# 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 C

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



## June 2009

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## ABBREVIATIONS

AAP	Area Action Plan	HOU	Housing
AMR	Annual Monitoring Report	1&0	Housing 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	LB Brent	London Borough of Brent
DEIXIX	Regulatory Reform	LBB	London Borough of Brent
BRE	Building Research Establishment	LBPN	London Bus Priority Network
BREEAM	BRE (Building Research Establishment)	LCN+	London Cycle Network Plus
	Environmental Assessment Method	LDA	London Development Agency
BVPI	Best Value Performance Indicator	LDD	Local Development Document
CABE	Commission for Architecture and Build	LDF	Local Development Framework
	Environment	LDS	Local Development Scheme
CCHP	Combined Cooling Heat and Power	LEA	Local Education Authority
CEP	Collingwood Environmental Planning	LEAP	Local Equipped Area for Play
CHD	Coronary Heart Disease	LES	Local Employment Site
CHP	Combined Heat and Power	LGA	Local Government Association
CO <sub>2</sub>	Carbon Dioxide	LIP	Local Implementation Plan
COM	Community	LNR	Local Nature Reserve
CP	Core Policy	LPA	Local Planning Authority
CS	Core Strategy	LSDC	London Sustainable Development
db	Decibels		Commission
DCLG	Department for Communities and Local Government	LSDF	London Sustainable Development Framework
DCMS	Department for Culture Media and Sport	LTP	Local Transport Plan
Defra	Department for Environment Food and Rural Affairs	MIX	Mixed Use
DETR	Department of the Environment, Transport	MOL	Metropolitan Open Land
DEIN	and the Regions	MUGA	Multi-use Games Area
DfT	Department for Transport	NCR	North Circular Road
DoH	Department of Health	NDC	New Deal for Communities
DP	Development Policy	NEAP	Neighbourhood Area for Play
DPD	Development Plan Document	NO <sub>2</sub>	Nitrogen dioxide
DTI	Department of Trade and Industry	NVQ	National Vocational Qualifications
EA	Environment Agency	ODPM	Office of the Deputy Prime Minister
EC	European Commission	ONS	Office of National Statistics
EEA	Energy Action Area	OS	Open Space
EEC	European Economic Community	PCT	Primary Care Trust
EIA	Environmental Impact Assessment	PM10	Particles measuring less than 10 microns
EMP	Employment	PPG	Planning Policy Guidance
ENV	Environment	PPP	Policy, Plan or Programme
EU	European Union	PPS	Planning Policy Statement
FRA	Flood Risk Assessment	PSA	Public Service Agreement
GCSE	General Certificate of Secondary	PTAL	Public Transport Accessibility Level
	Education	RES	Regional Economic Strategy
GIS	Geographical Information System	RIBA	Royal Institute of British Architects
GLA	Greater London Authority	RSL	Registered Social Landlords
GOL	Government Office for London	RSS	Regional Spatial Strategy
GP	General Practitioner	SA	Sustainability Appraisal
GPD	Gross Domestic Product	SAP	Standard Assessment Procedure
GQA	General Quality Assessment	SCI	Statement of Community Involvement
GWh	Gigawatt Hour	SD	Sustainable development
На	Hectare	SDC	Sustainable Development Commission

