li>• Living within environmental limits</li> <li>• Ensuring a strong, health and just society</li> <li>• Achieving a sustainable economy</li> <li>• Promoting good governance</li> <li>• Using sound science responsibly</li> </ul>	<p>A definition of sustainable development is provided in the glossary. Glossary definition of sustainable development to refer to the above Strategy and its key principles</p>
<p>The Core Strategy could set out in the introduction a set of locally relevant principles using these as a guide, along with the principles set out in the London Plan Policy 2A.1 “Sustainability Criteria”, and how these relate the local circumstances and priorities in Brent to provide a statement on what sustainable development means in Brent</p>	<p>The submission version of the CS included a policy setting out general principles for development. This has been taken out because of recommendations from the Government/Inspectorate and new government guidance that it should not include policy that is not locally distinctive.</p>
<b>Policy Specific Comments</b>	
<p><b>Growth Area Policies</b></p> <p>We have the following recommendations regarding the targets in the Growth Area policies:</p> <ol style="list-style-type: none"> <li>1. The types of infrastructure covered by the targets should ideally be ordered in a consistent way in all Growth Area policies. Whilst it is acknowledged that not all the Growth Areas will include the same types of infrastructure, a consistent order would assist understanding. The use of a common set of sub-headings may be useful.</li> <li>2. An explanation should ideally be provided on the method / rules that were used to calculate certain targets from the Infrastructure Investment Framework and clarify why some targets are included in the Growth Area policies and not others.</li> <li>3. A common level of description and detail should ideally be used for the targets. At present some refer to specific numbers, areas or types of infrastructure, others just to a need for increased provision or the name of a type of infrastructure.</li> </ol>	<p>The targets can be set out in a consistent order. Explanation of how targets were derived included in IIF classification of why those included be given. The targets for infrastructure are generally related directly to the level of development predicted and therefore the capacity of sites. Infrastructure will change only after monitoring and review of the strategy. New guidance (PPS12) requires that the infrastructure need be identified in the CS.</p>

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Comment	LB Brent Response
<p>One option would be to remove all targets from specific Growth Area policies and simply cross-refer to the Infrastructure Investment Framework, although this may not meet one of the objectives of making the Core Strategy as locally specific as possible (or include them in an appendix in the Core Strategy which could be easier to update than imbedding the targets in the policies). Assuming the Infrastructure Investment Framework is to be updated regularly (annually / bi-annually) targets included in the Core Strategy may relatively quickly become out of date</p>	<p>It is considered that including the targets in the policies provides greater weight and the targets are minimum requirements. New guidance (PPS12) requires that the infrastructure need be identified in the CS.</p>
<p>Clarify what is included within the definition of Public Open Space in the Core Strategy context. It is assumed this relates to the London Plan definition (paragraph 3.298) and will be covered in the supporting text?</p>	<p>Public Open Space will be defined in the glossary and will be consistent with London Plan hierarchy of Public Open Space Table 3D.1</p>
<p>Clarify what method has been used to set levels for Open Space provision. As an example, the National Playing Fields Association (NPFA) "6 acres standard" of 2.4 hectares (6 acres) of outdoor play-space per 1,000 people, if applied in Wembley would equate to a much greater level of provision than the target for Open Space (3.8 hectares) included in Policy CP7 – Wembley Growth Area although outdoor play space is not directly comparable to public open space. We are concerned that the current levels in the targets are potentially an underestimation of what is needed.</p>	<p>London Plan Public Open Space Hierarchy (Table 3D.1) has been applied to identify areas of open space deficiency and in determining the level of new public open space provision required to meet the needs of population growth. The Infrastructure and Investment Framework has considered these requirements and what can be delivered in areas of open space deficiencies including consideration for improvements to the quality and accessibility of existing public open space.</p>
<p>Policy 3D.12 of The London Plan states that boroughs should prepare Open Space Strategies. If LBB has or is in the process of developing one, the policy and / or supporting text to Growth Areas and Policy CP16 – Protection and Enhancement of Open Space, Sports and Biodiversity should include reference to this, as it should help identify Open Space targets and needs in the Growth Areas and the borough as a whole.</p>	<p>Council's intention to produce an Open Space Strategy will be added to paragraph on Open Space Infrastructure</p>
<p>The preamble / 1st paragraph in all Growth Area policies is at times rather descriptive and does not clearly represent a policy direction for each area. Descriptive text may be more appropriate in supporting text for each Growth Area policy rather than in the policy itself. We recommend that the policies set out more specific developmental / spatial goals for the Growth Area and the infrastructure needed to support it reflecting the Infrastructure Investment Framework targets for the area/s.</p>	<p>It is considered necessary in order to provide clear guidance to potential developers as to the priorities and type of development that will be brought forward for an area.</p>
<p><b>Comments on potential additional Policy: Improved Transport Choice</b></p> <p>The draft proposed policy text states that "improved links from Wembley towards Brent Cross and Ealing will be a priority". We recommend that text is included to make clear that these improved links will also provide access / connections through Park Royal (we assume at least this is the intension given the need to improve public transport links to Park Royal?).</p>	<p>Agreed. Policy text has been revised to state "Improved links from Wembley towards Brent Cross and Ealing (<u>via Park Royal</u>) will be sought."</p>
<p>We recommend that if policy is included, it also refers to the Fastbus proposal between Wembley and Park Royal</p>	<p>Fastbus is not yet a committed scheme, therefore should not be referred to in policy.</p>



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Comment	LB Brent Response
A comment arising from the Core Strategy appraisal workshop (14th October 2008) was that the Fastbus proposal should be extended to Burnt Oak / Colindale. We recommend that support for this extension is given consideration and included in this policy.	Initial focus and therefore priority should be orbital east/west from Wembley.
<p><b>CP1 – Core Spatial Strategy</b></p> <p>The current wording of policy CP1 does not provide a clear overarching spatial strategy for the borough as the title implies, instead it mainly outlines the proposed approach to employment and economic growth, especially in Wembley. As a result there is considerable overlap with Policy CP7 – Wembley Growth Area. We recommend that LBB consider modifying it so that it sets out, within a succinct policy, the Core Strategy's overall spatial approach.</p>	It is a reference to the expectation that Wembley is the only location. Where it is likely there will be demand for significant office development, housing can be amended to clarify.
We recommend that a cross-reference is included to the housing targets included in CP2 – Population and Housing Growth.	Add "(see policy CP2)" after "focus for growth" in 2 <sup>nd</sup> paragraph of supporting text.
With reference to the sentence "in time as the retail café and hotel uses grow, it is expected that it will be the only area in the borough (apart from First Central in Park Royal) that will be viable for new office development", is it the intention that office development will only be permitted when phased after provision of these other amenities etc., or is it just assumed this will occur? Ideally it would be the former, and this could be made clearer in the policy wording.	Wording changed to "...will contain most of the borough's new retail growth and office development..." Office development is not reliant on the provision of other facilities.
Consider removing "both economically and sustainably" from the last paragraph. In the usual definition of "sustainable", economic factors would be included. Or is the intended meaning of sustainable in this context just "long term"?	Agreed
<p><b>CP2 – Population and Housing Growth</b></p> <p>The 1st sentence of CP2 refers to population growth to 2017. This may need to be revised in line with PPS12 expectation, as set out in Overall Comments above</p>	Population projection is derived from London Plan housing target to 2016/17 as informed by London Housing Capacity Study 2004. Estimating post 2016/17 population could therefore be problematic.
We recommend that the housing development targets in CP2 are clarified:a) Does the 85% target for Growth Areas relate specifically to "new" homes, or does it include the proposed 1,030 re-occupied vacant homes?b) We note that the total of Growth Area homes targets proposed in CP2 (10,900 homes) equates to over 95% of the 11,200 homes total provision. We acknowledge these targets are intended as minima, however how the current targets relate to each other could be clarified.	a) The Growth Areas can only identify the potential new build /conversion housing capacity as the reoccupation of vacant homes occurs outside planning control and certainly cannot be estimated on a locational basis. b) The 10,900 homes are self contained new builds and therefore represents 119% of the London Plan's target of 9,150 additional self contained homes.
<p><b>CP3 – Commercial Regeneration</b></p> <p>Clarify what is meant by "incompatible uses" in 1st paragraph, does this just mean non-commercial uses?</p>	Non commercial uses.

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Comment	LB Brent Response
The 1st paragraph states that “investment in new infrastructure, such as transport improvements will be focused” in Park Royal, Staples Corner, Wembley/Neasden and East Lane. The meaning of “focused” in this context is unclear. Is it intended that transport improvements would be required as a pre-requisite for development? This requirement would be clearer, and preferable from sustainability perspective.	Amended to say “secured” rather than focused.
We recommend (if possible) that the proportion of the 11,000 Park Royal jobs target that Brent will seek to provide for is stated.	Agreed
<b>CP4 – North-West London Co-ordination Corridor</b> We recommend the inclusion of text setting out the need for co-ordination of public transport infrastructure needs as well.	The co-ordination of transport infrastructure requirements of development is a fundamental objective of the co-ordination corridor. It is considered unnecessary to spell it out from the other infrastructure requirements which need to be co-ordinated.
<b>CP5 - Placemaking</b> Clarify the purpose of the policy. The 1st sentence suggests that the points the policy includes will be used by LBB in the preparation of area based planning guidance, as well as by developers in preparing proposals. Whilst this may be the case, we recommend that the focus of the policy should be for developers to incorporate these requirements and follow the guidance once prepared (which will include the same topics).	Agreed. 1st sentence of policy will be revised to focus on the requirements of development. The preparation of area based planning guidance will be moved to the supporting text, stating that this will be prepared with regard to the principles of placemaking as set out in CP5.
We recommend replacing “regard will be had for the following” with a stronger requirement, such as “major development schemes will be required to show how they will contribute to delivery of the following.”	Council considers 'regard to' provides sufficient weight to placemaking criteria set out in the policy.
We recommend additional text in the policy is included which refers to major development outside the Growth Areas. While we appreciate that the majority of major schemes will take place within Growth Areas, where major development does take place outside the Growth Areas, these criteria should also be taken into account.	Policy wording now states that 'major development schemes' are to have regard to the placemaking criteria, this will apply to major scheme within or outside growth areas.
In preparing new area based guidance, potential transport impacts, building on transport elements in the Infrastructure Investment Framework should be considered. In particular consideration should be given to reducing impact on existing transport infrastructure, and minimising increased travel need and vehicular traffic.	Observation noted.
We recommend that bullet points 2 and/or 3 should include reference to green infrastructure	Bullet 2 will be amended to include 'green infrastructure'.
Clarify what is meant by “well connected and accessible” in bullet point 5. From a sustainability perspective, connectivity should be primarily by public and non-vehicular transport.	Point 2 emphasises public transport, cycling and walking infrastructure. Not considered necessary to repeat this in point 5.
Consider the inclusion of reference to and key aspects of existing Brent strategies relevant to “placemaking”. For example Brent Cultural Strategy, Brent Sports Facilities Improvement Strategy, Brent Biodiversity Action Plan, Brent Children and Young People's Plan, Brent Parks Strategy, etc	Agree. Reference will be made in supporting text referencing these Strategies in the preparation of area- based planning guidance.

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Comment	LB Brent Response
<p><b>CP6 – Design and Density in Place shaping</b></p> <p>We recommend consistency of terms between CP5 – Placemaking and CP6 – Design and Density in Place shaping, or is their distinction intended?</p>	Distinction intentional.
<p>In bullet point 1, we recommend clarifying, what will be required for the design of development, for it to be considered of the “highest or exemplary standard”?</p>	Clarification provided.
<p>Clarify what is meant by “higher densities than PTAL levels” in bullet point 2. We understand this to mean that densities higher than those suggested in the London Plan Density Matrix for the current PTAL rating of the area / site will be acceptable</p>	Provided. Clarification to be provided
<p>Clarify what is meant by a “reasonable” proportion of family housing in bullet point 5.</p>	“Reasonable proportion of family housing” must be assessed on a site specific basis as elaborated in Policy CP 19
<p>We recommend that the policy should also encourage design to take into account and respond to:</p> <ul style="list-style-type: none"> <li>• Areas of poor air quality</li> <li>• Presence and impacts of noise pollution</li> <li>• Relationships with the surrounding area and adjacent boroughs.</li> </ul>	Details of requirements of design of development generally provided by London Plan. These are general criteria, the sort which the council has been advised are inappropriate in a CS.
<p><b>CP7 – Wembley Growth Area</b></p> <p>Clarify the new homes target and proposed delivery timeframe in the Wembley Growth Area. We recognise that this is already established, but there remain some inconsistencies in how the policies are presented. For example current draft Policy CP7 refers to a target of 10,000 new homes, while the Informal Consultation draft Core Strategy, refers to the homes target for Wembley as being 5,000 to 2017 and a further 5,000 between 2017 and 2026.</p>	Clarification provided.
<p>Clarify whether the infrastructure listed in Policy CP7 is expected to support the target of 5,000 new homes, or 10,000 new homes, and over which timeframe it is expected to be delivered.</p>	Clarification provided.
<p>We recommend (as noted in the overall comments above) that a consistent approach is used in setting out infrastructure targets. In CP7, in relation to transport, only road / junction improvements are included in the infrastructure targets, but public transport / walking / cycling infrastructure is equally, if not more, important. In addition, public transport improvements in Wembley are included in CP14 – Infrastructure to Support Development, but not in CP7 – Wembley Growth Area itself.</p>	It is accepted that public transport, walking and cycling infrastructure improvements are equally, if not more, important than improvements to roads, and the section of the CS on Transport Infrastructure reflects this. However, the junction improvement is a specific improvement that has been identified as necessary to facilitate further growth at Wembley. It should be noted that this road junction improvement will assist with public transport improvements as it will enable buses to terminate or turn around at Wembley Park Station (necessary for fast bus).
<p><b>CP8 – Alperton Growth Area</b></p> <p>Clarify the timescale over which the infrastructure to support development is expected to be delivered.</p>	The Infrastructure listed within the policy is to support the housing target over the period to 2026. The Infrastructure Investment Framework includes further detail on the infrastructure requirements and the required phases of delivery.



June 2009

Comment	LB Brent Response
Specific reference could be made to the need for "affordable" workspace (as is case in CP10 – Church End Growth Area).	Agreed. This has been inserted.
<p><b>CP9 – South Kilburn Growth Area</b></p> <p>Clarify the timescale over which the infrastructure to support development is expected to be delivered.</p>	Clarification provided.
See overall comments on the relationship between Growth Area policy targets and the Infrastructure Investment Framework.	Noted
Reference to Pocket Parks is welcomed as these can have a significant beneficial effect on health and wellbeing. We would recommend their inclusion in targets in all Growth Areas.	Targets have now been included for parks and open space in all Growth Areas.
<p><b>CP10 – Church End Growth Area</b></p> <p>Clarify the timescale over which the infrastructure to support development is expected to be delivered.</p>	Clarification provided.
See overall comments on the relationship between Growth Area policy targets and the Infrastructure Investment Framework.	Noted
The policy text requiring the "highest standards of urban design to physically improve the area" is welcomed here, and would be equally applicable in all other Growth Areas.	Also specified in CP9 - South Kilburn, it is considered that CP6 <i>Design &amp; Density in Place Shaping</i> provides sufficient urban design requirements which need not be repeated in each Growth Area policy.
The policy text "connectivity with Wembley" could be clarified. Ideally this would maximise access by public transport / walking / cycling	Supporting text provides detail that access to public transport interchanges will be improved, no additional text in the policy required.
<p><b>CP11 – Burnt Oak / Colindale Growth Area</b></p> <p>Clarify the timescale over which the infrastructure to support development is expected to be delivered.</p>	Clarification provided.
See overall comments on the relationship between Growth Area policy targets and the Infrastructure Investment Framework.	It is considered that including the targets in the policies provides greater weight and the targets are minimum requirements.
<p><b>CP12 – Park Royal</b></p> <p>Clarify the timescale over which the infrastructure to support development is expected to be delivered.</p>	Clarification provided.
See overall comments on the relationship between Growth Area policy targets and the Infrastructure Investment Framework. Clarify also the how targets included in CP12 - Park Royal relate to the Park Royal Opportunity Area Planning Framework.	Targets reflect aims/objectives /targets of PROAPF
The draft policy text supports residential development (at First Great Central) to "enable" new station infrastructure and the Fastbus proposals. It is important that facilities in Park Royal area are suitable to support residential development, and we recommend that the policy seeks to ensure that suitable facilities and amenities will be provided to support any residential development – we note no education, health, community facilities etc are included in the targets.	The targets have been expanded to include relevant infrastructure to support residential growth including education and health facilities. NB open space provision has already been established through the creation of Coronation Gardens public open space in association with the early stages of First Great Central development.

June 2009

Comment	LB Brent Response
We recommend that policy CP12 and the related targets encourage realisation of the potential for green and open space provision relating to the Grand Union Canal / River Brent passing through Park Royal. This represents a significant opportunity and can also support regeneration.	The policy requires development to be in accordance with the PROAPF which sets out the open space and public realm improvements for Park Royal including those relating to the Grand Union Canal.
In addition we support the following recommendations arising from the Core Strategy appraisal workshop (14th October 2008): <ul style="list-style-type: none"> <li>• The policy could support the creation of a walking / cycling route connected with green infrastructure provision along the Grand Union Canal.</li> <li>• The policy should support the development of CHP in the Park Royal area.</li> </ul>	
<p><b>Policy CP13 – North Circular Road Improvement Area</b></p> <p>We have previously recognised (SA Commentary on the Core Strategy Informal Consultation Draft, August 2008) that much of the traffic pressure on the NCR is strategic in nature and originates / is generated by development outside the Borough. However, it is recommended that LBB consider inclusion of supporting text to Policy CP13 to emphasise that, while traffic pressure will continue on the NCR, every effort will be made to manage transport demand and reduce reliance on the car for journeys which originate within the Borough (e.g. by ensuring development in the Growth Areas minimises traffic generation).</p>	Agreed. Add “although every effort will be made to manage demand and reduce reliance on the car from development in the borough.”
Consider including text in Policy CP13 to ensure that junction improvements aim to provide better facilities and easier movement / permeability for pedestrians and cyclists.	Add to supporting text.
Clarify final bullet in relation to “detailed area plans to identify areas of change”.	Clarified.
Consider whether (in addition to the existing text) there is scope within the policy to promote further greening of the corridor in areas where dwellings have not been removed. For example lining the route with trees, which would have aesthetic, noise and air quality benefits. We note that the Brent Air Quality Action Plan examined several options for improving air quality including vegetative barriers, and that while TFL expressed concerns about their practical application, we suggest that re-location of residents would cause significant disruption in itself, and that greening the route could bring significant environmental and health benefits.	Agreed. Add to supporting text that opportunities will be taken to provide tree planting and other appropriate landscaping (i.e., 'greening') for this route.
<p><b>CP14 – Infrastructure to Support Investment</b></p> <p>As recommended under the overall comments, above, clarification of the relationship between targets in each Growth Area and in CP14 and how this particular list of infrastructure was selected is recommended.</p>	Targets for infrastructure removed from policy. Due to overlap and repetition with growth area policies, list of infrastructure has now been removed from CP15 Infrastructure to Support Development.
One option would be to include the totals for various types of infrastructure across the Growth Areas in the list in CP14 (e.g. school forms of entry required, GPs, area of open space etc.).	Targets for infrastructure removed from policy.
Infrastructure, and the need to deliver it before occupation, is as important for non-residential developments as residential (2nd paragraph).	Accepted. Policy wording has been revised to ‘large-scale development’.

June 2009

Comment	LB Brent Response
The current draft policy text refers to a 2nd secondary school to be developed "towards end" of the plan period. Is this to be identified in the SSA DPD, and if so will a specific site be allocated as we were not aware that one had been?	Unable to identify at present. Text indicates that priority will be the south of the borough.
While encouragement for CHP schemes and low carbon development exemplars are welcome, we previously recommended that higher standards should be encouraged in all development. In addition we recommend that exemplars should be encouraged in all aspects of Sustainable Construction (design, waste, sustainable drainage etc.) not just energy / carbon.	Noted.
In 2006 the Government announced that a step-by-step tightening of the Building Regulations would require zero carbon in all new dwellings by 2016 . We recommend that reference be made to this and that Policy CP14 should clarify that during the lifetime of the plan all new homes will be required to meet zero carbon homes standards.	Not considered necessary to amend policy. Reference to be included in supporting text.
<p><b>CP15 – Protecting and Enhancing the Suburban Character of Brent</b></p> <p>We commented previously (SA Commentary on the Core Strategy Informal Consultation Draft, August 2008) that it is not clear why it would be more acceptable for corner plots to be eroded than others in the borough. A clarification / justification for the acceptability of loss to "corner plots on main road frontages" should be included in the supporting text.</p>	It is considered that opportunities may exist to increase densities of corner plots on main road frontages as a)main road frontages are likely to already consist of higher densities and include mix uses and b) this will not have a significant impact in urban design terms on the character and rhythm of the existing context.
The policy objective to protect the borough's built and natural heritage would equally apply to the Growth Areas as the rest of the borough. We recognise this policy seeks to protect Brent's suburban character and we recommend the inclusion in CP5 – Placemaking of an additional point that development should protect all built and natural heritage from inappropriate development.	Consider that the revised policy CP15 (now 16) has enough general information to protect all areas of the borough of high townscape value i.e. "all development will be required to maintain and make a positive contribution to the distinctive character of Brent and its built and natural heritage".
We recommend the inclusion of specific text aiming to protect front gardens from inappropriate development or conversion (e.g. conversion into parking space).	Changes to Permitted Development have helped to overcome this problem. Regardless, this would be considered too detailed for the Core Strategy.
In last sentence we think "merging" should be "emerging".	Change made in newest version of CS
<p><b>CP16 - Protection and Enhancement of Open Space, Sports and Biodiversity</b></p> <p>See overall comment in relation to the need to clarify the definition of open space</p>	Definition to be included in glossary
We recommend that consideration be given to the inclusion of nature conservation and biodiversity in a specific policy, particularly given the importance of the green-grid, blue ribbon, wildlife corridors and other green spaces.	The council considers an overarching open space, sports and biodiversity protection and enhancement policy is an appropriate level of detail for the core strategy, more detailed policies on different forms of open space including wildlife corridors will be provided in the Development Policies DPD. The London Plan provides considerable detail on the Blue Ribbon Network which would not be appropriate to repeat within the core strategy, rather the relevant LP policies are cross-referred in the supporting text of this policy. No change required.

June 2009

Comment	LB Brent Response
London Plan Policy 3D.12 states that boroughs should produce Open Space strategies. We recommend inclusion of text that Brent will prepare, or has already prepared, such a strategy which does / will set out borough specific needs for the provision of green infrastructure.	Council's intention to produce an Open Space Strategy will be added to para. on Open Space Infrastructure.
London Plan Policy 3D.14 states that DPDs should include policy to protect and enhance key species included in the Biodiversity Action Plan. We recommend text to this end should be included in policy CP16.	The council considers CP17 provides appropriate overarching protection for open space, sports and biodiversity, detail of local priority species and habitats contained within Brent BAP is considered more appropriate for the Development Policies DPD. No change required.
We recommend that there be consistency between provision of new parks and open space proposed in CP16 and that included in the targets in Growth Area policies. for example, CP8 – Alperton Growth Area includes the target of a new 1ha open space, but this is not referred to in CP16.	To avoid repetition, the specific new open space requirements will be set out under the targets for each growth area and covered in the section on infrastructure to meet growth area development.
We recommend that consideration be given to the Draft GLA Climate Change Adaptation Strategy (GLA, 2008 ) which 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.). Reference to this role for the provision and protection of green space, could provide a link between CP16 and CP17 – Brent Strategic Climate Change Mitigation and Adaptation Measures.	Observation noted, role of open space provision also mitigating impacts of climate change will be highlighted in the supporting text with a cross-reference to new CP18 Brent Strategic Climate Change Mitigation and Adaptation Measures
<p><b>CP17 – Brent Strategic Climate Mitigation and Adaptation Measures</b></p> <p>We recommend that the 2nd paragraph is modified / clarified to state that all major proposals in the borough should submit a sustainability statement to cover all aspects of sustainable construction, including climate change mitigation and adaptation and air quality. Issues of concern in AQMAs are much broader than climate change mitigation and adaptation (2nd paragraph). For example the need for development to be designed so as not to exacerbate air quality, as well as minimise the impact of poor air quality on existing and new residents. Furthermore climate change mitigation and adaptation is an issue of importance for all development across the borough, and not just in AQMAs. The current wording of this requirement in Policy CP17 is somewhat ambiguous.</p>	The requirement for the submission of a Sustainability Statement to demonstrate sustainable design and construction measures is expected to cover the full spectrum of mitigation and adaptation measures (including energy, water, materials, air quality, waste and environmental protection), the detailed requirements of which will be set out in the Development Policies DPD. London Plan policy 4A.19 provides strategic context for improving air quality in London and this is cross referred in the supporting text of CP17. For clarification the wording of policy CP17 has been revised to state "All development should contribute towards achieving sustainable development...".
Given that a large portion of Brent is designated AQMA, we recommend that air quality management should either be considered through a separate policy, or if it is considered to be an issue that would be better addressed through the Development Policies DPD, we suggest that clearer policy text is required in relation to air quality within the Core Strategy.	It is considered that London Plan policy 4A.19 provides the strategic context for improving air quality in London and is cross referred to in the supporting text of CP18. No change required.

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Comment	LB Brent Response
We recommend that the policy be “future proofed” through reference to the forthcoming London Climate Change Adaptation Strategy and Water Strategy, as well as the requirement for LBB to produce an Adaptation Strategy, through National Indicator NI 188 – Adapting to Climate Change. We also recommend that reference is made to the step-wise strengthening of the Building Regulations to Zero carbon standards by 2016 (equivalent to Code level 6).	These references are made in the supporting text of Policy CP18 to explain that the requirement for higher Code for Sustainable Home level 4 in growth areas is a step-wise strengthening of getting developers proficient in higher building regulations.
Clarify whether reference to “in all areas” (3rd paragraph) refers to the Growth Areas or the borough as a whole	Refers to the borough as a whole, following paragraph specifies requirements in housing growth areas. No change required.
Ensure consistency of terminology. Are “major schemes” the same as “major proposals”?	Comment accepted. The text will be amended and replaced by a consistent terminology ‘major proposals’.
Clarify the sentence relating to requirements within Wembley EAA and Growth Areas. It is unclear if all major schemes should achieve Code level 4 standards, or if this requirement will be required only as “commensurate with scale”.	for clarification text has been revised to state that “major schemes are currently required to achieve a minimum Level 4 rating (in relation to the Code for Sustainable Homes).
We recommend including a proposed date of adoption in relation to the Brent Climate Change Strategy.	Although the production of Brent’s Climate Change Strategy is in progress, the actual adoption date is yet known. The inclusion of an unrealistic adoption date is considered inappropriate.
The final paragraph seeks “reductions [in carbon emissions] from ongoing development activity in Brent”. We feel this is not in practice possible. Increased development will inevitably increase emissions, and while the strategy may help to minimise the increase in carbon emissions arising from new development, net reductions from new development are not realistic.	The intention of referring to “reductions from ongoing development activity” in this context was to refer to <i>relative</i> carbon reductions in new development and not net reduction in borough-wide carbon emissions. No change required.
This raises a more strategic issue for the Core Strategy. Policy CP17 refers to the need for the borough to meet its “strategic mitigation obligations”. London Plan Policy 4A.2 states that boroughs should seek to achieve a minimum reduction in CO2 emissions (against 1990 base) of 15% by 2010, 20% by 2015 and 25% by 2020. In the light of development aspirations in the borough, Policy CP17 should reflect the scale of the challenge for the borough to reduce carbon emissions.	The scale of the challenge is highlighted in the supporting text. It is unnecessary to add it to the policy.
<p><b>CP18 – Sustainable Waste Management</b></p> <p>We accept that the focus of this policy is on site protection, however as previously commented (SA Commentary on the Core Strategy Informal Consultation Draft, August 2008) we recommend that text is included to encourage developments which maximise the reuse of materials, and design which increases ease of and opportunities for residents and businesses to recycle waste. This could be achieved through reference to further specific London Plan policies, such as 4A.3 – Sustainable design and construction, and through the inclusion of text similar to that in CP17 – Brent Strategic Climate Change Mitigation and Adaptation Measures, that major proposals should submit a sustainability statement to include how waste management / minimisation will be addressed in their development and occupation.</p>	Policy CP18 is removed as it merely repeats policy wording in the London Plan, however, references to the specific London Plan policies and the waste hierarchy have been added explicitly in the supporting text. The requirement for developers to address waste managements is considered a detail development management type requirement and therefore inappropriate for a Core Strategy.

June 2009

Comment	LB Brent Response
<p><b>CP19 - Strategic and Borough Employment Areas</b></p> <p>We recommend the inclusion of text which seeks to maximise freight by non-road means (rail/water) and minimise impact of industrial and employment uses on the road network. Chapter 4C of the London Plan includes a target to increase freight on the Blue Ribbon network by 5% between 2001 and 2011.</p>	<p>Agreed. This can be incorporated in to the policy text.</p>
<p>We recommend the inclusion of text which seeks to maximise benefits of and accessibility to jobs for local people and opportunities for skills development and training. This could also be included in Sustainability Statements, using text similar to that in CP17 – Brent Strategic Climate Change Mitigation and Adaptation Measures.</p>	<p>Agreed. This can be incorporated in to the policy text.</p>
<p>We recommend that text in the penultimate bullet point should be modified to reflect that environmental improvements should go beyond the public realm. For example maximisation of opportunities for greening of employment areas through the provision of green and open space, tree planting etc.</p>	<p>Agreed. This can be incorporated in to the policy text.</p>
<p>Clarify term “limited impact” in the final bullet point. We suggest that “minimising and mitigating for any impact” or similar text may be preferable.</p>	<p>Agreed. This can be incorporated in to the policy text.</p>
<p><b>CP20 – Town Centres and the Sequential Approach to Development</b></p> <p>We accept that Wembley is to be the focus for major new development. However we recommend that the policy should also seek to protect, enhance and ensure the long-term viability of existing small, local and niche shopping and retail centres / strips.</p>	<p>Supporting text to be amended to address the Council’s overarching objectives towards existing town centres (including small local centres) is to enhance their vitality and viability by concentrating efforts for rejuvenation through environmental enhancement and accessibility improvements.</p>
<p>Consider the addition of text such as “...and existing or committed public transport provision is adequate to meet needs (access needs / minimisation of transport generation)” to the end of the final sentence in policy CP20.</p>	<p>Supporting text to be amended to address the Council’s overarching objectives towards existing town centres (including small local centres) is to enhance their vitality and viability by concentrating efforts for rejuvenation through environmental enhancement and accessibility improvements.</p>
<p>The final sentence is somewhat ambiguous. Clarify that edge-of-centre locations are sequentially less preferable than town-centre locations throughout the borough, and not just in Wembley.</p>	<p>Summary of CEP’s comment: Policy to be amended to reassure the protection and enhancement of small local town centres and also to provide a clarification of the sequential order of appropriate retail locations. The last sentence in Policy CP20 will be modified to provide clarification and reads as ‘Major new retail or leisure development will only be permitted in other town centres and subsequently edge-of-centre locations, if it can be...’</p>



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Comment	LB Brent Response
<p><b>CP21 – A Balanced Housing Stock</b></p> <p>Clarify what is meant by “suitable sites” for family housing?</p>	<p>Sites ‘suitable for family housing’ are effectively defined by their locational factors and potential amenities provision, which cover too wide a range to be delineated in a Core Strategy. Therefore, the alternative approach of headlining the primary factors which makes a site unsuitable for family housing has been employed in the supporting text; “Family housing would not be required on sites where it is not possible to provide a satisfactory environment for young children, particularly a lack of external amenity space” (6.64)</p>
<p><b>CP22 – Protection of existing and provision of new Community Facilities</b></p> <p>We recommended previously (SA Commentary on the Core Strategy Informal Consultation Draft, August 2008) that the term “adequate compensation” should be clarified. We suggest the addition of text “in exceptional circumstances” before this term would help to ensure is considered only as a last resort.</p>	<p>Policy amended to read “or their loss mitigated where necessary”.</p>
<p>We recommend consistency with the community infrastructure included in targets to CP14 – Infrastructure to Support Development. We assume that the ratio here is that used to allocate community facilities in CP14. We also recommend that text is included to emphasise that provision should meet the prevailing recommended rate in the future.</p>	<p>Targets for CP14 removed.</p>
<p>We commented previously (SA Commentary on the Core Strategy Informal Consultation Draft, August 2008) that consideration should be given to the inclusion of policy text to reflect the need to meet existing needs and deficiencies in relation to community facilities. It is recognised that the planning framework can only assist in meeting part of these needs. However, recognition of the need to provide new / tackle existing deficiencies in Policy CP22 would be welcomed from a sustainability perspective.</p>	<p>Supporting text has been revised to recognise that there are existing deficiencies in community facilities including schools and places of worship. It is recognised that opportunities to address deficiencies will be limited, however the council’s emphasis on new cultural facilities which provide a multifunctional role will maximise the gains made where new provision is required.</p>
<p><b>Possible Policy Omissions</b></p>	
<p>There are potentially several areas which are not covered by policy which it would be beneficial from a sustainability perspective to include. Some key areas are highlighted below.</p>	<p>See responses below</p>
<p>There are numerous references within policies in the London Plan to how DPDs should include further detail on the local application of the policy. Whilst many of these policy areas are included in the current draft of the Core Strategy there are others that are not. It may be that it is intended that these will be included within the Development Policies DPD, but we would recommend that LBB consider again these references in the London Plan to ensure other aspects should not be included in Core Strategy policies</p>	<p>This Recommendation has been overtaken by the Joint GOL/GLA Note on the London Plan, which strongly advises against repeating criteria based London Plan policies. Where appropriate, references to LP policy have been included in supporting text.</p>

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Comment	LB Brent Response
<p>Another potential source of additional policies is the note provided by the Environment Agency on Water Resources prior to the Core Strategy appraisal workshop (14th October 2008). This proposes three policies to improve water efficiency for inclusion in the Core Strategy. These cover residential property, new commercial property and refurbishment and conversion of residential and commercial buildings. They argue that these policies will contribute to the borough achieving its desired objectives of development being within the sustainable limits of the local environment's ability to support such building activity. Although LBB may consider that these policies are sufficiently covered by the London Plan and/or they are more appropriate for the forthcoming Development Policies DPD.</p>	<p>The council acknowledges the pressing need to improve water efficiency within Brent. It is considered that water efficiency in development will be achieved by requiring all major development to meet a minimum of Level 3 Code for Sustainable Homes, in which, the implementation of water efficiency measures equivalent to reducing water use to 105 l/p/d forms a mandatory requirement. Equivalent BREEAM sustainability standards will be required of other forms of development.</p>
<p><b>Environmental protection and green infrastructure</b></p> <p>Overall, environmental protection and green infrastructure are insufficiently promoted / covered in the current policy drafts. We acknowledge that this may be because it is considered that the London Plan provides the policies necessary in this area and/or that more detail will be provided in the subsequent Development Policies DPD, however we still see this as an omission and consider there to be scope to provide locally specific and strategic policy direction in the Core Strategy on these topics. A key recommendation from the Core Strategy appraisal workshop (14th October 2008), for example, was that the Core Strategy should consider "green infrastructure" in its own right. We support this recommendation.</p>	<p>The London Plan provides detailed policies on environmental protection and these are referenced to in the supporting text of new CP18 Brent Strategic Climate Mitigation and Adaptation Measures. It is considered that these provide the strategic direction in London, and that further detailed guidance would be more appropriate in the Development Policies DPD. In recognition of the importance of green infrastructure, the need to secure adequate green infrastructure is now reflected in the challenges faced in the borough. Objective <i>Protecting and Enhancing Brent's Environment</i> has been expanded to include enhancements to Brent's green and blue infrastructure through tree planting, returning rivers to their natural course and mitigating the pollution effects of development. The health benefits of green infrastructure are also recognised under objective <i>Promoting Healthy Living...</i></p>
<p><b>Cultural diversity, arts and built and natural heritage</b></p> <p>Overall the current policies as drafted provide insufficient protection and promotion of Brent's cultural diversity, arts and built and natural heritage. For example placemaking could be expanded to include cultural aspects of place. The reinstatement of a revised previous Policy CP24 – Promoting Culture Sport and Tourism might help address this.</p>	<p>In light of comments received, CP22 has been revised to include to protection of cultural facilities which serve a community development and participation role.</p>
<p>London Plan Policy 3D.4 states that "DPD policies should:</p> <ul style="list-style-type: none"> <li>• identify, protect and enhance Strategic Cultural Areas and their settings</li> <li>• designate and develop Cultural Quarters</li> <li>• where appropriate, support evening and night-time entertainment activities in central London, City fringe areas and town centres and where appropriate manage their impact through policies such as Entertainment Management Zones</li> <li>• encourage 'Percent for Art' schemes and encourage arts and cultural facilities in major mixed-use developments".</li> </ul> <p>We recognise that such aspects could be included in the Development Policies DPD, however clarity over the rationale for inclusion / exclusion of policy areas required by the London Plan is encouraged.</p>	<p>Agreed. Wording of CP7 has been modified to clarify that the promotion of leisure, tourism, and visitor attractions etc within Wembley reflects its designation as a Strategic Cultural Area for London.</p>



June 2009

Comment	LB Brent Response
<p><b>Flood risk</b></p> <p>We recommend that reference is made to the SFRA and RFRA, and updates, in Policy CP17 – Climate Change Mitigation and Adaption. This policy should also refer to need for larger developments (over 1ha) to carry out FRA.</p>	<p>These references and the requirement for Flood Risk Assessments are made in the supporting text of CP18 Brent Strategic Climate Mitigation and Adaptation Measures.</p>
<p><b>Recreation / exercise facilities</b></p> <p>We recommend that Policy CP16 – Protection and Enhancement of Open Space, Sports and Biodiversity include clearer policy support for the provision and protection of recreation / exercise facilities.</p>	<p>It is considered that the current protection and provision for new and enhanced open space and sports facilities is sufficient to cover recreation/exercise facilities.</p>
<p><b>Blue-ribbon network</b></p> <p>We recommend the inclusion of policy to support the protection and enhancement of the blue-ribbon network in Brent, or at least reference to it in other policies. There are opportunities to significantly improve the access, use and relationship of waterways (e.g. in Park Royal, Wembley, Alperton) with the rest of the Borough, and to use them as a focus for regeneration. Reference should be made to London Plan Policy 4C.3.</p>	<p>CP17 Protection and Enhancement of Open Space and Biodiversity has been revised to explicitly recognise waterways as form of open space. Reference has been made in supporting text to the Blue Ribbon Network and London Plan policies.</p>

### SA recommendations 4<sup>th</sup> April 2009, and LB Brent responses

Recommendations	LB Brent Response
<p><b>Regeneration and Growth</b></p>	
<p><b>CP1 – Spatial Development Strategy</b></p> <p><i>Recommended change to supporting text</i></p> <p>Supporting text paragraph 4.3 sets out alternative approaches considered by the Council. However, no further explanation or justification is given as to why the preferred strategy was selected. It is recommended that some further information is included here.</p>	<p>Reference to be added to background paper</p>
<p><b>CP2 – Population and Housing Growth</b></p> <p>No specific recommendation</p>	<p>-</p>
<p><b>CP3 – Commercial Regeneration</b></p> <p><i>Recommended change to policy text</i></p> <p>Use of the term “sustainable development” in this policy: “...new sustainable development 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> <p><i>Recommended changes to supporting text</i></p> <p>It is recommended that consideration be given to removing the emphasis of supporting text (supporting text paragraph 4.20) on encouraging distribution businesses to locate in the borough.</p> <p>It is recommended that supporting text to encourage business / freight use of rail and water is included (in line with London Plan policy 3C.25).</p>	<p>It is considered that the term is in such common usage that explanation would be an unnecessary level of detail.</p> <p>It is included in the glossary.</p> <p>Distribution businesses are considered as appropriate and necessary in many of Brent's Strategic industrial locations. They provide employment opportunities and are an appropriate part of a diverse local economy.</p> <p>This is referred to in Paragraph 5.62. Additional reference would be unnecessary repetition.</p>

June 2009

Recommendations	LB Brent Response
<b>Overall Spatial Change</b>	
<p><b>CP4 – North West London Coordination Corridor</b></p> <p><i>Recommended changes to policy / supporting text</i></p> <p>It is recognised that this policy is intended as a strategic statement. However, it would be strengthened by the inclusion of policy and/or supporting text setting out the aims and objectives of proposed co-ordination.</p> <p>It is also recommended that 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>	<p>Point accepted. Text can be added to highlight the need to ensure development does not overload infrastructure.</p>
<p><b>CP5 – Placemaking</b></p> <p><i>Recommended changes to policy text</i></p> <p>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> <p><i>Recommended changes to supporting text</i></p> <p>Paragraph 4.22 under Placemaking heading should make reference to environmental infrastructure, in addition to physical and social, which is currently included.</p> <p>It is recommended that the supporting text includes reference to the need to protect and enhance habitats and species.</p> <p>It is recommended that the supporting text includes reference to the need to protect enhance Listed Buildings and Conservation Areas.</p>	<p>Terminology encompasses the whole list, including 1 &amp; 1F.</p> <p>Not clear what environmental infrastructure is without a definition. Reference to the need to secure Green Infrastructure is made in paragraph 1.27 and will be defined in the Glossary. Both the need to protect and conserve the historic environment and habitats and species are dealt with in paragraphs 5.12 – 5.24.</p> <p>Not accepted – “wildlife”, “biodiversity” and “nature conservation” are protected in Policy CP18 although the specific terms “habitats” and “species” aren’t used.</p> <p>Accept</p>
<p><b>CP6 – Design and Density in Place Shaping</b></p> <p><i>Recommended changes to policy text</i></p> <p>The fifth bullet point in Policy CP6 seeks a “reasonable proportion” of family size housing. While this requirement is welcomed, it is recommended that greater clarity be provided as to what level of family housing provision will be considered “reasonable”, perhaps through a cross-reference to policy CP21 – A Balanced Housing Stock.</p> <p>It is recommended that the Policy states that the placemaking objectives referred to in bullet point 6 are those included in Policy CP5 – Placemaking.</p> <p>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: <a href="http://www.securedbydesign.com/">http://www.securedbydesign.com/</a>. If this is considered too detailed for the Core Strategy, it is recommended that this requirement be included in the forthcoming Development Policies DPD.</p> <p>It is recommended that clarification is provided for the statement “highest and exemplary standard” in design (first</p>	<p>Accepted that a cross-reference would be appropriate.</p> <p>Accepted</p> <p>Agreed</p> <p>Not possible to provide detailed clarification as</p>

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<p>bullet) so it is clearer what is required in this regard.</p> <p><i>Recommended changes to supporting text</i></p> <p>The language used in the supporting text is in places somewhat ambiguous or complex and would benefit from clarification or simplification. For example, the final sentence of paragraph 4.28 states that "...the Council will examine closely the expression of this interface within the design of proposals and resist inappropriate solutions".</p> <p>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.</p>	<p>this is generally a subjective judgement</p> <p>Accepted</p> <p>Not considered necessary at this point.</p>
Strategic Area Policies	
<p><b>CP7 – Wembley Growth Area</b></p> <p><i>Recommended changes to policy text</i></p> <p>There is 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 Model , 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); and, 10 Neighbourhood Area for Play (NEAPs) / Multi-Use Games Areas (MUGAs ) (min size 1000 m2).</p> <p>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.</p> <p>The supporting text (paragraph 4.37) refers to the Wembley Masterplan 2008 which "proposes another 10,000 jobs and at least 5,000 homes". The Policy itself states that Wembley will generate "10,000 new jobs". It is recommended that the policy states clearly if the 10,000 jobs referred to within it are those intended by the Masterplan, or if the intention is to generate 20,000 jobs overall.</p>	<p>Further refinement of this has been undertaken, and the requirement identified in policy is what the council now considers can be reasonably expected to be delivered.</p> <p>Policy CP14 highlights the need to improve the key interchanges of Wembley Central and Wembley Stadium, and to provide orbital public transport hubs, particularly Wembley to Brent &amp; Ealing.</p> <p>No specific targets can be identified though, apart from reducing car trips by 10% in Wembley as indicated in the target set out for Strategic Objective 8.</p> <p>Accept need to clarify.</p>
<p><b>CP8 - CP12 other Growth Area Policies and Park Royal Policy</b></p> <p><i>Recommended changes to policy text</i></p> <p>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.</p> <p>Comparison of provision based on targets included in the Growth Area Policies and potential future demand calculated by LB Brent through their Social Infrastructure</p>	<p>It is not considered that extra detail is needed for social infrastructure given that reference is made to these in the IIF in each of the Overall Spatial Change policies.</p> <p>Projected shortfalls derive from the lack of suitable opportunities that can be identified at the present time in the local area, balanced</p>

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<p>Model has identified potential shortfalls. 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"> <li>• Potential shortfalls in provision of sport facilities and play areas (e.g. MUGAs) in Alperton, South Kilburn, Burnt Oak / Colindale and Park Royal.</li> <li>• Potentially significant shortfalls Identified in Alperton, Burnt Oak / Colindale and Park Royal in the provision of open space.</li> <li>• 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</li> <li>• Shortfalls in provision of community facilities in Alperton, Church End and Burnt Oak / Colindale.</li> </ul> <p>It is recommended that the public transport, walking and cycling aspirations are included within the policy targets for all Growth Areas.</p> <p>It is recommended that all policies could include specific targets seeking the introduction and enhancement of areas of habitat and biodiversity value.</p> <p>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).</p>	<p>against a judgement about what can reasonably be sought from development without rendering schemes unviable.</p> <p>This is considered to be too detailed for the Core Strategy and could be addressed in the Development Management policies DPD.</p> <p>London Plan Policy 3C.25 deals with promoting freight movement by water and is cross-referenced in paragraph 5.62</p>
<p><b>CP13 - North Circular Road Improvement Area</b></p> <p><i>Recommended changes to policy text</i></p> <p>It is recommended that the critical need for, and importance of, air quality mitigation 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 London<sup>1</sup>.</p> <p><i>Recommended changes to supporting text</i></p> <p>Environmental outcomes could be enhanced if the supporting text stated that greening / landscaping will be sought on stretches of the NCR where relocation is not possible, as well as where relocation is proposed – this is currently unclear in the supporting text / policy. It is not clear what is included in “landscaping” and it is recommended that supporting text / policy refers to greening and planting explicitly.</p> <p>The inclusion of wording in the supporting text to ensure that local communities are involved in decision making about proposed changes and home relocations, to minimise distress and disruption, is recommended.</p> <p>It is recommended that supporting text be included that seeks to ensure that junction improvements provide better facilities / movement for pedestrians and cyclists.</p>	<p>The rationale for the initiative is to deal with the environment , including air quality associated with living adjacent to the NCR. It is therefore considered unnecessary to give mitigation greater prominence.</p> <p>Accept</p> <p>Accept</p> <p>Accept</p>

<sup>1</sup> <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](http://ec.europa.eu/environment/air/quality/legislation/pdf/pm10_exceedances_2005_07.pdf)

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<p>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 try and reduce traffic volumes on the NCR. This may be appropriate both in this policy and in Policy CP4 – North-West London Coordination Corridor.</p> <p>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.</p>	<p>It is already highlighted in paragraph 4.21, that Brent will work in partnership with neighbouring boroughs, the GLA and TfL.</p> <p>This is covered by London Plan policy 4A.14 which sets out a Sustainable Urban Drainage hierarchy. SUDs need to be addressed throughout the borough and not just at the NCR. Furthermore, national and regional policy should not be repeated and regional policy also forms part of the development plan therefore it is not considered that this change is needed.</p>
<b>Infrastructure to Support Development</b>	
<p><b>CP14 – Public Transport Improvements</b></p> <p><i>Recommended changes to supporting text</i></p> <p>This policy is welcomed from a sustainability perspective. However, it is not in general well integrated with the supporting text which immediately precedes it. It is recommended that supporting text is included which provides clearer context to Policy CP14 within the wider issue of transport infrastructure.</p>	<p>Not accepted as not clear what is being sought.</p>
<p><b>CP15 – Infrastructure to Support Development</b></p> <p><i>Recommended changes to supporting text</i></p> <p>Given its significant role and important contribution to human health, wellbeing and quality of life, as well as environmental benefits relating to habitat and biodiversity and flood risk management, it is strongly recommended that “Green Infrastructure” is included as an additional infrastructure category.</p> <p>In paragraph 4.90 under sub-heading “Education”, clarification that the period over which 16 new forms of entry will be required is to 2026 is recommended.</p> <p>It is recommended that supporting text is added under sub-heading “Open space and sport” to recognise the importance and value of small open spaces and pocket parks.</p> <p>It is recommended that consideration be given to including within the supporting text 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 and biodiversity will have benefits for health, recreation and wellbeing / quality of life.</p>	<p>Accept</p> <p>Accept</p> <p>The importance of small open spaces and pocket parks is set out in the Council’s PPG17 assessment for open space, the Open Space Report. For the purposes of implementation of the Core Strategy, it is not considered that this reference is needed given that specific open space needs are set out in detail in each Overall Spatial Change policy.</p> <p>Links with health and wellbeing and open space are set out already in strategic borough wide policy CP18.</p>
<b>Strategic Borough-Wide Policies</b>	
<p><b>CP16 – Town Centres and the Sequential Approach to Development</b></p> <p><i>Recommended changes to policy text</i></p>	<p>Policy CP 16 specifically set out the sequential</p>

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<p>It is recommended that the addition of text such as "...and existing or committed public transport provision is adequate to meet needs (access needs / minimisation of transport generation)" to the end of the final sentence of the penultimate paragraph of policy CP16 should be considered as this will help ensure development has a little negative impact in terms of traffic generation as possible.</p>	<p>locations for new retail development in Brent. Other material considerations for determining proposals for new retail floorspace are set out in National Guidance and the London Plan. This is stated in paragraph 5.6 of the supporting text.</p> <p>Although it is considered inappropriate to insert the recommended wording in Policy CP 16, bullet point 1 of paragraph 5.6 will be amended to reflect that accessibility to new retail proposals is a key consideration.</p> <p>Bullet point 1 of paragraph 5.6 will be changed to read 'National guidance, Planning Policy 6, and London Plan policies, including the sequential approach to site selection, impacts on existing centres and accessibility of the locations by means of transport.'</p>
<p><b>CP17 – Protecting and Enhancing the Suburban Character of Brent</b></p> <p><i>Recommended changes to policy text</i></p> <p>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 Policies DPD.</p> <p>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 Policies DPD.</p> <p><i>Recommended changes to supporting text</i></p> <p>It is not clear why it would be more acceptable for corner plots to be eroded than other plots in the borough. It is recommended that justification explaining the reasons for acceptability of loss to "corner plots on main road frontages" should be included in the supporting text, or if this exception cannot be justified that this text is removed.</p>	<p>Appropriate in Development Policies DPD</p> <p>Appropriate in Development Policies DPD</p> <p>Accept that text explaining the rationale behind acceptability of corner plots be included</p>
<p><b>CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity</b></p> <p><i>Recommended changes to policy text</i></p> <p>a) It is recommended that consideration be given to the inclusion of nature conservation and biodiversity in a</p>	<p>a) CP18 provides the strategic level policy direction on the protection and enhancement of open space, sport facilities and biodiversity.</p>



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<p>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 Policies DPD.</p> <p>b) It is recommended that the policy should seek to promote no net loss of open space in the Borough.</p> <p>c) London Plan Policy 3D.14 states that DPDs should include policy to protect and enhance key species included in the Biodiversity Action Plan. It is recommended that text to this end should be included in policy CP18. If this is considered to be too detailed for the Core Strategy it is important greater detail is provided in the forthcoming Development Policies DPD.</p> <p><i>Recommended changes to supporting text</i></p> <p>a) 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.). Reference to this role for the provision and protection of green space within the supporting text to CP18, could provide a link between CP18 and CP19 – Brent Strategic Climate Change Mitigation and Adaptation Measures.</p> <p>b) It is recommended that the role of tree planting along roads in helping mitigate air pollution could be included within supporting text.</p>	<p>Detailed criteria based policies relating to all these aspects including biodiversity will be included in the Development Policies DPD.</p> <p>b) CP18 sets out the protection of open space in the Borough and is therefore seeking to prevent net loss. It is not considered necessary to reiterate this in the policy text.</p> <p>c) Reference to the Mayor's BAP and local priority species is made in paragraph 5.22</p> <p>a) Accepted. Reference will be made in supporting text</p> <p>b) Although it is undoubtedly the case that trees can help mitigate air pollution it is considered to be unnecessary detail for the Core Strategy. Proposals for tree planting can be brought forward for detailed guidance/plans for local areas such as the NCR Regeneration Area.</p>
<p><b>CP19 – Brent Strategic Climate Mitigation and Adaptation Measures</b></p> <p><i>Recommended changes to policy text</i></p> <p>a. Greater balance should be achieved in the policy text between the need for development to address climate change adaptation as well as mitigation. While the policy is predicted to have positive effects against sustainability objectives, it could be improved by having a greater focus on climate change adaptation. The policy currently predominantly addresses climate change mitigation.</p> <p>b. While encouragement of adherence with Code standards is welcomed, it is recommended that Code level 4 be required for all large developments, not just within Growth Areas.</p> <p>c. It is recommended that the policy include a requirement for developments to meet standards / policies which are relevant at the time of development, as this "future proofs" the policy. This is important in relation to climate change and sustainable construction, which is an area in which policy, standards and targets are rapidly evolving.</p> <p>d. It is recommended that policy should ensure consistency of terminology. For example, are "major schemes" the same as "major proposals"?</p> <p>e. The policy text relates to new development only. It is recommended that text is included to ensure that</p>	<p>a. Not accepted, Policy CP19 requires all development to incorporate both mitigation and adaptation measures, detailed adaptation measures such as water and air quality will be included in the Development Policies DPD</p> <p>b. Not accepted, it is considered that the size and scale of development within the growth areas will both justify and also enable the achievement of minimum Code level 4.</p> <p>c. Guidance received from PINS that previous text which sought to future proof the policy could not be implemented on proposals phased over a long period of time. It is foreseen that Building Regulations will increase the expectations on phased developments.</p> <p>d. Accepted – consistent terminology will be used</p> <p>e. Policy refers to all development. Extensions and refurbishments will be expected to incorporate sustainable design &amp; construction</p>

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<p>extensions and refurbishments as also developed to sustainable construction standards and contribute to climate change mitigation and adaptation. Retrofitting of existing housing stock to high sustainability standards is also likely to 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.</p> <p>f. 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 within Policy CP19 should reflect fully the scale of the challenge for the borough to reduce carbon emissions. This should also include reference to the need to work with partners to develop mechanisms to address the environmental performance and energy efficiency of the existing building stock.</p> <p>g. It is recommended that the 2nd paragraph of Policy CP19 should be modified / clarified to state that all major proposals in the borough should submit a sustainability statement to cover all 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.</p> <p>h. Cross reference to London Plan policy 4.A.14 – 4.A.20 in the supporting text is acknowledged, and welcomed, however air quality should be given greater prominence within CP19, or elsewhere in 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 London . Furthermore, given that a large portion of Brent is designated AQMA, it is recommended that air quality management should either be considered through a separate policy, or if it is considered to be an issue that would be better addressed through the forthcoming Development Policies DPD, it is suggested that clearer policy text is required in relation to air quality within the Core Strategy.</p> <p><i>Recommended changes to supporting text</i></p> <p>i. Paragraph 5.28 in the supporting text appears to suggest that the use of green infrastructure developments is the key element in climate change mitigation and adaptation. While green infrastructure is important in this regard, it is one of many aspects of development / planning required to successfully mitigate and adapt to climate change, and it is recommended that this paragraph is amended to reflect this.</p> <p>j. It is recommended that the supporting text should include details on what is to be included in Sustainability Statements referred to within the policy. For example, it is important that developers ensure that buildings, infrastructure, landscaping etc. are all adapted to climate change over their lifetimes, and this should be covered in</p>	<p>measures where planning approval is required.</p> <p>f. The need to work with partners to meet the Borough's CO2 reduction target forms an integral part of the forthcoming Climate Change Strategy and is referred to in paragraph 5.29.</p> <p>g. Not accepted. 2nd paragraph states that the submitted sustainability strategy should demonstrate sustainable design &amp; construction measures to mitigate and adapt to climate change. Air quality is one of the many issues encompassed by this. Detailed requirements of the sustainability strategy are more appropriate for the Development Management polices DPD</p> <p>h. Paragraphs 5.30 &amp; 5.35 make reference to the air quality problems in the borough. Repetition of London Plan policy 4A.19 should be avoided, to provide greater prominence to the issue would require a locally justified policy which is not considered appropriate.</p> <p>i. Accepted, text will modified accordingly.</p> <p>j. Level of detail considered appropriate for the Development Management Policies DPD</p>



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<p>the Sustainability Statements.</p> <p>k. It is recommended that reference be made in the supporting text to the fact that LB Brent has committed to reporting under new National Indicator 188 – Planning to Adapt to Climate Change. Under National Indicator NI188, LB Brent is required to produce a Climate Change Adaptation Strategy, and reference to this should be included in the supporting text.</p>	<p>k. Brent's forthcoming Climate Change Strategy covers the borough mitigation and adaptation obligations under NI185 and NI188. This is referenced in paragraph 5.29</p>
<p><b>CP20 – Strategic and Borough Employment Areas</b></p> <p><i>Recommended changes to policy text</i></p> <p>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.</p> <p>4th bullet in policy – it is recommended that the term “efficient movement” could be clarified.</p> <p>Penultimate bullet in policy – the addition of “landscaping” to 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.</p> <p><i>Recommended changes to supporting text</i></p> <p>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>	<p>Policy deals with all types of transport infrastructure, therefore detail considered unnecessary.</p> <p>Not considered necessary.</p> <p>Too detailed for policy dealing with regeneration of Employment Areas. This will be covered by policies in the DP document.</p>
<p><b>CP21 – A Balanced Housing Stock</b></p> <p>No specific recommendations</p>	<p>-</p>
<p><b>CP22 – Sites for Nomadic Peoples</b></p> <p><i>Recommended changes to policy text</i></p> <p>As noted in supporting text, paragraph 5.83, 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 3.A4 also requires site(s) to be identified where there is a known shortfall.</p> <p>Policy CP22 as currently drafted in the Core Strategy does state that the existing Lynton Close site will be protected, however it does not set out clear criteria for identifying the suitability of new site(s).</p> <p>Possible suggested wording for a modified Policy CP22 text is set out below:</p> <p><i>The Council will safeguard the continued use of the existing Lynton Close Travellers Site and will identify a</i></p>	<p>Although there is a need for a criteria-based policy the level of detail necessary is a question of balance between what is necessary to guide development to appropriate sites whilst not including detail which, although clearly relevant in identifying appropriate sites, would be applied to any form of residential accommodation.</p>

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<p><i>site(s) for additional permanent facilities within the Borough to meet the long-term needs of Nomadic Peoples where they are located on an acceptable site having regard to:</i></p> <ul style="list-style-type: none"> <li>- <i>The need for safe access to the road network</i></li> <li>- <i>The need for acceptable pedestrian access and access to public transport</i></li> <li>- <i>The impact on the local environment and the character of the area and safety and amenity considerations, including appropriate landscaping and boundary treatment</i></li> <li>- <i>The availability of essential services, such as water, sewerage and drainage and waste disposal</i></li> <li>- <i>The proximity to shops, services and community facilities</i></li> <li>- <i>The suitability for the undertaking of employment and entrepreneurial activities, where the prospective occupiers require, without detriment to adjacent occupiers' amenities</i></li> <li>- <i>The need to avoid areas at high risk from flooding.</i></li> </ul>	
<p><b>CP23 – Protection of existing and provision of new Community and Cultural Facilities</b></p> <p><i>Recommended changes to policy text</i></p> <p>The policy text could refer to and seek to address existing deficiencies in community facilities more than it currently does.</p> <p>It is recommended that the addition of text “in exceptional circumstances” before the policy text referring to “their loss mitigated” be considered, as this would help to ensure this is considered only as a last resort.</p> <p>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.</p>	<p>Not obvious how this can be achieved</p> <p>It may not be necessary that this is applied only as a last resort.</p> <p>This would be more appropriately dealt with as a review of policy. It is not apparent why the rate should change in the future.</p>

## **APPENDIX 8**

# **APPRAISAL OF CORE STRATEGY ALTERNATIVES**



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## Core Strategy Issues and Options Stage (2005)

### Appraisal of Strategic Planning Objectives and Priorities

Strategic Planning Objectives and Priorities							
Question 1. What do you think are the priorities in considering the future development of the Borough?							
<b>Potential options / priorities:</b> (not necessary mutually exclusive)							
A. Sustainable development (e.g. more energy efficient buildings)							
B. Protections of the natural environment							
C. Conservation of existing suburban character							
D. Regeneration of run-down areas (e.g. town centres)							
E. Building new homes							
F. Protecting Employment Areas such as Park Royal							
Social	A	B	C	D	E	F	Commentary
S1 Prosperity and Social Incl.	+	o	o	++	+	+	These are very strategic priorities and their effects will be largely depending on their detailed implementation. Therefore only an indication of there performance can be provided here and there is a high level of uncertainty over the significant of the effects. It may also be possible, for example, to reverse some of these effects by incorporating certain measures / requirements during implementing.
S2 Health	o	o	o	++	?	o	
S3 Education and Skills	o	o	o	+	o	o	
S4 Housing	o	o	o	++	+	o	
S5 Quality of surroundings	o	+	+	++	o	o	
S6 Crime Prevention & Community Safety	o	o	o	+	+	o	
S7 Community Identity	o	o	o	++	o	o	
S8 Accessibility	o	o	o	++	+	o	
Environmental							<b>Sustainability strengths:</b> Each of these priorities has its own potential contribution to make to sustainability. The dimension of sustainability which would potentially benefit or be adversely affected the most tends to vary from priority to priority. For example, regeneration could have very positive effects against social and economic objectives, but could have negative environmental consequences (such as additional traffic).
EN1 Traffic	+	o	o	-	--	-	
EN2 Water Quality & Resources	++	+	o	o	--	-	
EN3 Air Quality	++	+	o	-	-	-	
EN4 Biodiversity	+	++	o	o	o	o	
EN5 Landscape & Townscape	++	++	o	+	+	o	
EN6 Historic Env. & Cultural Assets	o	o	o	o	o	o	
EN7 Climate Change	++	+	o	-	-	o	
EN8 Waste Management	++	o	o	-	--	o	
EN9 Land and Soil	o	++	o	+	-	o	
Economic							<b>Sustainability weaknesses:</b> Some priorities have the potential for negative effects, for example protecting the natural environment could restrict economic growth and employment and building new homes could have environment consequences in terms of the generation of traffic, water resources and waste generation. These effects could be partly mitigated through the location of development and requirements for sustainable construction etc.
EC1 Growth	o	-	o	++	+	++	
EC2 Employment	o	-	o	++	+	++	
EC3 Regeneration	o	o	o	++	+	++	
EC4 Investment	o	o	o	++	+	++	
EC5 Efficient Movement	++	o	o	+	-	+	
							<b>Recommendations:</b> Elements of many of these priorities could be incorporated into an overall strategy and opportunities should be sought to realise the potential offered for "win-win-win" solutions.
<b>Key:</b> Major positive: ++ Minor positive: + Neutral: o Minor negative: - Major negative: -- Uncertain: ?							

## Strategic Planning Objectives and Priorities: The Scale and Pace of Regeneration in the Borough

**Question 2. Do you think the Council should support regenerative development, with associated growth in housing development, or should the Council restrict such growth?**

### Potential options / priorities:

A. Encourage residential led development and manage the environmental consequences and resulting pressure on facilities but reap the benefits regenerative development

B. Limit the opportunities for mixed, residential led development that in turn reduces potential impacts on the Borough, but does not bring forward the regenerative benefits of significant new investment

### Sustainability strengths and weaknesses:

As stated in the Issues and Options Papers, there are clear choices to be made in the scale and pace of regenerative development wanted in the Borough i.e. whether to embrace growth or to take a more cautious approach.

Currently residential development is providing the catalyst to deliver mixed use and regenerative development and the resulting benefits this provides (e.g. affordable housing, employment, services, infrastructure etc). Without this residential led development these wider social and economic benefits may not be realised, however this has to be balanced against the environmental consequences of this scale and type of development. There are also issues around the timing of the provision of improvements to services, such as health and education, and infrastructure which may lag behind the residential development and put unacceptable pressures on the current services and infrastructure.

Other potentially negative consequences of major regeneration, e.g. traffic, air pollution, flood risk, resource use etc, are discussed in more detail under other issues but are also relevant here.

### Recommendations:

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

### Strategic Planning Objectives and Priorities: Location of Major Regeneration Areas

**Question 3. Are there areas in the Borough where regeneration and larger scale development should be encouraged?**

**Question 4. Are there areas in the Borough that are in decline that need early intervention to arrest it?**

**Potential options / priorities:**

- A. Continue to expand regeneration development around Wembley Stadium area
- B. Encourage regeneration and larger scale development in other areas in Borough
- C. Focus regeneration other areas in the Borough that are in decline that need early intervention to arrest it

**Sustainability strengths and weaknesses / Recommendations:**

The Brent Regeneration Strategy 2001-2021 sets the direction of the Council's regeneration work over the next 20 years with the aim of making sure problems of deprivation are tackled effectively and to stop areas falling into decline. To achieve this vision, the strategy focuses on six key priorities which includes the use of landmark developments of regional or national significance, which also ensure local benefits, and focussing on particular neighbourhoods but also priorities across the whole borough. The strategy is supported by a series of two-year Action Plans. It is suggested that one of the challenges for the DPDs is to translate the spatial implications of the Strategy and Actions 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.

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**Strategic Planning Objectives and Priorities: Priority Land Uses or Themes**

**Question 5. Are there any land use priorities that should be stressed within the LDF? Are there any particular themes or objectives that should be emphasised or given priority within the LDF?**

**Potential options / priorities:**

- A. Make housing a priority land use  
 B. Make affordable housing a priority land use  
 C. Make employment generating a priority land use  
 D. Make mixed use a priority land use (more jobs, housing and environmental benefits - 'triple win')

Social	A	B	C	D	Commentary
S1 Prosperity and Social Incl.	+	++	+	+	<b>Sustainability strengths:</b> Provision of affordable housing has wider social and economic benefits. One of the key strengths of mixed use development over the other priorities is the potential to reduce the need for travel. Employment uses will provide major benefits on economic objectives, with the other land use priorities also providing some economic benefits. Affordable housing in particular has social benefits.
S2 Health	?	+	0	0	
S3 Education and Skills	0	+	0	0	
S4 Housing	+	++	-	+	
S5 Quality of surroundings	0	0	0	+	
S6 Crime Prevention & Community Safety	+	+	0	0	
S7 Community Identity	0	+	0	+	
S8 Accessibility	+	++	+	+	
					<b>Sustainability weaknesses:</b> All forms of additional built development have the potential to generate additional traffic, air pollution, waste etc, however the significance will depend on the location of housing and employment in relation to one another, whether employment opportunities are taken up by local residents therefore potentially reducing longer journeys, accessibility to public transport, the adoption of sustainable construction techniques and installation of fittings to minimise use of energy, water etc. A focus on housing development in particular has the potential to generate traffic and increase water use.  Potential effects on more site specific issues such as biodiversity and the historic environment will depend on site specific characteristics and the implementation of other protection policies.
<b>Environmental</b>					
EN1 Traffic	--	-	-	-	
EN2 Water Quality & Resources	--	-	-	-	
EN3 Air Quality	--	-	-	-	
EN4 Biodiversity	?	?	?	?	
EN5 Landscape & Townscape	+	+	+	+	
EN6 Historic Env. & Cultural Assets	?	?	?	?	
EN7 Climate Change	-	-	-	-	
EN8 Waste Management	-	-	-	-	
EN9 Land and Soil	?	?	?	?	
					<b>Recommendations:</b> 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.
<b>Economic</b>					
EC1 Growth	++	0	++	+	
EC2 Employment	-	+	++	+	
EC3 Regeneration	+	++	++	+	
EC4 Investment	+	+	++	+	
EC5 Efficient Movement	-	+	?	++	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ?					



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**Strategic Planning Objectives and Priorities: Spatial Expressions of Priorities****Question 6. Are there any land use priorities that lead to a particular spatial arrangement around the Borough?****Potential options / priorities:**

- A. Concentrate development in major town centres  
 B. Concentrate development on major public transport interchanges  
 C. Support a greater spread of development

Social	Option A	Option B	Option C	Commentary
S1 Prosperity and Social Incl.	+	+	0	It is unlikely that any one of these 'options' will be implemented in isolation to the exclusion of the others as elements of each are likely to provide the most sustainable policy position for the Borough to reflect different local circumstances.  Note that town centre locations and major public transport interchanges may be one and the same and therefore the benefits of each may be combined in certain locations (it is assumed for the purposes of this initial appraisal that the two do not coincide).
S2 Health	+	+	0	
S3 Education and Skills	0	0	0	
S4 Housing	+	+	+	
S5 Quality of surroundings	?	?	-	
S6 Crime Prevention & Community Safety	?	?	?	
S7 Community Identity	+	+	0	
S8 Accessibility	+	++	--	
				<b>Sustainability strengths:</b>
				All three priorities provide potential strengths, not least the concentration of development on major public transport interchanges. The issues of traffic and accessibility are key for the Borough, like the rest of London to varying degrees. Encouraging the use of public transport and improving accessibility, with associated indirect benefits on health and social inclusion, is therefore welcomed.
				With respect to environmental objectives, the aim of reducing traffic also has the potential to reduce pollution.
				The concentration of development has the potential to have positive effects on the economic objectives. The efficient movement objective could benefit as concentrating development could reduce the use of the car which should have a beneficial effect on congestion. In addition, reducing congestion and development of public transport could have benefits effects on the growth and regeneration objectives.
<b>Environmental</b>				
EN1 Traffic	-	++	--	<b>Sustainability weaknesses:</b> The greater spread of development has the potential weakness of increasing traffic and air pollution. Facilities and services are also likely to be less assessable to those without access to a car and on lower incomes. The quality of surrounds may be reduced by increasing the density of development leading to noise nuisance etc, this could be a particular issue if development is concentrated and uses mixed causing nuisance thresholds to be passed. Similarly crime / fear of crime could be exacerbated, however development may be an opportunity to address it through appropriate design etc.
EN2 Water Quality & Resources	-	-	-	
EN3 Air Quality	-	+	--	
EN4 Biodiversity	?	?	?0	
EN5 Landscape & Townscape	+	0	0	
EN6 Historic Env. & Cultural Assets	?	?	?	
EN7 Climate Change	-	0	-	
EN8 Waste Management	-	-	-	
EN9 Land and Soil	+	+	-	
<b>Economic</b>				
EC1 Growth	++	++	+	<b>Recommendations:</b> 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.
EC2 Employment	++	++	+	
EC3 Regeneration	++	++	+	
EC4 Investment	++	++	+	
EC5 Efficient Movement	+	++	-	

**Key:** Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ?



## Core Strategy Preferred Options Stage (2006) - alternative options not selected, reasons and SA comments

### Spatial Strategy Policies

Policies	Alternative options not selected	Reasons why not selected (as included in preferred options Core Strategy)	SA comments
<b>CP SS1: Key Principles for Development</b>	No alternative options included.	N/A	Policy SS1 sets out the highest level of development principles for the Core Strategy. The elements of this policy are reflected in the other Spatial Strategy policies. It does not represent a specific policy position which could be achieved by alternative means, and the alternatives to specific details contained within SS1 are reflected within alternatives to policies SS2 – SS10.
<b>CP SS2: Population and Housing Growth</b>	There is no alternative option to that of accommodating the level of growth proposed as the housing targets are set at a strategic level in the London Plan. A higher level of growth could be proposed.	A higher level of growth was rejected because London Housing Capacity Study demonstrated that suitable sites are not available which could include substantially more housing. A higher target would be difficult to sustain without developing on open space or putting an unacceptable strain on infrastructure.	From a sustainability perspective the reasons for rejecting the alternative is considered reasonable.  An additional option which could have been considered would be to aim to exceed the 50% affordable housing target set by the London Plan (which is considered under Policy H4).
<b>CP SS3: Focus of Growth</b>	The alternative to focusing growth is to disperse new housing around the Borough.	This would be a less sustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc. It would also be more difficult to provide the necessary infrastructure to support development.	Generally more dispersed development, especially in urban areas, is considered less positive from a sustainability perspective. Maximising the use and efficiency of existing infrastructure and ensuring new housing development is accessible to existing centres is considered a preferable option.
<b>CP SS4: Commercial Regeneration</b>	The Strategic Industrial locations have been identified in the London Plan and therefore must be reflected in Brent's strategy. The alternative to promoting a mix of uses in town centres is to develop as single uses and at lower densities.	This alternative approach, however, would not make the best use of town centres as accessible locations to public transport, would result in a greater need to travel and would mean an under-use of land.	From a sustainability perspective, ensuring a mix of uses at the same location is considered a preferable form of development, as it can reduce travel need and improve access to opportunities and services. It is important however that mixed-uses are appropriate in scale and type to their location and localised impacts such as noise nuisance and congestion are considered.
<b>CP SS5: Wembley as a Focus for Growth</b>	No alternative options included.	Much of the growth in housing and commercial development at Wembley is committed already through planning consents therefore it is too late to pursue an alternative option of more dispersal of investment.	Focussed growth has potential sustainability benefits. Refer to detailed appraisal of policy SS3 for further commentary.
<b>CP SS6: Infrastructure to Support Development</b>	An alternative option is to allow for major new development and the associated population growth without requiring provision of supporting infrastructure on	This could not be sustained because it would lead to insufficient school places, health facilities, etc. to meet needs and would result in increased congestion on transport systems with the consequential impact on the environment and local amenity	From a sustainability perspective it is vital that supporting infrastructure is phased with new development, so the rejection of this first alternative is supported.

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<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in preferred options Core Strategy)</b>	<b>SA comments</b>
	development, but to allow infrastructure provision to catch up at a later date.  Another alternative is to require any development, of whatever size, to fulfil infrastructure requirements.	through, for example, poorer air quality.  This is not acceptable because it is not reasonable to expect all small developments to meet their own infrastructure requirements directly.	The rejection of the second alternative is understood and is reasonable from a practical and financial perspective.
<b>CP SS7: Sustainable Communities</b>	There is no alternative to this general approach as it is a 'central plank' of Government policy for sustainable development.	N/A	No comment.
<b>CP SS8: Meeting Local Community Needs</b>	See alternative under SS6.	See SS6.	See SS6.
<b>CP SS9: Protecting the Built and Natural Environment</b>	An alternative approach would be to have less protection of those open or built up areas that are valued in the Borough to varying degrees.	Such an approach would lead to greater loss of the borough's existing character, its open areas and its biodiversity which would substantially reduce the Borough as an area in which to live or work and would be contrary to the wishes of the vast majority of the local community.	From a sustainability perspective the protection of natural and build environment is considered very important, so the decision not to select this proposed alternative is supported.  A further alternative not considered could be to not allow any development on open spaces or which affects the character of existing neighbourhoods. However, the position that in limited circumstances certain development associated with the use of the open space, e.g. changing facilities, will be acceptable is considered a reasonable position (with appropriate consideration to local impacts) and will facilitate the use of the area for sport and recreation.
<b>CP SS10: Implementation</b>	To take a less pro-active approach to the implementation of the strategy.	This would result in a less sustainable approach as for SS6 and SS8 above.	From a sustainability perspective, intervention to secure the delivery of necessary facilities is important to ensure implementation is achieved.

### Maintaining a Quality Environment Policies

<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
<b>CP UD1: Spatial Design Strategy</b>	To continue the current disparate policies dealing separately with the 'Areas of Low Townscape Quality'; the 'Transport Corridors & Gateways' and other priority areas.	The current approach has had some positive effect in terms of negotiating for design improvements in proposals within these areas, but this has been ad-hoc and limited in scope. It has not been effective in securing contributions for infrastructure improvements.  In view of the growth areas being proposed, continuing with the existing approach therefore means the full	This is supported from a sustainability perspective. A more coherent and 'joined-up' approach to spatial design is more likely to deliver preferable outcomes in terms of social, economic and environmental objectives.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
		potential for achieving significantly higher design standards and public realm quality is unlikely to be realised.	
<b>CP UD2: Design Delivery Protocol</b>	Not to have a Design Delivery Protocol. It means continuing with the existing situation of outcomes on the ground, which do not always reflect the quality that was initially intended.	<p>The local community would be unlikely to be confident about the Council's ability to ensure the quality townscape and public realm needed to help contribute to raising their quality of life, and enjoyment of their locality.</p> <p>The opportunity to use the proposed growth which is inevitable, to help regenerate areas in the Borough, would be lost.</p>	A design delivery protocol is seen as a useful tool in ensuring design reflects sustainability principles and is delivered in practice. Thus the rejection of this alternative is supported from a sustainability perspective.
<b>CP SD1: Climate Adaptation Infrastructure</b>	Not to have a Borough climate adaptation strategy.	This is not a viable option for two reasons; firstly because each local authority is expected to put in place preparedness measures to deal with climate change contingencies. Secondly, the Council cannot reasonably expect developers to demonstrate adaptation measures in their development proposals, while failing to set an example in its own operations. In addition, there are potential synergies and economies in taking a strategic approach to these issues - ensuring that opportunities from ongoing development are harnessed along with the Council's own efforts to provide an integrated strategy to enable Brent prepare effectively for the challenges ahead.	It is seen as very important for the Borough to develop an adaptation strategy. The reasons for not selecting the alternative of not developing a strategy are supported.
<b>CP SD2: Sustainable Design &amp; Construction</b>	No viable alternative to this policy approach.	The Planning & Compulsory Purchase Act 2004 and Government planning guidance in PPS1 have defined the purpose of the planning system as being to deliver sustainable development. The London Plan has existing policies on this issue, and is proposing alterations for more detailed policies, and Brent's LDF policies must be in conformity with the London Plan. It is also reasonable to combine sustainable development and climate change adaptation requirements as they are related and there are some solutions common to both.	The reasons for the policy are supported from a sustainability perspective.
<b>CP ENV 1: Climate Change</b>	An alternative to mitigating and adapting to climate change would be to allow commercial judgment and innovation to govern any climate change mitigation measures or adaptation in development.	This strategy would mean that Government guidance would be relied upon, which is quite detailed on some issues. However, experience suggests that commercial forces alone will not address climate change, and Government guidance advises the inclusion of policies on climate change at the local level.	From a sustainability perspective, the provision of a localised interpretation of climate change mitigation and adaptation, and thus the reasons for not selecting the alternative, are supported.
<b>CP ENV2: Protecting the Environment</b>	An alternative option for the protection of the environment could be to develop a more prescriptive policy.	This was not considered appropriate at this level, as development control policies, and supporting SPDs, will provide the detailed level of guidance.	This is accepted from a sustainability perspective. However it is important that development control policies and future SPDs do provide a sufficient framework for the protection and enhancement of the environment.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
			This will need to be addressed in the SAs of development control policies and SPDs as they are developed.
<b>CP OS1 Protection and Enhancement of Open Space</b>	To only protect MOL, POS and areas of National, Regional or Local significance, allowing the loss of other open space.	Allowing development on non designated open space areas such as private sports grounds and allotments, would exacerbate pressure on existing public open space, and reduce overall opportunities for sport and recreational activity. Other non designated open space areas also have an important role to play in maintaining biodiversity and balancing the health and well being of people, particularly young people who need access to play and recreation for their physical growth and development.	From a sustainability perspective protection of all open space would be the preferred outcome, especially given the existing deficit of open space in many parts of the Borough – thus not selecting this alternative is supported.
	Protect MOL, POS, and areas of National, Regional or Local significance and allow the loss where it is not in a deficiency area and surplus to requirements.	Assessments of provision and demand for open space demonstrate that there is a deficiency in the borough of public open space, playing fields and remaining allotments are well used. It is known that Brent is a third below the recommended National Playing Fields Association standards for open space area per population, and deficiencies are not evenly distributed. In addition public consultation has shown that most people wish to provide further protection for allotments and playing fields than currently exists.	The SA has identified open space deficiency as a key issue for the Borough. Thus this alternative is considered to be untenable as it relies on there being surplus in certain areas even though there is an overall deficit. The rejection of this alternative is thus supported.
<b>CP OS2 Promotion of Biodiversity and Nature Conservation</b>	Not to promote biodiversity or to protect identified habitats and species.	This would be contrary to the Mayor's Biodiversity Strategy and Best Practice Guidance of the London Plan for biodiversity. Not preserving biodiversity or habitats would result in an imbalance of economic and social elements with an apparent loss of nature. Public consultation showed that most people thought that areas of wildlife conservation should be protected.	This alternative (whilst somewhat extreme / unrealistic) would clearly be unacceptable from a sustainability perspective given the policy context highlighted and given the existing deficit of access to nature conservation in many parts of the Borough.
<b>CP W1: Sustainable Waste Management</b>	To not follow the waste hierarchy and to instead collect unsorted waste for landfilling.	Since the Landfill Allowance Trading Scheme (LATS) agreement has been introduced and space for landfilling is running out, this alternative is not feasible in the long term.	This alternative would also be considered unacceptable from a sustainability perspective, and from a national / London policy perspective, and thus its rejection is supported.
	For the borough to plan for waste management facilities on its own.	Given that Brent is a member of the West London Waste management consortium which jointly decides how the constituent boroughs waste will be dealt with then it is sensible and appropriate to plan for facilities jointly.	A combined approach to managing waste with other boroughs seems a pragmatic and efficient way of dealing with a complex problem. It is important that collaborative work remains focussed and progresses within a reasonable timeframe.

## Meeting Housing Needs Policies

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
<b>CP H1: Housing Provision</b>	Only potentially feasible option would be a higher housing target, as lower or 'stand still' targets would not be in conformity with the London Plan (as proposed for alteration), or generally accord with Government strategy.	<p>A significantly increased housing target may not be environmentally or infrastructurally sustainable. A significantly higher target would require substantial loss of employment sites and/or significant Greenfield housing development, involving the loss of open space amenity areas.</p> <p>Not requiring developers contributions to enable the necessary physical, social and environmental infrastructural enhancements would place an unreasonable new provision burden on existing residents and occupiers.</p>	The detailed appraisal of policies (see Section 5) identifies that housing development on the scale proposed has the potential to lead to significant environmental impacts over the plan period. From a sustainability perspective an alternative which seeks to set a higher housing target than that in the preferred options would result in an increase in the significance of several negative sustainability effects (e.g. consumption of resources, generation of waste, traffic congestion and air pollution, noise and loss of local amenity, loss of open space / greenfield sites etc).
<b>CP H2: Sustainable Housing Development</b>	Only potentially feasible option would be more detailed sustainability implementation requirements.	Ignoring sustainability issues would be contrary to the above strategies. More detailed sustainability implementation requirements may be deemed unduly prescriptive.	It is accepted that it is not suitable to include too much detail in the Core Strategy. It is important that 'more prescriptive' requirements are reflected sufficiently in development control policies and SPDs which set out the detail of implementation. Refer to comments against ENV2, above.
<b>CP H3: A Balanced Housing Stock</b>	See explanation of the reasons why other alternatives were not selected.	<p>To generally meet a narrower needs range would be contrary to London Plan and Council housing strategies.</p> <p>a) Over 75% of the housing completions between 1997-2004 have been 1/2 bedroom units. This does not accord with Brent's demography and housing needs. Current definition of family accommodation as comprising a minimum of two bedrooms is not evidentially supportable, particularly in private sector. Hence, need to redefine family accommodation. As the proposed 30% three bedroom requirement would only apply to sites of ten or more units and would be further subject to site suitability, the overwhelming majority of units would still be 1/2 bedrooms to meet the predominant smaller household needs.</p> <p>Retention of current two bedroom definition would not generate sufficient additional family accommodation.</p> <p>Higher bedroom size requirement, specified mix of 1/2/3/4 bedroom or application without regard to site suitability, could be regarded as unduly prescriptive.</p> <p>b) To better meet the needs of household with mobility disabilities. Omission of requirements would</p>	The need to provide for a mixed housing stock is supported from a sustainability perspective.



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<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
		<p>either not be in conformity with the London Plan or would require an empirical justification which cannot be evidenced.</p> <p>c) &amp; d) To recognise that there is a range of housing needs that cannot viably be met by the provision of self-contained accommodation. Failure to make satisfactory enabling provision would ignore significant housing needs.</p>	
<b>CP H4: Affordable Housing Provision</b>	Not protecting existing affordable housing stock	Would exacerbate the lack of affordable housing problem.	The reasons for not taking the first two alternatives forward are accepted. However, from a sustainability perspective, it is considered that a higher target or a lower threshold would be beneficial in meeting the Borough's growing affordable housing needs. This clearly need to be judged against practicalities and likely delivery by developers because of the cost implications as well as the 'reasonableness' test, although the current draft of the London Plan (September 2006) does allow for boroughs to set a lower threshold where justifiable therefore the policy context in relation to other boroughs may change as LDFs are developed.
	A lower target, or higher threshold (higher than the current UDP).	Would not be in conformity with the London Plan and would significantly fail to address Borough housing needs.	
	A higher target and/or lower threshold	Would better address Borough affordable housing needs. However, a target higher than other London boroughs may not satisfy the 'reasonableness test' of the proposed Plan's 'robustness'. While a lower threshold may generate difficulties in securing overall new housing delivery.	