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

#### **APPENDIX 10**

## SITE SPECIFIC ALLOCATIONS INCLUDED IN THE ISSUES AND OPTIONS PAPERS

Site No.	Area	Site Location	Site Size (ha)	Opportunities & Constraints	Current Use	Use option 1	Use option 2	Use option 3	Included/comments
1	Alperton	Atlip Site/ Dadoos/ Alpine Horn, Atlip Road/ Ealing Road	1.9	Part Borough employment area & part Major Opportunity Site	Vacant	B1 Work - Live Affordable Housing to support work-live	Housing & Industrial	Housing	Removed: planning application received by LBB
2	Alperton	Abbey Manufacturing Estate, Mount Pleasant	2.6	Part Borough Employment Area	Storage/ warehousing & car repair garages	Housing & Industrial	Housing		Removed see new allocations 43 & 44
3	Park Royal	Twyford Tip	5.3	Major Opportunity Site - Part Business Zone Area. Gateway site	Part waste management station, part vacant	General industrial uses	Mixed employment/ housing uses	Waste management	Included
4	Park Royal	Guinness Brewery	12	Strategic employment area/ Major opportunity site	Industrial	Mix of hospital and education uses with related employment uses	Mix of distribution/ storage and general industrial uses	Hospital and medical-related employment uses / Education & creative industry/ media uses	Included
5	Park Royal	Carey's site	1.4	Site adjacent to Central Middlesex Hospital. Strategic Employment Area - Major opportunity site.	Vacant	Employment uses	Employment uses & key worker housing	Mixed - commercial & general housing	Included
6	Park Royal	Former Heinz Sidings	4.1	Wildlife corridor - Portion of the site identified as site of Metropolitan Nature Conservation Importance and Site of Borough (Grade 1) Nature Conservation Importance	Vacant	Employment Use	Waste Management	Retain as open land	Removed: no discernable change of use anticipated or desired
7	Stonebridge	Unisys/ Bridge Park	2.85	Historically significant buildings	Vacant office buildings & Leisure Centre	Mixed use - Leisure Centre, Housing & Associated office & retail	Housing & Leisure Centre	Education & Leisure Centre	Included
8	Wembley	T Choithram & Sons, Lancelot Road	1.11		Industrial	Housing	Mixed - incl. industrial & housing	Industrial	Removed: permission granted for residential development.
9	Wembley	Vale Farm Sports	2.8	Area of open	Public open	Improvement of	Education use		Included

#### Site Specific Allocations Included in the Issues and Options Papers (September 2005)

Site No.	Area	Site Location	Site Size (ha)	Site Context / Opportunities & Constraints	Current Use	Use option 1	Use option 2	Use option 3	Included/comments
		Centre		character	space	existing sports facilities	on part of land		
10	Northwick Park	Northwick Park Hospital/ Ducker Pond	21	Part Metropolitan open land	Hospital/ Vacant	Hospital	Hospital/ Higher education facilities	Hospital/ Housing	Included
11	Wembley	London Transport Sports Ground	4.3	Area of open character	Private playing fields	Education use, maintaining sports pitches as open space with public access	Maintain as private playing fields	Development of site frontage for mixed use (residential & commercial uses) & maintain remainder as open space	Included
12	Wembley	Brent Town Hall	2.1	Listed building	Administration	Continued administration/ office	Mixed use - office / residential / community	Housing	Included
13	Neasden	Swaminarayan School & Gwyneth Rickus Building, Brentfield Road	3.6		School/ Teachers' Centre	Affordable housing & community facilities	Education use	Affordable Housing	Removed – NOT AVAILABLE FOR DEVELOPMENT
14	Queens Park Station, Salusbury Road	Cullen House	0.2	Major Estate Regeneration Area . Planning Brief for site	Residential	Bus interchange & housing	Bus interchange & mixed uses - incl. housing & retail	Housing	Included
		Station car park	0.12	Major Estate Regeneration Area. Car parking facilities need to be retained	Car park	Residential with car park below	Mixed residential & retail with car park below		Included
		Times House	0.2	Major Estate Regeneration Area	Printing press	Residential with car parking below	Mixed residential & retail	Residential and community facilities	Included
		British Legion	0.17	Major Estate Regeneration Area	Community facility	Residential	Community Facility	Mixed - incl. housing & community uses	Included
		Albert Road Day Centre	0.4	Major Estate Regeneration Area	Community facility	Housing with re- provision of community facility	Housing	Community uses	Included
15	South Kilburn	117 - 119 Malvern Road	0.16	Locally listed building	Car sales	Employment use	Education use	Housing	Removed: demolished. Applicants appealing refused decision