### Connecting Places Policies

<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
<b>CP TRN1: Prioritisation Investment</b>	An alternative to prioritising infrastructure investment in the growth areas would be to spread investment evenly across the Borough.	This would be a less sustainable approach as the critical mass of investment could not be achieved in particular locations which is necessary to influence people's modal choices.	Some advantage could be seen in a spread of investment, in particular in providing improved services in more isolated / peripheral areas. However from a sustainability perspective focussed investment is considered the best approach so the reason for not taking this alternative forward is supported.
	The strategy could also recognise that car usage is inevitable and not seek to promote investment in non-car modes.	This is an unsustainable approach which is likely to result in higher levels of greenhouse gas emissions and congestion and would disadvantage those without access to a car.	It is agreed that this alternative is unacceptable from a sustainability perspective, given the damaging social, environmental and (through congestion and reduced environmental / amenity quality) economic impacts of allowing car usage to grow.
<b>CP TRN2: Reducing the Need to Travel</b>	Spreading development more evenly around the Borough at lower densities.	This is a more unsustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc.	These reasons are supported from a sustainability perspective. Refer also to comments under SS3 above.
<b>CP TRN3:</b>	There is no option other	This could result in serious under-	These reasons are accepted.



<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
<b>Parking and Traffic Restraint</b>	<p>than to apply maximum parking standards as this is a requirement of both national government policy and the London Plan.</p> <p>An alternative to relating standards to public transport accessibility is to apply the same standard across the Borough.</p>	provision of parking in areas where there is little or no alternative means of access resulting in excessive on-street parking and potential under-investment in development opportunities.	However from a sustainability perspective the ideal outcome in the long-term would be for the provision, and thus use of alternative modes, including walking and cycling to allow the progressive restriction of parking in all areas – with the aim of encouraging and supporting modal shift which would have significant sustainability benefits for the Borough.
<b>CP TRN4: Transport Links in London</b>	To not prioritise the strategic links but to prioritise on purely local grounds.	This would result in key strategic routes not being implemented with a consequential impact on the ability to meet strategic aims and objectives in promoting public transport and walking.	The reasons for not selecting this alternative are supported from a sustainability perspective.

## A Strong Local Economy Policies

<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
<b>CP BIW1: Protection of Employment Land and Premises</b>	Not to protect industrial employment land and premises	<p>If the Council decided not to protect industrial employment land, there would remain a supply of Strategic Employment Land – designated by the London Plan.</p> <p>This approach would allow significant opportunities for residential development upon previously developed brownfield land, significantly increasing housing numbers within Brent.</p> <p>This would be unsustainable as substantially increased residential development would lead to many more cars upon the Borough's roads and lead to greater congestion; increased levels of local and regional unemployment; and a disproportionate number of homes to jobs resulting in a 'dormitory' Borough where people travel away to work.</p>	<p>The reasons for not taking this alternative forward are supported from a sustainability perspective.</p> <p>However, at the same time, as stated in the detailed appraisal of policies, it is important that the opportunities for employment which are 'protected' are suitable for the local population – otherwise the opposite to the situation set out in the reasons here may occur – larger numbers may commute into Brent for work, leading to increased environmental and congestion impacts with little benefit to the Borough.</p>
<b>CP BIW2: Principles of Business, Industrial and Warehousing Development</b>	An alternative approach could be to 'deregulate' such development in order to maximise the potential of economic development by removing the requirements of developments.	Establishing principles of business, industrial and warehousing development along the themes of sustainable development helps to contribute to the creation of sustainable communities. Such principles can also help to support the viability of industrial employment land by maintaining modern standards of land use and managing the cumulative impact of development.	The reasons for not supporting this alternative are in line with sustainability principles.

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<b>Policies</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
	The Council could also decide to establish more prescriptive standards of development.	Could prove inflexible and restrictive to some development in some areas.	The justification for not taking forward this alternative is less strong, however it is understood. From a sustainability perspective it is in fact likely be a preferred outcome to restrict development in some areas (those unsuitable on long-term transport, environment or social grounds – regardless of short-term economic benefit). As a result it is important that 'more prescriptive' requirements are reflected sufficiently in development control policies and SPDs which set out the detail of implementation. Refer to comments against ENV2, above.
<b>CP BIW3: The Re-use of Employment Land and Premises</b>	These areas could be awarded no protection so that their redevelopment for alternative uses would be subject to the performance of the market; and	Although the Council seeks to protect a supply of readily available industrial employment land, national and regional policy requires that the supply is reviewed and that surplus land be identified for alternative uses, especially for residential development.	The reasons for not supporting these alternatives are accepted. From a sustainability perspective the managed re-use of employment land for use appropriate to their setting and location can play an important role in meeting social / economic objectives. Thus the preferred option is supported.
	The Council could afford more stringent protection and not consider redevelopment under any circumstances.	There is therefore a presumption for the redevelopment of industrial areas under certain circumstances, except for designated Industrial Employment Areas, where such change will be strongly resisted.	
<b>CS TC1: Principal Retail Location</b>	An alternative option is to have no town centre focus and allow economic growth to be more dispersed.	Such an approach could lead to the creation of ad-hoc retail provision and investment in accessible locations. It would also mean that the opportunities which have arisen at Wembley, as a result of stadium regeneration, would not be maximised. It would also diminish the opportunity for Wembley to be regenerated consistent with its status as a major centre. PPS6 states that LPAs should identify the centres within their area where development should be focused.	Refer to comments under SS3, above. From a sustainability perspective the rejection of this option is supported.
<b>CS TC2: Other Preferred Locations</b>	There are no alternative options.	It is a requirement under PPS6 that LPAs must apply the sequential approach in their development plans to support retail and related town centre use developments at more central location.	The reasons for no specific alternative being included in the Draft DPD is understood. No comments from a sustainability perspective.
<b>CS TC3: Exceptional Locations</b>	As above.	As above.	As above.
<b>CS TC4: Town Centre Opportunity Sites</b>	No alternative options included.	Government guidance in PPS6 states that LPAs, after considering the need for development, the likely impacts on other existing centres and accessibility, should identify and allocate sites for town centre development consistent with the sequential approach. The selected policy option recognises that if town centres are to be maintained and enhanced then opportunities for redevelopment and expansion will have to be identified.	As above
<b>CP TC5:</b>	Below Major centre, an	PPS6 requires that LPAs consider a	The network may evolve over

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Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
<b>Network of Town Centres</b>	option is to identify an alternative network.	network of town centres and their relationship in the hierarchy and to consider the need for regeneration to strengthen them. In addition deficiencies in the network should also be highlighted by promoting centres to function at a higher level in the hierarchy, or by designating new centres. Wembley and Kilburn are the London Plan identified Major Centres. Their position is fixed.  Below Major centre, therefore, an option is to identify an alternative network. However, regular monitoring of the town centres such as the level of floorspace, the number of multiples, level of vacancies, etc. means that the hierarchy identified is based on the best available evidence.	time, however it is supported that the network of town centres is a fixed issue.
<b>CS CT1: Promoting Leisure and Tourism</b>	Allowing leisure and tourist facilities to locate anywhere in the Borough without good access.	This would attract business away from town centres and result in decentralisation of network infrastructure. By focusing leisure and tourism facilities in town centres with better transport links, these uses are more accessible to a wider range of users and supported by complementary uses, such as shops, restaurants, information bureaux, and other leisure activities. Also, the impacts of these facilities can be more easily managed, rather than being dispersed throughout the borough where residential character and amenity may be compromised and impacts on surrounding uses may be greater	This alternative would be considered a less favourable approach from a sustainability perspective, potentially leading to significant increases in travel need and associated environmental and social impacts. Thus, the reasons for rejecting this alternative are supported.
	Leisure and tourism facilities not promoted and no contributions sought	As a borough it would be a missed opportunity to help raise the local economy and promote regeneration, particularly as tourism revenue accounts for 6.4% of the UK's total GDP. Leisure and tourism facilities help make Brent an enjoyable and a pleasant place to be, and would be advantageous for developers who impact on existing infrastructure and resources to help contribute towards improving public realm, the creation of high quality environments, and boosting the local economy.	This alternative is also not considered favourable from a sustainability perspective as leisure and tourism play an important role in the physical, cultural and social well-being of the Borough.

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**Enabling Community Facilities Policy**

<b>Policy</b>	<b>Alternative options not selected</b>	<b>Reasons why not selected (as included in Draft Core Strategy)</b>	<b>SA comments</b>
<b>CP CF1 Meeting the needs of the Community</b>	To allow the market to determine where community facilities are located.	Community facilities, while integral for public or community benefit, are low value uses and cannot compete financially on the open market against higher land use values such as housing or commercial use. As demand for land substantially outweighs supply, community facilities are likely to be under provided or forced to locate in areas not well accessed by the wider community. Existing Facilities are also likely to be over stretched and under-resourced if new provision is not made when allowing for new growth and development.	From a sustainability perspective it is deemed likely that in some circumstances the market is not a sufficient instrument to meet community needs – especially in areas of greatest social exclusion and relative poverty. Thus the reasons for not taking forward this alternative are supported.

**APPENDIX 9**

**APPRAISAL OF THE PROPOSED SUBMISSION CORE STRATEGY**

## Appraisal of the Proposed Submission Core Strategy

The policies appraised below are those included in proposed Submission Core Strategy provided by LB Brent on 21<sup>st</sup> May 2009.

Note that some of the comments recorded in the column of the appraisal matrices are in abbreviated form. For further information on how scores are assigned against specific Sustainability Objectives please refer to the Significance Criteria in Appendix 6 (Part A).

The Appraisal of each policy is recorded in the matrices on the following pages (note that the text of the policy from the proposed Submission Core Strategy is included at the top of the matrices for ease of reference).

### The policies in the proposed Submission Core Strategy are:

#### Regeneration and Growth

- CP1: Spatial Development Strategy
- CP2: Population and Housing Growth
- CP3: Commercial Regeneration

#### Overall Spatial Change

- CP4: North West London Coordination Corridor
- CP5: Placemaking
- CP6: Design and Density in Place Shaping

#### Strategic Area Policies

- CP7: Wembley Growth Area
- CP8: Alperton Growth Area
- CP9: South Kilburn Growth Area
- CP10: Church End Growth Area
- CP11: Burnt Oak / Colindale Growth Area
- CP12: Park Royal
- CP13: North Circular Road Improvement Area

#### Infrastructure to Support Development

- CP14: Public Transport Improvements
- CP15: Infrastructure to Support Development

#### Strategic Borough-Wide Policies

- CP16 – Town Centres and the Sequential Approach to Development
- CP17 – Protecting and Enhancing the Suburban Character of Brent
- CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity
- CP19 – Brent Strategic Climate Mitigation and Adaptation Measures
- CP20 – Strategic and Borough Employment Areas
- CP21 – A Balanced Housing Stock
- CP22 – Sites for Nomadic Peoples
- CP23 – Protection of existing and provision of new Community and Cultural Facilities

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A matrix is included for all policies with a score provided against each of the sustainability criteria, and SA comments and proposed mitigation and enhancement provided at the sustainability objective level.



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**Note:** to avoid unnecessary repetition of specific recommendations for inclusion of mitigation and enhancement in the forthcoming Development Management Policies DPD, rather than including similar lists of recommendations under each policy, a summary list is provided in the main report Part B, Section 6.

### **Brent's Spatial Strategy: Delivering Sustainable Places Regeneration and Growth Policies (CP1-3)**

Based on initial appraisal of Core Strategy (version "Revision 2008", Word file dated 26 November 2008 - received from LBB 3 December 2008) appraised by Owen White, 12 – 19 December 2008

Reviewed by Ric Eales, 10 Feb 2009

Appraisal updated by Owen White 25 March – 1 April 2009 for changes to pre-Submission Core Strategy document, and 26 May 2009 for changes in proposed Submission Core Strategy dated June 2009.

#### **Policy CP1: Spatial Development Strategy**

Brent's strategy is to concentrate housing growth in well located areas that provide opportunities for growth, creating a sustainable quality environment that will have positive economic impacts on deprived neighbourhoods that may surround them. The key diagram sets out the growth areas and illustrates the need to provide more orbital public transport links between such areas.

Wembley will deliver the majority of the borough's development and employment growth, will contain most of the borough's new retail growth and office development, and will become the primary location for new hotels and associated uses such as conferencing. Wembley will become a cultural focus, and the borough's main area for tourism, being the location for large scale visitor attractions.

Wembley will be the preferred destination for the town centre and other uses illustrated above.

In the other four growth areas, South Kilburn, Colindale/Burnt Oak, Church End and Alperton, mixed use development will be encouraged in accordance with the place-making policies set out below.

This will be complemented by the protection and modernisation of Strategic and Borough Employment Areas for industrial and warehousing uses.

It is essential (both economically and sustainably) that local people benefit from new job creation and skills training. The council will seek training and placement opportunities from development to place local people in local jobs.

#### **Policy CP1: Spatial Development Strategy**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social	Will it reduce poverty and social exclusion, in particular in those areas most affected?	++	<b>Effects:</b> Focussing development in Growth Areas is intended to bring about regeneration in areas most in need.

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<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
exclusion	Will it improve affordability of essential services?	+	Development in line with Placemaking policies (CP5 and CP6) is likely to lead to long-term improvements in relation to poverty and social inclusion. However significant development / regeneration in specific areas may exacerbate some inequalities. Equally supporting text (paragraph 4.7) recognises that “there are other parts of the borough that are also in need of regeneration”. This may restrict the poverty and social exclusion benefits. Mixed use development and emphasis on public transport likely to improve affordability / accessibility of essential services. <b>Mitigation / Enhancement:</b> None
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	+	<b>Effects:</b> The policy seeks housing-led regeneration to enable provision of services and community facilities, including health care. Positive effects will depend on delivery of infrastructure. Where regeneration is achieved this may positively impact on health inequalities, by improving quality of life and living conditions / access to services for people in deprived areas. Major development may increase noise levels and concerns, both during construction and occupation / as a result of increased population densities and traffic. Mixed use development may lead to increased noise nuisance. <b>Mitigation / Enhancement:</b> The detailed delivery of the Spatial Development Strategy will depend on other policies in the Core Strategy, as well as the SSA DPD and the forthcoming Development Management Policies DPD and relevant SPDs. Impacts on noise will depend on the success of managing traffic and mitigating the effects of higher density and mixed use developments. This is partly dealt with by policy CP6 – Design and Density in Place Shaping and CP15 – Infrastructure to Support Development.
	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?	-	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	<b>Effects:</b> Policy specifically mentions need for skills training and training and placement opportunities. This is likely to help fill skill gaps and improve skills of the population. Aim is for housing-led regeneration to enable provision of services and community facilities, this is likely to lead to improved access to education facilities where these are enabled. However population increase (as set out in Policy CP2) will increase pressure on both existing and proposed new facilities. <b>Mitigation / Enhancement:</b> The Growth Area Policies (CP7 – CP12), Policy CP15 – Infrastructure to Support Development, and its supporting text, together with the Infrastructure and Investment Framework and the SSA DPD seek to meet current and forecast school place deficits in the Borough.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	+	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	<b>Effects:</b> Main aim is to promote housing-led, mixed-use development. Policy states that the strategy for Brent is to concentrate housing growth in “well located” areas. Positive effects are likely to be particularly concentrated therefore in these Growth Areas. Effect on homelessness is uncertain. <b>Mitigation / Enhancement:</b> Policies CP2 – Population and Housing Growth and CP21 – A Balanced Housing Stock set out the detailed policy in relation to housing provision in the Borough. This includes reference to the need for a range of dwelling types, sizes and tenure, as well as the aim to meet the London Plan target of 50% of new homes being affordable.
	Will it encourage a range of dwelling type, size and tenure?	+	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	+	
	Will it reduce homelessness?	?	
5. To reduce	Will it reduce actual levels of crime?	+	<b>Effects:</b>

<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
crime and anti-social activity	Will it reduce the fear of crime?	+	Regeneration in areas of need is likely to reduce crime and fear of crime. Where regeneration is successful these benefits may spread beyond areas of new development. <b>Mitigation / Enhancement:</b> Crime and fear of crime are not addressed specifically in any of the Core Strategy policies. Objective 12 (To Promote Healthy Living and Create a Safe and Secure Environment) does seek to embrace "a design led approach to reduce crime and fear of crime".
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	<b>Effects:</b> Effects on sense of local community, identity and welfare are difficult to predict. However, regeneration and redevelopment in Wembley and the Growth Areas may enhance the image of the Borough as a whole and increase a sense of pride in the Growth Areas in the long-term. Public realm and townscape improvements may also increase a sense of pride and a sense of place. Where housing-led development enables enhanced / increased community facilities provision, this may encourage engagement and improve ethnic relations and understanding. <b>Mitigation / Enhancement:</b> Policies CP15 – Infrastructure to Support Development and CP23 - Protection of existing and Provision of New Community and Cultural Facilities provide more detailed and specific support for community facilities and needs.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0/+	
	Will it improve understanding between different communities of their respective needs and concerns?	0/+	
	Will it encourage people to respect and value their contribution to society?	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?	+	<b>Effects:</b> Aim of housing-led development in Growth Areas is to enable the provision of key services and community facilities. A positive effect is therefore predicted in terms of investment in key community services. Growth areas are intended to have, or achieve good or very good public transport accessibility, which is likely to improve accessibility and affordability of access to key services, especially for those without access to a car. <b>Mitigation / Enhancement:</b> Policies CP15 – Infrastructure to Support Development and CP23 - Protection of existing and Provision of New Community and Cultural Facilities provide more detailed and specific support for community facilities and needs. The timing of the provision of new services needs to ensure that new facilities / services are in place before the number of residents increases. Policy CP15 requires that the Council is satisfied that the infrastructure requirements arising from development will be met "by the time it is needed".
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	+	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	-	<b>Effects:</b> The policy refers to the Core Strategy Key Diagram, emphasising in particular the need for more orbital public transport links between the Growth Areas. Supporting text states that the focus of growth is intended in areas with
	Will it increase the proportion of journeys using modes other than the car?	++	

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Policy CP1: Spatial Development Strategy			
Objective	Criteria	Score	Comments
	Will it encourage walking and cycling?	+?	<p>good or very good public transport, or where deliverable improvements can be made. This should help encourage journeys using modes other than the car.</p> <p>However the large scale of development proposed (Policy CP2) is likely to increase traffic volumes overall, and focussing the majority of development and employment growth around Wembley may generate additional travel need, especially to and around Wembley.</p> <p>Mixed use development may encourage walking and cycling, as homes and services are located close to each other, however this will depend on facilities being provided.</p> <p><b>Mitigation / Enhancement:</b> Policy CP14 – Public Transport Improvements seeks to improve public transport provision, particularly at key interchanges.</p> <p>Core Strategy Objective 8 – To Reduce the Need to Travel and Improve Transport Choices seeks to promote access by public transport, walking and cycling and improve key transport interchanges.</p> <p>It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policies to help deliver on the commitment to reduce the need to travel, the Brent Local Implementation Plan (LIP) and Air Quality Action Plan will also be key in delivering improvements.</p>
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?	?	<p><b>Effects:</b> Effects on water quality and consumption / efficiency are uncertain and will depend on the implementations of more detailed policies and guidance (e.g. Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures, and particularly policy in the forthcoming Development Management Policies DPD. Increased housing and related development, even when delivered to high environmental standards will increase net water consumption and sewage generation.</p> <p><b>Mitigation / Enhancement:</b> Supporting text to Policy CP19- Brent Strategic Climate Mitigation and Adaptation Measures promotes water efficiency and recycling. Policy CP19, which also includes the proposal for developers to prepare a Sustainability Statement, and the existing SPG on sustainable design and construction (SPG19) also supports this.</p> <p>It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policies on delivering improved water quality and water conservation.</p>
	Will it reduce water consumption and improve water efficiency?	-	
10. To improve air quality	Will it improve air quality?	-/+	<p><b>Effects:</b> Supporting text (paragraph 4.6) states that generally Growth Areas are in areas with good access to existing forms of public transport or where improvements are planned. This may help minimise negative air quality effects, where car use is reduced. Positive effects would depend on there being a modal shift away from car use. However construction of new developments will generate air pollution, and increased population implied is likely to generate additional traffic, leading to increased emissions of key air pollutants.</p> <p>See Objective 8.</p> <p><b>Mitigation / Enhancement:</b> There is no specific policy text in the Core Strategy relating to improving air quality. Supporting text to CP19 – Brent Strategic Climate Mitigation and Adaptation Measures refers to the Brent Air Quality Action Plan (2005-2010), and the policy itself requires major developments in AQMAs to produce a sustainability statement.</p> <p>It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policies on delivering improved air quality. The Brent Local Implementation Plan may also be key in delivering improvements.</p>
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	+	

<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
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?	?	<b>Effects:</b> Direct effects are uncertain. Large scale development may lead to the loss of some habitat / biodiversity value, especially on brownfield land. <b>Mitigation / Enhancement:</b> CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity, seeks to protect and enhance open spaces.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	?	
	Will it conserve and enhance sites designated for their nature conservation interest?	?	
	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	
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?	+/?	<b>Effects:</b> Regeneration in Growth Areas should lead to improvements in townscape in these areas. Although there is no explicit mention of views, development at Wembley may provide opportunities to create / enhance views. <b>Mitigation / Enhancement:</b> Policies CP5 – Placemaking, CP6 – Design and Density in Place Shaping, CP15 – Infrastructure to Support Development and the Growth Area policies (CP7 – CP12) seek to provide more detail on enhancing landscape and townscape. It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policies.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	+/?	
	Will it decrease litter in urban areas and open spaces?	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/+?	<b>Effects:</b> No specific mention in Policy CP1 or supporting text of Conservation Areas, listed buildings or archaeological features. Direct effects unclear due to the strategic nature of this policy. Focussing development in Growth Areas, which are generally outside of the Conservation Areas (except South Kilburn) may reduce pressure on sites and features elsewhere. <b>Mitigation / Enhancement:</b> Supporting text to Policy CP5 – Placemaking recognises that existing historical assets are important in deriving a sense of place and identity. It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policies on conserving and enhancing the historic and cultural environment.
	Will it protect listed buildings and their settings?	0/+?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
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?	-	<b>Effects:</b> Direct effects uncertain as will depend on the delivery of policies elsewhere in the Core Strategy. Growth Area focussed development may offer some opportunities to minimise increases in greenhouse gas emissions, particularly where modal shift to public transport, walking and cycling is encouraged. However new development, will increase energy consumption and emissions, and travel need generated by additional population and commercial activity is likely to exacerbate this effect. An overall increase in greenhouse gas emissions is therefore predicted. Increased development may increase the number of people and properties at risk of flooding and storm events. Renewable energy is not mentioned in policy CP1. <b>Mitigation / Enhancement:</b> Flood risk and climate change adaptation measures are included in Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. Policy CP19 also includes the proposal for developers to prepare a Sustainability Statement, and the existing SPG on sustainable design and construction (SPG19) also supports this.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	?	
	Will it help reduce the impact of increased urban temperatures on people and property?	?	

<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	<p><b>Effects:</b> Increased development in the Growth Areas (and associated population – see appraisal of CP2 below) will increase consumption of materials and increase waste arising, both during construction and in habitation / use. Direct effects uncertain as Policy CP1 does not explicitly mention or seek to address waste / materials issues, and effects will depend on policies elsewhere in the Core Strategy and the forthcoming Development Management Policies DPD.</p> <p><b>Mitigation / Enhancement:</b> Requirement for developers to prepare a Sustainability Statement (Policy CP19) should support waste minimisation in the construction industry. It is recommended that policies in the forthcoming Development Management Policies DPD should also support waste minimisation, recycling and the use of renewable materials.</p>
	Will it reduce household waste?	-	
	Will it increase waste recovery and recycling and improve facilities?	?	
	Will it reduce hazardous waste?	?	
	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?	+	<p><b>Effects:</b> Supporting text (paragraph 4.4) states that the strategy “exploits a direct relationship between brownfield land, public transport and density”. Focus on Growth Areas aims to minimise use of Greenfield land. The protection and modernisation of industrial land is likely to require remediation of contaminated land. Soil loss, subsidence and heave are not mentioned in Policy CP1 or supporting text.</p> <p><b>Mitigation / Enhancement:</b> National and London (the London Plan) level policy requires the maximisation of development on previously used land, and sets targets in this regard. Growth Area policies (CP7 – CP12) seek to maximise development on brownfield land.</p>
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure contaminated land is remediated as appropriate?	+	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	?	
	Will it reduce the risk of subsidence and heave?	?	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+?	<p><b>Effects:</b> Regeneration and the protection and modernisation of employment areas, and policy text seeking to ensure skills development and placement opportunities for local people should have a positive effect on economic growth. They are also likely to enhance the image of the Borough as a business location. Mixed use development may provide opportunities for start-ups.</p> <p><b>Mitigation / Enhancement:</b> Policy CP20 – Strategic and Borough Employment Areas provides more detailed implementation, including requirement for “starter” and “move-on” units. It is recommended that the forthcoming Development Management Policies DPD should include more specific policy.</p>
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	+?	
	Will it promote growth in key clusters?	+?	
	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?	+	<p><b>Effects:</b> Protection and modernisation of employment areas and emphasis on ensuring that local people benefit from new job creation is likely to have significant positive effect on employment in the Borough. Skills training and placement opportunities should help benefits to be felt in the long-term and help those most in need of employment.</p> <p><b>Mitigation / Enhancement:</b> Policy CP20 – Strategic and Borough Employment Areas seeks the protection and regeneration of employment locations and premises in the Borough.</p>
	Will it provide job opportunities for those most in need of employment?	++	
	Will it help to improve earnings?	+	



<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<p><b>Effects:</b> Key aim of Policy CP1 is to set out the Borough's preferred spatial strategy for regeneration in the Borough, with an emphasis on Growth Areas. As these are in some of the most deprived areas of the Borough, disparities are likely, in the long-term to be reduced.</p> <p><b>Mitigation / Enhancement:</b> The Growth Area policies (CP7 – CP12) include more detailed implementation in relation to area specific regeneration. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed promotion of regeneration.</p>
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	<p><b>Effects:</b> Regeneration and the protection and modernisation of employment areas are likely to require inward investment. Where skills training and placement opportunities encourage local people into new employment areas and to develop new skills there may be long-term benefits in terms of indigenous business.</p> <p><b>Mitigation / Enhancement:</b> Policy CP20 – Strategic and Borough Employment Areas seeks the protection and regeneration of employment locations and premises in the Borough.</p>
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	+	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-/+	<p><b>Effects:</b> Encouraging development in locations with good public transport accessibility is a key aim of Policy CP1. The Core Strategy key diagram, referred to in Policy CP1 also illustrates the need to provide more orbital public transport links between the Growth Areas. This is likely to significantly improve accessibility. However improved accessibility, and significant development at Wembley in particular may encourage cross-Borough commuting as well as commuting from outside the Borough. Support for skills, training and placement opportunities may help reduce out-commuting by providing people with the opportunity to work within the Borough.</p> <p><b>Mitigation / Enhancement:</b> Policy CP14 – Public Transport Improvements and CP15 – Infrastructure to Support Development seek to improve transport infrastructure, in particular public transport, walking and cycling. The Brent Local Implementation Plan will also be key in delivering transport improvements. Policy CP20 - Strategic and Borough Employment Areas encourages the maximisation of freight transport by rail and water.</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?	++	
	Will it encourage rail and water based freight movement?	?	
<p><b>Key:</b> Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: -/+</p>			
<p><b>Overall Summary</b></p> <p><b>Effects:</b></p> <p>The Spatial Development Strategy is generally predicted to have positive effects on the sustainability criteria. As Policy CP1 sets out the high-level spatial approach to development in the Borough, effects will depend on the implementation of other policies in the plan.</p> <p>However, locating development in areas in need of regeneration, and in locations with generally good public transport accessibility are likely to lead to significant social and economic benefits, especially in terms of reducing inequalities and 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, broader sustainability, health and environmental benefits are likely.</p> <p>Protection and enhancement of employment areas is likely to have benefits for the local economy. The inclusion of policy text to strongly encourage employment opportunities which benefit local people, together with training and skills development and placement opportunities are considered very positive in both economic and social terms. In the long-term, this might also reduce current high levels of out-commuting to other Boroughs for work, which will lead to benefits in terms of reducing congestion and related pollution and disruption.</p> <p>No major negative effects are expected. However, some negative effects include potential increased noise pollution from increased development and density, increased traffic and congestion due to significant development at Wembley, increased greenhouse gas emissions, the potential for increased flood risk to people and property, and also that scale of new development proposed will increase resource use and waste generation.</p>			



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<b>Policy CP1: Spatial Development Strategy</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Mitigation / Enhancement:</b>			
As noted above, due to the nature of Policy CP1 the scale of effects predicted will depend on the implementation of other policies in the Core Strategy, the SSA DPD and the forthcoming Development Management Policies DPD. Mitigation and enhancement comments identify areas where the forthcoming Development Management Policies DPD, and other policy documents such as the Local Implementation Plan, Brent Air Quality Action Plan and existing SPG / SPDs, should include requirements which will help avoid or mitigate negative effects or help deliver enhancements.			
More specific comments include:			
<ul style="list-style-type: none"> <li>• It is recommended that the forthcoming Development Management Policies DPD should provide more detailed policy to<sup>2</sup>:           <ul style="list-style-type: none"> <li>○ help deliver on the commitment to reduce the need to travel;</li> <li>○ deliver improved water quality and conservation / efficiency;</li> <li>○ set out how development can help improve air quality;</li> <li>○ seek to enhance the quality of landscape, townscape and the public realm;</li> <li>○ conserve and enhance the built historic and cultural environment;</li> <li>○ support waste minimisation, recycling and the use of renewable materials;</li> <li>○ ensure economic development and employment / business opportunities are accessible to local people; and,</li> <li>○ promote regeneration and reduce disparities.</li> </ul> </li> </ul>			

<b>Policy CP2: Population and Housing Growth</b>		
<p>The Borough will plan for sustainable population growth of up to 28,000 people by 2017. The provision of at least 22000 additional homes (including 1,030 re-occupied vacant homes) will be delivered between 2007 and 2026 (including over 11,200 homes to 2016/17). The Borough will aim to achieve the London Plan target that 50% of new homes should be affordable. Over 85% of the new homes will be delivered in the growth areas with the following minimum targets:</p>		
	<b>2007 – 2016</b>	<b>2017 - 2026</b>
Wembley	5000	6500
Alperton	1500	100
Burnt Oak/Colindale	1400	1100
Church End	700	100
South Kilburn	1400	1000
Rest of borough	2050	360
<p>The Council will also promote additional housing as part of mixed use development in town centres where public transport access is good.</p>		
<p><b>Appraisers note:</b> This policy sets out targets for population and housing. The potential effects of population growth are recognised in the supporting text, and the magnitude / nature of these effects will be dictated by the detailed implementation and controls / standards placed upon them – which is set out in policies throughout the Core Strategy and should be included in the forthcoming Development Management Policies DPD.</p> <p>However, this policy has been appraised based on the sustainability implications of these growth proposals. In essence this policy is appraised 'stand-alone', but with awareness of the broader issues tackled by the supporting text and detailed policies throughout the Core Strategy, as growth on the proposed scale will impose sustainability pressures as well as delivering benefits.</p>		

<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	++	<b>Effects:</b> The key focus of the policy is growth, to be delivered in the Growth Areas. These areas (aside Wembley/Park Royal) have been chosen as "priority areas for physical and social renewal" (paragraph 4.14). Supporting text sets out that increase provision of services
	Will it improve affordability of essential services?	+	

<sup>2</sup> To avoid unnecessary repetition of these specific recommendations for inclusion in the forthcoming Development Management Policies DPD, a summary list is provided in the main report Part B, Section 6.

<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			will be required, which may improve affordability. <b>Mitigation / Enhancement:</b> The Growth Area policies (CP7 – CP12) set out in greater detail how development is to be achieved in each Growth Area, together with infrastructure targets, which are expanded upon in the Infrastructure and Brent Investment Framework (IIF). In addition CP15 – Infrastructure to Support Development and CP23 – Protection of existing and Provision of New Community and Cultural Facilities, seek to ensure adequate provision of facilities, and the promotion of regeneration. The Core Strategy is supported by an Infrastructure and Investment Framework (IIF) providing more detail on infrastructure provision in the Growth Areas. The SSA DPD and the forthcoming Development Management Policies DPD should also support the provision of infrastructure in relation to development.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	<b>+?</b>	<b>Effects:</b> Focussing growth in a small number of relatively accessible locations is predicted to have a positive effect on health inequalities, particularly in the long-term. Facilities and infrastructure are to be provided as part of growth and regeneration, however positive effects are dependent on provision of facilities which more than just meet the increase demand implied by growth on the scale expected, due to current deficit of facilities and health issues in areas of deprivation, for example. Potential minor negative effects are predicted in relation to noise concerns, due to increased population density and traffic. The focus of growth at Wembley could be a source of major noise pollution due to traffic generation associated with a regional centre (even given focus on public transport improvements) as well as specific noise nuisance associated with the use of the stadium and other leisure facilities. <b>Mitigation / Enhancement:</b> See under Objective 1, above. Infrastructure targets within the Growth Areas include health facilities, open space and sport facilities.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	<b>0</b>	
	Will it reduce health inequalities?	<b>+</b>	
	Will it improve physical and mental health?	<b>+?</b>	
	Will it reduce noise levels and concerns?	<b>-</b>	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	<b>0</b>	<b>Effects:</b> Supporting text explicitly seeks to address the need to meet increasing demands on education. However the scale of new demand is likely to be very significant over the plan period, and the timing, location and nature of provision will affect access. Provision of facilities will not in itself necessarily improve qualifications and skills. <b>Mitigation / Enhancement:</b> The Growth Area policies (CP7 – 12) include infrastructure targets relating to education provision which is intended to meet expected deficits at both primary and secondary levels. The Core Strategy is supported by an Infrastructure and Investment Framework providing more detail on infrastructure provision in the Growth Areas. The SSA DPD includes proposed allocations which seek to provide expansion of existing and development of new schools.
	Will it improve access to high quality educational facilities?	<b>+?</b>	
	Will it help fill key skill gaps?	<b>+?</b>	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	<b>++</b>	<b>Effects:</b> The policy's key aim is the provision of new homes, including the achievement of a target of 50% affordable housing. The inclusion of a target to re-occupy vacant homes is also welcome, and this may help to reduce the number of unfit homes in the Borough. However there is some risk that regeneration may increase the ratio of house prices to earnings more generally (across borough, and in specific locations) which may exacerbate affordability problems. Successful delivery of mix of housing sizes to cater for families / larger households will be critical. <b>Mitigation / Enhancement:</b> The intentions of the Mayor of London to amend London
	Will it encourage a range of dwelling type, size and tenure?	<b>++</b>	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	<b>+</b>	
	Will it reduce homelessness?	<b>+?</b>	

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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			Plan policy relating to affordable homes may lead to changes in the proportion of affordable homes to be provided in Brent, however the detail of these changes are not yet known. Implementation details are provided in the Growth Area policies (CP7 – CP12), Policy CP21 – A Balanced Housing Stock, and the SSA DPD proposed allocations. It is recommended that the forthcoming development Management policies DPD should also support the provision of a balanced housing stock.
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	?	<b>Effects:</b> Overall effects are uncertain. Crime and fear of crime reduction depends on design and long-term improvements in quality of life and reductions in disparities and exclusion. The increase in population and growth per se will not directly affect actual or fear of crime, and the relationship between increasing density of housing and crime / fear of crime are complex. <b>Mitigation / Enhancement:</b> Crime and fear of crime are not addressed specifically in any of the Core Strategy policies. Objective 12 (To Promote Healthy Living and Create a Safe and Secure Environment) does seek to embrace “a design led approach to reduce crime and fear of crime”. It is recommended that the forthcoming Development Management Policies DPD should include more detailed policy in relation to security by design.
	Will it reduce the fear of crime?	?	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	<b>Effects:</b> Improvements to deprived areas likely to enhance pride in these areas. However other possible effects are very much dependent on the nature of communities and development which actually occurs. Influx of new population may create, rather than ease tensions, if not managed sensitively. <b>Mitigation / Enhancement:</b> It is important to focus on the creation of communities – looking beyond the physical construction of homes and facilities and including local people in decision making and planning. Opportunities for involving the local community in the delivery of growth in the Borough should be incorporated into the implementation of the Core Strategy. Implementation details are included in the Growth Area policies (CP7 – CP12) and it is recommended further detailed policy should be included in the forthcoming Development Management Policies DPD.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
Will it encourage people to respect and value their contribution to society?	+		
7. To improve accessibility to key services especially for those most in need	Will it improve the level of investment in key community services?	+	<b>Effects:</b> Focussing development in areas with generally good public transport accessibility together with transport infrastructure and provision improvements, should increase ease of access to key local services, however population increase on the scale proposed will increase demand pressures on existing services. See also Objective 1 above. <b>Mitigation / Enhancement:</b> It is very important that facilities are provided to at least cater for, if not exceed expected increased demand for services and amenities and are provided in time for the population growth. The Growth Area policies (CP7 – CP12) include greater detail on implementation in each Growth Area. Policy CP23 – Protection of existing and Provision of New Community and Cultural Facilities seeks to ensure provision of community facilities. The Core Strategy is supported by an Infrastructure and Investment Framework providing more detail on infrastructure provision in the Growth Areas, including transport provision.
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	+	
<b>Environmental</b>			
8. To reduce the effect of traffic on the	Will it reduce traffic volumes and congestion?	-/--	<b>Effects:</b> In spite of Growth Areas being in areas with relatively good public transport access, proposed public transport
	Will it increase the proportion of	+/-	

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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
environment	journeys using modes other than the car?		improvements and the location of services close to population centres, the level of population growth / development expected is likely to overall increase the levels of traffic in the borough. Construction traffic required to bring about development on scale proposed could have significant temporary impacts at specific locations over the cause of the implementation of the Core Strategy. <b>Mitigation / Enhancement:</b> The only way to avoid such impacts would be to limit growth, but this is not possible given the London Plan context. Implementation details are / should be included in the Growth Area policies (CP7 – CP12) the forthcoming Development Management Policies DPD and the Infrastructure and Investment Framework.
	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?	-?	<b>Effects:</b> The scale of population growth expected will inevitably increase pressure on water resources regardless of efforts to minimise that increase through conservation. Detailed controls should protect the water environment from pollution – regeneration proposals may provide opportunities to enhance riparian / canal side areas, such as development adjacent to the Grand Union canal in Alperton. <b>Mitigation / Enhancement:</b> Supporting text to Policy CP19- Brent Strategic Climate Mitigation and Adaptation Measures promotes water efficiency and recycling. Policy CP18, which also includes the proposal for developers to prepare a Sustainability Statement, and the existing SPG on sustainable design and construction should also support this. SSA DPD proposed allocations in the Alperton Growth Area seek to enhance the canal side setting. The forthcoming Development Management Policies DPD should also include more detailed policies on delivering improved water quality, efficiency and water conservation, as well as enhancing riparian areas throughout the borough.
	Will it reduce water consumption and improve water efficiency?	-	
10. To improve air quality	Will it improve air quality?	--	<b>Effects:</b> See Objective 8. Increased population, increased traffic volumes and construction in the borough are all likely to impact negatively on air quality both in the short and long term, even where efforts are made to minimise this impact through promoting public transport etc. <b>Mitigation / Enhancement:</b> The Growth Area policies seek to promote growth in areas of good public transport accessibility and seek to reduce the need to travel etc, but there is still likely to be a significant increase in traffic and emissions. The only way to avoid such impacts would be to limit growth, but this is not possible given the London Plan context. The Brent Local Implementation Plan and Air Quality Action Plan will be key in delivering improvements.
	Will it help achieve the objectives of the Air Quality Management Plan?	--	
	Will it reduce emissions of key pollutants?	--	
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?	+/-	<b>Effects:</b> There is the potential for some positive effects realised through development proposals e.g. habitat creation, tree planting. However the level of growth proposed also has the potential to cause negative effects on biodiversity, including direct loss of sites / features, habitat fragmentation, disturbance etc. Given the focus on brownfield sites, this could in particular result in loss / damage to species and habitats that have colonised these areas. <b>Mitigation / Enhancement:</b> Protection and enhancement of biodiversity are covered in Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity. It is recommended that the forthcoming Development
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0/-?	
	Will it conserve and enhance sites designated for their nature conservation interest?	-?	
	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	0	

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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	biodiversity value?		Management Policies DPD should provide further policy in this area. The Local Biodiversity Action Plan (BAP) and Mayors Biodiversity Strategy provide further details on implementation and priorities.
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?	-?	<p><b>Effects:</b> The Growth Areas are generally considered priority areas for physical renewal, so development should enhance the quality of townscape and the public realm. The design of development, and any enhancement measures that could be delivered via development, are not covered by this policy. Positive effects can be delivered through development proposals e.g. landscape and public realm enhancement, open space creation, tree planting etc. However the level of growth also has the potential to cause negative effects on landscape and townscape depending on its location, design etc. Although the borough has no strategic views, development on scale proposed may have impact on local skylines / views etc.</p> <p><b>Mitigation / Enhancement:</b> One of the key aims of the Core Strategy, and in particular the Growth Area Policies (CP7 – CP12) and policy CP15 – Infrastructure to Support Development is to use development and growth to enable the enhancement of public realm, townscape and provision of services and amenities. The Placemaking and Design and Density in Place Shaping (CP5 and CP6) policies also seek to improve townscape and public realm. It is recommended that the forthcoming Development Management Policies DPD will also need to adequately address the enhancement landscape / townscape quality. It will be important to consider the impact, as part of implementation of the policy, on skylines and views and this should also be covered in the forthcoming Development Management Policies DPD.</p>
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it protect and enhance local distinctiveness and sense of place?	+/-	
	Will it minimise visual intrusion and protect views?	-?	
	Will it decrease litter in urban areas and open spaces?	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?	+/-?	<p><b>Effects:</b> No explicit reference to Conservation Areas, cultural and historic values. Scale of growth / development proposed has the potentially to negatively effect the historic environment, but focus on the Growth Areas means the areas of greatest interest are mainly avoided. Impact on specific buildings and sites is uncertain given the strategic nature of this policy.</p> <p><b>Mitigation / Enhancement:</b> Policy CP17 - Protecting and Enhancing the suburban Character of Brent seeks to protect Conservation Areas, as well as listed buildings and monuments. The forthcoming Development Management Policies DPD should also provide implementation details.</p>
	Will it protect listed buildings and their settings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
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?	--	<p><b>Effects:</b> Welcome reference in supporting text to the environmental implications of increased population. Increased construction, population and associated consumption activities and traffic are all likely to increase the Boroughs overall consumption of energy and emissions of greenhouse gases, regardless of mitigation provided by other policies. Given the level of development and even with incorporation of sustainable drainage systems etc, it is likely that there will be a net increase in run-off etc and therefore an increase in flood risk.</p> <p><b>Mitigation / Enhancement:</b> The only way to avoid such impacts would be to limit growth, but this is not possible given the London Plan context. Policy CP19 - Brent Strategic Climate Mitigation and Adaptation Measures, requires major developments to meet the renewable energy requirement relevant at the time of development. CP18 also requires major developments to</p>
	Will it lead to an increased proportion of energy needs being met from renewable sources?	-	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	?	
	Will it help reduce the impact of increased urban temperatures on people and property?	?	



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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			prepare a Sustainability Strategy. CP19 and implementation of policies elsewhere in the Core Strategy, including the Growth Area Policies (CP7 – CP12), CP5 – Placemaking and CP6 – Design and Density in Place Shaping, will help partly mitigate the effects, by for example promoting public transport, building in resilience to increased flood risk and storminess under climate change, requiring Flood Risk Assessments to provide better information on the risk associated with individual sites and suitable mitigation e.g. SUDS. The existing Brent SPG on sustainable design and construction (SPG19) will also support this.
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	--	<p><b>Effects:</b>            Focussed development / growth may offer opportunities to enhance / provide dedicated facilities for waste recovery and recycling. However, increased construction, population and associated consumption activities are all likely to increase the Boroughs overall use of resources and generation of waste, regardless of mitigation implied by other policies.            Waste recovery / recycling may increase but as a result of increased waste generation. New development could incorporate improved waste recycling facilities, particularly flats etc.            Growth on the scale proposed is likely to generate significant construction and demolition waste.  <b>Mitigation / Enhancement:</b>            The only way to avoid such impacts would be to limit growth, but this is not possible given the London Plan context.            Implementation of other policies in the Core Strategy (e.g. CP5, CP6 and CP19), as well as the Growth Area Policies CP7 – CP12) will partly mitigate the effects, by for example promoting waste minimisation and use of sustainable materials.            The existing Brent SPG on sustainable design and construction (SPG19) will also support this.</p>
	Will it reduce household waste?	--	
	Will it increase waste recovery and recycling and improve facilities?	+?	
	Will it reduce hazardous waste?	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?	+	<p><b>Effects:</b>            The focus of the overall strategy is to be on redevelopment of previously developed / brownfield land. However development on scale required could increase pressure on greenfield sites, although the London Housing Capacity Study indicates level of growth proposed can be accommodated (but not higher levels).            Impact on soils and remediation uncertain – but the latter is covered elsewhere in the strategy.  <b>Mitigation / Enhancement:</b>            No explicit mention that development should be only on or mostly on previously developed / brownfield land. National and London (the London Plan) level policy requires the maximisation of development on previously used land, and sets targets in this regard.            The Growth Area policies and Policy CP1 – Spatial Development Strategy include reference to development on previously developed / brownfield land. The SSA DPD proposed allocations identify previously developed and brownfield sites in almost all cases. Where remediation of previously contaminated land is likely this is also recognised.            Supporting text to Policy CP18 – Brent Strategic Climate Mitigation and Adaptation Measures refers to the need to seek the remediation and re-use of contaminated land.            The potential for increased risk of subsidence under climate change could be dealt with by the forthcoming Development Management Policies DPD and an updated SPD on sustainable construction and design.</p>
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	
	Will it ensure contaminated land is remediated as appropriate?	?	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	?	
	Will it reduce the risk of subsidence and heave?	-?	
<b>Economic</b>			
17. To encourage sustainable economic	Will it encourage new business start-ups and opportunities for local people?	+	<p><b>Effects:</b>            Core aim of the policy / overall strategy is to use growth / housing development to promote regeneration with</p>
	Will it improve business development	+	

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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
growth	and enhance productivity?		proposed population increase of 28,000 people. Likely to lead to cascading of economic benefits. However positive effects will depend on detail of implementation. <b>Mitigation / Enhancement:</b> Policy CP2 is concerned with the overall level of growth in terms of population and housing. The local economy and commercial regeneration are addressed by policies CP3 – Commercial Regeneration and CP20 – Strategic and Borough Employment Areas.
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	
	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?	+	<b>Effects:</b> See above under objective 17 <b>Mitigation / Enhancement:</b> Policy CP1 – Spatial Development Strategy explicitly seeks to ensure that employment opportunities are suitable and available to local people. This is welcomed.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to improve earnings?	+	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<b>Effects:</b> Key aim of policy (see above under objective 17 and 18). <b>Mitigation / Enhancement:</b> Specific implementation details are provided in the Growth Area Policies (CP7 – CP12).
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	<b>Effects:</b> Development should provide opportunities for local construction companies and builders. Inward investment is likely to be promoted by the scale of growth and stimulate land / property available for business development. However, the current economic climate represents a risk to the development and investment proposed, and may limit the amount of inward investment coming forward. <b>Mitigation / Enhancement:</b> Implementation details are covered in other policies in the Core Strategy, in particular, the Growth Area policies (CP7 – CP12), CP3 – Commercial Regeneration and CP20 – Strategic and Borough Employment Areas. The SSA DPD proposed allocations seek to identify sites suitable for business and industrial development. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	+	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	<b>Effects:</b> Positive effect on commuting due to location of Growth Areas in areas with good public transport accessibility and plans to locate development of housing close to employment and services. However, increased population in Borough likely to lead to increase in commuting from / to Brent and, where additional journeys to work are made by car this will lead to increased congestion. <b>Mitigation / Enhancement:</b> The Growth Area policies (CP7 – CP12), CP14 – Public Transport Improvements, and CP15 – Infrastructure to Support Development provide implementation details. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	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	
<b>Key:</b> Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: +/-			
<b>Overall Summary</b>			
<b>Effects:</b> Focussing growth in areas of relatively good public transport accessibility and in need of regeneration is beneficial in terms of sustainability and the policy is generally predicted to have positive effects on social and economic criteria as a result. The policy's key aim is the provision of new homes, including the achievement of a target of 50% affordable housing, which is predicted to have major positive effects on the supply of affordable homes and providing everybody with the opportunity to live in a decent home. However, there are a number of major negative environmental effects predicted. This is due to the implications of construction, population increase and the associated consumption of materials, travel needs, waste, water, air pollution and energy requirements / creation this implies. This is likely to be the case regardless of mitigation through other policies, although the magnitude of the effects could be reduced. It is welcomed that this factor is recognised in the supporting text.			



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<b>Policy CP2: Population and Housing Growth</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			<p>The level of provision of additional homes is largely dictated by the London Plan and therefore the opportunity to avoid some negative effects, particularly some of the environmental effects, are not open to the Borough. Therefore the only option available is to try to mitigate these negative effects as far as possible.</p> <p>Positive effects predicted under social objectives are dependant on regeneration impacts being suitable and accessible to local people. It is also important that development at local level, particularly in areas currently relatively deprived, does not lead to new housing / opportunities unsuitable for existing residents – which may in long term increase current disparities rather than ease them.</p> <p><b>Mitigation / Enhancement:</b></p> <p>The only way to avoid negative effects predicted would be to limit the scale of growth. However this is not possible given London Plan context.</p> <p>The main 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, and the forthcoming Development Management Policies DPD and SPDs. 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>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 the proposed development will be critical to both manage negative effects during construction, including the cumulative effects such as noise and dust on local people of several 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>

<b>Policy CP3: Commercial Regeneration</b>
<p><b>Park Royal, Staples Corner, Wembley/Neasden and East Lane will be promoted as strategic industrial/ business locations where redevelopment for incompatible uses will be resisted, new sustainable development for business and industry will be encouraged, and investment in new infrastructure, such as transport improvements will be secured.</b></p> <p><b>Purpose built development not ancillary to warehousing and industrial uses will be directed in the first instance to Wembley and First Central at Park Royal.</b></p> <p><b>Brent will target 10,000 new jobs in the Wembley Growth Area to 2026 and contribute around 40% of (based on the proportion of the estate within the borough) the 11,000 jobs target in the whole of Park Royal over a thirty year period.</b></p>

<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Social</b>			
1. To reduce poverty and social exclusion	<p>Will it reduce poverty and social exclusion, in particular in those areas most affected?</p> <p>Will it improve affordability of essential services?</p>	<p><b>+</b></p> <p><b>0</b></p>	<p><b>Effects:</b></p> <p>The aim of the policy is to promote and protect certain strategic industrial / business locations, encourage redevelopment, investment and employment generation. Therefore this policy is likely to have a positive effect on reducing poverty and social exclusion within the Borough. However, opportunities will need to be suitable and accessible to local people.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Implementation is covered in other policies in the Core Strategy. CP1 – Spatial Development Strategy includes text encouraging local skills development and training, as well as placement schemes to help ensure local people benefit from job opportunities. Policy CP20 – Strategic and Borough Employment Areas sets of specific policy in relation to industrial areas. It is recommended that the forthcoming Development Management Policies DPD should also provide implementation detail.</p>
2. To improve the health and	Will it improve access to high quality health care?	<b>0</b>	<p><b>Effects:</b></p> <p>Limited positive effect on health, although health will be</p>

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<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
wellbeing of the population	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	improved through alleviation of deprivation through regeneration, employment etc. Significance uncertain. Increased business activity, development and construction will all potentially create noise pollution and ongoing risk of increased noise nuisance. <b>Mitigation / Enhancement:</b> See Objective 1. Although not explicitly mentioned, noise concerns should be partially addressed by CP6 – Design and Density in Place Shaping. It is recommended that the forthcoming Development Management Policies DPD should also provide implementation detail.
	Will it reduce health inequalities?	+?	
	Will it improve physical and mental health?	+?	
	Will it reduce noise levels and concerns?	-	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	<b>Effects:</b> See Objective 1. Explicit mention in supporting text of use of S106 agreements to provide training for local people, and to encourage links between schools / further education establishments and local businesses, to improve job prospects is very positive. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	+	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	<b>Effects:</b> No significant effects identified. Possible indirect positive effect on crime through reduced poverty and social exclusion (see Objective 1). <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> See Objective 1. Where social exclusion is reduced and opportunities provided for local people, a sense of pride and engagement in the local area may be developed. Where long-term unemployed are enabled back into work, may encourage greater appreciation of value of their contribution to society. These positive effects are however uncertain. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it foster a sense of pride in local area?	+?	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+?	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	-	<b>Effects:</b> The development of new employment / business is likely to increase net travel / number of journeys, even where effort is made to improve public transport provision. This may be mitigated to some extent by reducing out-commuting to
	Will it increase the proportion of journeys using modes other than the car?	+/-	

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<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it encourage walking and cycling?	?	adjacent boroughs, particularly where opportunities are suitable and accessible to local people. Supporting text seeking to link expansion of job opportunities to employment growth will also help support this. The development of distribution businesses may be particularly detrimental to reducing the effects of traffic, as these are likely to rely on van / lorry transport. <b>Mitigation / Enhancement:</b> Implementation details are covered in other policies in the Core Strategy, in particular CP14 – Public Transport Improvements, CP15 – Infrastructure to Support Development and CP20 – Strategic and Borough Employment Areas. It is recommended that the forthcoming Development Management Policies DPD should also provide implementation details. Overall level of traffic will also depend on the success of other initiatives and strategies (e.g. the Brent Air Quality Action Plan and Local Implementation Plan) in the future to reduce traffic.
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?	-	<b>Effects:</b> Will depend largely on the nature of business which is developed. As with Objective 8 above, the business and industrial development proposed will lead to a net increase in water consumption in the Borough. In addition to water consumption, development at specific locations could potentially lead to additional run off and pollution risk. There is some uncertainty over the significance of the potentially effects on water quality given the strategic nature of the Spatial Strategy. Redevelopment of contaminated sites could also provide an opportunity to remediate sites and reduce the pollution risk. <b>Mitigation / Enhancement:</b> Implementation detail is covered in other policies in the Core Strategy, in particular CP6 – Design and Density in Place Shaping and CP15 – Infrastructure to Support Development. It is recommended that the forthcoming Development Management Policies DPD should also provide implementation detail.
	Will it reduce water consumption and improve water efficiency?	-	
10. To improve air quality	Will it improve air quality?	-	<b>Effects:</b> Development at specific locations likely to lead to environmental pressures – see Objective 8. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	
	Will it reduce emissions of key pollutants?	-	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> The development / enhancement of industrial and employment sites should seek to maximise tree planting and habitat creation.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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	<b>Effects:</b> Limited and uncertain positive effects predicted. Regeneration of business / industrial sites could lead to improvement to their local environment, however significance uncertain. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+?	
	Will it protect and enhance local distinctiveness and sense of place?	0	

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<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it minimise visual intrusion and protect views?	?	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> Overall the policy is predicted to have limited significant effects against this objective. The impact on the historic environment is likely to be determined by the implementation of more detailed policies elsewhere in the Core Strategy. <b>Mitigation / Enhancement:</b> It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed policy in relation to the historic environment and cultural assets.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	-	<b>Effects:</b> Increased commercial activity is likely to increase energy consumption and greenhouse gas emissions. For example, air conditioning use is likely to rise with new development, and transport based emissions will rise where distribution industry expands. Areas of Park Royal, Wembley and Neasden are in flood risk zones 2 and 3. In addition, extra run-off could increase flood risk. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	0	
	Will it help reduce the impact of increased urban temperatures on people and property?	0	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	<b>Effects:</b> Expanded commercial activity, and construction associated with regeneration will increase overall the consumption of materials and resources, regardless of mitigation action / controls. <b>Mitigation / Enhancement:</b> Implementation of other policies in the Core Strategy (e.g. CP5, CP6 and CP19) will partly mitigate these effects, by for example promoting waste minimisation and use of sustainable materials. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	?	
	Will it reduce hazardous waste?	?	
	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?	+	<b>Effects:</b> Development will be largely / entirely on previously developed land and should ease pressure on open / greenspace elsewhere. Regeneration in employment areas / on historic industrial land should provide opportunities to remediate possible contamination. <b>Mitigation / Enhancement:</b> Supporting text to Policy CP20 – Brent Strategic Climate Mitigation and Adaptation Measures refers to the need to seek the remediation and re-use of contaminated land. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure contaminated land is remediated as appropriate?	+	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	++	<b>Effects:</b> The aim of the policy is to promote and protect certain strategic industrial / business locations, encourage redevelopment, investment and employment generation. Therefore this policy should have a major positive effect on promoting economic growth in the Borough. However, opportunities will need to be suitable and accessible to local people.
	Will it improve business development and enhance productivity?	++	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	

<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it enhance the image of the area as a business location?	++	<b>Mitigation / Enhancement:</b> Some mention could be made of the need for long-term investments which ensure employment opportunities are durable. Implementation detail is provided in other policies in the Core Strategy, in particular CP1 – Spatial Development Strategy, the Growth Area policies (CP7 – CP12) and CP20 – Strategic and Borough Employment Areas. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation detail.
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	++	<b>Effects:</b> See Objective 17. It is difficult to predict impact earnings and therefore this remains uncertain. <b>Mitigation / Enhancement:</b> Policy CP1 – Spatial Development Strategy explicitly seeks skills enhancement, training and job placements to provide employment opportunities for local people. See Objective 17.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to improve earnings?	+?	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<b>Effects:</b> Reducing disparities in economic performance and promoting regeneration is one of the key aims of the policy and therefore a major positive effect is predicted under this objective <b>Mitigation / Enhancement:</b> See Objective 17.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+/-?	<b>Effects:</b> Impact on indigenous business is unclear, although promotion of strategic business locations likely to provide business investment opportunities. New business investment from outside the Borough could increase competition pressure and/or increase premises costs for local, indigenous businesses, but overall a major positive effect is predicted from the policy on investment and making land available to business development – by protecting land for employment, loss to residential will be avoided. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	++	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	<b>Effects:</b> Supporting text explicitly refers to aim of seeking local benefits and reducing excessive commuting to central London. In principle locations for growth were selected to be accessible / located on or near public transport, however the creation of 10,000 jobs in Wembley, and employment at Park Royal may encourage commuting from other areas outside the Borough and from within the Borough, this will in turn have a negative effect on access to and between employment areas. Freight is not mentioned in Policy CP3, however the supporting text (paragraph 4.20) notes that three of the four strategic business and industrial locations in the Borough have “good and direct access to the Strategic Road Network”. This suggests road freight may be expected over other means. <b>Mitigation / Enhancement:</b> Supporting text could include reference to the need to maximise use of rail and water based freight, and the need to improve public transport infrastructure, through other policies and the IIF.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it improve access between key employment areas and key transport interchanges?	+/-	
	Will it encourage rail and water based freight movement?	-?	
<b>Key:</b> Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-			

**Overall Summary****Effects:**

Overall this policy is predicted to have positive effects, particularly against economic objectives. The emphasis given in the supporting text to supporting local needs and use of S106 agreements to provide training for local people is welcomed from a sustainability perspective.

There are, however, predicted to be some negative effects against environmental objectives, which relate primarily to the generation of traffic (either through general increase in business activity, or the proposed encouragement of distribution business), the reliance on road

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<b>Policy CP3: Commercial Regeneration</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			transport, and increased use of resources and materials associated with construction and increased business activity.
			<p><b>Mitigation / Enhancement:</b></p> <p>Although 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, caution is recommended against it being encouraged as a focal industry for Brent. Distribution is likely to create disproportionately less employment relative to the land take of buildings, as well as generate traffic and associated noise and pollution. They may increase local GVA, but lead to limited benefit for local residents.</p> <p>The avoidance and mitigation of the predicted 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. More detailed implementation should be provided in the (forthcoming) Development Policies DPD.</p> <p>Phasing of infrastructure will also be important, this is addressed in Policy CP15.</p> <p>More specific comments include:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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).</li> </ul>

## Overall Spatial Change Policies (CP4-6)

Based on initial appraisal of Core Strategy (version “Revision 2008”, Word file dated 26 November 2008 - received from LBB 3 December 2008) appraised by Owen White, 12 – 19 December 2008

Reviewed by Ric Eales, 10 Feb 2009

Appraisal updated by Owen White 25 March – 1 April 2009 for changes to pre-Submission Core Strategy document, and 26 May 2009 for changes in proposed Submission Core Strategy dated June 2009.

## Policy CP4: North West London Co-ordination Corridor

**The Council will work with partners at Camden, Barnet and Harrow Councils and the GLA family to co-ordinate development in the growth areas of Wembley, Burnt Oak / Colindale and South Kilburn in context with other planned developments within the North West London Co-ordination Corridor. Opportunities to produce joint policy and regeneration guidance documents will be explored with partners.**



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**Policy CP4: North West London Co-ordination Corridor****Note:**

A formal appraisal matrix has not been completed for this policy as it is seeking to improve partnership working and therefore is unlikely to have significant direct effects on sustainability.

However, co-ordination of development in Growth Areas in Brent with planned development within the NW London Co-ordination Corridor has the potential to have significant positive sustainability effects. For example co-ordinating public transport elements of development to ensure that public transport infrastructure provision is phased effectively and provides a coherent service between key development areas could help minimise the road traffic generating potential of major developments in the Corridor. This would have positive environmental and social effects as well.

It is recommended that supporting text could be included to identify key development elsewhere in the North West London Co-ordination Corridor which is expected to be the focus of co-ordination.

**Policy CP5: Placemaking**

In considering major development schemes, regard shall be had to the following:

- The allocation of sites for a range of uses (as set out in the Site Specific Allocations DPD), with particular support for development that is mixed in use and mixed in tenure. A vertical mixing of uses is encouraged.
- The needs of the community and the need for infrastructure, both social and physical, arising from development, such as education facilities, health provision, sports facilities, green infrastructure, public transport, walking and cycling infrastructure.
- The creation of open space (including new squares / public meeting places) or, if that is not practicable, contributions towards the significant improvement of existing open space close to the growth areas. New play areas will be required in all major housing developments.
- Brent Infrastructure and Investment Framework
- The contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration of the heritage of the area and investigate means of introducing continuity through urban design measures and the possibility of reusing and restoring buildings of merit

**Policy CP5: Placemaking**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> The placemaking principles seek explicitly to ensure the needs of communities are met, including social needs. In relation to specific developments and Growth Areas (which are the focus of Policy CP5) this is likely to reduce poverty and social exclusion. Increased provision may improve affordability, however this will depend on the nature of provision. <b>Mitigation / Enhancement:</b> More detailed implementation is provided in the Growth Area Policies (CP7 – CP12), Policy CP15 – Infrastructure to Support Development, CP23 – Protection of existing and Provision of New Community and Cultural Facilities and the Infrastructure and Investment Framework, which sets out the infrastructure needs, and phasing underpinning the Core Strategy. The appropriate phasing of infrastructure will be critical in meeting community needs. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation. Supporting text refers to a number of existing Brent Plans and Strategies, and the implementation of these will be support these effects. Equally existing and proposed area specific SPDs and SPGs will support implementation.
	Will it improve affordability of essential services?	+?	
2. To improve the health and	Will it improve access to high quality health care?	+	<b>Effects:</b> Health provision is explicitly sought by the Policy. Creation

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<b>Policy CP5: Placemaking</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
wellbeing of the population	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	of open space, walking and cycling infrastructure and sports facilities and play areas are also likely to improve health and healthy lifestyles in those areas benefiting from investment. Regeneration and the meeting of community needs more generally may help reduce health inequalities and improve mental health. Mixed use development may increase the likelihood of noise nuisance. <b>Mitigation / Enhancement:</b> See Objective 1. The existing SPG on sustainable design and construction (SPG19) includes guidance and design principles relating to noise pollution mitigation. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation in relation to design and layout considerations for the mitigation of noise.
	Will it reduce health inequalities?	+?	
	Will it improve physical and mental health?	+	
	Will it reduce noise levels and concerns?	-	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+?	<b>Effects:</b> Policy explicitly seeks the provision of education facilities. Provision of facilities alone is not guaranteed to improve qualifications and skills. <b>Mitigation / Enhancement:</b> See Objective 1. The SSA DPD proposed allocations identifies sites where education development is supported.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	<b>Effects:</b> The focus of Policy CP5 is on how major development can help create and support community facilities etc. rather than on the development of / access to housing, which is addressed in other policies in the Core Strategy. Policy explicitly seeks to create mixed tenure development, though it is not clear if this refers to housing tenure. <b>Mitigation / Enhancement:</b> See Objective 1. Detailed implementation is also provided in Policy CP21 – A Balanced Housing Stock. The SSA DPD proposed allocations identifies sites where housing and/or mixed use developments are supported.
	Will it encourage a range of dwelling type, size and tenure?	+	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	?	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	<b>Effects:</b> Where community needs are met and facilities provided for sport and recreation, as well as open spaces, crime and fear of crime may be reduced. This may be further supported where vibrant communities are created, with significant pedestrian movement in improved / attractive public open spaces. Positive effects are likely to occur in the long-term. <b>Mitigation / Enhancement:</b> Crime and fear of crime are not addressed specifically in any of the Core Strategy policies. Objective 12 (To Promote Healthy Living and Create a Safe and Secure Environment) does seek to embrace “a design led approach to reduce crime and fear of crime”.
	Will it reduce the fear of crime?	+	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	<b>Effects:</b> While provision of facilities cannot guarantee engagement, Policy CP5 aims to provide community facilities and meet a range of community needs. Policy seeks to help create distinctive places and positive sense of identity. Where this is achieved, it is likely to foster a sense of pride in local areas. Where improved community facilities are created more cohesive communities may develop and this may improve ethnic relations, and understanding. The significance of this effect is however uncertain. <b>Mitigation / Enhancement:</b> See Objective 1. Supporting text could include reference to the need to involve local communities in decisions relating to infrastructure provision and community facilities development.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	?	
	Will it improve ethnic relations?	+?	
	Will it improve understanding between different communities of their respective needs and concerns?	+?	
	Will it encourage people to respect and value their contribution to society?	?	
7. To improve accessibility to key services	Will it improve the level of investment in key community services?	++	<b>Effects:</b> Key aim of policy is the provision of a range of infrastructure to meet community needs. Increased provision may
	Will it make access more affordable?	+?	



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<b>Policy CP5: Placemaking</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
especially for those most in need	Will it make access easier for those without access to a car?	+	improve affordability however this will depend on the how such facilities are delivered. Increasing provision in relation to major developments and the Growth Areas will, in these areas, improve access for those without a car. Policy also seeks to provide public transport, walking and cycling infrastructure. <b>Mitigation / Enhancement:</b> See Objective 1.
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	+	<b>Effects:</b> The provision of public transport, walking and cycling infrastructure is likely to encourage people to make fewer journeys by car. Where this is the case traffic volumes and congestion is also likely to be reduced. Where community needs are met locally, the need to travel should also be reduced. Minor positive effects predicted as these improvements are associated with major development schemes and the Growth Areas, and therefore the effect may, for example, minimise increased traffic volumes associated with new development, but have limited effect on overall volumes within the Borough. <b>Mitigation / Enhancement:</b> See Objective 1. Policy CP14 – Public Transport Improvements will support this. The Brent Local Implementation Plan will also be important in relation to these effects.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking and cycling?	+	
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	<b>Effects:</b> No significant effects identified. The provision of green space may have some beneficial effects on surface water drainage / water quality. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+	<b>Effects:</b> Where improved public transport, walking and cycling infrastructure encourage a greater proportion of journeys to be made by modes other than the car, beneficial air quality effects are expected. Where community needs are met locally, the need to travel should also be reduced. <b>Mitigation / Enhancement:</b> See Objective 1. Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures should also provide implementation detail.
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	?	
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	<b>Effects:</b> Biodiversity and habitats are not specifically mentioned in Policy CP5. The provision of green infrastructure and open space may provide opportunities to create / enhance habitats, and promote tree planting. Supporting text stresses the importance of tree-planting. <b>Mitigation / Enhancement:</b> Supporting text could include reference to the need to protect and enhance habitats and species. Supporting text does refer to the Biodiversity Action Plan. Policy CP17 – Protection and Enhancement of Open Space, Sports and Biodiversity provides detailed implementation, and it is recommended that the forthcoming Development Management Policies DPD should also support this. The Infrastructure and Investment Framework and the Growth Area policies include specific targets relating to tree planting.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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?	+	<b>Effects:</b> Key aim of policy is to provide community infrastructure including open space / new squares/ public meeting spaces. It also seeks the creation of distinctive places with positive sense of identity. Where this is achieved this is likely to have a positive effect on landscape and townscape, and the quality of the public realm.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	

<b>Policy CP5: Placemaking</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it minimise visual intrusion and protect views?	?	Effect on views and litter uncertain. Where community pride / sense of identity is increased this may reduce the likelihood of anti-social behaviour such as littering. <b>Mitigation / Enhancement:</b> Supporting text refers to public realm strategies which are to be developed for each Growth Area. These, together with existing SPGs and proposed SPDs will provide much greater implementation detail.
	Will it decrease litter in urban areas and open spaces?	?	
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?	+	<b>Effects:</b> The policy refers to the need for consideration to be given to the heritage of areas and the "possibility" of reusing and restoring "buildings of merit". <b>Mitigation / Enhancement:</b> Policy or supporting text could include reference to listed buildings and Conservation Areas. More detailed implementation is provided in Policy CP17 – Protecting and Enhancing the Suburban Character of Brent. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it protect listed buildings and their settings?	+?	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	+	<b>Effects:</b> See Objective 8. Where the volume of journeys made by car is reduced this will lead to a reduction in CO <sub>2</sub> emissions associated. The significance of this effect may be limited. In areas where increased provision of open / green space is achieved, this may help to reduce the impact of increased urban temperatures. Policy refers to the Infrastructure and Investment Framework, which proposed district wide Combined Heat and Power within Wembley. <b>Mitigation / Enhancement:</b> See Objective 8. In addition policy relating to climate change and renewable energy generation is provided in Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	+	
	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	+?	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-?	<b>Effects:</b> The provision of increased community facilities may result in increased consumption of materials / creation of waste, especially associated with construction. The provision of recycling facilities (such as space within developments for storage / recycling centres) is not included in Policy CP5. <b>Mitigation / Enhancement:</b> Policy / supporting text could include recycling facilities as a community infrastructure need. The existing SPG on sustainable design and construction (SPG19) includes principles relating to waste minimisation associated with demolition / construction and the inclusion of appropriate storage and recycling facilities. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	?	
	Will it reduce hazardous waste?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> Policy CP5 seeks to create distinctive "places" which meet community needs. Other policies in the Core Strategy set out the principles regarding the location and type of development that is considered appropriate, in particular Policy CP1 – Spatial Development Strategy, the Growth Area Policies (CP7 – CP12) and Policy CP20 – Strategic and Borough Employment Areas. The SSA DPD proposed allocations also identify sites for development, which are almost exclusively previously developed / brownfield in nature.
	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	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			

<b>Policy CP5: Placemaking</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+?	<b>Effects:</b> Effect on business development / start-ups and opportunities for local people uncertain. However, where community facilities / amenities and infrastructure required to create vibrant, well served communities this is likely to have a positive effect on the image of the area as a business location, as well as potentially encouraging skilled people to remain in the Borough / making it an attractive place to live, which may improve resilience. These effects are expected to be minor in significance. <b>Mitigation / Enhancement:</b> Detailed implementation is provided in other policies in the Core Strategy, in particular Policy CP20 – Strategic and Borough Employment Areas and the Growth Area Policies (CP7 – CP12). The SSA DPD proposed allocations and existing and proposed SPD and SPGs will / should provide more detailed, and area specific implementation.
	Will it improve business development and enhance productivity?	+?	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	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?	+?	<b>Effects:</b> See Objective 17. There may be some employment opportunities associated with provision, maintenance and operation of certain types of community facility / service, such as sports and leisure facilities, or health provision. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it provide job opportunities for those most in need of employment?	+?	
	Will it help to improve earnings?	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	<b>Effects:</b> Creating communities well served by facilities and services and supported by a full range of infrastructure is likely to enhance regeneration and reduce disparity. Minor positive effect predicted as these benefits will only be directly delivered in relation to major new development / the Growth Areas. <b>Mitigation / Enhancement:</b> See Objective 1.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	<b>Effects:</b> See Objective 17. Creation / provision of significant new community facilities and infrastructure will require additional inward investment. Aim of policy is to secure contributions arising from development to invest in infrastructure and facilities / amenities. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	+	
	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?	+?	<b>Effects:</b> The need to provide public transport and walking and cycling infrastructure are explicitly included in the policy. However no mention is made of the need for this infrastructure to provide access to employment opportunities / areas. Effect on commuting also uncertain, as provision of facilities may reduce the need for some journeys (see Objective 8) but this is not directly related to commuting for work. <b>Mitigation / Enhancement:</b> More detailed implementation is provided in other policies in the Core Strategy, in particular CP14 – Public Transport Improvements, CP15 –Infrastructure to Support Development and the Growth Area Policies (CP7 – CP12). The Local Implementation Plan will also be important in supporting this objective. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it improve access between key employment areas and key transport interchanges?	+?	
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive: <span style="color: green;">■</span> Minor positive: <span style="color: green;">+</span> Neutral: 0 Minor negative: <span style="color: orange;">-</span> Major negative: <span style="color: red;">■</span> Uncertain: ? Mixed: <span style="color: yellow;">-/+</span>			
<b>Overall Summary</b>  <b>Effects:</b> Generally Policy CP5 is predicted to have positive effects on the SA objectives. Encouraging major developments to contribute to / provide a mix of uses, a broad range of community facilities and to provide open / public space is predicted to have minor or major positive effect against the majority of objectives. Major positive effects are predicted in relation to the level of investment in community facilities, as this a central aim of the policy. There is some uncertainty about the magnitude and nature (positive or negative) of effects (for example affordability of community			

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<b>Policy CP5: Placemaking</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			<p>facilities) as this will depend to a large extent on the nature of implementation, which is not set out within this strategic level policy.</p> <p>In addition minor positive effects are likely under many objectives because of the geographical scale of the effect predicted. Although some effects will benefit wider community / provide facilities for use by the population as a whole, the focus of these effects is generally limited to specific major developments and the Growth Areas.</p> <p>One minor negative effect is predicted, relating to the potential for mixed-use development to lead to some additional risk of noise nuisance.</p> <p><b>Mitigation / Enhancement:</b></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 and the Infrastructure and Investment Framework) and through existing and proposed supplementary planning guidance, such as the Wembley Masterplan, South Kilburn SPD and proposed SPDs/SPGs in the other Growth Areas. Public realm strategies, proposed for each Growth Area will also enhance effects, particularly in relation to quality of townscape.</p> <p>The forthcoming Development Management Policies DPD should also provide more detailed policies to mitigate negative and enhance positive effects predicted.</p> <p>More specific comments include:</p> <ul style="list-style-type: none"> <li>• 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: <a href="http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf">http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf</a> [accessed 26/05/09]</li> <li>• It is recommended that 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.”</li> <li>• Supporting text could include reference to the need to protect and enhance habitats and species, or include a cross-reference to Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity.</li> <li>• Supporting text could include reference to the need to protect enhance Listed Buildings and Conservation Areas.</li> </ul>

<b>Policy CP6: Design and Density in Place Shaping</b>			
			<p>Proper regard shall be made to the London Plan density Policy 3A.3 which supports higher densities in areas of good public transport accessibility. The council will also take into account the following criteria to ensure that a notional density figure is not the only consideration and the quality of design, the location of the site and the need to provide family housing are all important. The following criteria are therefore important in determining density and requiring good design:</p> <ul style="list-style-type: none"> <li>• Where design is of the highest or exemplary standard, higher densities will be considered</li> <li>• Higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements</li> <li>• The site should contribute towards wider public realm improvements commensurate with the scale of development</li> <li>• Development in growth areas should take into account the suburban interface</li> <li>• On appropriate sites a reasonable proportion of family housing meeting amenity/ open space standards should be properly accommodated (see policy CP21)</li> <li>• The council will take into account placemaking objectives, as set out in policy CP5, in determining density levels</li> <li>• Tall buildings are acceptable in identified areas of Wembley, South-Kilburn and Burnt Oak and in defined areas in Alperton and Park Royal.</li> <li>• The council will use design review panels, architectural competitions, design guidance and design protocols to improve design quality; and</li> <li>• Schemes will be assessed having regard to CABI’s design guidance.</li> </ul>

<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Social</b>			
1. To reduce poverty and social	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> The linking of housing densities with public transport accessibility may facilitate access to opportunities for some

<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
exclusion	Will it improve affordability of essential services?	+?	currently excluded. Accounting for placemaking objectives in determining density levels will help support this. This effect depends on those currently excluded / in poverty being able to benefit from new developments in accessible areas. <b>Mitigation / Enhancement:</b> The inclusion of the London Plan target of 50% affordable homes in Policy CP2 increases the likelihood of these predicted effects. Policies elsewhere in the Core Strategy seek to address the specific issue of regeneration and the provision of community services and infrastructure, in particular the Growth Area Policies CP7 – CP12, CP15 – Infrastructure to Support Development and CP23 – The Protection of Existing and Provision of New Community and Cultural Facilities. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	<b>Effects:</b> Where development linked with higher PTAL levels or committed public transport investment encourages people to travel by modes other than the car there may be beneficial health effects, however overall these effects are not predicted to be significant. Density is linked with PTAL in the policy, and is required by the London Plan, however higher densities may lead to some increase in domestic noise disturbance / nuisance. Good quality design, supported by the Policy, should mitigate for these effects. The Policy also states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> Policies elsewhere in the Core Strategy seek to address the provision of community services and infrastructure, including health provision, in particular the Growth Area Policies CP7 – CP12, and CP15 – Infrastructure to Support Development. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	0	
	Will it improve physical and mental health?	+?	
	Will it reduce noise levels and concerns?	-?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> The Policy and supporting text explicitly supports the provision of family sized homes. <b>Mitigation / Enhancement:</b> Housing provision, and affordable housing is included in Policy CP2 – Population and Housing Growth, and Policy CP21 – A Balanced Housing Stock. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it encourage a range of dwelling type, size and tenure?	+	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	0	
	Will it reduce homelessness?	0	
5. To reduce	Will it reduce actual levels of crime?	+	<b>Effects:</b>



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<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
crime and anti-social activity	Will it reduce the fear of crime?	+	High quality design, and wider improvements in the public realm supported by Policy CP6 are likely to lead to neighbourhoods and developments which enhance passive surveillance and pedestrian flows, which should reduce crime and fear of crime. <b>Mitigation / Enhancement:</b> The Policy and/or supporting text could explicitly encourage the use of Secured by Design guidance and designing out crime principles. Core Strategy Objective 12 (To Promote Healthy Living and Create a Safe and Secure Environment) does seek to embrace "a design led approach to reduce crime and fear of crime". It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	<b>Effects:</b> The Policy requires sites to contribute to wider public realm improvements, and supporting text emphasises need to encourage design and "regenerative change across sites" (paragraph 4.27) to create distinctive neighbourhoods. This is likely to have positive effects on distinctiveness and sense of place, as well as pride in the local area, in the Growth Areas in particular. The Policy also states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> Policies elsewhere in the Core Strategy seek to address the specific issue of regeneration and the provision of community services and infrastructure, in particular the Growth Area Policies CP7 – CP12, CP15 – Infrastructure to Support Development and CP23 – The Protection of Existing and Provision of New Community and Cultural Facilities. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
Will it encourage people to respect and value their contribution to society?	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	<b>Effects:</b> Linking density of development with public transport accessibility is likely to make access to key services easier for those without a car, and may also help to make access more affordable. The Policy also states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> See Objective 6.
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	+	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	+	<b>Effects:</b> Key to the policy is guiding higher density development to areas with high PTAL and / or where public transport improvements are "committed". This should support an increase in journeys using public transport. Well designed
	Will it increase the proportion of journeys using modes other than the car?	+	

<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it encourage walking and cycling?	+	developments and neighbourhoods, with good quality public realm are more likely to be attractive for, and therefore encourage, walking and cycling. Minor positive effects predicted as these effects will be limited to the Growth Areas / specific developments. The Policy also states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> More detailed implementation is included in the Growth Area Policies (CP7 – CP12), Policy CP14 – Public Transport Improvements and Policy CP15 – Infrastructure to Support Development will support this. The Brent Local Implementation Plan will also be important in relation to these effects. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
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?	-?	<b>Effects:</b> Higher densities of development could lead to reductions in surface area of private and public open space, as well as an increase in impermeable surfaces, which may lead to increased urban run-off and pollution. <b>Mitigation / Enhancement:</b> Good quality design may include environmental design elements such as green roofs, SUDS and rainwater harvesting systems, energy efficiency etc. If this is the case positive effects would be expected in relation to water quality and consumption / efficiency. Specific mention could 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. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+	<b>Effects:</b> See Objective 8. Air quality improvements will depend on development in areas with high PTAL or where public transport improvements are delivered leading to a modal shift to non-car travel. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	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	<b>Effects:</b> Good quality design is likely to include tree-planting and green space. However this is not explicitly stated within the policy or supporting text, and therefore it is not possible to predict an effect. <b>Mitigation / Enhancement:</b> See Objective 9. Core Strategy policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity, also provides more detailed implementation.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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?	+	<b>Effects:</b> Aim is the promotion of good design quality, and use of design review panels, architectural competitions and proposed assessment with regard to CABE's design guidance is welcomed. This is predicted to have a positive effect in relation to townscape quality, distinctiveness and sense of place. The Policy and supporting text requires sites to contribute to wider public realm improvements, and supporting text
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	?	