Site No.	Area	Site Location	Site Size (ha)	Site Context / Opportunities & Constraints	Current Use	Use option 1	Use option 2	Use option 3	Included/comments
16	Kilburn	Kilburn Square	0.6	Major Town Centre	Retail	Town Centre/ Mixed Uses incl. housing, education, health & other community uses	Housing	Office/ retail	Included
17	Kilburn	Mecca Bingo and adjoining land	1.4	Listed building	Bingo hall	Community/ retail & arts/ culture/ entertainment & employment uses	Place of worship		Included
18	Cricklewood	243 - 289 Cricklewood Broadway	0.6	Special employment policy area	Business & residential	Housing	Mixed - housing & retail		Included
19	Dollis Hill	Dollis Hill Estate	1.5		Industrial/ Business uses/ School & vacant buildings	School expansion & other community uses	Maintain as employment land	Housing	Included
20	Chalkhill	Chalkhill Community Centre & Chalkhill Public Open Space	4.7	Part of land liable to flooding. Metropolitan open land & site of Metropolitan Nature Conservation Importance & site of Borough (Grade 1) Nature Conservation Importance.	POS & community centre	New school/ POS	Retain as community use & POS		Removed – RETAIN IN EXISTING USE. NOT PREFERRED SCHOOL SITE
21	Alperton	Alperton House	0.5	Borough Employment Area	Vacant office building	Employment use	Education	Housing	Removed – NOT AVAILABLE FOR DEVELOPMENT
22	Kingsbury	1-3 The Mall	1	Hostels	Residential	Education	Housing	Commercial e.g. hotel	Included
23	Queensbury	Morrisons, Westmoreland Road	2.3	Retail & transport corridor	Retail	Mixed - incl housing & retail	Retail	Housing	Included
24	Edgeware Road	Capitol House, Capitol Industrial Park, Capitol Way	1.7	Retail & transport corridor	Retail	Retail	Housing	Mixed - incl retail, housing & employment uses	Removed see new allocations 45 & 47
25	Edgeware Road	Oriental City	2.7	Retail & transport corridor	Retail & car park	Retail	Mixed use - incl. housing, retail & community uses		Included

Site No.	Area	Site Location	Site Size (ha)	Site Context / Opportunities & Constraints	Current Use	Use option 1	Use option 2	Use option 3	Included/comments
26	Edgeware Road	Mercedes Garage	1.5	Retail & transport corridor	Car sales/ repair	Car sales/ repair	Mixed uses - including housing & retail	Housing	Removed see new allocation 47
27A	Church End	Asiatic Carpets Warehouse Site	2.3	Borough Employment Area	Industrial	Housing	Employment uses	Mixed - incl. housing & employment uses/ work-live	Included
27B	Church End	Eboney Court, Neasden Lane	0.5	Archeological priority area. Local town centre	Vacant residential	Housing	Housing & community uses	Housing & employment/ retail uses	Included
27C	Church End	White Hart Public Hotel	0.42	Archeological priority area. Local centre. Market site	Vacant	Mixed uses - incl. housing, community uses & market	Housing	Housing & retail uses	Included
27D	Church End	Church End Local Centre	1.3	Archeological priority area. Local town centre	Retail/ residential	Mixed town centre uses - incl. housing, retail, community uses	Employment/ retail uses		Included
28	Wembley	Wembley Town Centre West End	0.8	Town Centre	Retail	Mixed - residential, retail, leisure, car parking	Commercial uses	Community uses	Included
29	Neasden	Neasden Car Park	0.1	Gateway site to town centre, opportunity for link to Birse Crescent	Car Park	Retail/ employment use	Mixed-use including residential		Included
30	Alperton	Marvelfairs House/ Carlyon Print, Ealing Road/ Carlyon Road	0.8	Local Employment Site	Employment	Employment	Retail	Mixed-use including residential	Removed see new allocation 46
31	Kensal Green	Adjacent to 864 Harrow Road	0.1	Proposed open space	Vacant	Public Open space	Residential	Mixed open space/ residential	Included
32	Alperton	Northfields Industrial Estate	8.5	Strategic Employment Area	Employment Use/Vacant	Employment	Employment/ Zero Energy Housing	Employment/ Affordable Housing	Included