<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it decrease litter in urban areas and open spaces?	<b>0</b>	emphasises need to encourage design and “regenerative change across sites” to create distinctive neighbourhoods. This is likely to have positive effects on distinctiveness and sense of place, as well as pride in the local area, in the Growth Areas in particular. Effect on views is uncertain however good quality design is likely to take into account visual aspects and views. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy provide detailed implementation, in particular the Growth Area Policies CP7 – CP12, CP17 – Protecting and Enhancing the Suburban Character of Brent, and CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity. Area specific guidance, such as existing and proposed SPDs and SPGs and the forthcoming Development Management Policies DPD should also provide more detailed implementation.
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?	<b>?</b>	<b>Effects:</b> Effects uncertain. The Policy states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> More detailed implementation is provided in Policy CP17 – Protecting and Enhancing the Suburban Character of Brent. Area specific guidance in the form of existing and proposed SPDs and SPGs and the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it protect listed buildings and their settings?	<b>?</b>	
	Will it help preserve, enhance and record archaeological features and their settings?	<b>?</b>	
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?	<b>+</b>	<b>Effects:</b> See Objective 8 and 10. Positive effect on emissions of greenhouse gases dependent on higher densities in areas with high public transport accessibility leading to a reduction in the use of the private car. Supporting text states that consideration will be given to PPS1 Climate Change Supplement and incorporated into design. Where this is the case, a positive effect on greenhouse gas emissions, and adaptation is likely. Higher densities of development could lead to reductions in surface area of private and public open space, as well as an increase in impermeable surfaces, which may lead to increased urban run-off and associated flood risk. High quality design may encourage higher energy efficiency standards, and greater flood / storm resilience of properties, however this is not explicitly stated in the policy or supporting text. <b>Mitigation / Enhancement:</b> See Objectives 8, 9 and 10.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	<b>?</b>	
	Will it reduce emissions of ozone depleting substances?	<b>0</b>	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	<b>-?</b>	
	Will it reduce the risk of damage to property from storm events?	<b>?</b>	
	Will it help reduce the impact of increased urban temperatures on people and property?	<b>?</b>	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	<b>0</b>	<b>Effects:</b> High quality design may encourage more efficiency in construction and the use of environmentally preferable materials / increase recycling and reuse in construction. High quality design will not necessarily lead to improved household behaviour in relation to waste / consumption, where design includes provision of convenient and sufficient facilities for waste storage / recycling this may have a positive effect. <b>Mitigation / Enhancement:</b> See Objective 9.
	Will it reduce household waste?	<b>0</b>	
	Will it increase waste recovery and recycling and improve facilities?	<b>+?</b>	
	Will it reduce hazardous waste?	<b>0</b>	
	Will it reduce waste in the construction industry?	<b>+</b>	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	<b>+</b>	<b>Effects:</b> Higher density development, where appropriate, is likely to reduce pressure on land for development elsewhere, which is predicted to have a positive effect in terms of reducing likelihood of development on Greenfield site. See Objective 9 and 14: high quality design might increase resilience to climate change, including subsidence and heave, however this is not stated in policy or supporting
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	<b>+</b>	
	Will it ensure contaminated land is remediated as appropriate?	<b>0</b>	

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<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	<b>0</b>	text. <b>Mitigation / Enhancement:</b> See Objective 9. More detailed implementation is included in other policies in the Core Strategy, in particular Policy CP1 – Spatial Development Strategy, the Growth Area Policies (CP7 – CP12) and Policy CP20 – Strategic and Borough Employment Areas. The SSA DPD proposed allocations also identify sites for development, which are almost exclusively previously developed / brownfield in nature.
	Will it reduce the risk of subsidence and heave?	<b>?</b>	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	<b>0</b>	<b>Effects:</b> Ensuring residential development is of a good quality design and in areas of high public transport accessibility is likely to enhance the image of the areas as a business location (due to the likelihood that employees will be able to access employment), and may, in the long-term improve resilience of the local economy. <b>Mitigation / Enhancement:</b> Detailed implementation is provided in other policies in the Core Strategy, in particular Policy CP20 – Strategic and Borough Employment Areas and the Growth Area Policies (CP7 – CP12). The SSA DPD proposed allocations and existing and proposed SPD and SPGs will / should provide more detailed, and area specific implementation.
	Will it improve business development and enhance productivity?	<b>0</b>	
	Will it improve the resilience of business and the local economy?	<b>+?</b>	
	Will it promote growth in key sectors?	<b>0</b>	
	Will it promote growth in key clusters?	<b>0</b>	
	Will it enhance the image of the area as a business location?	<b>+</b>	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	<b>0</b>	
	Will it help to improve earnings?	<b>0</b>	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	<b>+</b>	<b>Effects:</b> High quality design is likely to enhance the regeneration benefits of new development. The Policy also states that the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). <b>Mitigation / Enhancement:</b> See Objective 1.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	<b>0</b>	<b>Effects:</b> Higher density development is likely to reduce pressure on land currently or potentially available for business / industrial uses. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	<b>0</b>	
	Will it make land and property available for business development?	<b>+?</b>	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	<b>?</b>	<b>Effects:</b> Effect on commuting uncertain as it is not possible to predict effect policy will have on the choices people make in relation to where they travel for work. Linking housing density explicitly with PTAL and secured public transport improvements is predicted to have a significant positive effect on accessibility to work by means other than the private car. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it improve accessibility to work by public transport; walking and cycling?	<b>++</b>	
	Will it improve access between key employment areas and key transport interchanges?	<b>+</b>	
	Will it encourage rail and water based freight movement?	<b>0</b>	
<b>Key:</b> Major positive:  Minor positive:  Neutral: 0 Minor negative:  Major negative:  Uncertain: ? Mixed:			
<b>Overall Summary</b>			
<b>Effects:</b> Policy CP6 is predicted to have positive effects under many SA Objectives. No negative effects are predicted, with the exception of the potential increase in noise nuisance related with high-density development. It is expected that this would be partly mitigated by high quality design, which is the other key aim of the policy. Ensuring that the density of residential development is related to existing or committed public transport accessibility is considered very positive, and is predicted to have positive effects on accessibility, traffic reduction and encouraging modes other than the private car. Although these effects may provide some benefit for the population as a whole, the focus of these effects is generally limited to the Growth Areas. Encouraging high quality design is predicted to have positive effects under a number of social and environmental objectives, especially			

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<b>Policy CP6: Design and Density in Place Shaping</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			<p>in relation to public realm enhancement, the quality of townscapes and promoting a sense of place and pride in neighbourhoods.</p> <p>The policy states the Council will take into account placemaking objectives in determining density levels. The placemaking objectives are appraised above (Policy CP5). Rather than reflecting the appraisal of Policy CP5 – Placemaking, Policy CP6 has been appraised as a standalone policy. Where the placemaking objectives are expected to impact upon the effect against a particular objective, this is noted above.</p> <p><b>Mitigation / Enhancement:</b></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. Existing and proposed area specific guidance, in the form of SPDs and SPGs, proposed Growth Area Public Realm Strategies, together with the SSA DPD proposed allocations will also provide more detail and support implementation.</p> <p>More specific comments include:</p> <ul style="list-style-type: none"> <li>• The Policy and/or supporting text could explicitly encourage the use of Secured by Design guidance and designing out crime principles or this requirement should be included in the forthcoming Development Management Policies DPD. See for example: <a href="http://www.securedbydesign.com/">http://www.securedbydesign.com/</a></li> <li>• Specific mention could 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.</li> <li>• It was previously noted that clarification should be provided for the statement “highest and exemplary standard” in design (first bullet), this remains the case.</li> </ul>

## Strategic Area Policies (CP7 – CP13)

Based on initial appraisal of Core Strategy (version “Revision 2008”, Word file dated 26 November 2008 - received from LBB 3 December 2008) appraised by Owen White, 12 – 19 December 2008

Reviewed by Ric Eales, 22 March 2009

Appraisal updated by Owen White 25 March – 1 April 2009 for changes to pre-Submission Core Strategy document, and 26 May 2009 for changes in proposed Submission Core Strategy dated June 2009.

### Notes:

- The Infrastructure and Investment Framework referred to in the following matrices is the version dated November 2008, as available from LBB website: [http://www.brent.gov.uk/tps.nsf/Files/LBBA-360/\\$FILE/Infrastructure%20Investment%20Framework.pdf](http://www.brent.gov.uk/tps.nsf/Files/LBBA-360/$FILE/Infrastructure%20Investment%20Framework.pdf) (accessed 26/05/09)
- The draft Wembley Masterplan, referred to in the appraisal, is that published for further consultation on 22<sup>nd</sup> December 2008. As available from LBB website: <http://www.brent.gov.uk/tps.nsf/Pages/LBB-273> (accessed 26/05/09)
- The South Kilburn SPD referred to in the appraisal of policies CP8 – CP12 is that published by LBB in April 2005. Available from LBB website at: [http://www.brent.gov.uk/regeneration.nsf/Files/LBBA-27/\\$FILE/South%20Kilburn%20SPD.pdf](http://www.brent.gov.uk/regeneration.nsf/Files/LBBA-27/$FILE/South%20Kilburn%20SPD.pdf) (accessed 26/05/09)
- The draft Park Royal Opportunity Area Planning Framework referred to in the appraisal of policies CP8 – CP12 is that published by GLA in February 2008. Available from: <http://www.london.gov.uk/mayor/planning/park-royal.jsp> (accessed 26/05/09)

**Policy CP7: Wembley Growth Area**

Wembley will drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating 10,000 new jobs across a range of sectors including retail, offices, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as a Strategic Cultural Area for London. Around 70 hectares of land around the Wembley National Stadium and Wembley town centre will be redeveloped for at least 11,500 new homes to 2026, supported by infrastructure identified within the Infrastructure and Investment Framework. This will include:

- New road connections
- Junction improvements
- 2 new 2 form of entry primary schools
- A new combined primary (2 form of entry ) and secondary school (6 form of entry) on the Wembley Park site
- Extensions to existing local schools
- Nursery places
- At least 2.4 hectares of new public open space comprising of a new park (1.2ha min) and 3 pocket parks/squares (0.4ha each)
- Improvements to the quality and accessibility of existing open spaces
- A new community swimming pool
- A new civic centre
- Indoor and outdoor sports facilities
- Play areas
- A minimum of 1000 trees
- New health facilities with space for 17 GPs and 13 new dentists
- District-wide Combined Cooling, Heat and Power as set out in Policy CP17
- New multi use community facilities

As identified in Map E.1 'Wembley Growth Area, Energy Action Plan and Town Centre Boundary ', Wembley town centre will be extended eastwards to facilitate a further 30,000 sq m net of new retail floorspace in addition to that already granted planning consent.

**Policy CP7: Wembley Growth Area**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<p><b>Effects:</b></p> <p>Significant development focussed within Wembley and accompanied by appropriate infrastructure should promote regeneration and have a positive effect on reducing poverty and social exclusion. Policy explicitly seeks to generate 10,000 new jobs across a range of sectors which is also likely to help reduce poverty and social exclusion.</p> <p>These potential positive effects are dependent on the benefits of regeneration, and employment opportunities being suitable and accessible to local people and particularly those currently living in poverty / socially excluded.</p> <p>Potential effect on affordability is uncertain, however increased supply and the requirement for a proportion to be affordable, as included in Policy CP2 – Population and Housing Growth, should cause a positive effect.</p> <p><b>Mitigation / Enhancement:</b></p> <p>If infrastructure requirements set out in the draft Wembley Masterplan and Infrastructure and Investment Framework (IIF) actually ensure that infrastructure is delivered and is appropriate to local needs (and phased to meet demand when needed) then enhancement of these potential effects are likely in the long-term.</p> <p>More detail on how Policy CP7 will be implemented is included in other policies within the Core Strategy, for example: CP14, CP15, CP21 and CP23. It is recommended that the forthcoming Development Management Policies DPD and proposed Area Action Plan</p>
	Will it improve affordability of essential services?	+?	

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Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			for Wembley should also provide more detailed implementation.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	<p><b>Effects:</b></p> <p>Policy target includes the provision of additional GP and dentist facilities. Comparison with LBBs social infrastructure modelling (see Supplementary Tables, below) indicates the proposed provision will be sufficient to meet predicted demand. However as new facilities are intended to meet additional demand, the overall effect is predicted to be neutral.</p> <p>Infrastructure targets also propose the provision of a new swimming pool as well as indoor and outdoor sports facilities. However the scale of provision proposed by these targets is not quantified within Policy CP7.</p> <p>Comparison with LBBs social infrastructure modelling (see Supplementary Tables, below) indicates that there is likely to be a shortfall in the provision of open space, based on the target included in CP7. As a result opportunities for outdoor recreation and exercise may be insufficient, with the potential for permanent, long-term negative effects on health and wellbeing of residents.</p> <p>Improvements to public realm implied by regeneration may increase opportunities for walking and cycling in the area, which in turn could have a positive effect on health.</p> <p>A potential short term and long-term (given the phasing of construction over the plan period) / temporary negative effect on noise levels and concerns is predicted, due to construction associated with development on the scale proposed, as well as specific development at Wembley (i.e. housing close to stadium) which may generate more permanent noise / nuisance effects – such as those associate with live music / sporting events.</p> <p>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.</p> <p><b>Mitigation / Enhancement:</b></p> <p>See mitigation / enhancement under Objective 1.</p> <p>More detailed health infrastructure requirements are included in the IIF, however, whether this meets needs will depend on whether infrastructure is actually delivered in line with requirements set out.</p> <p>More details on how Policy CP7 is to be implemented are included in other policies in the Core Strategy, in particular CP15 and CP18.</p> <p>It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.</p> <p>Noise impacts and managing traffic within the Wembley growth area in particular will need to be considered within the forthcoming Development Management Policies DPD, as well as the proposed Area Action Plan for Wembley and the LIP when this is updated.</p>
	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?	-	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p><b>Effects:</b></p> <p>Policy includes specific target for the provision of additional educational facilities in the form of a new combined primary and secondary school and extensions to existing schools. Based on comparison with LBBs social infrastructure modelling (see Supplementary Tables, below) there may be some shortfall of school places, particularly secondary, which is likely in the medium and long-term to have a negative effect on access to education and educational attainment.</p> <p>Unclear if nursery place provision will meet predicted demand as this provision is not quantified in the policy.</p>
	Will it improve access to high quality educational facilities?	-	
	Will it help fill key skill gaps?	0	



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Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			<p><b>Mitigation / Enhancement:</b></p> <p>See Objective 1.</p> <p>Greater detail is provided in the IIF, such as specific targets for school expansion and nursery school places, however, whether this meets needs will depend on whether infrastructure is actually delivered in line with requirements set out, which in turn is dependent on a critical mass of development being achieved to ensure the financial support is available.</p> <p>Training for local people so that they can compete for jobs created is a core objective of the draft Wembley Masterplan, if this leads to actual action on this issue this would enhance this effect and lead to positive effects in relation to skills.</p>
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	<p><b>Effects:</b></p> <p>The policy proposes the development of 11,500 new homes over the plan period. Supporting text refers to opportunities to provide affordable family homes. Increased supply of housing is likely to improve the quality of the housing stock, as well as making supply of a mix of housing size and tenure, and affordability more likely over the long-term.</p> <p>Effect on homelessness uncertain.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Although not explicitly set out in Policy CP7 itself, the draft Wembley Masterplan and other Core Strategy policies seek to provide a mix of housing size and tenure, and to meet the London Plan target of 50% of new homes being affordable. Core Strategy Policies CP2, CP5 and CP6 provide more implementation details in relation to housing type and density.</p> <p>It is recommended that the forthcoming Development Management Policies DPD, and proposed Area Action Plan for Wembley should also contain more detailed policy.</p>
	Will it encourage a range of dwelling type, size and tenure?	+	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	++	
	Will it reduce homelessness?	?	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	<p><b>Effects:</b></p> <p>Regeneration and public realm improvements may have a beneficial effect on crime and fear of crime in the long-term. However, development of Wembley as a regional centre may result in an increase in crime associated with major events. Effects uncertain.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Community safety, and minimising crime and fear of crime within Wembley are specifically addressed within the draft Wembley Masterplan, if this leads to actual action on this issue this would enhance this effect and lead to positive effects on crime and fear of crime.</p> <p>The IIF sets out requirements for public realm improvements. If these are delivered this may enhance the positive effect on reducing crime and fear of crime.</p> <p>Addressing crime and fear of crime is included within Core Strategy Objective 12 – To Promote Healthy Living and Create a Safe and Secure Environment, however there is no specific policy text seeking to reduce crime or fear of crime.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and Area Action Plan for Wembley should include more detailed policy on reducing crime and fear of crime.</p>
	Will it reduce the fear of crime?	+?	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+?	<p><b>Effects:</b></p> <p>Policy includes specific targets relating to improved community facilities and a new civic centre. Where developed, these are likely, in the long-term to encourage engagement in community activities, however this effect is uncertain as increased provision would not in itself increased participation.</p>
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	

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Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
	Will it improve understanding between different communities of their respective needs and concerns?	0	<p>Regeneration of Wembley on the scale proposed is intended to generate considerable local pride – Brent is to be home of “Destination Wembley”. This is likely to have a positive effect on local pride, in the short and long-term.</p> <p><b>Mitigation / Enhancement:</b></p> <p>The draft Wembley Masterplan and IIF include more detailed requirements / aspirations in relation to community facilities. If these are delivered as set out these will potentially significantly enhance these effects.</p> <p>The draft Wembley Masterplan has been subject to two rounds of public consultation which should have improved the ability of local people to contribute to decisions made about the Growth Area’s future direction.</p> <p>Core Strategy Policy CP23 sets out more implementation details in relation to community facilities. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed policy.</p>
	Will it encourage people to respect and value their contribution to society?	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?	+	<p><b>Effects:</b></p> <p>See Objective 6. Specific targets in policy seek improved provision of community facilities, and a new civic centre.</p> <p>Improved provision may make access more affordable, and as Wembley is relatively well served by public transport access should become easier for those without a car.</p> <p>However, minor negative effects predicted in relation to access, particularly in the long-term as the local population increases, as comparison of policy target with predicted demand in LBBs social infrastructure model (see Supplementary Tables, below) indicates that provision in line with targets in CP7 will fall short of future need.</p> <p><b>Mitigation / Enhancement:</b></p> <p>See mitigation / enhancement under Objective 6.</p>
	Will it make access more affordable?	-	
	Will it make access easier for those without access to a car?	-	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	--	<p><b>Effects:</b></p> <p>Development on the scale proposed, including new homes (and implied population), the creation of 10,000 new jobs, and the promotion of Wembley as a major regional / national retail and tourist destination will all impact negatively on traffic volumes and congestion, even where infrastructure is improved. These effects are likely in both the short and long-term.</p> <p>The Policy targets include specific mention of new road connections and junction improvements, however reference to public transport, walking and cycling improvements are only included in supporting text.</p> <p>The recent Wembley Masterplan Transport Strategy Review (MVA consultants, November 2008) identifies (among many other findings) that development will have significant traffic impact on the local road network and that these will be particularly pronounced in Stage 1 of the Masterplan – up to 2014. It also indicates that a step-change in public transport (especially bus) provision is required.</p> <p><b>Mitigation / Enhancement:</b></p> <p>The draft Wembley Masterplan Transport Strategy Review includes a series of recommendations for “next steps”, many of which could have significant sustainability benefits. The IIF includes more detailed transport infrastructure requirements, including public transport and walking and cycling. If these are delivered as set out, this is likely to help mitigate some of the potentially negative effects of increased travel need predicted.</p> <p>It is recommended that public transport, walking and cycling aspirations are included within the policy targets.</p> <p>Core Strategy Policy CP14 includes more detailed implementation in relation to public transport improvements</p>
	Will it increase the proportion of journeys using modes other than the car?	+?	
	Will it encourage walking and cycling?	+?	



Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			in the borough. It is recommended that the forthcoming Development Management Policies DPD, Area Action Plan for Wembley should also include more implementation details. Future revisions of the LIP should also consider transport infrastructure requirements related to the development of Wembley.
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?	-	<b>Effects:</b> Water quality and use are not considered explicitly within the policy, however development on the scale proposed will potentially lead to increased water demand as well as run-off and pollution risk. Given the significant population increase expected this potential effect is likely even where mitigation measures to minimise water use in developments etc. reduce consumption per capita. <b>Mitigation / Enhancement:</b> More detailed policy in relation to water use in development is provided in Core Strategy Policy CP19. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed policy in relation to water use and quality relating to development. The Mayor's future Water Strategy for London is also likely to provide targets, policy and guidance in relation to water use, quality and management in development. The draft Wembley Masterplan includes description of suitable SUDS techniques in the development area. Where such measures are adopted this will help mitigate the potential negative effects predicted.
	Will it reduce water consumption and improve water efficiency?	-	
10. To improve air quality	Will it improve air quality?	--	<b>Effects:</b> See Objective 8. Even though Wembley is relatively well connected to public transport, significant road traffic increases would be expected from development on the scale proposed. Given that existing poor air quality in Brent is strongly related to road traffic, this is very likely to have a significant negative effect on air quality and reduce likelihood of the achievement of AQMA objectives. <b>Mitigation / Enhancement:</b> See mitigation / enhancement under Objective 8.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	
	Will it reduce emissions of key pollutants?	-	
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?	+?	<b>Effects:</b> Supporting text seeks to encourage development along Wealdstone Brook to respect and enhance the waterside location and enhance biodiversity. Policy includes target of the planting of at least 1000 trees in the Growth Area. There are areas of Grade I and Grade II nature conservation importance located within the Wembley Growth Area. It is unclear from Policy CP7 if these will be enhanced. Policy also seeks to create a new park and new public open space, which may lead to the creation of some habitats. <b>Mitigation / Enhancement:</b> More detailed policy in relation to biodiversity is included in other policies in the Core Strategy, in particular CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity. It is recommended that the forthcoming Development Management Policies DPD should also include more detailed implementation. The IIF includes more detailed requirements in relation to open space and parks, particularly Wealdstone Brook Park. If these requirements are met, this would enhance the minor positive effects predicted. The draft Wembley Masterplan recognises the biodiversity
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	

Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			importance of the River Brent and Wealdstone Brook. It also seeks measures such as SUDS and green roofs, which can have biodiversity benefits. If such measures are delivered this will also enhance positive effects. The River Brent Restoration Project is seeking to recreate a more natural river, removing concrete culverts and restoring the river to its natural path.
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?	+	<p><b>Effects:</b> Policy seeks the regeneration of Wembley, and development on the scale proposed is likely to provide significant opportunities for public realm and townscape enhancements. This is predicted to have a positive effect on local distinctiveness and sense of place, especially in the long-term. Policy CP7 includes specific targets to create a new park and public open spaces, as well as improvements to existing open spaces. The planting of a minimum of 1000 trees is also likely to have a positive effect on the visual amenity of open spaces and the public realm. Effect on views / visual intrusion uncertain.</p> <p><b>Mitigation / Enhancement:</b> More detailed implementation in relation to landscape and townscape is included in other policies in the Core Strategy, in particular Policies CP5, CP6 and CP18. The draft Wembley Masterplan and IIF set out more detailed public realm and open space requirements. If these are achieved this will potentially enhance positive effects identified. It is also recommended that the forthcoming Development Management Policies DPD and proposed Area Action Plan for Wembley should also set out more detailed implementation.</p>
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	?	
	Will it decrease litter in urban areas and open spaces?	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?	?	<p><b>Effects:</b> Limited significant effects predicted. Policy CP7 does not specifically refer to built heritage and historic conservation value in Wembley, and the effect on this objective is therefore uncertain. There is the possibility of both significant positive and negative impacts on the historic environment, particularly over the long-term, as Wembley Growth Area is adjacent to a Conservation Area (see Figure 26 – Part A) and includes Brent Town Hall, a Grade II listed building. Brent Town Hall is included as one of the Wembley Growth area Site Specific Allocations (see Part C Report).</p> <p><b>Mitigation / Enhancement:</b> There is no policy in the Core Strategy specifically addressing the historic environment and built heritage. It is recommended that consideration be given to the inclusion of policy which seeks to protect and enhance the historic environment and cultural assets. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation in relation to development and the historic environment.</p>
	Will it protect listed buildings and their settings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
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?	--	<p><b>Effects:</b> See Objective 8. Construction associated with development on the scale proposed will result in significant temporary increases in green house gases and energy consumption. In the medium to long-term, increased economic activity, visitor numbers and residential population will all contribute to an overall increase in emissions of greenhouse gases, regardless of mitigation measures. Policy includes specific target of district-wide Combined Cooling, Heat and Power (CCHP), which if delivered in line</p>
	Will it lead to an increased proportion of energy needs being met from renewable sources?	+	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	

Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
	Will it reduce the risk of damage to property from storm events?	0	with policy target is likely to increase the proportion of energy needs met from renewable sources.
	Will it help reduce the impact of increased urban temperatures on people and property?	-	<p>There are significant areas at risk of flooding in Wembley Growth area, associated with Welsh Harp, River Brent and Wealdstone Brook, see Figure 20 (Part A). Increased development is likely to exacerbate flood risk, especially in the long-term as flood risk zones expand with the effects of climate change. Sewer flooding due to overloading of existing infrastructure may also be an issue associated with development on the scale proposed, as well as rainfall patterns predicted under climate change.</p> <p>The inclusion of targets for tree planting, and open space provision may help ease the impact of increased urban temperatures, however development on the scale proposed may outweigh these benefits, hence a minor negative effect is predicted.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Other policies in the Core Strategy, in particular CP18 – Brent Strategic Climate Mitigation and Adaptation Measures provide more details on implementation in relation to energy and climate change.</p> <p>It is recommended that the forthcoming Development Management Policies DPD, and proposed Area Action Plan for Wembley should also provide more detailed implementation.</p> <p>The IIF includes more detailed requirements in relation to the CCHP proposed, as well as flood risk mitigation associated with Wealdstone Brook.</p> <p>The draft Wembley Masterplan incorporates a 'flood risk strategy', which draws upon the Brent SFRA (levels 1 and 2). This strategy summarises flood risk in the Masterplan area and proposes measures such as SUDS. If implemented this will help mitigate for flood risk in the Growth Area.</p> <p>All development in Wembley Growth Area should account for guidance included in the Brent SFRA, and subsequent revisions.</p>
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	<p><b>Effects:</b></p> <p>There is the potential for significant temporary negative effects in relation to consumption of materials and resources, and waste in the construction industry. These potential effects are predicted due to the scale of development proposed and may occur in both the short and long-term depending on the phasing of construction. The construction of 10,000 homes over the plan period, together with associated infrastructure, will lead to a significant increase in resource and material use, and will generate significant construction waste, regardless of mitigation measures adopted.</p> <p>Potential negative effect also predicted in relation to household waste generation, particularly in the long-term, due to increased residential population associated with new housing provision.</p> <p>Significant new development and increased waste generation may provide opportunities to increase waste recovery and improve waste management and recycling facilities, however this is not explicitly recognised in Policy CP7.</p> <p><b>Mitigation / Enhancement:</b></p> <p>It is recommended that the forthcoming Development Management Policies DPD should provide greater implementation detail in relation to waste minimisation and management, including a requirement for compliance with ICE Demolition Protocol standards.</p> <p>Brent SPG19: Sustainable Design, Construction and Pollution Control is a material consideration in relation to large developments and should also provide some</p>
	Will it reduce household waste?	-	
	Will it increase waste recovery and recycling and improve facilities?	+?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	-	

Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			<p>mitigation for these potential negative effects.</p> <p>The Wembley Masterplan encourages developers to minimise waste associated with construction and for developments to 'explore' recycling and re-use of materials. A 20% minimum (by value) recycled content in construction materials is expected, in line with ICE Demolition Protocol standards. It also proposes that development in Wembley integrates up-to-date waste infrastructure from the outset.</p> <p>These may help mitigate waste and resource use associated with construction, but such measures are considered unlikely to alter the potential overall effects predicted.</p> <p>As noted in the Core Strategy (paragraphs 5.36 – 5.41) LB Brent is working other West 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>
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	<p><b>Effects:</b></p> <p>Development in the Wembley Growth area is intended to be almost exclusively on brownfield land.</p> <p>Figure 27 (Part A) shows that a large proportion of Wembley Growth Area is potentially contaminated land (due to historic industrial uses). Re-development of this land will necessitate remediation, and this is thus predicted to have a positive effect on the remediation of contaminated land, especially in the long-term.</p> <p><b>Mitigation / Enhancement:</b></p> <p>It is recommended that the forthcoming Development Management Policies DPD, and proposed Area Action Plan for Wembley should provide more detailed policy and implementation in relation to land quality and soil resources. LBB 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 LBB website. These are likely to enhance the potential positive effects.</p> <p>Specific developments should also consider potential land contamination and soil resource issues in site / project specific EIAs and other investigations.</p>
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	
	Will it ensure contaminated land is remediated as appropriate?	+	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	<p><b>Effects:</b></p> <p>Core aim of the policy is for Wembley to 'drive the economic regeneration of Brent'. This is likely to lead to economic and growth opportunities. Significant new retail floorspace is proposed in a specific target in Policy CP7, which also seeks the creation of 10,000 new jobs in retail, hospitality, offices, conference facilities, hotels, leisure, tourism and visitor attractions. Significant potential positive effects are predicted in relation to the image of the area as a business location. This may also provide opportunities for local people and for new business start-ups. These effects are predicted in the short and long-term.</p> <p>The realisation of these economic goals 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.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Policy CP3 – Commercial Regeneration, and CP20 – Strategic and Borough Employment Areas provides more detailed policy related to the economy and employment</p> <p>It is also recommended that the forthcoming Development Management Policies DPD and proposed Area Action Plan</p>
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	?	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	++	

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Policy CP7: Wembley Growth Area			
Objective	Criteria	Score	Comments
			for Wembley should provide more detailed policy. The draft Wembley Masterplan identifies the creation of affordable creative workspaces as a core objective. This may enhance opportunities for start-ups and for local people.
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	++	<b>Effects:</b> See Objective 17. Key aim of policy is the creation of 10,000 new jobs over the plan period. If this is achieved, and local people are able to benefit from the opportunities arising short and long-term local unemployment is likely to be reduced. A major positive long-term effect is therefore predicted in relation to reducing local unemployment and a minor positive long-term effect in relation to providing opportunities for those most in need of employment. Impact on earnings will depend on types of employment created. 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 plan this may negate, or delay any positive effects predicted. <b>Mitigation / Enhancement:</b> The draft Wembley Masterplan includes as a core objective training for local people to compete for locally created jobs. If this is achieved it will enhance the potential positive effects predicted. It is recommended that the forthcoming Development Management Policies DPD and proposed Area Action Plan for Wembley should also include more detailed implementation on how employment opportunities can be made as accessible to local residents as possible.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to improve earnings?	+?	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<b>Effects:</b> Key aim of the policy is regeneration of Wembley so that it is 'transformed'. It is intended to become the 'economic engine room for Brent'. If delivered, infrastructure targets included within Policy CP7 are also likely to aid regeneration and reduce disparity with surrounding areas. A potential major positive effect is therefore predicted. This effect is likely to be realised in the long-term and should be permanent. 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 plan this may negate, or delay any positive effects predicted. <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objective 1.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	<b>Effects:</b> See Objective 17. The key aim of Policy CP7 is to encourage investment in Wembley and to make land available for business (as well as residential) development. Development on the scale proposed will require significant inward investment over the plan period, and therefore a potentially major positive effect is predicted. Impact on the encouragement of indigenous business uncertain, however regeneration and significant investment in commercial premises may create local business opportunities. 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 plan this may negate, or delay any positive effects predicted. <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objective 17. The draft Wembley Masterplan includes more detail on the development of retail and business within Wembley.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	+	



<b>Policy CP7: Wembley Growth Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	<b>Effects:</b> Emphasis on transport linkages, and location of Wembley in accessible location is positive. However residential and commercial development on the scale proposed and the creation of a regional centre for sport, entertainment and leisure will generate commuting for work (unless all jobs are taken locally), events and conferences. These effects are predicted in the short and long-term. The recent Wembley Masterplan Transport Strategy Review (MVA consultants, November 2008) identifies (among many other findings) that development will have significant traffic impact on the local road network and that these will be particularly pronounced in Stage 1 of the Masterplan – the period to 2014. It also indicates that a step-change in public transport (especially bus) provision is required. Focussed growth and location of growth near / in areas of good public transport accessibility should encourage the use of public transport and support walking and cycling. <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objective 8. The draft Wembley Masterplan seeks the maximisation of opportunities to use rail for freight activities. Where achieved this would be expected to have a positive effect on encouraging freight movement by rail.
	Will it improve accessibility to work by public transport; walking and cycling?	+/-	
	Will it improve access between key employment areas and key transport interchanges?	+	
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive: <span style="color: green;">■</span> Minor positive: <span style="color: green;">+</span> Neutral: 0 Minor negative: <span style="color: orange;">-</span> Major negative: <span style="color: red;">■</span> Uncertain: ? Mixed: <span style="color: yellow;">-/+</span>			
<b>Overall Summary</b>  <b>Effects:</b> Policy CP7 is predicted to have potentially significant positive effects, especially against social and economic objectives, reflecting the policy's core aim of regenerating Wembley as the 'economic engine room for Brent'. Potential major positive effects are predicted in relation to reducing the number of unfit homes and improving the quality of the housing stock, ensuring development occurs on derelict, vacant or underused previously developed land and buildings and in relation to economic criteria: enhancing the image of the area as a business location, and reducing unemployment. All of these effects are predicted in the long-term, and 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. The inclusion of specific infrastructure targets, intended to meet identified needs arising from development are welcomed, although in some cases (e.g. open space provision, sports facilities) there is a risk that proposed targets will not be sufficient to meet new demand arising from development, which in turn will exacerbate existing deficiencies. These deficiencies are identified based on comparison of LBB's Social Infrastructure Model with the targets included in Policy CP7, see Supplementary Tables, below. In addition, there is the potential for significant negative effects against some environmental objectives. In particular, these are associated with the travel need / trips generated by residential, commercial, retail and leisure development on the scale proposed, and the intended creation of a regional entertainment and retail centre at Wembley. There are potential benefits however of promoting Wembley over, for example, Brent Cross as it will be more accessible by public transport, walking and cycling. Construction on the scale proposed, together with the increased resource consumption, waste generation, energy and water uses associated with population growth are also predicted to have potentially negative effects. Potential major negative effects are predicted in relation to increased traffic volumes, air quality and green house gas emissions / the consumption of energy. Minor negative effects are predicted in relation to noise pollution and concerns, water consumption and quality, and flood risk to people and property. Flood risk is also identified as a potentially significant issue in the Wembley Growth Area, particularly where significant development leads to more people / property being exposed to flood risk.  <b>Mitigation / Enhancement:</b> The infrastructure targets included within Policy CP7 reflect 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. The likelihood of 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, forthcoming Development Management Policies DPD and 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. 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 for positive and mitigation for negative effects identified in this appraisal.			

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<b>Policy CP7: Wembley Growth Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			<p>More specific comments include:</p> <ul style="list-style-type: none"> <li>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.</li> <li>There is apparent 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 Model, 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 100m<sup>2</sup>); 38 Local Equipped Area for Play (LEAPs) (min size 400 m<sup>2</sup>); and, 10 Neighbourhood Area for Play (NEAPs) / Multi-Use Games Areas (MUGAs ) (min size 1000 m<sup>2</sup>). It is recognised that the Council has made a judgement of the level of provision it considers can reasonably 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.</li> </ul>



**Policy CP8: Alperton Growth Area**

Alperton is promoted for mixed use regeneration along the Grand Union Canal. The Council will facilitate a shift in character towards a compact and sustainable waterside community. Alperton will become an enterprise hub, with a new supply of modern light industrial units, studios and managed affordable workspaces for creative industries, local business and artists to reinvigorate the local economy. 12.25 hectares of land along the canal is promoted for at least 1600 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including:

- A new 2 form of entry primary school
- A redeveloped Alperton Community School providing a further form of entry at secondary level
- New nursery facilities
- New health facilities including space for at least 2 GPs and 2 dentists
- A new 1 hectare public open space
- Improvements to the quality and accessibility existing public open spaces
- 3 x 0.2ha (minimum) public squares and pocket parks along the canal and linking improved pedestrian and cycling routes.
- A series of play areas within new developments and open space
- A new multi use community centre
- A minimum of 500 trees

As identified Map E.2 'Alperton Growth Area', a further 31 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generis uses.

**Policy CP9: South Kilburn Growth Area**

South Kilburn will experience substantial transformation. The area is promoted for regenerative development using the highest standards of urban design to physically improve the area and change the perception to a busy, thriving, safe and secure section of urban London. The Council will facilitate a shift from the housing estates of the 1960s and 1970s to a compact district set around the traditional street pattern with a substantial increase in the proportion of owner occupied households. A series of commercial uses and community facilities will be delivered, including indoor and outdoor recreation uses and new and improved open and public spaces. Around 48 hectares of land is promoted for the delivery of at least 2400 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including:

- A new 3 form of entry primary school
- Queen's Park secondary school to be extended by 2 forms of entry
- New nursery school places
- A healthy living centre with space for 9 GPs and other health services
- 4 new pocket parks of at least 0.2ha each
- Improvements to existing open spaces
- A series of play spaces
- Multi use games area
- 3 multi purpose community centres
- Replacement Albert Road Day centre
- A minimum of 200 trees

**Policy CP10: Church End Growth Area**

Church End is promoted for mixed use regeneration set around the economic revitalisation of the local centre and an outdoor market square, using the highest standards of urban design to physically improve the area and change the perception to a busy, thriving, safe and secure village with new family sized homes. Affordable premises for local businesses and an educational outreach centre will help to support business start ups and skills development. New open spaces and outdoor recreation facilities will be supported by a high quality landscaping, tree planting and public realm strategy to soften the impact of vehicular movement and improve conditions for pedestrians and cyclists. Connectivity with Wembley and beyond will be improved with safe routes to local interchanges. Around 8 hectares of brownfield land is promoted for around 800 new homes to 2026, supported by social and physical infrastructure identified within the Infrastructure Investment Framework, including:

- Extensions to existing local primary and secondary schools
- A new 2ha park and Multi Use Games Area
- A minimum of 200 trees
- A range of new play facilities within new developments and on open spaces
- A new health centre in the heart of the area with space for a further GP and 1 new dentist
- A new arts based community centre providing education and training to local people of all ages

A further 6.5 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generic uses.

#### **Policy CP11: Burnt Oak / Colindale Growth Area**

The Burnt Oak/Colindale area is promoted for mixed use regeneration along the axis of the Edgware Road. While tall buildings are acceptable in appropriate places along the Edgware Road, the Council will facilitate a shift in character and use towards a tradition street pattern supporting pedestrian movement, street frontages and public spaces and squares. New economic activity will be created in the form of ground floor commercial (including retail, where compliant with the sequential approach). New connections will be created in the form of improved access to local stations and the creation of effective interchanges with new buses. 14.65 hectares of land is promoted for at least 2500 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including:

- A new 2 form of entry primary school
- Extensions to a secondary school to provide a further 1 form of entry 6th form places
- New nursery places
- New health services including space for 3 GPs and 3 dentists
- A series of 3 new public open spaces and squares of at least 0.2ha each
- Improvements to the quality and accessibility of existing local open spaces
- A series of play areas within new developments and open space
- Indoor and outdoor sports facilities, including contributions towards a new community swimming pool serving the local area
- New bus services to provide interchanges with local rail and underground stations
- Multi-use community centre
- A minimum of 200 new trees planted

9 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generic uses.

#### **Policy CP12: Park Royal**

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The Council will work with its neighbouring boroughs, the GLA and the Park Royal Partnership to secure the 'opportunity area' objectives for Park Royal. The Council will plan for:

- The development or redevelopment of 50 hectares of land for employment uses to 2007 - 2017
- 4,400 new jobs created 2007 – 2017.
- Development contributing to 'Heart of Park Royal' implemented.
- Significant public transport improvements in relation to First Central secured.
- Introduction of improved orbital public transfer links to Wembley.
- New restaurants, bars, cafes to support the business area.
- 4,000 trees as Brent's contribution towards 10,000 trees in Park Royal as a whole.
- New children's nursery
- Expansion of existing primary school
- 1 new GP surgery

Development proposals should be in accordance with general policy for Strategic Industrial Locations apart from at Central Middlesex hospital where key worker housing and uses appropriate to a local centre meeting the needs of workers and visitors will be acceptable, and First Central development where enabling residential development will be acceptable where it helps to deliver significant public transport improvements; and parts of the Northfields Industrial Estate to secure industrial and commercial regeneration.

Development Proposals should be in accordance with the Park Royal Opportunity Area Planning Framework, to which regard will be had in determining planning applications. Tall buildings will be suitable at Central Middlesex Hospital and First Central sites.

#### Policies:

CP8: Alperton

CP9: South Kilburn

CP10: Church End

CP11: Burnt Oak / Colindale

CP12: Park Royal

Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
<b>Social</b>							
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	+	+	+	+	<b>Effects:</b> The aim of all the Growth Area policies is to bring about regeneration in identified priority areas. This is predicted to have a potentially positive effect on poverty and social exclusion, particularly in the long-term. The provision of social infrastructure in line with targets proposed is likely to also improve access to essential services. Where public transport, walking and cycling infrastructure are improved (e.g. in Alperton) there may be further benefits in reducing social exclusion, especially households with no access to a car. New economic / commercial opportunities are also sought in all Growth Areas (such as a permanent market space in Church End, and affordable creative workspaces in Alperton). Where achieved these initiatives are also likely to help reduce poverty and social exclusion. These potential positive effects are dependent on the benefits of regeneration, and employment opportunities being suitable and accessible to local people and particularly those currently living in poverty / socially excluded. Potential effect on affordability is uncertain, however increased supply and the requirement for a proportion to be
	Will it improve affordability of essential services?	+?	+?	+?	+?	+?	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							<p>affordable, as included in Policy CP2 – Population and Housing Growth, should cause a positive effect.</p> <p><b>Mitigation / Enhancement:</b></p> <p>If infrastructure requirements set out in the Infrastructure and Investment Framework (IIF) actually ensure that infrastructure is delivered and is appropriate to local needs (and phased to meet demand when needed) then enhancement of these potential effects are likely, in the long-term.</p> <p>More detail on how policies CP8 – CP12 will be implemented are included in other policies within the Core Strategy, for example: CP14, CP15, CP21 and CP23.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance, referred to in supporting text should also provide more detailed implementation.</p> <p>In South Kilburn Growth Area the South Kilburn SPD sets out detailed regeneration principles for the area. This SPD will guide development in South Kilburn. The overarching aim of the SPD to ensure long term physical, social and environmental regeneration of the area will enhance positive effects.</p> <p>Regeneration of Park Royal will need to be in accordance with the draft Park Royal Opportunity Area Planning Framework. Its primary aim is to protect Park Royal as an economic resource and help ensure that it can provide more employment for existing and new residents.</p>
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	0	0	0	0	<p><b>Effects:</b></p> <p>Minor positive effects are predicted, as all policies include specific targets to provide additional health services. In addition, improved housing, employment opportunities, and where achieved public realm improvements and opportunities for walking and cycling are all determinants in improving health.</p> <p>Comparison with LBBs social infrastructure modelling (see Supplementary Table, below) indicates the proposed provision of GP and dental services will be sufficient to meet predicted new demand in all Growth Areas, however, as there are existing deficits in provision in many areas (see Figure 4, Part A), the overall effect is predicted to be neutral.</p> <p>Infrastructure targets for the Growth Areas also propose play spaces and sports facilities, however based on comparison</p>
	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?	-	-	-	-	-	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							<p>with LBBs social infrastructure model there are predicted shortfalls in provision of specific types of facility / play area in most Growth Areas, and in Park Royal no targets are included for sports facilities, so effects are uncertain. With the exception of South Kilburn and Church End there are potentially significant shortfalls in the provision of open space compared to predicted demand (see Supplementary Tables, below). As a result opportunities for outdoor recreation and exercise may be insufficient, with the potential for permanent, long-term negative effects on health and wellbeing of residents.</p> <p>Potential temporary negative effects on noise are predicted due to the scale of construction required for redevelopment on the scale proposed. These effects are likely in the short and long-term given the phasing of construction over the plan period proposed.</p> <p>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.</p> <p><b>Mitigation / Enhancement:</b> See mitigation / enhancement under Objective 1.</p> <p>More detailed health infrastructure requirements are included in the IIF, however, whether this meets needs will depend on whether infrastructure is actually delivered in line with requirements set out.</p> <p>More detail on how Policies CP8 – CP12 are to be implemented is included in other policies in the Core Strategy, in particular CP15 and CP18.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also provide more detailed implementation.</p> <p>It is also recommended that future revisions to the LIP should specifically consider and promote cycling and walking infrastructure in the Growth Areas.</p> <p>The South Kilburn SPD and draft Park Royal Opportunity Area Planning Framework provide more detailed policy and implementation in these areas.</p>
3. To improve the education and skills of	Will it improve qualifications and skills of the population?	0	0	0	0	0	<p><b>Effects:</b> All the Growth Area policies and Park Royal policy include infrastructure targets</p>

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
the population	Will it improve access to high quality educational facilities?	+	+	-	+	-	<p>for expanded / improved education provision.</p> <p>Based on comparison with LBBs social infrastructure model (see Supplementary Tables, below) for primary and secondary levels the targets proposed are predicted to meet demand in Alperton, South Kilburn and Burnt Oak / Colindale. However there are potential shortfalls predicted in Church End and Park Royal. In these areas therefore there is likely in the medium and long-term to be a negative effect on access to education and educational attainment.</p> <p>Nursery school provision is not quantified in any of the policy targets, so it is not possible to predict if this will meet expected demand.</p> <p>No significant effects predicted on qualifications and skills, or meeting key skill gaps.</p> <p><b>Mitigation / Enhancement:</b> See Objective 1.</p> <p>Greater detail is provided in the IIF, such as specific targets for school expansion and nursery school places, however, whether this meets needs will depend on whether infrastructure is actually delivered in line with requirements set out, which in turn is dependent on a critical mass of development being achieved to ensure the financial support is available.</p> <p>The draft Park Royal Opportunity Area Planning Framework seeks to provide training to enable local people to access jobs. In South Kilburn the SPD seeks to ensure that opportunities and training are made available to local people so that they can benefit from jobs created through regeneration / construction.</p>
	Will it help fill key skill gaps?	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?	+	+	+	+	+	<p><b>Effects:</b> Collectively the Growth Areas are proposed to include the development of 7300 new homes over the plan period. Limited housing development is expected in Park Royal, although some key worker housing associated with Central Middlesex hospital and "enabling" residential development at First Central is proposed.</p> <p>Increased supply of housing is likely to improve the quality of the housing stock, as well as making supply of a mix of housing size and tenure, and affordability more likely, particularly in the long-term.</p> <p>Policy and/or supporting text to policies for South Kilburn (CP9) and Church End (CP10) explicitly seek a mix of tenure and size of dwellings, hence potentially major positive effects are predicted in these</p>
	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	
	Will it reduce homelessness?	0	0	0	0	0	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							<p>Growth Areas in relation to encouraging a range of dwelling type, size and tenure. Effect on homelessness uncertain, but not expected to be significant.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Core Strategy Policy CP2 – Population and Housing Growth seeks to ensure that housing development in the Growth Areas meets the London Plan target of 50% of new homes being affordable.</p> <p>Core Strategy Policies CP2, CP5 and CP6 provide more implementation details in relation to housing type and density in the Growth Areas.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also contain more detailed policy.</p> <p>In South Kilburn the existing SPD seeks to 'ensure a mix of housing type and tenure built to high quality environmentally sustainable standards'. This is likely to enhance positive effects in this area.</p> <p>The draft Park Royal Opportunity Area Planning Framework includes the objective to deliver housing where it can enable other benefits including affordable.</p>
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	+?	+	+?	+?	<p><b>Effects:</b></p> <p>Regeneration and public realm improvements may have a beneficial effect on crime and fear of crime, however this effect is uncertain.</p> <p>Supporting and policy text for Church End (CP10) explicitly seeks design which emphasises the benefits of 'natural surveillance' and creates a safe and secure village centre. Therefore there is predicted to be a potential positive effect on crime levels and fear of crime in Church End. This is likely to be a long-term and permanent effect.</p> <p><b>Mitigation / Enhancement:</b></p> <p>The IIF sets out more detailed requirements for public realm improvements. If these are delivered this may enhance the positive effect on reducing crime and fear of crime.</p> <p>Addressing crime and fear of crime is included within Core Strategy Objective 12 – Promoting Healthy Living and Creating a Safe and Secure Environment, however there is no specific policy text seeking to reduce crime or fear of crime.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area Specific guidance should include more detailed</p>
	Will it reduce the fear of crime?	+?	+?	+	+?	+?	



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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							policy on reducing crime and fear of crime.. In South Kilburn the South Kilburn SPD includes specific Safety and Security principles which seek to deter all forms of crime and reduce fear of crime. Where achieved this would have a significant positive effect on these objectives.
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	+	+	+	+	<b>Effects:</b> Increased provision of community facilities which are included in all Growth Area policies and Park Royal policy may encourage, in the long-term, engagement in community activities, however this effect is uncertain as increased provision would not in itself increased participation. Regeneration, public realm improvements, and the provision of improved / increased open space may all contribute to fostering a sense of pride in the Growth Areas and Park Royal. A positive but uncertain effect is therefore predicted. <b>Mitigation / Enhancement:</b> The IIF includes more detailed requirements / aspirations in relation to community facilities, open space and public realm improvements. If these are delivered as set out these would potentially enhance these effects. Core Strategy Policy CP23 sets out more implementation details in relation to community facilities. It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also provide more detailed policy. The South Kilburn SPD is seeking to deliver the New Deal for Communities objective to create a better place where people are proud to live, learn and work.
	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	
	Will it improve ethnic relations?	0	0	0	0	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	0	0	0	0	
	Will it encourage people to respect and value their contribution to society?	0	0	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?	+	+	+	+	?	<b>Effects:</b> All the Growth Area policies include targets relating to community facilities. These targets are intended to lead to increased investment in community services and facilities. In some areas however there is a potentially significant shortfall in the target proposed in policy, and the predicted demand identified by the LBB social infrastructure model (see Supplementary Tables, below). In particular in Alperton (CP8) the policy proposes a target of 1 new multi-use community centre, whereas predicted demand is for more than 2 centres, and in Burnt Oak / Colindale (CP11) the policy proposes a target of 1 centre, while the model predicts demand
	Will it make access more affordable?	-	-?	-?	-	?	
	Will it make access easier for those without access to a car?	-	-?	-?	-	?	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							for more than 4 centres over the plan period. In these Growth Areas there is a minor negative effect predicted in relation to affordability and ease of access to key services. There is no similar target in Park Royal policy (CP12). <b>Mitigation / Enhancement:</b> See mitigation / enhancement under Objectives 1 and 6.
<b>Environmental</b>							
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	-	-	-	-	-/+	<b>Effects:</b> Increased development, population and economic activity 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. Mixed effect predicted in Park Royal, as policy CP12 explicitly seeks significant public transport improvements in relation to First Central and improved public transfer between Park Royal and Wembley. These effects are likely to be both short and long-term and permanent.  Policies CP8 (Alperton), CP11 (Burnt Oak / Colindale) and CP12 (Park Royal) all include specific targets for improving public transport provision and/or walking and cycling provision. However given increases in housing and population in these areas it is considered unlikely that these will lead to an increase in the overall proportion of journeys made using modes other than the car.  The policy for Alperton (CP8) includes a target of improved pedestrian and cycling routes, which is likely to encourage walking and cycling. In other areas improved public realm and open space provision may have this effect, but this is uncertain. <b>Mitigation / Enhancement:</b> It is recommended that the inclusion of public transport, walking and cycling aspirations within the policy targets for all Growth Areas.  Core Strategy Policy CP14 includes more detailed implementation in relation to public transport improvements in the borough.  It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also include more detailed implementation.  Future revisions of the LIP should also consider transport infrastructure
	Will it increase the proportion of journeys using modes other than the car?	?	?	?	?	?	
	Will it encourage walking and cycling?	+	+	+	+	?	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							requirements related to development in the Growth Areas. The IIF includes more detailed transport infrastructure requirements, including public transport and walking and cycling. If these are delivered as set out, this is likely to help mitigate some of the negative effects of increased travel need predicted. In South Kilburn and Park Royal the South Kilburn SPD and draft Park Royal Opportunity Area Planning Framework provide more detailed policy and principles in relation to improving public transport and walking / cycling infrastructure.
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?	-?	-?	-?	-?	-?	<b>Effects:</b> Water quality and use are not considered explicitly in the policies, however development on the scale proposed will potentially lead to increased water demand as well as run-off and pollution risk. Given the significant population increase expected this potential effect is likely even where mitigation measures to minimise water use in developments etc. reduce consumption per capita. <b>Mitigation / Enhancement:</b> More detailed policy in relation to water use in development is provided in Core Strategy Policy CP19. It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also provide more detailed policy in relation to water use and quality relating to development. The South Kilburn SPD seeks to ensure that developments maximise water efficiency, recycling and attenuation and reduce consumption. The Mayor's future Water Strategy for London is also likely to provide targets, policy and guidance in relation to water use, quality and management in development.
	Will it reduce water consumption and improve water efficiency?	-	-	-	-	-	
10. To improve air quality	Will it improve air quality?	-	-	-	-	-/+	<b>Effects:</b> See Objective 8. Given that existing poor air quality in Brent is strongly related to road traffic, the predicted increase in travel need, even where mitigation measures are taken, is very likely to have a negative effect on air quality and reduce likelihood of the achievement of AQMA objectives. Mixed effect predicted in Park Royal (CP12) due to the policy targeting significant public transport improvements. <b>Mitigation / Enhancement:</b>
	Will it help achieve the objectives of the Air Quality Management Plan?	-	-	-	-	-/+	
	Will it reduce emissions of key pollutants?	0	0	0	0	0	

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Objective	Criteria	Score					Comments
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							See mitigation / enhancement under Objective 8.
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	<p><b>Effects:</b></p> <p>All policies include targets relating to tree planting. Therefore positive effects are predicted in relation to the protection and enhancement of trees, although these effects will depend on planting being in excess of any loss to trees as a result of development.</p> <p>There are areas of local nature conservation importance, or other designation in all Growth Areas (see Figure 34, Part A), except South Kilburn, 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.</p> <p>Targets in all policies (except CP12 – Park Royal) seeking improved open space and parks provision may provide opportunities to provide / enhance habitats and biodiversity.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Biodiversity and habitat can play an important role in maintaining a quality environment, as well as improving quality of life and wellbeing for residents. It is recommended that all policies could include specific targets seeking the introduction and enhancement of areas of habitat and biodiversity value, and the promotion / realisation of the Brent BAP targets.</p> <p>More detailed policy in relation to biodiversity is included in other policies in the Core Strategy, in particular CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also include more detailed implementation.</p> <p>The South Kilburn SPD seeks to ensure development in the area contributes to the achievement of the Brent BAP aims.</p>
	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	
	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?	-/+	+	+	-/+	?	<p><b>Effects:</b></p> <p>See Objective 6 and Objective 2.</p> <p>All Growth Area policies (except Park Royal) include targets which seek to provide new and improve the quality of existing open spaces. However, some mixed effects are predicted in relation to improving the visual amenity of open spaces, because, as noted under Objective 2, with the exception of South Kilburn and Church End there are</p>
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	+	+	+	+	
	Will it protect and	+	++	+	+	+	

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		CP8	CP9	CP10	CP11	CP12	
	enhance local distinctiveness and sense of place?						<p>potentially significant shortfalls in the provision of open space compared to predicted demand (see Supplementary Tables, below).</p> <p>A central aim of the Growth Area policies is to enhance the quality of the public realm and townscape in the Growth Areas, and this is likely also to enhance local distinctiveness and sense of place, particularly in the long-term.</p> <p>The creation of distinctive quarters in South Kilburn (CP9) is likely to have a major positive effect on sense of place and local distinctiveness, particularly in the long-term.</p> <p>Impact on views is uncertain.</p> <p><b>Mitigation / Enhancement:</b></p> <p>More detailed implementation in relation to landscape and townscape is included in other policies in the Core Strategy, in particular Policies CP5, CP6 and CP18.</p> <p>The IIF sets out more detailed public realm and open space requirements. If these are achieved this will potentially enhance positive effects identified.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also set out more details on implementation.</p> <p>The South Kilburn SPD includes detailed Development Principles in relation to public open space and the public realm, design and development in the built environment, architectural quality etc. These are likely to enhance positive effects in South Kilburn. Growth Area specific guidance for other areas could draw upon the example of South Kilburn SPD in this regard.</p> <p>The draft Park Royal Opportunity Area Planning Framework also includes specific guidance in relation to public realm and open space, which should enhance positive effect.</p>
	Will it minimise visual intrusion and protect views?	?	?	?	?	?	
	Will it decrease litter in urban areas and open spaces?	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?	?	?	?	?	?	<p><b>Effects:</b></p> <p>The Growth Area policies and policy for Park Royal do not specifically refer to built heritage and historic conservation value, and the effect on this objective is therefore uncertain. There is, however, the possibility of both significant positive and negative impacts on the historic environment, particularly over the long-term given the scale of development proposed.</p> <p><b>Mitigation / Enhancement:</b></p> <p>There is no policy in the Core Strategy</p>
	Will it protect listed buildings and their settings?	?	?	?	?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	?	?	?	?	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							specifically addressing the historic environment and built heritage. It is recommended that consideration be given to the inclusion of policy which seeks to protect and enhance the historic environment and cultural assets.  It is also recommended that the forthcoming Development Management Policies DPD and Growth Area specific guidance should provide more detailed implementation in relation to development and the historic environment.  The South Kilburn SPD seeks specifically to protect / enhance the historic environment / landscape in the area.
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?	-	-	-	-	-	<b>Effects:</b> See Objective 8. Construction associated with development on the scale proposed will result in significant temporary increases in greenhouse gases and energy consumption. In the medium to long-term, increased economic activity and residential population will all contribute to an overall increase in emissions of greenhouse gases. This impact is likely to occur regardless of mitigation measures taken. Supporting text to Policy CP9 – Alperton, seeks low carbon homes which maximise passive solar gain, however the overall effect is still predicted to be negative. Energy efficiency and renewable energy generation are not mentioned in any of the Growth Area Policies or in Park Royal Policy. Development adjacent to the Grand Union Canal in Alperton and Park Royal may exacerbate fluvial flood risk. In other Growth Areas and Park Royal, increased development may lead to higher risk of surface water / run-off flooding. Sewer flooding due to overloading of existing infrastructure may also be an issue associated with development on the scale proposed, as well as rainfall patterns predicted under climate change. The inclusion of targets for tree planting, and open space provision may help ease the impact of increased urban temperatures, however development on the scale proposed may outweigh these benefits, hence a minor negative effect is predicted. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy, in particular CP18 – Brent Strategic Climate Mitigation and Adaptation Measures provide more details on implementation in relation to energy and climate change.
	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?	-	-?	-?	-?	-	
	Will it reduce the risk of damage to property from storm events?	0	0	0	0	0	
	Will it help reduce the impact of increased urban temperatures on people and property?	-	-	-	-	-	



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Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							<p>It is recommended that the forthcoming Development Management Policies DPD, and proposed Growth Area specific guidance should also provide more detailed implementation.</p> <p>The South Kilburn SPD seeks to maximise energy efficiency, and requires development to ensure that at least 10% of energy need is met through renewable sources.</p> <p>All development in the Growth Areas should account for guidance included in the Brent SFRA, and any subsequent revisions.</p>
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	-	-	-	-	<p><b>Effects:</b></p> <p>There is the potential for significant temporary negative effects in relation to consumption of materials and resources, and waste in the construction industry. These potential effects are predicted due to the scale of development proposed and may occur in both the short and long-term depending on the phasing of construction.</p> <p>Potential negative effect also predicted in relation to household waste generation, due to increased residential population associated with new housing provision. This effect will be permanent and long-term.</p> <p>Significant new development and increased waste generation may provide opportunities to increase waste recovery and improve waste management and recycling facilities, however this is not explicitly recognised in the policies.</p> <p><b>Mitigation / Enhancement:</b></p> <p>It is recommended that the forthcoming Development Management Policies DPD and Growth Area specific guidance should provide greater implementation detail in relation to waste minimisation and management, including a requirement for compliance with ICE Demolition Protocol standards.</p> <p>Brent SPG19: Sustainable Design, Construction and Pollution Control is a material consideration in relation to large developments and should also provide some mitigation for these potential negative effects.</p> <p>The draft Park Royal Opportunity Area Planning Framework seeks to 'improve waste management utilising the latest technologies'.</p> <p>The South Kilburn SPD includes a development principle seeking improved waste management, including, for example, complying with the ICE Demolition Protocol standards.</p>
	Will it reduce household waste?	-	-	-	-	-	
	Will it increase waste recovery and recycling and improve facilities?	?	?	?	?	?	
	Will it reduce hazardous waste?	0	0	0	0	0	
	Will it reduce waste in the construction industry?	-	-	-	-	-	

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Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							This is likely to mitigate for the negative effects predicted in these areas. As noted in the Core Strategy (paragraphs 5.36 – 5.41) LB Brent is working other West 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.
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	+	+	+	+	<p><b>Effects:</b></p> <p>The aim of the Growth Area and Park Royal Policies is to encourage regeneration and maximise the use of previously developed / brownfield land. However, as development on the scale proposed is likely to put pressure on existing open / green spaces, minor positive effects are predicted. These are likely to be long-term and permanent effects.</p> <p>Figure 27 (Part A) shows that there is considerable historic industrial land in Brent, and that a significant area of the Growth Areas and Park Royal are made up of this. Redevelopment on this land will necessitate appropriate remediation, and this is predicted to have a positive effect on the remediation of contaminated land, especially in the long-term.</p> <p><b>Mitigation / Enhancement:</b></p> <p>It is recommended that the forthcoming Development Management Policies DPD, and proposed Growth Area specific guidance should provide more detailed policy and implementation in relation to land quality and soil resources.</p> <p>LBB 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 LBB website. These are likely to enhance the potential positive effects.</p> <p>Specific developments should also consider potential land contamination and soil resource issues in site / project specific EIAs and other investigations.</p>
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	+	+	+	+	
	Will it ensure contaminated land is remediated as appropriate?	+	+	+	+	+	
	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	
<b>Economic</b>							
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	++	+	++	+	++	<p><b>Effects:</b></p> <p>All of the policies seek new economic and commercial development and opportunities. Positive effects are predicted in relation to these economic criteria. In Alperton (CP8), Church End</p>
	Will it improve business development and	+	0	+	0	+	

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Policies: CP8: Alperton CP9: South Kilburn CP10: Church End CP11: Burnt Oak / Colindale CP12: Park Royal							
Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
	enhance productivity?						<p>(CP10) and Park Royal (CP12), major positive effects are predicted as these policies and supporting text seek specific improvements which are expected to have significant positive effects. For example Alperton policy text seeks to create a new enterprise hub, with a supply of new modern light industrial units, studios and managed affordable workspaces. The needs of local businesses are also specifically targeted. These effects are predicted in the long-term.</p> <p>Improvements to the public realm, transport infrastructure and provision of social and recreation / sports facilities are all likely to enhance the image of these areas as business locations. Provision of good quality housing will have the same effect. Positive effects are therefore predicted, particularly in the long-term. Potentially major positive effects are predicted in Alperton and Park Royal as in these areas the policies are explicitly seeking significant improvements to commercial / industrial infrastructure and premises.</p> <p>Effects on the resilience of the local economy and the promotion of key clusters and sector are uncertain. This will depend on the nature of businesses which develop, which is probably beyond the scope of the Core Strategy (as a strategic document) to influence.</p> <p>The realisation of these economic goals 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.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Policy CP3 – Commercial Regeneration, and CP20 – Strategic and Borough Employment Areas provides more detailed policy related to the economy and employment.</p> <p>It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also provide more detailed policy.</p> <p>In Park Royal the draft Park Royal Opportunity Area Planning Framework will enhance these positive effects.</p>
	Will it improve the resilience of business and the local economy?	?	?	?	?	?	
	Will it promote growth in key sectors?	?	?	?	?	?	
	Will it promote growth in key clusters?	?	?	?	?	?	
	Will it enhance the image of the area as a business location?	++	+	+	+	++	
18. To offer everybody the opportunity for	Will it reduce short and long-term local unemployment?	+	+	+	+	+	<p><b>Effects:</b></p> <p>See Objective 17.</p>

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Objective	Criteria	Score					Comments
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rewarding and satisfying employment	Will it provide job opportunities for those most in need of employment?	+	+	+	+	+	Effect on earnings uncertain as these will depend on types of employment created, however increased opportunities may have a positive effect, particularly in the long-term.  As with effects under Objective 17 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 plan this may negate, or delay any positive effects predicted.  <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objective 17.  The South Kilburn SPD seeks to maximise employment opportunities for local residents arising from regeneration.  It is recommended that the forthcoming Development Management Policies DPD and proposed Growth Area specific guidance should also include more detailed implementation on how employment opportunities can be made as accessible to local residents as possible.
	Will it help to improve earnings?	+	+	+	+	+	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	++	++	++	++	<b>Effects:</b> This is one of the key aims of the Growth Area policies and Park Royal policy. Potentially major positive effects are predicted. These effects are likely to be realised in the long-term and should be permanent. See effects under Objectives 1 – 7, and 17.  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 plan this may negate, or delay any positive effects predicted.  <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objectives 1 - 7 and 17.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	++	+	++	+	+	<b>Effects:</b> See Objective 17. Significant positive effects predicted in relation to encouraging indigenous business. These are predicted to be potentially major effects in Alperton (CP8) and Church End (CP10) as Policy CP8 specifically seeks to supply affordable workspaces / units for local businesses, and Policy CP10 seeks to create a new permanent market space, as well as industrial units for small and medium size enterprises. These effects are likely to be realised in the long-term and should be permanent.
	Will it encourage inward investment?	+	+	+	+	+	
	Will it make land and property available for business development?	++	+	+	+	++	

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Objective	Criteria	Score					Comments
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							Development on the scale proposed will necessitate inward investment over the plan period, and therefore a potentially major positive effect is predicted. 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 plan this may negate, or delay any positive effects predicted. <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objectives 17 and 18.
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-/+	-/+	-/+	-/+	-/+	<b>Effects:</b> Potentially mixed effects are predicted in relation to commuting. The provision of employment opportunities close to new housing development may help to reduce travel need and commuting. However population and economic activity increases on the scale proposed are likely to lead to some additional commuting for work, both within the borough and to/from adjacent boroughs. Supporting text to CP8 – Alperton seeks to improve access to existing interchanges at Alperton and Stonebridge Park Stations, and policy text in CP12 – Park Royal seeks significant public transport improvements at First Central, and direct orbital links to Wembley. These are likely to have positive effect in terms of improved access between key employment areas and transport interchanges. However existing public transport accessibility in Park Royal is relatively poor, and thus a mixed effect is predicted. Focussed growth and location of growth near / in areas of relatively good public transport accessibility should encourage the use of public transport and support walking and cycling. Specific improvements to walking and cycling infrastructure are included in the targets for Policy CP8 – Alperton. Supporting text to Policy CP12 – Park Royal mentions opportunities to develop the potential to for water freight. <b>Mitigation / Enhancement:</b> See mitigation and enhancement under Objective 8. It is recommended that Policy CP8 – Alperton seek to maximise opportunities for transport / freight movement by water on the Grand Union Canal. The draft Park Royal Opportunity Area Planning Framework will provide implementation support which is likely to
	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	+	

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**Policies:****CP8: Alperton****CP9: South Kilburn****CP10: Church End****CP11: Burnt Oak / Colindale****CP12: Park Royal**

Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							enhance these effects.

**Key:** Major positive: ■ Minor positive: + Neutral: 0 Minor negative: ■ Major negative: ■ Uncertain: ? Mixed: -/+

**Overall Summary****Effects:**

Overall policies CP8 – CP12 are predicted to have predominantly positive effects in relation to social and economic sustainability objectives, but are predicted to have some potentially significant negative effects in relation to some environmental objectives.

The Policies' shared aim of facilitating regeneration, housing provision and enhanced / increased social infrastructure is predicted to have positive effects on reducing poverty and social exclusion, improving health and providing the opportunity to live in a decent home. As development is to be phased over the plan period, and is seeking to transform the Growth Areas as places to live, the majority of these effects are predicted to be long-term and permanent effects

The scale and likelihood of these positive effects will 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 to the actual delivery of the infrastructure, if a critical mass is not achieved. This would clearly undermine 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.

In addition, potential 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.

In addition in some cases comparison of the targets included in policies CP8 – CP12 and predicted need calculated in LBBs social infrastructure model has identified specific potential shortfalls in provision:

- With the exception of South Kilburn and Church End there are potentially significant shortfalls in the provision of open space compared to predicted demand, this may mean there are insufficient opportunities for outdoor recreation and exercise, with the potential for permanent, long-term negative effects on health and wellbeing of residents.
- Shortfalls are predicted in the provision of specific types of facility / play area (LEAPs, MUGAs etc) in most Growth Areas, and in Park Royal no targets are included for sports facilities, so potential effects are uncertain. Where there are shortfalls in provision, opportunities for outdoor play and recreation for children and youths will be restricted, with potential negative health and wellbeing effects in the long-term, as well as potential noise / anti-social behaviour problems if young people are unable to congregate in safe, designated areas.
- There are potential shortfalls in primary and secondary level school places predicted in Church End and Park Royal. In all areas the policy targets do not quantify proposed supply of nursery school places. Where there is a shortfall of places there is likely in the medium and long-term to be a negative effect on access to education and educational attainment.
- There are potential shortfalls in the provision of community facilities, for example in Alperton (CP8) the policy proposes a target of 1 new multi-use community centre, whereas predicted demand is for more than 2 centres, and in Burnt Oak Colindale (CP11) the policy proposes a target of 1 centre, while the model predicts demand for more than 4 centres over the plan period. In these Growth Areas therefore a minor negative effect is predicted in relation to affordability and ease of access to key services.

Significant potential positive long-term economic effects are also predicted, as all policies seek to encourage and support new commercial and economic activity, which is likely to encourage new start ups, and provide opportunities and employment, some of which is likely to benefit local people. Potential economic effects are predicted to be particularly strong in Alperton (CP8) and Park Royal (CP12) where economic regeneration and the provision of improved industrial / commercial units are a particular focus of policy.

Potential 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.

New and increased population as well as employment / economic activity is also expected to generate travel need, and associated air pollution, noise and disruption. This effect may be mitigated to some extent by measures to improve / enhance public transport, walking and cycling infrastructure, however there is only clear policy in this regard in Policies CP8 - Alperton and CP12 – Park Royal.

**Mitigation / Enhancement:**

For a number of issues / effects other policies in the Core Strategy are likely to provide more detailed implementation and mitigation / enhancement.

More detailed infrastructure requirements are set out in the IIF. Where these requirements are actually delivered this is likely to help mitigate for negative and enhance positive effects, particularly in relation to social objectives.

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



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**Policies:****CP8: Alperton****CP9: South Kilburn****CP10: Church End****CP11: Burnt Oak / Colindale****CP12: Park Royal**

Objective	Criteria	Score					Comments
		CP8	CP9	CP10	CP11	CP12	
							<p>these two areas, and are likely in many cases to help mitigate negative and enhance positive effects. 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> <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 Growth Areas. This guidance will provide an important opportunity to mitigate for negative and enhance positive effects identified in this appraisal. In addition the forthcoming Development Management Policies DPD could also provide more detailed implementation and policies in relation to a number of specific issues.</p> <p>All development in the Growth Areas should account for guidance included in the Brent SFRA, and any subsequent revisions.</p> <p>The Mayor's future Water Strategy for London is also likely to provide targets, policy and guidance in relation to water use, quality and management in development.</p> <p>More specific comments include:</p> <ul style="list-style-type: none"> <li>• It is recommended that future revisions to the LIP should specifically consider public transport infrastructure improvements and promote cycling and walking infrastructure in the Growth Areas.</li> <li>• As noted in the Core Strategy (paragraphs 5.36 – 5.41) LB Brent is working other West 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.</li> <li>• It is recommended that an increased level of detail 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.</li> <li>• 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. Comparison of provision based on targets included in the Growth Area Policies and potential future demand calculated by LB Brent through the Social Infrastructure Model has identified potential shortfall (see Supplementary Tables). It is recommended that the policies should seek to target provision in line with, or exceeding predicted demand in relation to the following infrastructure shortfalls: <ul style="list-style-type: none"> <li>○ Potential shortfalls in provision of sport facilities and play areas (e.g. MUGAs) in Alperton, South Kilburn, Burnt Oak / Colindale and Park Royal.</li> <li>○ Potentially significant shortfalls Identified in Alperton, Burnt Oak / Colindale and Park Royal in the provision of open space.</li> <li>○ 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</li> <li>○ Shortfalls in provision of community facilities in Alperton, Church End and Burnt Oak / Colindale.</li> </ul> </li> <li>• It is recommended that the public transport, walking and cycling aspirations are included within the policy targets for all Growth Areas.</li> <li>• It is recommended that all policies could include specific targets seeking the introduction and enhancement of areas of habitat and biodiversity value.</li> <li>• It is recommended that Policy CP8 – Alperton could seek to maximise opportunities for transport / freight movement by water on the Grand Union Canal, perhaps through cross-reference to Policy CP20 – Strategic and Borough Employment Areas, and in particular supporting text paragraph 5.62.</li> </ul>

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### Supplementary Tables: Comparison of Policy Infrastructure Targets included in Growth Area Policies (and Park Royal Policy) and Social Infrastructure needs as identified by LBB through the Brent Social Infrastructure Model – 12/01/09 as supplied to CEP 27/01/09

The table below sets out the basis for estimated social infrastructure need. These have been copied from the LBB social infrastructure model, and were used by LBB to calculate requirements and demand arising from proposed development in the Growth Areas and the rest of the borough.

Infrastructure type	Basis for estimated need / demand in Infrastructure model
Transport	N/a
Education	Infrastructure model assumes: <ul style="list-style-type: none"> <li>60 children per nursery</li> <li>30 children per class in primary, secondary and post-16.</li> </ul>
Health	<ul style="list-style-type: none"> <li>Infrastructure model uses PCT target of 1,500 people per GP</li> <li>And target of 2,000 people per dentist</li> </ul>
Open space and sport	<ul style="list-style-type: none"> <li>1 swimming pool per 40,000 people</li> <li>Outdoor sports facilities based on area / 1,000 people from Draft Sports Facilities Improvement Strategy</li> <li>Sports halls – one court hall per 13,000 people</li> <li>Health and fitness stations – 6.3 per 1,000 people</li> <li>Childrens playspace based on GLA Guidance of 10sqm per child</li> </ul>
Community facilities	<ul style="list-style-type: none"> <li>Community facilities: 371sqm per 1,000 people (South Kilburn SPG)</li> </ul>
Other	Libraries: <ul style="list-style-type: none"> <li>30sqm per 1,000 people (Department for Culture Media and Sport standard)</li> </ul>

Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
<b>CP7 - Wembley</b>			
Transport	<ul style="list-style-type: none"> <li>New road connections</li> <li>Junction improvements</li> </ul>		Road improvements are included but not public transport, policy could also include reference to key public / walking / cycling infrastructure improvements.
Education	<ul style="list-style-type: none"> <li>3 new 2 form of entry primary schools</li> <li>A new combined (2 form of entry) primary and secondary school (6 form of entry) on the Wembley park site</li> <li>Extensions to existing local schools</li> <li>Nursery places</li> </ul>	<ul style="list-style-type: none"> <li>Total requirement 8.6 primary school FE.</li> <li>5.1 secondary FE</li> <li>6.6 post 16 FE</li> <li>27.7 nursery classes</li> </ul>	The main provisions in the policy should meet identified need. Although there is a potential shortfall in secondary places, depending on proposed "extensions". It is unclear if nursery places need will be met as policy does not state scale of provision expected.
Health	<ul style="list-style-type: none"> <li>New health facilities with space for 17 GPs 13 new dentists</li> </ul>	<ul style="list-style-type: none"> <li>17.1 GPs</li> <li>12.8 dentists</li> </ul>	Provisional target proposed by policy should meet expected demand.
Open space and sport	<ul style="list-style-type: none"> <li>At least 2.4 hectares of new public open space to comprise of a new park (1.2ha min) and 3</li> </ul>	<ul style="list-style-type: none"> <li>3.8ha outdoor space (smaller parks)</li> </ul>	Apparent shortfall in meeting predicted open space need based on target included in policy.

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Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
	<ul style="list-style-type: none"> <li>pocket parks/squares (0.4ha each)</li> <li>Improvements to the quality and accessibility of existing open spaces</li> </ul>		
	<ul style="list-style-type: none"> <li>A new community swimming pool serving the north of the borough</li> </ul>	<ul style="list-style-type: none"> <li>1.2 swimming pools</li> </ul>	Policy target should help meet new demand arising within Wembley GA itself – however this may be insufficient to address existing demand / and policy proposes this new provision will serve the entire north of the borough.
	<ul style="list-style-type: none"> <li>Indoor and outdoor sports facilities</li> </ul>	<ul style="list-style-type: none"> <li>7.8 hectares outdoor sports space</li> <li>2 sports halls</li> <li>161 health and fitness stations</li> </ul>	Unclear if policy will meet identified need as numbers / area not specified.
	<ul style="list-style-type: none"> <li>Play areas</li> </ul>	<ul style="list-style-type: none"> <li>4.8ha Child and Young People play space</li> <li>235 LAPs (min size 100m<sup>2</sup>)</li> <li>38 LEAPs (min size 400 m<sup>2</sup>)</li> <li>10 NEAPs / MUGA (min size 1000 m<sup>2</sup>)</li> </ul>	<p>Unclear if policy will meet identified need as numbers / areas not specified.</p> <p>However, identified need is significant – and meeting this need will require strong implementation and requirements on development.</p>
	<ul style="list-style-type: none"> <li>A minimum of 1000 trees</li> </ul>	n/a	Target for trees is welcomed.
Community facilities	<ul style="list-style-type: none"> <li>New multi use community facilities</li> </ul>	<ul style="list-style-type: none"> <li>19 multi-functional community centres</li> </ul>	Unclear if policy will meet identified need as number not specified.
	<ul style="list-style-type: none"> <li>A new civic centre</li> </ul>	n/a	
Other	<ul style="list-style-type: none"> <li>District wide combined cooling, heat and power as set out in CP17</li> </ul>		
		<ul style="list-style-type: none"> <li>1.5 libraries</li> </ul>	No mention in policy.
<b>CP8 – Alperton</b>			
Transport	<ul style="list-style-type: none"> <li>Improved pedestrian and cycling routes</li> </ul>		<p>Reference to pedestrian and cycling routes welcomed. More detail might increase likelihood of implementation, especially as there is limited detail on pedestrian and cycling facilities in IIF.</p> <p>Recommend inclusion of public transport infrastructure in policy too, as this is included in IIF.</p>

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Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
Education	<ul style="list-style-type: none"> <li>New 2 form of entry primary school</li> <li>Redeveloped Alperton community school providing 1 extra FE.</li> <li>New nursery facilities</li> </ul>	<ul style="list-style-type: none"> <li>3.9 nursery classes</li> <li>1.3 primary school FE</li> <li>0.9 secondary school FE + 1.1 FE post 16</li> </ul>	<p>Potential shortfall in primary and secondary provision based on predicted demand.</p> <p>Unclear if nursery places need will be met as policy does not state what provision is expected.</p>
Health	<ul style="list-style-type: none"> <li>New health facilities with space for at least 2 GPs and 2 dentists</li> </ul>	<ul style="list-style-type: none"> <li>2.4 GPs</li> <li>1.8 dentists</li> </ul>	Provision target proposed by policy appears to meet demand.
Open space and sport	<ul style="list-style-type: none"> <li>A new 1 ha public open space</li> <li>Improved quality and accessibility of existing public spaces</li> <li>3 x 0.2 ha (minimum) public squares and pocket parks.</li> <li>A series of play areas within new developments and open space</li> <li>A minimum of 500 trees</li> </ul>	<ul style="list-style-type: none"> <li>2.6ha - Outdoor Open Space</li> <li>1.2ha - Outdoor sports space</li> <li>0.7ha - Child and young people play space</li> <li>33 LAPs (min 100m<sup>2</sup>)</li> <li>6 LEAPs (min 400m<sup>2</sup>)</li> <li>1.6 NEAPs / MUGAs (1000m<sup>2</sup>)</li> <li>0.2 swimming pools</li> <li>0.3 sports halls</li> <li>22 indoor sport health and fitness stations</li> </ul>	<p>Potentially significant shortfall in open space provision based on predicted need for open space and policy targets.</p> <p>Unclear if play area provision likely to meet the need for predicted demand.</p> <p>No mention in policy of indoor / outdoor sports provision.</p>
Community facilities	<ul style="list-style-type: none"> <li>A new multi-use community centre</li> </ul>	<ul style="list-style-type: none"> <li>2.6 multi-functional community centres</li> </ul>	Shortfall in provision predicted.
Other		<ul style="list-style-type: none"> <li>0.1 libraries</li> </ul>	Unclear if policy will meet identified need as not included.
<b>CP9 – South Kilburn</b>			
Transport			No mention of transport infrastructure.
Education	<ul style="list-style-type: none"> <li>A new 3 form of entry primary school</li> <li>Queen's Park secondary school to be extended by 2 forms of entry</li> <li>New nursery school places</li> </ul>	<ul style="list-style-type: none"> <li>7.4 nursery classes</li> <li>2.5 primary school FE</li> <li>1.6 secondary school FE + 2.0 post 16 FE</li> </ul>	<p>Primary and secondary school provision target appears to meet identified demand.</p> <p>Unclear if policy will meet identified need for nursery places as number not specified.</p>
Health	<ul style="list-style-type: none"> <li>A healthy living centre with space for 9 GPs and other health services</li> </ul>	<ul style="list-style-type: none"> <li>3.9 GPs</li> <li>2.9 dentists</li> </ul>	Policy target appears to meet and exceed new demand.
Open space and sport	<ul style="list-style-type: none"> <li>4 new pocket parks of at least 0.2ha each</li> <li>Improvements to existing open spaces</li> <li>A series of play spaces</li> <li>Multi use games area</li> <li>A new sports hall on Brent land for St</li> </ul>	<ul style="list-style-type: none"> <li>0 outdoor open space</li> <li>1.9ha outdoor sports space</li> <li>1.4ha child and young people play space</li> <li>64 LAPs (min 100m<sup>2</sup>)</li> <li>11 LEAPs (min 400m<sup>2</sup>)</li> <li>3 NEAPs / MUGAs (min</li> </ul>	<p>Policy target expected to meet need for open space.</p> <p>Unclear if policy will meet the need for play and outdoor sport space.</p> <p>Potential shortfall in MUGA provision (policy seeks 1, infrastructure</p>

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Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
	Augustine's School <ul style="list-style-type: none"> <li>A minimum of 200 trees</li> </ul>	1000m <sup>2</sup> ) <ul style="list-style-type: none"> <li>0.2 swimming pools</li> <li>0.4 sports halls</li> <li>37 indoor sports health and fitness stations</li> </ul>	model predicts need for 3). Sports hall provision will only meet demand where it is publicly accessible.
Community facilities	<ul style="list-style-type: none"> <li>3 multi purpose community centres</li> <li>Replacement Albert Road Day centre</li> <li>2 new youth centres</li> </ul>	<ul style="list-style-type: none"> <li>4.3 multi-functional community centres</li> </ul>	Policy target likely to meet predicted need.
Other		<ul style="list-style-type: none"> <li>0.3 libraries</li> </ul>	Unclear – no mention of library need in policy.
<b>CP10 – Church End</b>			
Transport			No mention of transport infrastructure.
Education	<ul style="list-style-type: none"> <li>Extensions to existing local primary and secondary schools</li> </ul>	<ul style="list-style-type: none"> <li>2.1 nursery classes</li> <li>0.7 primary school FE</li> <li>0.5 secondary school FE + 0.6 post 16 FE</li> </ul>	Unclear if policy likely to meet predicted demand for primary and secondary FE. No mention of nursery classes in policy.
Health	<ul style="list-style-type: none"> <li>A new health centre in the heart of the area with space for a further GP and 1 new dentist</li> </ul>	<ul style="list-style-type: none"> <li>1.3 GPs</li> <li>1 dentist</li> </ul>	Policy target likely to meet predicted demand.
Open space and sport	<ul style="list-style-type: none"> <li>A new 2ha park and Multi Use Games Area</li> <li>A range of new play facilities within new developments and on open spaces</li> <li>A minimum of 200 trees</li> </ul>	<ul style="list-style-type: none"> <li>1.5 ha outdoor open space</li> <li>0.6 ha outdoor sports space</li> <li>0.4 ha child and young people play space</li> <li>18 LAPs (min 100m<sup>2</sup>)</li> <li>3 LEAPs (min 400m<sup>2</sup>)</li> <li>1 NEAP / MUGA (min 1000m<sup>2</sup>)</li> <li>0.1 swimming pools</li> <li>0.2 sports halls</li> <li>12 indoor sports health and fitness stations</li> </ul>	Open space and MUGA target in policy appears to meet expected demand. Unclear if policy likely to meet need for play spaces as numbers / area not specified. No mention in policy of indoor sports facilities.
Community facilities	<ul style="list-style-type: none"> <li>A new arts based community centre providing education and training to local people of all ages</li> </ul>	<ul style="list-style-type: none"> <li>1.5 multi-functional community centres</li> </ul>	Policy target may lead to some shortfall in community floorspace.
Other		<ul style="list-style-type: none"> <li>0.1 libraries</li> </ul>	No mention of library need in policy.
<b>CP11 – Burnt Oak / Colindale</b>			
Transport	<ul style="list-style-type: none"> <li>New bus services to provide interchanges with local rail and underground stations</li> </ul>		Public transport target welcomed – a reference to improving walking and cycling could be included if needed.