Site no.	Site Name	Brent Planning Team- / Ward	Options considered by LB Brent at issues and options stage	LB Brent's reasons for exclusion from preferred options stage
2	Abbey Manufacturing Estate, Woodside Close	West Alperton	1. Housing and industrial 2. Housing	New allocations at Sunleigh Road and Abbey Manufacturing Estate have been identified, allowing for an improved separation between industrial and new and existing residential development and encouraging improved vehicular access.
6	Former Heinz sidings	West Stonebridge	1. Employment use 2. Waste management 3. Retain as open land	Not only is this site of nature conservation and wildlife importance, vehicular access is restricted, precluding development.
8	T Choitham and Sons, Lancelot Road	West Tokyington	1. Housing 2. Mixed including industrial and housing 3. Industrial	Permission for development has been awarded and development is nearing completion.
13	Swaminarayan School, Gwyneth Rickus Building	West Willesden Green	1. Affordable housing and community facilities 2. Education use 3. Affordable housing	The sites within this allocation are no longer available for development.
14a	Cullen House, Salisbury Road	South Kilburn	1. Bus interchange and housing 2. Bus interchange and mixed use including housing and retail 3. Housing	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14b	Station Car Park, Salisbury Road	South Kilburn	1. Residential with car park below 2. Mixed residential and retail with car park below	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14c	Times House, Claremont Road	South Kilburn	<ol> <li>Residential with car parking below</li> <li>Mixed residential and retail</li> <li>Residential and community facilities</li> </ol>	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14d	British Legion, Albert Road	South Kilburn	<ol> <li>Residential</li> <li>Community facility</li> <li>Mixed including housing and community facilities</li> </ol>	The collective allocation for Queens Park Station entails the provision of new community facilities commensurate with the British Legion and the Albert Road Day centre. Any redevelopment of the British Legion and/or Albert Road Day Centre will be contingent on this re-provision. Therefore it is not considered appropriate to encourage the redevelopment of this site at this stage and to leave any change to occur in time as part of the New Deal for Communities programme.
14e	Albert Road Day Centre	South Kilburn	<ol> <li>Housing with re-provision of community facility</li> <li>Housing</li> <li>Community uses</li> </ol>	The collective allocation for Queens Park Station entails the provision of new community facilities commensurate with the British Legion and the Albert Road Day centre. Any redevelopment of the British Legion and/or Albert Road Day Centre will be contingent on this re-provision. Therefore it is not considered appropriate to encourage the redevelopment of this site at this stage and to leave any change to occur in time as part of the New Deal for Communities programme.
18	Cricklewood Broadway, Edware Road	North Mapesbury	1. Housing 2. Housing and retail	This has developed into a viable spatial cluster of retailers specializing in interior decoration and design, with off street parking above. The site is also

#### Site Specific Allocations considered at Issues and Options stage but excluded from preferred options (June 2007)

Site no.	Site Name	Brent Planning Team- / Ward	Options considered by LB Brent at issues and options stage	LB Brent's reasons for exclusion from preferred options stage
				constrained by the motor vehicle operations to the rear that despite causing local environmental nuisance, have certificates of lawful use and represent thriving local employment. Considering these reasons, and in the absence of developer interest the council is minded not to promote this allocation at this stage.
20	Chalkhill Community Centre and Chalkhill Public Open Space	North Tokyngton	<ol> <li>Public Open Space and community centre</li> <li>New School and Public Open Space</li> <li>Retain as community use and Public Open Space</li> </ol>	The council does not generally support the loss of open space unless there is an exceptional reason to do otherwise - for example for a new school. Although the council believes that there is both a need for a new secondary school and a shortage of suitable sites, there are more suitable locations for a school in terms of accessibility. A significant section of this site is land liable to flooding and therefore difficult to support any further development.
21	Alperton House, Bridgewater Road	West Alperton	1. Employment use 2. Education 3. Housing	This site is providing well occupied employment floor space for a range of operations in a town centre location
24	Capitol House, Capitol Way	North Queensbury	1. Retail     2. Housing     3. Mixed use including retail, housing     and employment uses	This has been included in a larger allocation (number 85) encompassing the buildings to the east and north east.
26	Mercedes Garage, Edware Road	North Queensbury	1. Car sales and repair     2. Mixed use including housing and     retail     3. Housing	This has been included in a larger allocation (number 85) encompassing the buildings to the south and south west.
30	Marvefairs House/Carlyon Road	West Alperton	1. Employment 2. Retail 3. Mixed use including residential	This allocation has been extended to include the public house and the vacant retail warehouse to the north. The new allocation is Carlyon Road.
112	The Lyon Industrial Estate, Staples Corner	North Welsh Harp	Representations were made at issues and options stage for a mix of residential and employment uses.	The land is designated by the London Plan as a Strategic Employment Location. The Council has identified sites to meet the planned housing capacity figures through the Growth Strategy as identified within the Core Strategy (preferred options).