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Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
Education	<ul style="list-style-type: none"> <li>A new 2 form of entry primary school</li> <li>Extensions to a secondary school to provide a further 1 form of entry 6th form places</li> <li>New nursery places</li> </ul>	<ul style="list-style-type: none"> <li>6.4 nursery classes</li> <li>2.2 primary school FE</li> <li>1.4 secondary school FE + 1.8 post 16 FE</li> </ul>	<p>Policy target likely to meet primary school places need.</p> <p>Potential shortfall in provision of secondary school FE.</p> <p>Unclear if nursery classes demand will be met.</p>
Health	<ul style="list-style-type: none"> <li>New health services including space for 3 GPs and 3 dentists</li> </ul>	<ul style="list-style-type: none"> <li>3.9 GPs</li> <li>2.9 dentists</li> </ul>	Policy target likely to meet predicted demand.
Open space and sport	<ul style="list-style-type: none"> <li>A series of 3 new public open spaces and squares of at least 0.2ha each</li> <li>Improvements to the quality and accessibility of existing local open spaces</li> <li>A series of play areas within new developments and open space</li> <li>Indoor and outdoor sports facilities, including contributions towards a new community swimming pool serving the local area</li> <li>Minimum of 200 new trees planted</li> </ul>	<ul style="list-style-type: none"> <li>2.6 ha outdoor open space</li> <li>1.9 ha outdoor sports space</li> <li>1.2 ha child and young people play space</li> <li>54 LAPs (min 100m<sup>2</sup>)</li> <li>10 LEAPs (min 400m<sup>2</sup>)</li> <li>2.5 NEAPs / MUGAs (min 1000m<sup>2</sup>)</li> <li>0.2 swimming pools</li> <li>0.4 sports halls</li> <li>37 indoor sport health and fitness stations</li> </ul>	<p>Potentially significant shortfall in open space provision based on predicted need.</p> <p>Unclear if demand for play areas and outdoor / indoor sports facilities will be met as policy does not quantify these targets.</p> <p>Where contributions made lead to the development of a new swimming pool this is likely to meet predicted demand.</p>
Community facilities	<ul style="list-style-type: none"> <li>Multi-use community centre</li> </ul>	<ul style="list-style-type: none"> <li>4.3 multi-functional community centres</li> </ul>	Potentially significant shortfall in community centre provision based on predicted demand.
Other		<ul style="list-style-type: none"> <li>0.4 libraries</li> </ul>	No mention of libraries in policy.
<b>CP12 – Park Royal</b>			
Transport	<ul style="list-style-type: none"> <li>Significant public transport improvements in relation to First Central secured.</li> <li>Introduction of improved orbital public transfer links to Wembley.</li> </ul>		<p>Public transport target welcomed.</p> <p>Consider inclusion of walking and cycling infrastructure requirements / expectations.</p>
Education	<ul style="list-style-type: none"> <li>New children's nursery</li> <li>Expansion of existing primary school</li> </ul>	<ul style="list-style-type: none"> <li>2.8 nursery classes</li> <li>0.9 primary school FE</li> <li>0.6 secondary school FE + 0.8 FE post 16</li> </ul>	Unclear if demand likely to be met as numbers not specified.
Health	<ul style="list-style-type: none"> <li>1 new GP surgery</li> </ul>	<ul style="list-style-type: none"> <li>1.7 GPs</li> <li>1.3 dentists</li> </ul>	Policy target likely to meet identified demand.
Open space and sport	<ul style="list-style-type: none"> <li>4,000 trees as Brent's contribution towards 10,000 trees in Park</li> </ul>	<ul style="list-style-type: none"> <li>2.6ha outdoor open space</li> <li>0.9ha outdoor sports</li> </ul>	No mention of open space / sports space / play space provision in policy. Therefore potentially



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Infrastructure type	Infrastructure targets included in policy	Social Infrastructure Model identified needs (as included in SI Model dated 09/01/12 received 27/01/09)	SA Comments
	Royal as a whole.	space <ul style="list-style-type: none"> <li>• 0.5ha child and young people play space</li> <li>• 23 LAPs (min 100m<sup>2</sup>)</li> <li>• 4 LEAPs (min 400m<sup>2</sup>)</li> <li>• 1 NEAP / MUGA (min 1000m<sup>2</sup>)</li> <li>• 0.1 swimming pools</li> <li>• 0.2 sports halls</li> <li>• 16 indoor sports health and fitness stations</li> </ul>	significant shortfall.
Community facilities		<ul style="list-style-type: none"> <li>• 1.9 multi functional community centres</li> </ul>	No mention in policy of community facilities provision. Potentially significant shortfall in provision.
Other	<ul style="list-style-type: none"> <li>• The development or redevelopment of 50 hectares of land for employment uses between 2007 – 2017.</li> <li>• 4,400 jobs 2007 – 2017.</li> <li>• Development contributing to 'Heart of Park Royal' implemented.</li> <li>• New restaurants, bars, cafes to support the business area.</li> </ul>		New restaurants, bars etc should also meet needs of existing / new residents
		0.2 libraries	No mention of libraries in policy

**Policy CP13: North Circular Road Improvement Area**

In order to respond to the poor, and worsening, living conditions along the North Circular Road and to enhance the image of the borough, the council will:

- Bring forward proposals that remove the houses most affected by noise and air pollution, with priority to those on the St Raphael's Estate facing the NCR while ensuring no net loss of homes;
- Use developments such as at Unisys/Bridge Park and Wembley Point to offer new focal points that also assist in providing alternative homes;
- Use small infill sites on the St Raphaels estate to relocate some homes;
- Work with TfL to improve junctions, notably at Brentfield Road Create cycle paths and environmental barriers/open space on the dwellings removed; and
- Bring forward more detailed area plans to identify boundaries of areas of change.

**Policy CP13: North Circular Road Improvement Area**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> As the aim of the policy is to respond to poor living conditions close to the NCR, relocating people living in this area may help reduce social exclusion in these specific groups. Enhancing the environmental quality of these areas and providing new housing for those living adjacent to the NCR may also help ease poverty and support wider regeneration. <b>Mitigation / Enhancement:</b> None identified.
	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	<b>Effects:</b> Main aim of the policy is to respond to poor living conditions along the NCR. For those currently living close to the NCR health, quality of life and noise nuisance will be significantly improved. Landscaping and environmental barriers are likely to provide noise abatement which is also likely to benefit the wider area near the NCR. <b>Mitigation / Enhancement:</b> Health outcomes could be enhanced if supporting text clarifies that greening / landscaping will be sought on stretches of the NCR where relocation is not possible as well as those where relocation is proposed.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	0	
	Will it improve physical and mental health?	++	
	Will it reduce noise levels and concerns?	++	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> The policy states there will be no net loss of homes. Relocating people living along the NCR to other locations will require the provision of replacement homes. Given the significant negative impacts the NCR has on houses / people living adjacent to it this is likely to improve the overall housing stock in these areas. <b>Mitigation / Enhancement:</b> Replacement homes will need to be built in line with policies elsewhere in the Core Strategy, in particular CP21 – A Balanced Housing Stock and CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation in relation to housing.
	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?	+	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<b>Effects:</b> No significant effects predicted. <b>Mitigation / Enhancement:</b> None.
	Will it reduce the fear of crime?	0	
6. To encourage a sense of local community;	Will it encourage engagement in community activities?	0	<b>Effects:</b> Improving living conditions and visual amenity in areas adjacent to the NCR may help foster a sense of pride in the area.
	Will it foster a sense of pride in local area?	+	

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<b>Policy CP13: North Circular Road Improvement Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
identity and welfare	Will it increase the ability of people to influence decisions?	+	Supporting text 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. <b>Mitigation / Enhancement:</b> None.
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	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	<b>Effects:</b> No significant effects predicted. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	+/-	<b>Effects:</b> Although not the expressed aim of the policy, junction improvements may help reduce congestion in the short-term and encourage some additional car travel. The policy seeks to create cycle paths on the space left where dwellings are removed, which is predicted to have a positive effect in relation to encouraging walking and cycling. <b>Mitigation / Enhancement:</b> The addition of supporting text stating that every effort will be made 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 try and reduce traffic volumes on the NCR. This may be appropriate both in this policy and in Policy CP4 – North-West London Coordination Corridor.
	Will it increase the proportion of journeys using modes other than the car?	-?	
	Will it encourage walking and cycling?	+	
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?	+?	<b>Effects:</b> Providing landscaping and areas of greenspace adjacent to the NCR may provide opportunities to mitigate / minimise run-off of from the NCR causing water pollution. <b>Mitigation / Enhancement:</b> 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.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+/-	<b>Effects:</b> The aim of Policy CP13 is to reduce the impact of noise and air pollution associate with the NCR on those living in proximity to it. The policy also proposes environmental barriers and open space on the land where dwellings have been removed. This likely to have a positive effect on air pollution. However although not the expressed aim of the policy, junction improvements may help reduce short term congestion and encourage some additional car travel. <b>Mitigation / Enhancement:</b> See Objective 8. Air quality is a critical issue, and it is recommended that consideration be given to including additional wording in the policy / supporting text setting out how air quality will be mitigated.
	Will it help achieve the objectives of the Air Quality Management Plan?	+/-	
	Will it reduce emissions of key pollutants?	+/-	
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/+	<b>Effects:</b> Policy refers to environmental barriers. This is likely to include tree planting. Supporting text refers to the need for landscaping to include the creation of green-space and tree planting. <b>Mitigation / Enhancement:</b> See Objective 2.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	0	

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<b>Policy CP13: North Circular Road Improvement Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	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	
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	<b>Effects:</b> In areas adjacent to the NCR townscape is likely to be improved by relocation and landscaping. <b>Mitigation / Enhancement:</b> None.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	0	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	+/-	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	0	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	<b>Effects:</b> Demolition of old and construction of new homes will lead to some increase in waste and use of materials. This impact will be limited to the relocation of homes in the NCR corridor. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy seek to mitigate these effects, in particular CP6 – Design and Density in Place Shaping and CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	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?	+?	<b>Effects:</b> Effects will depend on where / what sort of site relocated homes are developed on. Small infill sites on the St Raphaels estate identified in the policy are considered likely to be previously developed land. However relocation may result in some loss of Greenfield land. <b>Mitigation / Enhancement:</b> The policy identifies two specific sites for locating new homes: Unisys/Bridge Park and Wembley Point. The SSA DPD proposed allocations provides more detail on these specific sites.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+?	
	Will it ensure contaminated land is remediated as appropriate?	0	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	

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<b>Policy CP13: North Circular Road Improvement Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it reduce the risk of subsidence and heave?	<b>0</b>	Other policies in the Core Strategy seek to protect Greenfield and guide development to previously developed land, in particular Policy CP CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity and Policy CP21 – A Balanced Housing Stock. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	<b>0</b>	<b>Effects:</b> Aim of policy is to enhance the image of the Borough. This may have a minor beneficial effect on potential investor's image of the Borough as a location for business. <b>Mitigation / Enhancement:</b> None.
	Will it improve business development and enhance productivity?	<b>0</b>	
	Will it improve the resilience of business and the local economy?	<b>0</b>	
	Will it promote growth in key sectors?	<b>0</b>	
	Will it promote growth in key clusters?	<b>0</b>	
	Will it enhance the image of the area as a business location?	<b>+</b>	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	<b>0</b>	
	Will it help to improve earnings?	<b>0</b>	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	<b>+</b>	<b>Effects:</b> See Objective 1. <b>Mitigation / Enhancement:</b> See Objective 1.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	<b>0</b>	<b>Effects:</b> See Objective 17. <b>Mitigation / Enhancement:</b> None.
	Will it encourage inward investment?	<b>+?</b>	
	Will it make land and property available for business development?	<b>0</b>	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	<b>-?</b>	<b>Effects:</b> See Objective 8. The policy seeks to create cycle paths, which may improve ease of movement and accessibility to work for those using the NCR to travel to work on foot or by bike. Supporting text states that junction improvements 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. Effect on access between key employment areas and transport interchanges uncertain. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it improve accessibility to work by public transport; walking and cycling?	<b>+</b>	
	Will it improve access between key employment areas and key transport interchanges?	<b>?</b>	
	Will it encourage rail and water based freight movement?	<b>0</b>	
<b>Key:</b> Major positive: <b>++</b> Minor positive: <b>+</b> Neutral: <b>0</b> Minor negative: <b>-</b> Major negative: <b>---</b> Uncertain: <b>?</b> Mixed: <b>-/+</b>			
<b>Overall Summary</b>			
<p><b>Effects:</b></p> <p>Overall Policy CP13 is predicted to have mainly positive effects against the Sustainability Appraisal criteria. Positive effects are expected in relation to poverty and social exclusion, health and mental health and reduced noise concerns due to the relocation of homes adjacent to the NCR and landscaping of the space left by this relocation. Even though the policy has a specific geographical focus, as the key effects relate to human health (associated with noise and air pollution), and given the severe nature of current negative health impacts associated with the NCR, the positive health effects of the policy are considered to be of major significance.</p> <p>Policy text seeking to create cycle paths is predicted to have a positive effect on walking and cycling.</p> <p>The inclusion of supporting text between versions of the Core Strategy in December 2008 and June 2009 seeking to ensure that junction improvements should aim to provide better facilities / movement for pedestrians and cyclists is welcomed.</p> <p>Some mixed 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.</p>			

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<b>Policy CP13: North Circular Road Improvement Area</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			<p>There are only two minor 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>Many effects are uncertain, this is due to the fact that they will depend to a large extent on other policies in the Core Strategy, the SSA DPD and (forthcoming) Development Policies DPD.</p> <p><b>Mitigation / Enhancement:</b></p> <p>Mitigation and enhancement of the effects predicted is generally included in other policies in the Core Strategy. The SSA DPD proposed allocations includes specific implementation details relating to the two specific sites mentioned in the policy for relocation of homes.</p> <p>Some supporting text is unclear and would benefit from reviewing.</p> <p>More specific comments include:</p> <ul style="list-style-type: none"> <li>• The critical need for and importance of air quality mitigation 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 London<sup>3</sup>.</li> <li>• The addition of 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 try and reduce traffic volumes on the NCR. This may be appropriate both in this policy and in Policy CP4 – North-West London Coordination Corridor.</li> <li>• 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.</li> </ul>

## Infrastructure to Support Development (CP14-15)

Based on initial appraisal of Core Strategy (version “Revision 2008”, Word file dated 26 November 2008 - received from LBB 3 December 2008) appraised by Owen White, 12 – 19 December 2008

Reviewed by Ric Eales, 22 March 2009

Appraisal updated by Owen White 25 March – 1 April 2009 for changes to pre-Submission Core Strategy document, and 26 May 2009 for changes in proposed Submission Core Strategy dated June 2009.

<b>Policy CP14: Public Transport Improvements</b>			
<p>The key interchanges of Wembley Central, Wembley Stadium and Queen’s Park will be improved and a new interchange at First Central, Park Royal will be provided.</p> <p>The Council will promote improvements to orbital public transport routes which link the strategic centres in North West London and the Growth Areas (as shown on the key diagram), making use of contributions from development where appropriate. Improved links from Wembley towards Brent Cross and Ealing (via Park Royal) will be sought. Improvements in the distribution of buses through the Wembley area will be a priority.</p>			

<b>Policy CP14: Public Transport Improvements</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Social</b>			
1. To reduce poverty and social	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> Improved public transport facilities are likely to have beneficial effects in relation to social exclusion and may

<sup>3</sup> <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](http://ec.europa.eu/environment/air/quality/legislation/pdf/pm10_exceedances_2005_07.pdf)



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<b>Policy CP14: Public Transport Improvements</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
exclusion	Will it improve affordability of essential services?	+?	improve affordability of access to essential services. Exclusion will particularly be reduced for people and households without access to a car. Minor positive effects are predicted as the focus of this policy is on improving links to and within Wembley and other key interchanges as a priority, which may mean some deprived areas remain poorly served by public transport. <b>Mitigation / Enhancement:</b> The Growth Area Policies (CP7 – CP12), Policy CP15 – Infrastructure to Support Development and the Local Implementation Plan provide more detail in relation to transport infrastructure and development.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	<b>Effects:</b> Where improved public transport provision leads to a modal shift away from the private car localised noise nuisance associated may be reduced. However, buses will also lead to noise pollution and the impact is not expected to be significant in the light of implied increase in travel need associated with population growth on the scale proposed by the Core Strategy (see Policy CP2 – Population and Housing Growth). <b>Mitigation / Enhancement:</b> See Objective 1. It is recommended that the forthcoming Development Management Policies DPD should also provide implementation detail in relation to noise concerns.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	0	
	Will it improve physical and mental health?	0	
	Will it reduce noise levels and concerns?	+?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> Although not the aim of the policy, a well maintained, efficient and reliable public transport service within the Borough may foster a sense of pride in the area. <b>Mitigation / Enhancement:</b> None.
	Will it foster a sense of pride in local area?	+?	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	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	<b>Effects:</b> See Objective 1. Improved public transport provision will make access to key services easier, especially for those without access to a car. <b>Mitigation / Enhancement:</b> See Objective 1. Other policies in the Core Strategy seek to improve accessibility to key services, in particular CP15 – Infrastructure to Support Development and CP23 – Protection of existing and Provision of New Community and Cultural Facilities.
	Will it make access more affordable?	+?	
	Will it make access easier for those without access to a car?	+	
<b>Environmental</b>			
8. To reduce the	Will it reduce traffic volumes and	+?	<b>Effects:</b>

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<b>Policy CP14: Public Transport Improvements</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
effect of traffic on the environment	congestion?		The aim of the policy is to improve public transport provision. This should increase the proportion of journeys made by modes other than the car. Impact on overall traffic volumes and congestion uncertain given the increases in traffic volumes predicted as a result of the population growth proposed by the Core Strategy (see Policy CP2 – Population and Housing Growth). <b>Mitigation / Enhancement:</b> Policy CP15 – Infrastructure to Support Development and the Local Implementation Plan provide more detail in relation to transport infrastructure and development.
	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+?	<b>Effects:</b> See Objective 8. Air quality will be improved and emissions associated with transport will be reduced only if improved public transport provision leads to a reduction in the amount of travel by private car. Given population growth proposed in Policy CP2, this effect is not certain. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it help achieve the objectives of the Air Quality Management Plan?	+?	
	Will it reduce emissions of key pollutants?	+?	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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	<b>Effects:</b> Providing improved public transport infrastructure may provide opportunities to enhance public realm and townscape, and sense of place, particularly at key interchanges. <b>Mitigation / Enhancement:</b> None.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+?	
	Will it protect and enhance local distinctiveness and sense of place?	+?	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	0	
14. To reduce contributions to climate change and reduce vulnerability to	Will it reduce emissions of greenhouse gases by reducing energy consumption and the need to travel?	+?	<b>Effects:</b> See Objective 8 and 10. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	

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<b>Policy CP14: Public Transport Improvements</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
climate change	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	0	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	<b>Effects:</b> Improving public transport infrastructure within the Borough is likely in the long-term to enhance the image of the area a business location. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy seek to support and provide for economic growth and employment, in particular Policy CP20 – Strategic and Borough Employment Areas and the Growth Area Policies (CP7 – CP12). The SSA DPD proposed allocations and existing and proposed SPD and SPGs will / should provide more detailed, and area specific implementation.
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	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	<b>Effects:</b> The policy will not provide new job opportunities, however it may improve access to employment, especially for those most in need. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to improve earnings?	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	<b>Effects:</b> See Objective 1. <b>Mitigation / Enhancement:</b> See Objective 1.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<b>Effects:</b> See Objective 17. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	0	
21. To encourage efficient patterns of	Will it reduce commuting?	-	<b>Effects:</b> The key aim of the policy is to improve public transport provision and infrastructure to link key interchanges and the
	Will it improve accessibility to work by public transport; walking and cycling?	++	

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<b>Policy CP14: Public Transport Improvements</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
movement in support of economic growth	Will it improve access between key employment areas and key transport interchanges?	+++	Growth Areas. This is predicted to have major positive effects on accessibility to work by public transport and access between key employment areas and key transport interchanges. Enhanced provision may encourage additional commuting, however where this is by public transport the environmental and social effects will be less than commuting by private car. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive: +++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: -/+			
<b>Overall Summary</b>			
<b>Effects:</b>			
Policy CP14 is predicted to have some major positive effects and no major negative effects. Major positive effects are predicted where public transport infrastructure improvements 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 minor negative effect is predicted, due to the fact that improved public transport provision may encourage additional commuting.			
A number of effects are minor in significance and / or uncertain as it is not possible to predict if improved public transport provision will have net beneficial effects taking proposed population growth into account, the effects of which are appraised above under Policy CP2 – Population and Housing Growth.			
<b>Mitigation / Enhancement:</b>			
Other policies in the Core Strategy provide more detailed implementation 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.			

<b>Policy CP15: Infrastructure to Support Development</b>
<p><b>The Council will set out, in an Infrastructure and Investment Framework, the infrastructure requirements necessary to support new development in the growth areas, and will indicate where and when this will be provided. It will also set out the scale of funding necessary to achieve this and the possible sources of funding available from a range of agencies, including the council, as well as from development.</b></p> <p><b>Before granting planning permission for large-scale development, the Council will have to be satisfied that the infrastructure requirements arising from the scheme will be met by the time it is needed. Contributions will be sought from development giving rise to the need for new infrastructure.</b></p> <p><b>The Council will also bid for infrastructure funding from Government and other sources, such as the Community Infrastructure Fund. The council will review its position after this Core Strategy is adopted and progress its infrastructure work into proposals for the Community Infrastructure Levy.</b></p>
<p><b>Note:</b></p> <p>While the supporting text which precedes it includes considerable detail pertaining to the infrastructure needs, as policy CP15 itself simply sets out the Council's intention to develop an Infrastructure and Investment Framework and sets out how infrastructure is intended to be funded. In itself therefore the policy is not appraisable for sustainability effects, as it is implementation of other policies in the Core Strategy (in particular the Growth Area Policies), the Infrastructure and Investment Framework, the proposed allocations in the SSA DPD, and policies included in the forthcoming Development Management Policies DPD which will dictate the scale and type of effects.</p> <p>The detail provided in supporting text to Policy CP15 is welcomed.</p> <p>Specific comments and recommendations include:</p> <ul style="list-style-type: none"> <li>The addition to supporting text under sub-heading "Open space, sport and green infrastructure" to recognise the importance and value of small open spaces and pocket parks is recommended.</li> <li>The supporting text could include introductory or concluding text which expresses the cross-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 positive effects on health and wellbeing, and in the long-term potentially reduce pressure on health facilities.</li> </ul>

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## Strategic Borough Wide Policies (CP16-23)

Based on initial appraisal of Core Strategy (version "Revision 2008", Word file dated 26th Nov - received from LBB 03-12-08) appraised by Owen White, 12 – 19 Dec 2008  
 Reviewed by Ric Eales, 12 Feb 2009.  
 Appraisal updated by Owen White 25 March – 1 April 2009 for changes to Core Strategy document

### Policy CP16: Town Centres and the Sequential Approach to Development

In identifying potential sites, and in considering proposals for new retail and other town centre uses in Brent, the following sequential order of centres will be applied:

Wembley  
 Kilburn  
 District Centres  
 Local Centres  
 Neighbourhood Centres  
 Out-of-centre locations

Wembley Town centre is designated as the principal centre within the Borough. The Council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development. Major new retail or leisure development will only be permitted in other town centres and then edge-of-centre locations, if it can be demonstrated that no sequentially preferable sites are available in, then edge of Wembley centre.

Outside of Wembley, the council will continue to support proposals that maintain the position of town centres in the retail hierarchy. Town centre opportunity sites have been identified within, or on the edge of, some existing town centres in Brent. These opportunity sites are usually outmoded premises or sites currently under utilised with redevelopment potential to help meet Brent's future retail needs. Regeneration of these opportunity sites will be sought with the aim of revitalising the vitality and viability of the centres where they are located.

**Note:** As Policy CP16 simply sets out the hierarchy of town centres, together with the designation of Wembley as the principle centre of the Borough it has not been felt necessary to complete a full appraisal matrix for this policy.

Guiding retail development to town-centres is considered positive from a sustainability perspective, in relation particularly to ensuring accessibility by non-car modes of transport, and supporting the viability and vibrancy of existing centres in the Borough.

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. In addition imbalanced development towards one or two major centres is more likely to generate travel need, which will increase environmental pressures, even when mitigated by access by public transport.

The inclusion of supporting text to ensure that accessibility is a key consideration in the allocation of new retail floorspace is welcomed.

**Policy CP17: Protecting and Enhancing the Suburban Character of Brent**

The distinctive suburban character of Brent will be protected from inappropriate development. The council will bring forward design guidance that limits development, outside of the main town centres and away from corner plots on main road frontages, which would erode the character of suburban housing. Development of garden space and infilling of plots with out-of-scale buildings that do not respect the settings of the existing dwellings will not be acceptable.

The council supports emerging London plan policy to limit the inappropriate development of back gardens in suburban areas that erode its character.

**Policy CP17: Protecting and Enhancing the Suburban Character of Brent**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> Policy seeks to protect back gardens from inappropriate development. Where this protects open spaces it may promote physical activity which is likely to have a positive effect on health and quality of life. <b>Mitigation / Enhancement:</b> More detailed implementation is provided in other policies in the Core Strategy, such as CP1 – Spatial Development Strategy, CP5 – Placemaking, Policy CP15 – Infrastructure to Support Development and Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity. Supporting text notes that future SPDs will provide more detailed policy implementation / criteria. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	0	
	Will it improve physical and mental health?	+	
	Will it reduce noise levels and concerns?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> The policy seeks to maintain and improve the character of suburban parts of Brent and to ensure that development does not erode existing character. This is not predicted to have significant effects however. <b>Mitigation / Enhancement:</b> Supporting text notes that the proposed SPDs will provide more detailed policy / criteria to support implementation. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it foster a sense of pride in local area?	0	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	0	
7. To improve	Will it improve the level of investment in	0	<b>Effects:</b>



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<b>Policy CP17: Protecting and Enhancing the Suburban Character of Brent</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
accessibility to key services especially for those most in need	key community services?		No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> More detailed implementation is provided in other Policies in the Core Strategy, in particular Policy CP14 – Public Transport Improvements and Policy CP15 – Infrastructure to Support Development will support this. The Brent Local Implementation Plan will also be important. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it increase the proportion of journeys using modes other than the car?	0	
	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it help achieve the objectives of the Air Quality Management Plan?	0	
	Will it reduce emissions of key pollutants?	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	<b>Effects:</b> The protection of back gardens is predicted to have potential positive effects on biodiversity. <b>Mitigation / Enhancement:</b> Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity provides more detailed implementation in relation to biodiversity. Supporting text notes that proposed SPDs will provide more detailed policy / criteria to support implementation. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	+	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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?	+	<b>Effects:</b> One of the main aims of policy is to protect the character of suburban areas of Brent. The policy is therefore predicted to have a positive effect on quality of landscape and townscapes in these areas. <b>Mitigation / Enhancement:</b> See Objective 2.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	+?	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	0	

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<b>Policy CP17: Protecting and Enhancing the Suburban Character of Brent</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
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?	0	<b>Effects:</b> The protection of back gardens is likely to help reduce flood risk as it will help maintain permeable surfaces, reducing run-off. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	+?	
	Will it reduce the risk of damage to property from storm events?	+	
	Will it help reduce the impact of increased urban temperatures on people and property?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	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?	+	<b>Effects:</b> The protection of distinctive sub-urban character and garden space is likely to protect green-spaces and encourage development on previously developed land. The protection of back gardens is likely to help maintain soil quality. <b>Mitigation / Enhancement:</b> See Objective 2.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure contaminated land is remediated as appropriate?	0	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	+	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	0	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to improve earnings?	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<b>Effects:</b> The protection of suburban character may limit some availability of land for business development. <b>Mitigation / Enhancement:</b> See Objective 2.
	Will it encourage inward investment?	0	
	Will it make land and property available for business development?	-	
21. To encourage	Will it reduce commuting?	0	<b>Effects:</b>

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<b>Policy CP17: Protecting and Enhancing the Suburban Character of Brent</b>			
Objective	Criteria	Score	Comments
efficient patterns of movement in support of economic growth	Will it improve accessibility to work by public transport; walking and cycling?	0	No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve access between key employment areas and key transport interchanges?	0	
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive:  Minor positive: + Neutral: 0 Minor negative:  Major negative:  Uncertain: ? Mixed: -/+			
<b>Overall Summary</b>			
<b>Effects:</b>			
Overall this policy is considered positive. Minor positive effects are predicted as the protection of suburban character and gardens from inappropriate development may potentially encourage increased physical activity, protect biodiversity, and enhance visual amenity / quality of the public realm in suburban areas.			
One minor negative effect is predicted as protection of suburban areas and garden spaces may limit the availability of some land for commercial development.			
<b>Mitigation / Enhancement:</b>			
No significant mitigation proposals have been identified.			
The supporting text sets out that detailed criteria that will be used to protect key suburban neighbourhoods will be included in the (forthcoming) Development Policies DPD. In addition further detailed guidance is to be provided through SPDs.			
More specific comments include:			
<ul style="list-style-type: none"> <li>Policy text (in December 2008 version of 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 effects and it is recommended that consideration is given to reinstating this text, and the focus of this policy. If this is considered too detailed for the Core Strategy it should be included within the <a href="#">forthcoming Development Policies DPD</a>.</li> <li>It was recommended previously that specific text aiming to protect front gardens from inappropriate development or conversion (e.g. conversion into parking space) be included. 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 <a href="#">forthcoming Development Policies DPD</a>.</li> </ul>			

<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>	
<p><b>Open space (including waterways) of local value will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well being of Brent's residents, visitors and wildlife. Support will be given to the enhancement and management of open space for recreational, sporting and amenity use, and the improvement of both open space and the built environment for biodiversity and nature conservation. New or improved provision (including improved access) will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created. This includes new parks in Church End and Wembley and improvements to existing open spaces in Alperton, South Kilburn and Burnt Oak/Colindale growth areas.</b></p> <p><b>Priorities for sports facilities improvements have been identified in the council's Sports Facilities Improvement Strategy. Initially, a site for a new third community swimming pool will be identified to serve the north of the borough. Contributions will be sought from development to help provide these facilities. The council will seek a site for a fourth pool thereafter to meet population expansion.</b></p>	

<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>			
Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> In terms of open space and opportunities for outdoor play, sport and recreation, the policy and supporting text seeks to enhance existing, and provide new open spaces which are accessible by walking and cycling, particularly in areas where there is current deficiency. It also seeks to provide new sport facilities. These are important factors in enhancing quality of life and
	Will it improve affordability of essential services?	0	

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<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			wellbeing of local residents and are likely to alleviate some of the effects of poverty and social exclusion. <b>Mitigation / Enhancement:</b> The implementation of other Core Strategy policies (e.g. the Growth Area Policies CP7 – CP12, Policy CP15 – Infrastructure to Support Development, and CP21 – A Balanced Housing Stock) will support / enhance this policy. Supporting text refers to the Brent Strategy for Sports Facilities Improvement. Other Brent plans will support implementation, such as the Brent Children and Young People's Plan, Brent Parks Strategy and the Brent BAP.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	<b>Effects:</b> Improved quality, greater provision, and easier access to open spaces, sports facilities and outdoor play areas are likely to encourage physical activity. Positive health benefits and opportunities for sport and recreation are therefore predicted. <b>Mitigation / Enhancement:</b> See Objective 1.
	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?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> Opportunities for environmental education could be incorporated into enhancement and provision of open space e.g. provision of signage. This could be incorporated in the forthcoming Development Management Policies DPD.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	<b>Effects:</b> The enhancement of existing open spaces may help reduce anti-social behaviour sometimes associated with poorly maintained and used open and play spaces. The significance of this effect is uncertain. <b>Mitigation / Enhancement:</b> It is recommended that the forthcoming Development Management Policies DPD could include requirements to consider safety issues in the design of open space etc.
	Will it reduce the fear of crime?	+?	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	<b>Effects:</b> Enhancing the quality of open spaces and the natural and built environment could contribute to local pride and engagement – especially where new open spaces are created in areas of previous deficit, or where existing open spaces are enhanced. Enhanced / increased provision of sports facilities will improve access and encourage participation, which may improve understanding and respect between groups and individuals. <b>Mitigation / Enhancement:</b> Where new areas of open space are created or existing areas enhanced, the local residents and businesses should be involved in the process.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	+?	
	Will it encourage people to respect and value their contribution to society?	+?	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the	Will it reduce traffic volumes and congestion?	0	<b>Effects:</b> By improving the quality of existing open spaces and providing new space in current areas of deficit, some trips
	Will it increase the proportion of	0	

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<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
environment	journeys using modes other than the car?		currently made to access open space elsewhere are likely to be avoided, although in terms of reduced traffic volume overall this is may be a minor benefit. Policy text seeking to improve access to open space through new or improved provision is welcomed. Improved open space, sport and recreation facilities may encourage more people to walk and cycle. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it encourage walking and cycling?	+	
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?	+/++	<b>Effects:</b> The policy explicitly protects waterways from inappropriate development in the same way it does open space. Open space plays an important role in the regulation of the water cycle. An increase in permeable surfaces (perhaps achieved through new provision in open space deficient areas) will benefit groundwater recharge and may reduce local flood risk. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy, in particular the Growth Area Policies (CP7 – CP12) and Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures will support this policy. The forthcoming Development Management Policies DPD should also provide more detailed policy.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+	<b>Effects:</b> Trees and other vegetation cover, usually associated with open spaces, the amount of which is protected and enhanced by Policy CP18, play an important role in mitigating poor air quality. <b>Mitigation / Enhancement:</b> Tree planting along roads / streets can have air quality benefits. It is recommended that supporting text refers to this. The LIP should have a role in encouraging planting of trees along roads.
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	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?	+	<b>Effects:</b> Supporting text explicitly mentions sites of conservation importance and the need to protect / enhance habitats and species in accordance with the Brent BAP. Minor positive effects predicted as protected sites, species and habitats are not included in policy. Supporting text refers to the importance of tree planting. <b>Mitigation / Enhancement:</b> Opportunities for environmental education could be incorporated into enhancement and provision of open space e.g. provision of signage. It is recommended that this could be incorporated in the forthcoming Development Management Policies DPD.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	+	
	Will it conserve and enhance sites designated for their nature conservation interest?	+	
	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?	?	
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?	++	<b>Effects:</b> 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. Parks and open spaces also play an important role in sense of place and local distinctiveness. Positive effects are therefore likely to result from enhancement and creation of open space. <b>Mitigation / Enhancement:</b> The policy should include text to promote no net loss of open space in the Borough. The Growth Area Policies (CP7 – CP12) provide greater detail on implementation in these areas specifically. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed policy.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	+	
	Will it decrease litter in urban areas and open spaces?	0	
13. To conserve and where appropriate	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and	+?	<b>Effects:</b> The protection and enhancement of parks and open spaces may provide opportunities to enhance the setting / quality of



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<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
enhance the historic environment and cultural assets	cultural value?		some listed buildings, historical / cultural sites and Conservations Areas. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	<b>+?</b>	
	Will it help preserve, enhance and record archaeological features and their settings?	<b>0</b>	
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?	<b>+</b>	<b>Effects:</b> See Objectives 8 and 9. Trees and vegetation may provide a carbon sink function. Open space / semi natural habitats play an important role in flood risk management. Where car journeys are reduced this will also help reduce emissions. Open areas and green space, together with trees and other vegetation, play an important role in regulating the urban heat island effect. <b>Mitigation / Enhancement:</b> See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	<b>0</b>	
	Will it reduce emissions of ozone depleting substances?	<b>0</b>	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	<b>+</b>	
	Will it reduce the risk of damage to property from storm events?	<b>+</b>	
	Will it help reduce the impact of increased urban temperatures on people and property?	<b>+</b>	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	<b>0</b>	
	Will it increase waste recovery and recycling and improve facilities?	<b>0</b>	
	Will it reduce hazardous waste?	<b>0</b>	
	Will it reduce waste in the construction industry?	<b>0</b>	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	<b>++</b>	<b>Effects:</b> The policy seeks to protect open space from development and therefore development on greenfield sites should be largely avoided. Open space and vegetation / green space plays an important role in regulation of the water cycle, which may help minimise the effects of subsidence and heave. <b>Mitigation / Enhancement:</b> None.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	<b>+</b>	
	Will it ensure contaminated land is remediated as appropriate?	<b>0</b>	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	<b>0</b>	
	Will it reduce the risk of subsidence and heave?	<b>+?</b>	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	<b>0</b>	<b>Effects:</b> Indirectly, by creating open spaces and habitats, and increasing the provision of sports facilities and recreation opportunities, it will improve the quality of the environment and create communities in which people want to live and work. Businesses are more likely to locate to an area with high quality of life and attractive surroundings. <b>Mitigation / Enhancement:</b> None
	Will it improve business development and enhance productivity?	<b>0</b>	
	Will it improve the resilience of business and the local economy?	<b>0</b>	
	Will it promote growth in key sectors?	<b>0</b>	
	Will it promote growth in key clusters?	<b>0</b>	
	Will it enhance the image of the area as a business location?	<b>+</b>	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	<b>0</b>	
	Will it help to improve earnings?	<b>0</b>	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	<b>+</b>	<b>Effects:</b> Provision of open space and habitats, recreation and sports facilities will be an important aspect in regeneration projects. <b>Mitigation / Enhancement:</b> The Growth Area Policies (CP7 – CP12), the Infrastructure and Investment Framework provide more detailed implementation. It is also recommended that the



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<b>Policy CP18: Protection and Enhancement of Open Space, Sports and Biodiversity</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			forthcoming Development Management Policies DPD should provide more detailed policy.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<b>Effects:</b> See Objective 17. Creating new and protecting existing open space may conflict with making land available for industrial / business uses. <b>Mitigation / Enhancement:</b>
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	-	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	<b>Effects:</b> See Objective 8. Enhanced / increased provision of open space may encourage more people to walk or cycle to work. The Metropolitan Walk Network which is mentioned in the supporting text may contribute to this also. <b>Mitigation / Enhancement:</b> None.
	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	
<b>Key:</b> Major positive: <span style="color: green;">■</span> Minor positive: + Neutral: 0 Minor negative: <span style="color: orange;">■</span> Major negative: <span style="color: red;">■</span> Uncertain:? Mixed: <span style="color: yellow;">■</span>			
<b>Overall Summary</b>			
<b>Effects:</b>			
This policy is very positive from a sustainability perspective. There is only one minor negative effect predicted, relating to the fact that protecting open and green space may conflict with making land available for business development.			
The effects of protecting open space and waterways from inappropriate development, creating new or improved open space in current areas of deficiency and additional pressure and protecting and creating habitats are likely to include direct positive effects on biodiversity and the quality of the public realm, which in turn could have many other benefits such as an enhancing the quality of life and wellbeing of the local residents, providing the conditions to attract economic development and employment uses and providing a carbon and pollution sink.			
The provision of new and enhanced sport and recreation facilities and opportunities are also likely to have positive effects on health and wellbeing, quality of life and in addressing some of aspect of poverty and social exclusion.			
<b>Mitigation / Enhancement:</b>			
The implementation of other Core Strategy policies will support / enhance this policy. It is recommended that the forthcoming Development Management Policies DPD also provide more detailed policies to enhance positive and mitigate negative effects predicted. The supporting text refers to the Brent Strategy for Sports Facilities Improvement, and other Brent plans will support implementation, such as the Brent Children and Young People's Plan, Brent Parks Strategy and the Brent BAP.			
It was previously recommended that consideration be given to the inclusion of nature conservation and biodiversity in a specific 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 detailed is provided in the forthcoming Development Management Policies DPD.			
More specific comments include:			
<ul style="list-style-type: none"> <li>• It is recommended that the policy should seek to promote no net loss of open space in the Borough.</li> <li>• 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.</li> <li>• 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.</li> <li>• It is recommended that the role of tree planting along roads in helping mitigate air pollution could be included within supporting text.</li> <li>• Opportunities for environmental education could be incorporated into enhancement and provision of open space e.g. provision of signage/ interpretation boards. This could be included in the forthcoming Development Management Policies DPD.</li> </ul>			

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**Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures**

All development should contribute towards achieving sustainable development, including climate change mitigation and adaptation.

Major proposals (10 or more dwellings and 1,000m<sup>2</sup> or more floorspace) and proposals for sensitive uses (education, health and housing) in Air Quality Management Areas, should submit a Sustainability Statement demonstrating, at the design stage, how sustainable design and construction measures are used to mitigate, and adapt to, climate change over the intended lifetime of a development. This includes the application of the London Plan energy hierarchy and meeting or exceeding London Plan targets.

In all areas a minimum rating of Code level 3 should be achieved. For non-residential, a rating of BREEAM 'Excellent' is expected, or the equivalent on any 'Code for Sustainable Commercial Schemes' (when forthcoming).

Within the Wembley Energy Action Area (EAA) and in the Housing Growth Areas, major proposals are currently required to achieve a minimum Level 4 rating (in relation to the Code for Sustainable Homes). In particular, proposals will be expected to connect to, provide, or contribute towards, decentralised energy networks (heating and cooling) and renewables infrastructure, in key Growth Areas of the Borough notably Wembley.

**Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<p><b>Effects:</b> Developments built to high Code standards are likely to contribute to reducing poverty and social exclusion, particularly by alleviating fuel poverty. The impact of this on those most in need may be limited as this will apply mainly to major new developments, although many of these will be required to be affordable as set out under policies CP2 – Population and Housing Growth and CP21 – A Balanced Housing Stock.</p> <p><b>Mitigation / Enhancement:</b> The policy appears to relate to new development only. It is recommended that text is included to ensure that extensions and refurbishments meet standards too. Retrofitting of existing stock to high sustainability standards is likely to be necessary to meet emissions targets, however it is recognised this may be outside the scope of the Core Strategy but mechanisms should be sought by the council to work with other partners (such as developers) to help achieve this.</p> <p>The implementation of other policies in the Core Strategy (e.g. CP6 – Design and Density in Place Shaping, and the Growth Area Policies – CP7 – CP12) will support / enhance this policy. It is recommended that the forthcoming Development Management Policies DPD should also support this.</p> <p>When adopted, the Brent Climate Change Strategy will provide additional detailed implementation.</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	<p><b>Effects:</b> Health benefits could be derived from better quality buildings, due to improvement such as energy efficiency, ventilation, consideration of the construction materials used / internal pollution and the replacement of unfit homes.</p> <p>Policy requires “sensitive uses” to submit a Sustainability Statement, which is likely to support this effect.</p> <p><b>Mitigation / Enhancement:</b> Reference to improving health should be considered as an objective of sustainable construction and included in the forthcoming Development Management Policies DPD.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	+	
	Will it improve physical and mental health?	+	
	Will it reduce noise levels and concerns?	+?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p><b>Effects:</b> No significant effects identified.</p> <p><b>Mitigation / Enhancement:</b> None.</p>
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	

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<b>Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	?	<p><b>Effects:</b> See Objective 1 and 2. Highest standards of sustainable construction as set out in existing guidance is likely to increase the quality of construction and materials used.</p> <p>This is expected to have a positive effect on the quality of housing, however this effect will be limited to new developments.</p> <p><b>Mitigation / Enhancement:</b> The Borough will need to work with developers so that higher design / sustainability standards and climate proofing are not used to justify reduced provision of affordable housing due to any (real or perceived) additional costs of sustainable construction.</p>
	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?	+	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<p><b>Effects:</b> No significant effects identified.</p> <p><b>Mitigation / Enhancement:</b> Core Strategy Objective 12 (To Promote Healthy Living and Create a Safe and Secure Environment) seeks to embrace "a design led approach to reduce crime and fear of crime". It is recommended that the forthcoming Development Management Policies DPD should provide more detailed implementation by encouraging the use of Secured by Design guidance and designing out crime principles.</p>
	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	<p><b>Effects:</b> See Objectives 1 and 4. Development which is of the highest standards is more likely to make use of good design and layout, which may contribute to attractive developments and neighbourhoods. This may increase / foster pride in these areas.</p> <p><b>Mitigation / Enhancement:</b> The need to engage with local people and stakeholders as part of developing major schemes and regeneration proposals could be referred to in the supporting text.</p>
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	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	<p><b>Effects:</b> No significant effects identified.</p> <p><b>Mitigation / Enhancement:</b> None.</p>
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	+?	<p><b>Effects:</b> Transport and travel are not explicitly included in the policy, however the Borough Climate Change Strategy may include reductions in emissions from transport associated with development. Zero Energy Development (ZED) identified in the supporting text will include travel planning at these specific locations / sites, however the effect of these on overall traffic / travel is not expected to be significant. Sustainability Statements, required on major proposals are likely to include travel planning.</p> <p><b>Mitigation / Enhancement:</b> 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 this policy. It is recommended that more detailed implementation should be included in the forthcoming Development Management Policies DPD. Sustainability Statements referred to in Policy CP19 should include planning for mitigation over the lifetime of developments, including the minimisation of traffic generation, Green Travel planning for businesses etc. It is important to clarify what will need to be included in Sustainability Statements.</p>
	Will it increase the proportion of journeys using modes other than the car?	+?	
	Will it encourage walking and cycling?	+?	
9. To improve water quality; conserve water	Will it improve the quality of surface and ground water?	+	<p><b>Effects:</b> Development to high Code / excellent standards will need to ensure high levels of water efficiency. Sustainability Statements for major proposals should include how water</p>
	Will it reduce water consumption and improve water efficiency?	+	

<b>Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
resources and provide for sustainable sources of water supply			use, sustainable drainage etc will be incorporated into development. <b>Mitigation / Enhancement:</b> To have significant Borough-wide effects high standards of water efficiency, drainage etc will need to be incorporated within extensions, refurbishments and retrofitting of properties, however it is recognised this may be outside the scope of the Core Strategy but mechanisms should be sought by the council to work with other partners (such as water companies) to help achieve this. See Objective 8.
10. To improve air quality	Will it improve air quality?	+	<b>Effects:</b> Sustainability Statements for development proposals in AQMAs are likely to help mitigate for, and not exacerbate poor air quality. Policy promotes renewables and decentralised energy networks, which are likely to contribute to improved air quality, although this effect may be felt outside the Borough. Energy efficiency is also likely to contribute to improving air quality. <b>Mitigation / Enhancement:</b> It is recommended that more detailed implementation information should be included in the forthcoming Development Management Policies DPD.
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	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?	+	<b>Effects:</b> No specific reference in policy, however high standards of design/construction are likely to incorporate habitat / biodiversity features. Supporting text refers to the Council's intention to use green infrastructure as part of its approach to climate change mitigation and adaptation. <b>Mitigation / Enhancement:</b> Policy could refer explicitly to the role that green infrastructure (for example incorporated within SUDS) and planting (e.g. trees) can play in climate change adaptation, and mitigation (as a carbon sink). It is recognised this level of detail may be more appropriate in the forthcoming Development Management Policies DPD. The implementation of Core Strategy Policy CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity will support / enhance this effect.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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?	+	<b>Effects:</b> See Objective 6. Development which meet high Code levels / BREEM "excellent" is may be more likely to provide high-quality townscape / public realm, and contribute to distinctive areas. <b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy will enhance these effects, in particular CP5 – Placemaking, the Growth Area Policies (CP7 – CP12), CP17 - Protecting and Enhancing the Local Character of Brent and CP18 - Protection and Enhancement of Open Space, Sports and Biodiversity.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> Climate change impacts will have effects on build and natural heritage and archaeology, for example due to the effects of heat, drying, ground heave or subsistence. Reference to these effects could be included in supporting text, or if this is considered beyond the scope of the Core Strategy, the forthcoming Development Management Policies DPD should include more detailed implementation.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	++	<b>Effects:</b> One of the key aims of the policy is climate change mitigation, in the form of reduced CO <sub>2</sub> emissions. The supporting text includes a target for Brent of a reduction on CO <sub>2</sub> emissions of 25% by 2020 from the 1990 baseline. This is in line with targets set in the London Plan. High Code levels and BREEAM ratings will require new development to achieve greater energy efficiency, and the policy seeks to increase the use of renewable energy and
	Will it lead to an increased proportion of energy needs being met from renewable sources?	++	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from	+	

<b>Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	rivers and watercourses to people and property?		decentralised energy networks. These effects will be particularly significant within the Growth Areas and the Wembley Energy Action Area. However, it should be noted that reduction in the rate of <i>growth</i> of emissions from new development will not bring about a net reduction in CO <sub>2</sub> across the Borough – which is necessary if the Borough's own target is to be met. <b>Mitigation / Enhancement:</b> The Council's Climate Change Strategy should provide more detailed implementation to support / enhance this policy. As stated in policy the Climate Change Strategy seeks to address mitigation only. It is recommended that it also includes adaptation. It is recommended that the forthcoming Development Management Policies DPD should also include more detailed policy in relation to climate change mitigation and renewables.
	Will it reduce the risk of damage to property from storm events?	+	
	Will it help reduce the impact of increased urban temperatures on people and property?	+	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+	<b>Effects:</b> Sustainability Statements required for major developments are likely to include measures to minimise construction waste and use of environmentally preferable materials. Construction to high Code levels / BREEAM standards is more likely to use more efficient materials / minimise waste. Effect on overall Borough waste and resource use may be limited. <b>Mitigation / Enhancement:</b> It is recommended that the forthcoming Development Management Policies DPD should provide more detailed policy in relation to waste management and resource use minimisation.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	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	<b>Effects:</b> Supporting text (paragraph 5.28) refers developers to the GLA Adapting to Climate Change Checklist for Development. <b>Mitigation / Enhancement:</b> The requirement to complete Sustainability Statements for major proposals should help protect and maintain soil quality and reduce subsidence / heave risk, however it is not clear from the policy or supporting text what these Statements should include. It is recommended that the forthcoming Development Management Policies DPD should provide more detailed policy in relation to soil quality and contaminated land.
	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	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	+?	
	Will it reduce the risk of subsidence and heave?	+?	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	<b>Effects:</b> Climate change resilience is a factor in ensuring a stable economy in light of predicted climate impacts. Resilience of infrastructure and buildings will be important in maintaining a working local economy. Increased development of commercial / industrial buildings constructed to BREEAM Excellent standards may help attract additional investment / enhance the image of the Borough as a business destination, especially in the long term. Reducing reliance on external fuel / energy supplies, which could become increasingly costly / unpredictable, can also enhance economic resilience. <b>Mitigation / Enhancement:</b> It is recommended that more detailed implementation should be included in the forthcoming Development Management Policies DPD. The existing SPG on sustainable design and construction (SPG19) includes case studies of employment and commercial developments built to sustainability standards.
	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	
	Will it promote growth in key clusters?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to improve earnings?	0	



<b>Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	<b>Effects:</b> High standards of construction and design likely to contribute to overall regeneration efforts. Building resilient properties and infrastructure will ensure that regeneration efforts are as resilient as possible to climate change impacts. Also, see Objective 1. Energy efficient / high quality development can help reduce social exclusion / poverty, especially fuel poverty, which may reduce disparities within the Borough, and with surrounding areas. <b>Mitigation / Enhancement:</b> It is recommended that more detailed implementation should be included in the forthcoming Development Management Policies DPD. The existing SPG on sustainable design and construction (SPG19) sets out principles and guidance for construction to sustainability standards.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<b>Effects:</b> See Objective 17. <b>Mitigation / Enhancement:</b> None.
	Will it encourage inward investment?	+	
	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?	0	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> See Objective 8.
	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	
<b>Key:</b> Major positive: <span style="background-color: #90EE90;">■</span> Minor positive: <span style="background-color: #90EE90;">+</span> Neutral: 0 Minor negative: <span style="background-color: #FFD700;">-</span> Major negative: <span style="background-color: #FF0000;">■</span> Uncertain: ? Mixed: <span style="background-color: #FFD700;">-/+</span>			
<b>Overall Summary</b>			
<b>Effects:</b> This policy is positive from a sustainability perspective, with no negative effects predicted. However, as we have commented previously, it should be noted that reduction in the rate of growth of emissions from new development will not bring about a net reduction in CO <sub>2</sub> across the Borough – which is necessary if the Borough's own target is to be met. See mitigation comment below.			
<b>Mitigation / Enhancement:</b> Detailed policy and implementation included in the Brent Climate Change Strategy, when adopted, will be important in supporting this policy. The forthcoming Development Management Policies DPD should also provide more detailed implementation in relation to climate change mitigation and adaptation in developments. 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. While the policy is predicted to have positive effects against sustainability objectives, it could be improved by having a greater focus on climate change adaptation. The policy currently predominantly addresses climate change mitigation, and it is recommended that greater emphasis be given to adaptation, and the role development can play in this. While the supporting text refers to the pending LB <i>Brent Climate Change Strategy</i> this also stresses the importance of mitigation. It is recommended that the Climate Change Strategy should address both mitigation <i>and</i> adaptation. Specific recommendations include: <ul style="list-style-type: none"> <li>Greater balance could be achieved in the policy text between the need for development to address climate change adaptation as well as mitigation.</li> <li>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 1,000m<sup>2</sup> or more floorspace), not just within Growth Areas.</li> <li>It is recommended that supporting text should include details on what is to be included in Sustainability Statements. It is recognised that detailed requirements relating to sustainability statements may more appropriately be included in the forthcoming Development Management Policies DPD.</li> <li>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 stock is to high sustainability standards is also likely to 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</li> </ul>			



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<b>Policy CP19: Brent Strategic Climate Mitigation and Adaptation Measures</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	<p>partnership with other organisations.</p> <ul style="list-style-type: none"> <li>Supporting text refers to the target for the Borough of achieving a reduction in CO<sub>2</sub> 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.</li> <li>It was previously noted that the 2nd paragraph of Policy CP19 should be modified / clarified to state that all major proposals in the borough should submit a sustainability statement to cover all 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 is considered to not provide a similar clarity of aim / purpose as our proposed amendment.</li> <li>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 London<sup>4</sup>.</li> </ul>		

<b>Policy CP20: Strategic and Borough Employment Areas</b>
<p>The council will protect designated Strategic Employment Areas designated for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generic uses that are closely related, having regard for the provisions of Preferred Industrial Locations and Industrial Business Parks (SILs) within the London Plan. The council will protect its Borough Employment sites for the same range of uses as SEA's.</p> <p>B1 office space is acceptable in SEA and BEA's where it is ancillary to other industrial and warehousing uses and any necessary transport infrastructure required to support development is properly assessed and provided in time for occupation. Purpose-built offices are promoted in town centres and the Wembley Regeneration Area and are acceptable otherwise where proposals fulfil the requirements of the sequential approach, such as the First Central site in Park Royal.</p> <p>The regeneration of Strategic and Borough Employment Areas is supported where proposals will not undermine the employment land hierarchy. Redevelopment will be expected to deliver:</p> <ul style="list-style-type: none"> <li>Maximise opportunities to move freight by non-road means (such as water and rail) and minimise the impact of industrial and employment use on the road network.</li> <li>Provide opportunities for skills training, and employment for local people.</li> <li>Provide new employment floor space that is fit for modern usage for a range of B use classes including business parks, 'starter' and 'move on' units for small and medium enterprises, and studios for artists and cultural and creative industries.</li> <li>Intensify land use, including the efficient movement and use of loading and delivery areas.</li> <li>Deliver significant environmental improvements in terms of the public realm and landscaping of employment areas and industrial estates; and</li> <li>Minimise and mitigate any impact from development upon surrounding land uses.</li> </ul>

<b>Policy CP20: Strategic and Borough Employment Areas</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
<b>Social</b>			
1. To reduce poverty and social	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> Protecting and enhancing employment areas in the Borough, seeking to improve access to them, and providing

<sup>4</sup> <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](http://ec.europa.eu/environment/air/quality/legislation/pdf/pm10_exceedances_2005_07.pdf)

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<b>Policy CP20: Strategic and Borough Employment Areas</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
exclusion	Will it improve affordability of essential services?	0	opportunities for skills development and training are predicted to have indirect and direct effects on reducing poverty and social exclusion. <b>Mitigation / Enhancement:</b> The ability of those most in need, and those in most deprived areas to take advantage of new opportunities will depend on jobs being suitable for and/or there being appropriate (and affordable) training made available. The implementation of other Core Strategy policies will support / enhance this policy.
2. To improve the health and wellbeing of the population	Will it improve access to high quality health care?	0	<b>Effects:</b> Indirect health / mental health effects are likely where aspects of social exclusion and poverty are addressed (see Objective 1). Supporting text seeks improvements to pedestrian accessibility from employment area regeneration proposals. Where this encourages walking / cycling to work this may also have health benefits. Some industrial uses may have negative noise impacts, and distribution (B8) uses may generate freight / lorry traffic which will be a major cause of road noise. <b>Mitigation / Enhancement:</b> See Objective 1. The policy / supporting text could emphasise that transport infrastructure associated with development should maximise access for walking and cycling as well as public transport.
	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?	-	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	<b>Effects:</b> The policy explicitly seeks opportunities for skills development and training. This is likely to have a positive effect on skills and skill gaps, especially in the long-term. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it improve access to high quality educational facilities?	+?	
	Will it help fill key skill gaps?	+	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	-?	<b>Effects:</b> Although not the aim of the policy, protecting employment land uses may in some cases restrict the availability of land for affordable / other housing development. <b>Mitigation / Enhancement:</b> Other Core Strategy policies (CP2 and CP7 – CP12) seek explicitly to increase housing supply which will mitigate for these potential minor negative effects.
	Will it encourage a range of dwelling type, size and tenure?	-?	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	0	
	Will it reduce homelessness?	0	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	<b>Effects:</b> Possible indirect minor positive effects where policy leads to an enhanced local economy, and more local employment opportunities. Enhancing the quality of industrial and employment areas may reduce some anti-social / vandalism behaviour. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it reduce the fear of crime?	+?	
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	<b>Effects:</b> See Objective 5. Environmental and public realm improvements in employment / industrial areas may help foster a sense of pride in these areas. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it foster a sense of pride in local area?	+?	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+?	
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	<b>Effects:</b> No significant effect identified. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the	Will it reduce traffic volumes and	-	<b>Effects:</b>

Policy CP20: Strategic and Borough Employment Areas			
Objective	Criteria	Score	Comments
effect of traffic on the environment	congestion?		Minor negative effects are predicted. This is because while the supporting text emphasises the need for regeneration / development in employment and industrial areas to improve / maximise access by non-car means, 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. <b>Mitigation / Enhancement:</b> The policy / supporting text could emphasise more clearly that transport infrastructure associated with development should maximise access for walking and cycling as well as public transport. The implementation of other policies in the Core Strategy will support / enhance this policy, for example CP1 – Spatial Development Strategy, CP3 – Commercial Regeneration, The Growth Area Policies (CP7 – CP12) and CP14 – Public Transport Improvements. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation / policy.
	Will it increase the proportion of journeys using modes other than the car?	-	
	Will it encourage walking and cycling?	+	
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?	-?	<b>Effects:</b> Additional business / industrial activity will increase water consumption and potential pollution. The policy refers to “significant environmental improvements” in employment areas and industrial estates, however these improvements are in relation to the public realm in these areas, and no explicit reference is made to water consumption or policy. <b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy will help support / enhance this policy, in particular CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. It is recommended that and the forthcoming Development Management Policies DPD should provide more detailed implementation.
	Will it reduce water consumption and improve water efficiency?	-?	
10. To improve air quality	Will it improve air quality?	-	<b>Effects:</b> See Objective 8. Due to nature of businesses in the Borough, the major pressure on air quality is likely to be from transport and trip generation. The policy seeks to maximise opportunities for freight movement by non-road means, and supporting text emphasises need to maximise pedestrian accessibility, however potential negative effects are considered likely to outweigh any benefits achieved. <b>Mitigation / Enhancement:</b> See Objective 8. Policy CP19 - Brent Strategic Climate Mitigation and Adaptation Measures will also support / enhance potential positive effects.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	
	Will it reduce emissions of key pollutants?	-	
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	<b>Effects:</b> The policy seeks “significant environmental improvements” including landscaping in employment areas and industrial estates. Unclear if this is likely to include tree planting / greening. <b>Mitigation / Enhancement:</b> The inclusion of text which encourages the maximisation / creation of green space and planting (e.g. trees) within employment areas and industrial estates would enhance this potential positive effect.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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	<b>Effects:</b> See Objective 11. Policy also seeks public realm improvements in employment areas / industrial estates. This may have positive effects on townscape quality and help to enhance distinctiveness and sense of place. <b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	

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<b>Policy CP20: Strategic and Borough Employment Areas</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it minimise visual intrusion and protect views?	0	will support / enhance this policy, for example CP1 – Spatial Development Strategy, CP3 – Commercial Regeneration, CP5 – Placemaking, CP6 – Design and Density in Place Shaping and CP19 – Brent Strategic Climate Mitigation and Adaptation Measures. It is recommended that the forthcoming Development Management Policies DPD should also provide support / enhancement.
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	-	<b>Effects:</b> See Objectives 8 and 10. Increased industrial and business activity will increase energy use. <b>Mitigation / Enhancement:</b> See Objective 8 and 10. Where freight is diverted from road to water / rail, and access to employment by non-car means improved this will help to reduce emissions.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	0	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	<b>Effects:</b> Increased industrial and business activity is likely to generate waste and increase resource use. <b>Mitigation / Enhancement:</b> See Objective 9.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	-	
	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?	+	<b>Effects:</b> The protection of existing employment and industrial land is likely to ease pressure on Greenfield sites. <b>Mitigation / Enhancement:</b> The implementation of other Core Strategy policies will support / enhance this policy.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure contaminated land is remediated as appropriate?	+	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	++	<b>Effects:</b> Main aim of the policy is to protect employment and industrial land and premises in order to promote economic growth. Provision of starter and move-on units likely to encourage start-ups and opportunities for local people. <b>Mitigation / Enhancement:</b> Implementation of other policies in the Core Strategy, in particular CP1 – Spatial Development Strategy and CP3 – Commercial Regeneration will support / enhance this policy.
	Will it improve business development and enhance productivity?	++	
	Will it improve the resilience of business and the local economy?	++	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	
	Will it enhance the image of the area as a business location?	++	
18. To offer everybody the opportunity for rewarding and	Will it reduce short and long-term local unemployment?	+	<b>Effects:</b> See Objective 17. Policy explicitly seeks opportunities for skills development and training, which is likely to help those most in need of employment. The ability of those most in
	Will it provide job opportunities for those most in need of employment?	++	

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<b>Policy CP20: Strategic and Borough Employment Areas</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
satisfying employment	Will it help to improve earnings?	+	need, and those in most deprived areas to take advantage of new opportunities will depend on jobs being suitable and/or appropriate (and affordable) training made available. <b>Mitigation / Enhancement:</b> See Objective 17.
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	<b>Effects:</b> Regeneration and disparities are a complex issue. Structured protection and support for employment land uses and business development can play an important role in this. Policy explicitly seeks to regenerate employment and industrial areas, however effect on wider regeneration will depend on a broad range of factors. <b>Mitigation / Enhancement:</b> See Objective 17.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	<b>Effects:</b> The policy key aim is to make land and property available for business development. Regeneration / redevelopment in employment areas is likely to require inward investment. Starter and move-on units together with studios for artists, creative and cultural industries are likely to support indigenous business. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	++	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	-	<b>Effects:</b> See Objective 8. Policy seeks explicitly to maximise opportunities to move freight by rail and water and to reduce the impact of industrial and employment uses on the road network, and this is welcomed. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it improve accessibility to work by public transport; walking and cycling?	+?	
	Will it improve access between key employment areas and key transport interchanges?	+?	
	Will it encourage rail and water based freight movement?	+	

**Key:** Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ?/+ Mixed: -/+

## Overall Summary

### Effects:

Overall Policy CP20 is predicted to have both positive and negative effects. There are significant positive effects predicted in relation to economic objectives, as the main aim of the policy is the protection and enhancement of business and industrial land uses in the Borough. This is likely to have indirect minor positive effects on a number of social objectives too, such as poverty and social exclusion and health.

However increased industrial activity and associated resource use, waste generation and traffic generation are predicted to have some minor negative effects, even where policy and supporting text seeks to mitigate for this, for example by encouraging pedestrian access to employment areas, or the promotion of rail and water based freight.

### Mitigation / Enhancement:

Other policies in the Core Strategy will provide more detailed implementation, mitigation and enhancement for this policy, and it is recommended that the forthcoming Development Management Policies DPD should also provide more detailed policy.

More specific comments include:

- 2<sup>nd</sup> paragraph of policy – while it is welcomed that the policy required “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.
- 4<sup>th</sup> bullet in policy – “efficient movement” could be clarified.
- Penultimate bullet in policy – the inclusion of “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.
- Supporting text under heading “Skills” is welcomed, however it is recommended that it set 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.



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**Policy CP21: A Balanced Housing Stock**

The Plan seeks to maintain and provide a balanced housing stock in Brent in support of Policy CP2 by protecting existing accommodation that meets known needs and ensuring that new housing appropriately contributes towards the wide range of Borough household needs including:

- An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) on suitable sites providing 10 or more homes and in house subdivision/conversion schemes.
- Non-self contained accommodation to meet identified needs
- Care and support accommodation for those unable to live independently
- Residential care homes which meet known need in the borough

**Policy CP21: A Balanced Housing Stock**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<p><b>Effects:</b> The provision of good quality and appropriate housing is likely to help tackle many key deprivation and social exclusion issues in the Borough. However housing will need to be delivered as part of broader regeneration projects to achieve significant benefits.</p> <p><b>Mitigation / Enhancement:</b> Supporting text includes considerable analysis of the need for affordable homes in Brent, and states that London Plan policies 3.A.9, 3.A.10 and 3.A.11 will be applied to sites larger than 10 units. These policies should help ensure provision of affordable housing in the Borough. Policy CP2 – Population and Housing Growth seeks provision in line with the London Plan target of 50% new homes being affordable.</p> <p>The Growth Area Policies (CP7 – CP12) provide more detailed implementation in each Growth Area the SSA DPD proposed allocations will also support this.</p> <p>It is recommended that the forthcoming Development Management Policies DPD should also include more detailed housing policies to ensure affordability and an appropriate mix of type, size and tenure.</p> <p>The Brent Community Strategy and the Council's Housing Strategy will also support this policy.</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	<p><b>Effects:</b> Appropriate, good quality housing is an important determinant of health.</p> <p>Where those currently in poor-quality housing are able to move to improved accommodation health inequalities are likely to be reduced, although this effect may not be significant.</p> <p>Ensuring housing is appropriate to its location (e.g. student housing, family housing) will help reduce noise concerns, in the long term, however this effect is not expected to be significant.</p> <p><b>Mitigation / Enhancement:</b> See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	+?	
	Will it improve physical and mental health?	+	
	Will it reduce noise levels and concerns?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p><b>Effects:</b> No significant effects identified.</p> <p><b>Mitigation / Enhancement:</b> None.</p>
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	++	<p><b>Effects:</b> The policies main aim is to provide a balanced, appropriate and sufficient housing stock. This includes a range of tenure, size and type of housing to meet the needs of different groups. The housing target for the Borough referred to in supporting text (and Policy CP2 – Population and Housing Growth) seeks to bring vacant homes back into use and seeks to meet a target of 50% affordable homes.</p> <p>This is likely to improve the quality of the housing stock and</p>
	Will it encourage a range of dwelling type, size and tenure?	++	
	Will it reduce the number of unfit homes and improve the quality of the housing stock?	+	
	Will it reduce homelessness?	+	



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<b>Policy CP21: A Balanced Housing Stock</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
			reduce the number of unfit homes. <b>Mitigation / Enhancement:</b> See Objective 1.
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> Provision of good quality, appropriate housing is likely to help foster a sense of pride / satisfaction in the area. Where the physical quality of areas and their environments improve, this should have a knock on effect on the sense of community. <b>Mitigation / Enhancement:</b> The policy could refer to the need to engage local communities in the provision of housing and associated amenities / facilities. The masterplanning approach adopted in South Kilburn may offer a good example – where example units were build for trial by local residents and comments / feedback and suggestions considered in the final selection of design / layouts. See Objective 1.
	Will it foster a sense of pride in local area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+	
7. To improve accessibility to key services especially for those most in need	Will it improve the level of investment in key community services?	+	<b>Effects:</b> Provision of appropriate accommodation, including care and support accommodation for those unable to live independently is likely to increase investment and access to these services. <b>Mitigation / Enhancement:</b> See Objective 1. Policy CP23 – Protection of existing and Provision of New Community and Cultural Facilities will help support / enhance this.
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	0	<b>Effects:</b> The provision of housing (and associated population) on the scale proposed has been appraised under Policy CP2, above. Policy CP21 is appraised as a stand-alone policy, however these “no significant effect” scores should be seen in the context of the appraisal of CP2. <b>Mitigation / Enhancement:</b> None.
	Will it increase the proportion of journeys using modes other than the car?	0	
	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	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	0	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> None.
	Will it help achieve the objectives of the Air Quality Management Plan?	0	
	Will it reduce emissions of key pollutants?	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	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> None.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	0	

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<b>Policy CP21: A Balanced Housing Stock</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	biodiversity value?		
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	<b>Effects:</b> Provision of good quality, appropriate housing is likely to help enhance the physical quality of areas and their environments. This should have a knock on effect on the sense of place and local distinctiveness. See Objective 6. <b>Mitigation / Enhancement:</b> Other policies in the Core Strategy will provide more detailed implantation, for example CP6 – Design and Density in Placemaking. It is recommended that the forthcoming Development Management Policies DPD should also provide more detailed implementation.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?		
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	0	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> Core Strategy Policy CP19 – Brent Strategic Climate Mitigation and Adaptation Measures seeks to ensure major new development proposals are built to standards which should minimise greenhouse gas emissions / maximise renewable energy etc.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	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	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	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	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> The Growth Area Policies (CP7 – CP12) seek to maximise development on brownfield land.
	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	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	<b>Effects:</b> Indirect positive effects. A supply of an adequate housing stock (together with Increased population and larger workforce), improved public realm and a better mix of housing are all likely in the long term to have positive knock-on effects for the local economy. <b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy
	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	
	Will it promote growth in key clusters?	0	

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<b>Policy CP21: A Balanced Housing Stock</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it enhance the image of the area as a business location?	+	will support / enhance this policy. It is recommended that the forthcoming Development Management Policies DPD should also set out more detailed implementation.
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	<b>Effects:</b> No significant effects identified. There is some risk that as new housing will attract new residents to the Borough this could increase competition for in the local job market, making it harder for those in the Borough to find employment. This may particularly affect those in the currently most deprived areas. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to improve earnings?	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	<b>Effects:</b> A balanced housing stock which meets the needs of the population will be a factor in promoting regeneration and addressing disparity both within the Borough and with surrounding areas. <b>Mitigation / Enhancement:</b> See Objective 17.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<b>Effects:</b> Development of new housing on the scale proposed (in CP2) will require inward investment. There is a potentially indirect effect as conflict may arise between meeting housing development needs and the demand for land for business development. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	-	
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+	<b>Effects:</b> An appropriate mix of housing may provide people with greater opportunities to live and work in the same areas, which may help reduce commuting. However housing development on the scale proposed (in CP2) is likely to increase commuting overall. <b>Mitigation / Enhancement:</b> See Objective 17.
	Will it improve accessibility to work by public transport; walking and cycling?	0	
	Will it improve access between key employment areas and key transport interchanges?	0	
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive: <span style="background-color: #90EE90;">■</span> Minor positive: <span style="background-color: #FFFFFF;">+</span> Neutral: 0 Minor negative: <span style="background-color: #FFA500;">-</span> Major negative: <span style="background-color: #FF0000;">-</span> Uncertain: ? Mixed: <span style="background-color: #FFFF00;">-/+</span>			
<b>Overall Summary</b>  <b>Effects:</b> Overall Policy CP21 is very positive in terms of sustainability effects, particularly against social objectives. Major positive effects are predicted in relation to encouraging a range of dwelling type, size and tenure, through the policies key aim of meeting diverse housing needs. One minor indirect negative effect has been identified, as housing development to meet diverse needs may conflict with meeting business development needs in some cases.  Policy CP21 sets out the Council's intentions to provide a balanced housing stock which meets the needs of all residents of Brent. The policy does not include detail on the number of homes (included in CP2 and the Growth Area Policies) or on the way / manner in which homes should be constructed (addressed in CP6 – Design and Density in Place Shaping and CP19 – Brent Strategic Climate Mitigation and Adaptation Measures).  Policy CP21 has been appraised in isolation, however it should be seen in the wider context of the overall housing targets for the Borough set out in CP2, and other policies in the Core Strategy. Policy CP21 therefore is predicted to have no significant / neutral effects against the majority of environmental objectives, however this does not indicate that housing development is environmentally neutral. The environmental effects of increased housing provision are appraised under Policy CP2, and the Growth Area Policies (CP7 – CP12).  <b>Mitigation / Enhancement:</b> Key enhancement, and more detailed implementation will be in the form of London Plan policies, which are referred to in the supporting text. The SSA DPD proposed allocations, and the forthcoming Development Management Policies DPD should also provide more detailed implementation. The Brent <i>Community Strategy</i> and the Council's <i>Housing Strategy</i> will also support this policy.			

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**Policy CP22: Sites for Nomadic Peoples**

A). The existing Lynton Close Travellers Site will be protected for its current use

B). Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Showpeople should:

- Meet a need for such accommodation which is not being met in the Borough or elsewhere in London, whilst avoiding an over-concentration of such facilities in Brent in comparison to other boroughs.
- Be located on a site and in an area both environmentally acceptable for residential occupation and - where the prospective occupiers require – suitable for the undertaking of employment and entrepreneurial activities without detriment to adjacent occupiers' amenities.
- Have acceptable road and pedestrian access and be accessible to local services and public transport.
- Be suitably landscaped, with appropriate boundary treatment.

**Policy CP22: Sites for Nomadic Peoples**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	+	<b>Effects:</b> Protecting sites suitable for nomadic peoples and seeking to ensure possible new sites are accessible and provide suitable space for employment and entrepreneurial activities is predicted to have a potentially significant positive effect on poverty and social exclusion within nomadic groups. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> Where suitable space and is made available for nomadic community / family groups, with easy access to local amenities and services, there may be beneficial effects on health and health inequalities. <b>Mitigation / Enhancement:</b> None.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	0/+	
	Will it improve physical and mental health?	0/+	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	+	<b>Effects:</b> Supporting text (paragraph) refers to accommodation for nomadic peoples being a specialist type of affordable housing. Ensuring that the existing site is protected, and setting out criteria for potential new site(s) is predicted to have a potentially beneficial effect on access to suitable, affordable "housing" for nomadic peoples, especially in the long-term. Where individuals or families currently unable to find suitable accommodation are in future, this may have a positive effect on homelessness. <b>Mitigation / Enhancement:</b> See overall mitigation and enhancement comments below. It is recommended that Policy CP22 set out more clear criteria for the identification of suitable site(s).
	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	
	Will it reduce homelessness?	0/+	
5. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it foster a sense of pride in local area?	0	
	Will it increase the ability of people to influence decisions?	0	

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<b>Policy CP22: Sites for Nomadic Peoples</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it improve ethnic relations?	0	
	Will it improve understanding between different communities of their respective needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	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	<b>Effects:</b> Criteria for proposals for sites seeks that they are accessible to local services and public transport, as well as having acceptable road and pedestrian access. This is predicted to have potential positive effects on making access to key services easier and more affordable. <b>Mitigation / Enhancement:</b> None.
	Will it make access more affordable?	0/+	
	Will it make access easier for those without access to a car?	0/+	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it increase the proportion of journeys using modes other than the car?	0	
	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it help achieve the objectives of the Air Quality Management Plan?	0	
	Will it reduce emissions of key pollutants?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	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	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	0	
	Will it protect and enhance local distinctiveness and sense of place?	0	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	
13. To conserve and where appropriate enhance the historic environment	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	0	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	

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<b>Policy CP22: Sites for Nomadic Peoples</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
and cultural assets	Will it help preserve, enhance and record archaeological features and their settings?	<b>0</b>	
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?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	<b>0</b>	
	Will it reduce emissions of ozone depleting substances?	<b>0</b>	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	<b>0</b>	
	Will it reduce the risk of damage to property from storm events?	<b>0</b>	
	Will it help reduce the impact of increased urban temperatures on people and property?	<b>0</b>	
15. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	<b>0</b>	
	Will it increase waste recovery and recycling and improve facilities?	<b>0</b>	
	Will it reduce hazardous waste?	<b>0</b>	
	Will it reduce waste in the construction industry?	<b>0</b>	
16. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it ensure that, where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	<b>0</b>	
	Will it ensure contaminated land is remediated as appropriate?	<b>0</b>	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	<b>0</b>	
	Will it reduce the risk of subsidence and heave?	<b>0</b>	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	<b>0/+</b>	<b>Effects:</b> Criteria for assessing proposals for sites include one to ensure sites have suitable space for undertaking employment and entrepreneurial activities. This is predicted to have a potential positive effect on business and employment opportunities for people living on these sites. <b>Mitigation / Enhancement:</b> None.
	Will it improve business development and enhance productivity?	<b>0</b>	
	Will it improve the resilience of business and the local economy?	<b>0</b>	
	Will it promote growth in key sectors?	<b>0</b>	
	Will it promote growth in key clusters?	<b>0</b>	
	Will it enhance the image of the area as a business location?	<b>0</b>	
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	<b>0/+</b>	<b>Effects:</b> See Objective 17. <b>Mitigation / Enhancement:</b> None.
	Will it provide job opportunities for those most in need of employment?	<b>0/+</b>	
	Will it help to improve earnings?	<b>0</b>	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
20. To encourage and accommodate both indigenous	Will it encourage indigenous business?	<b>0/+</b>	<b>Effects:</b> See Objective 17. <b>Mitigation / Enhancement:</b> None.
	Will it encourage inward investment?	<b>0</b>	
	Will it make land and property available for business development?	<b>0</b>	



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<b>Policy CP22: Sites for Nomadic Peoples</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
and inward investment			
21. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	<b>0</b>	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it improve accessibility to work by public transport; walking and cycling?	<b>0</b>	
	Will it improve access between key employment areas and key transport interchanges?	<b>0</b>	
	Will it encourage rail and water based freight movement?	<b>0</b>	
<b>Key:</b> Major positive:  Minor positive:  Neutral: 0 Minor negative:  Major negative:  Uncertain: ? Mixed:			
<b>Overall Summary</b>			
<b>Effects:</b>			
<p>Policy CP22 is predicted to have limited significant effects, due to its specific nature and focus. However minor positive effects are predicted in relation to reducing poverty and social exclusion and increasing access to affordable housing. These effects are due to the policy's aim to protect and provide suitable accommodation for the needs of nomadic peoples choosing to live in Brent.</p> <p>Other potential positive effects identified include improving ease and affordability of access to key services, and the potential for employment and business opportunities for nomadic peoples. These effects are predicted due to criteria included in the policy which seek to ensure "acceptable" access to sites, and suitable space on sites to accommodate employment and entrepreneurial activities.</p> <p>Positive effects will also depend on the number and location of sites that come forward. This will to a large extent depend on further work on needs etc to be done in association with the revision of the London Plan.</p>			
<b>Mitigation / Enhancement:</b>			
<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.</p>			

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**Policy CP23: Protection of Existing and Provision of New Community and Cultural Facilities**

In order to ensure that the continuing needs of Brent's diverse community are met, existing community and cultural facilities, that support community participation and development, will be protected or their loss mitigated where necessary.

New multi-functional community facilities (excluding schools, health facilities) should be provided at a rate of 370m<sup>2</sup> per 1000 new population.

**Policy CP22: Protection of Existing and Provision of New Community and Cultural Facilities**

Objective	Criteria	Score	Comments
<b>Social</b>			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion, in particular in those areas most affected?	++	<p><b>Effects:</b> Meeting community needs for a range of facilities e.g. the arts, cultural centres, social care and general wellbeing, is expected to have a major positive effect on reducing poverty and social exclusion. The policy also notes the need to address "continuing" needs which is positive for the long-term provision of facilities.</p> <p><b>Mitigation / Enhancement:</b> 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 be important in implementation. The SSA DPD proposed allocations also seek to identify specific sites for community facilities provision. It is recommended that the forthcoming Development Management Policies DPD should provide additional support and enhancement.</p>
	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?	+	<p><b>Effects:</b> Health facilities and schools provision are explicitly addressed elsewhere in the Core Strategy (the Growth Area Policies in particular), however provision of a range of community facilities, including meeting and cultural spaces and space for community gatherings can have a significant positive effect on health and wellbeing of individuals and the community. Some community uses may generate localised noise nuisance, however this effect is not predicted to be significant.</p> <p><b>Mitigation / Enhancement:</b> See Objective 1.</p>
	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?	-?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	<p><b>Effects:</b> Schools provision is explicitly addressed elsewhere in the Core Strategy (in the Growth Area Policies and CP15 – Infrastructure to Support Development). However multi-use community facilities are likely to provide opportunities for informal education, evening classes and cultural learning / development. This is expected to have a positive effect on education and skills.</p> <p><b>Mitigation / Enhancement:</b> See Objective 1.</p>
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to affordable housing?	0	<p><b>Effects:</b> No significant effect identified.</p> <p><b>Mitigation / Enhancement:</b> None.</p>
	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	
	Will it reduce homelessness?	0	
5. To reduce	Will it reduce actual levels of crime?	+?	<b>Effects:</b>

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<b>Policy CP22: Protection of Existing and Provision of New Community and Cultural Facilities</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
crime and anti-social activity	Will it reduce the fear of crime?	+?	Although crime is not the explicit focus of the policy, it is likely that improved access to community facilities will have a beneficial impact on crime / fear of crime. Some indirect positive effects predicted, but the significance of the effects uncertain. <b>Mitigation / Enhancement:</b> See Objective 1.
6. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	<b>Effects:</b> The policy is predicted to have a major positive effect on sense of local community and identity as it focuses on promoting local communities and their diversity, culture and identity. Access and quality of community facilities is likely to play an important role in residential amenity, neighbourhood satisfaction, sense of place and vibrant working communities. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it foster a sense of pride in local area?	++	
	Will it increase the ability of people to influence decisions?	+	
	Will it improve ethnic relations?	+?	
	Will it improve understanding between different communities of their respective needs and concerns?	+	
	Will it encourage people to respect and value their contribution to society?	+	
7. To improve accessibility to key services especially for those most in need	Will it improve the level of investment in key community services?	++	<b>Effects:</b> Culture, leisure, sports and art facilities are an essential part of local service provision. The main aim of Policy CP22 is to improve provision and access to local services and community facilities and is therefore predicted to have a major positive effect on accessibility to key services. <b>Mitigation / Enhancement:</b> See Objective 1.
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	++	
<b>Environmental</b>			
8. To reduce the effect of traffic on the environment	Will it reduce traffic volumes and congestion?	+	<b>Effects:</b> Where new community facilities are protected in accessible locations, and trips to access facilities elsewhere are prevented positive effects predicted. Local service and facility provision close to centres of population should encourage walking and cycling and reduce car trips. <b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy, in particular the CP5 – Placemaking and the Growth Area Policies (CP7 – CP12) should support / enhance this policy. Also see Objective 1.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking and cycling?	+	
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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce water consumption and improve water efficiency?	0	
10. To improve air quality	Will it improve air quality?	+	<b>Effects:</b> See Objective 8. Positive effect is not predicted to be significant. <b>Mitigation / Enhancement:</b> None
	Will it help achieve the objectives of the Air Quality Management Plan?	0/+	
	Will it reduce emissions of key pollutants?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it conserve and enhance sites designated for their nature conservation interest?	0	
	Will it protect and enhance woodland cover and trees and promote their management?	0	

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<b>Policy CP22: Protection of Existing and Provision of New Community and Cultural Facilities</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it improve access to and promote the educational value of sites of biodiversity value?	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	<b>Effects:</b> See Objective 6. <b>Mitigation / Enhancement:</b> See Objective 6.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	0	
	Will it protect and enhance local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	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	<b>Effects:</b> No significant effects identified. <b>Mitigation / Enhancement:</b> None.
	Will it protect listed buildings and their settings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	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?	+?	<b>Effects:</b> See Objective 8. <b>Mitigation / Enhancement:</b> See Objective 8.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	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	
	Will it help reduce the impact of increased urban temperatures on people and property?	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	<b>Effects:</b> No significant effect identified. <b>Mitigation / Enhancement:</b> None.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling and improve facilities?	0	
	Will it reduce hazardous waste?	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	<b>Effects:</b> No significant effect identified. <b>Mitigation / Enhancement:</b> None.
	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	
	Will it minimise the loss of soils to development and maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence and heave?	0	
<b>Economic</b>			
17. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	<b>Effects:</b> Communities which are well served by services and amenities are likely to be more attractive places to live and work in, which may enhance the image of the area as a business location. In the long-term, communities which enhance the wellbeing, education and health of residents may support and
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	

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<b>Policy CP22: Protection of Existing and Provision of New Community and Cultural Facilities</b>			
<b>Objective</b>	<b>Criteria</b>	<b>Score</b>	<b>Comments</b>
	Will it promote growth in key clusters?	0	encourage local businesses and start-ups.
	Will it enhance the image of the area as a business location?	+	<b>Mitigation / Enhancement:</b> The implementation of other policies in the Core Strategy, in particular CP1 – Commercial Regeneration and the Growth Area Policies (CP7 – CP12) will support this policy.
18. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	<b>Effects:</b> See Objective 17. There may also be some employment generation in facilities themselves.
	Will it provide job opportunities for those most in need of employment?	+	<b>Mitigation / Enhancement:</b> See Objective 17.
	Will it help to improve earnings?	0	
19. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<b>Effects:</b> See Objectives 1 and 17. Community facilities and the impact they have on the health and well being of local communities is a key aspect in long-term regeneration. <b>Mitigation / Enhancement:</b> See Objectives 1 and 17.
20. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0/+	<b>Effects:</b> See Objective 17.
	Will it encourage inward investment?	0	<b>Mitigation / Enhancement:</b> See Objective 17.
	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?	+	<b>Effects:</b> Where new community facilities are protected in accessible locations, and trips to access facilities elsewhere are prevented positive effects predicted.
	Will it improve accessibility to work by public transport; walking and cycling?	0	<b>Mitigation / Enhancement:</b> See Objective 8.
	Will it improve access between key employment areas and key transport interchanges?	0	
	Will it encourage rail and water based freight movement?	0	
<b>Key:</b> Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: +/-			
<b>Overall Summary</b>			
<b>Effects:</b>			
Overall Policy CP23 is predicted to have very positive effects against social objectives, and positive effects against economic objectives. No negative effects are predicted.			
The policy sets out a rate of 370 m <sup>2</sup> of new facilities per 1000 new population, which should be provided. This is welcomed, however positive effects predicted should be seen in the context of existing deficits across the Borough, and particularly in deprived areas / wards. Thus new provision may meet demand arising from new housing development however existing deficits may in many cases remain. Supporting text which recognises existing deficiencies is welcomed.			
<b>Mitigation / Enhancement:</b>			
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 be important in implementation. The SSA DPD proposed allocations also seek to identify specific sites for community facilities provision. It is recommended that the forthcoming Development Management Policies DPD should provide additional support and enhancement.			
More specific comments include:			
<ul style="list-style-type: none"> <li>The policy text could refer to and set out the need to address existing deficiencies in community facilities more than it currently does.</li> <li>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.</li> <li>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.</li> </ul>			