#### **Overall SA Comment on Sites Considered but not included:**

The following sites have been incorporated in larger allocations or split into several smaller allocations: 2, 14a, 14b, 14c, 14d, 14e, 24, 26, and 30. Two further sites have been excluded, one because the development is nearing completion (number 8) and the other because the site is no longer available for development (13).

The comments focus on the remainder sites in this table:

Site 6: this site is part of a nature conservation area and wildlife corridor so development should be avoided. In addition, the site has no access for vehicles which makes it unsuitable for employment or waste management use.

Sites 18, 21 and 112 are currently used for employment. The options considered for the sites included housing or mixed use including housing and education but as the sites contribute to generate employment and business for the borough there are other more suitable sites for those uses. There are further issues which constrain the development of these sites: noise levels and lack of developers interest (18) additionally site 112 is within land designated as Strategic Employment Location in the London Plan.

Site no.	Site Name	Brent Planning Team- / Ward	Options considered by LB Brent at issues and options stage	LB Brent's reasons for exclusion from preferred options stage					
Site 20: Development of this site would have resulted in loss of open space. The site is also in a flood risk area and the Environment Agency recommended that it is not									
included in the	preferred options in thei	r comments during the i	ssues and options consultations. The	se two issues mean that development of the site should be avoided.					

#### **APPENDIX 11**

### APPRAISAL OF SSA ALTERNATIVES AND SELECTED SITES

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
Wemt W1	bley Growth Area Wembley West End (south)	0.8	<ol> <li>Mixed retail, commercial and residential</li> <li>Commercial uses</li> <li>Community uses</li> </ol>	<ul> <li>This site is identified within the adopted Wembley West End Supplementary Planning Document 2006. The Council's 2006 retail capacity study concluded that Wembley Town Centre is suffering from decline and identified this site as a retail opportunity. In line with national and regional policy, the allocation promotes the mixed use redevelopment of a brown field site for uses that are suitable for a town centre location. This is an opportunity to establish a regenerative anchor at the western end of Wembley Town Centre in the light of the planned extensive redevelopment around the Stadium. The Ealing Road section has been included to encourage a comprehensive approach to development. Reasons for not selecting alternatives:</li> <li>Commercial uses would require larger units to deliver regeneration</li> </ul>	The proposed mixed use allocation of this site is likely to provide the best opportunity to achieve wider regeneration benefits for the Wembley area. The site has good access by public transport, as well as benefiting from proximity to schools and leisure facilities which also favours mixed use development. Location on Wembley High road also makes this site suitable for retail. The planning justifications for selecting the proposed allocation also reflect the reasons why this use is likely to be the most beneficial in sustainability terms. Sole commercial use may generate greater opportunities for employment, however it may also generate proportionately more travel need, including car use, and other potential sources of environmental impacts (e.g. noise, air pollution). If feasible, sole use for community facilities may generate less travel need than the two alternative allocations, and could also provide important community services to this deprived ward improving quality of life and community identity. However community use alone may not provide the opportunity to realise broader regeneration objectives.
W2	Former London Transport Sports Ground	4.3	<ol> <li>School building and improved dual use playing fields</li> <li>Maintain as private playing fields</li> <li>Development of site frontage for mixed use (residential &amp; commercial uses) and maintain remainder as open space</li> </ol>	<ul> <li>There is both need, and shortage of suitable site, for a new school. This site presents an opportunity in terms of excellent public transport accessibility while maintaining and improving access to sports and recreation facilities Reasons for not selecting alternatives:</li> <li>The Councils priority is for new school places to meet existing deficiencies and the planned growth for Wembley</li> <li>No public access to open space. The regeneration activity requires extra school capacity.</li> </ul>	There is an identified need for additional school places in the Borough. The proposed allocation is supported by the site's good public transport access. Although this site is not in an area of open space deficiency, ensuring public access to open space following development is also welcomed as use of this open space for recreation and exercise is likely to lead to public health benefits. The planning justifications for selecting the proposed allocation also reflect the reasons why this use is likely to be the most beneficial in sustainability terms. However while the proposed allocation may be the most beneficial use of this site from a sustainability perspective of the alternatives considered, it is also relevant to consider whether this site is the most suitable for a school compared to other potential sites in

#### Proposed Site Specific Allocations, Alternatives and SA Comments

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
					the Borough. Due to the potential impacts associate with the proposed allocation (e.g. noise, travel need), the risk of loss to greenspace and flood risk, and the need to consider the proposed allocation of a school on this site against other sites in the Borough, it warranted more detailed appraisal – see Table C1 below.
W3	Brent Town Hall	0.651	<ol> <li>Mixed commercial (offices, hotel), residential and community</li> <li>Continued administration / office</li> <li>Housing</li> </ol>	<ul> <li>The building is reaching the limits of its use in terms of purpose and size and the Council is seeking a new Civic Centre within the Wembley Regeneration Area. The existing Grade II Listed building however remains an important visual, social and historic landmark in the borough. The outbuildings to the rear have been added over time and are not subject to the Listing. The sensitive redevelopment of these buildings and appropriate re-use of the main building can enable its continued use and secure long term restoration.</li> <li>Reasons for not selecting alternatives:</li> <li>The intended civic centre in the Wembley Masterplan area will house the majority of the councils administrative and office work.</li> <li>Chalk hill major estate regeneration development, which has significantly raised the housing stock in the area, releases the town hall to house a different usage.</li> </ul>	Sensitive mixed use development may offer the best opportunity to protect and restore the character of the listed Town Hall. The proximity to Wembley stadium and accessibility by public transport would help support its use as a hotel. Given that the Town Hall will not be needed as Council offices in the medium to long-term, and the site's close proximity to new housing developments at Chalk Hill, the proposed mixed use allocation is likely to provide particular sustainability benefits, such as the provision of local employment opportunities and community facilities. Other uses are likely to provide less opportunity for these types of benefit.
W4	Shubette House/Apex House/Karma House	0.9	<ol> <li>Mixed use hotel, residential and commercial</li> <li>Industrial employment uses</li> <li>Bulky goods retail</li> </ol>	<ul> <li>Surrounding SSA's that are heavily residential/affordable workspace orientated, make this allocation an intrinsic landuse to fulfill community needs.</li> <li>Reasons for not selecting alternatives: <ul> <li>Masterplan envisages industrial employment uses being located in the Eastern Lands area and further east.</li> <li>Main artery road that could service bulky goods retail, Olympic Way, is car free. Masterplan envisages an area where cars, that are essential to a bulky retail outlet, are ousted for an area leaning more towards leisure, retail, office, affordable workspace and housing.</li> </ul> </li> </ul>	The proposed mixed use allocation is potentially the most likely to meet the need for local amenities in this area. While they may generate more employment opportunities, industrial use and bulky goods retail uses are more likely to generate additional travel need and vehicle movements, and associated impacts, and may conflict with identified community needs, such as improving public space, and providing affordable workspaces to support small businesses. The planning justifications for selecting the proposed allocation also reflect the reasons why this use is likely to be the most beneficial in sustainability terms.

<sup>1</sup> Site size is 2.1ha, however assumed developable area is 0.65ha

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
W5	Wembley Eastern Lands	9	<ol> <li>Mixed use</li> <li>Bulky goods retail</li> <li>Industrial Employment</li> </ol>	<ul> <li>Wembley is the main focus for growth. This is a major opportunity for a new urban quarter taking advantage of the new Stadium and public transport accessibility. A mix of uses will deliver jobs and homes and bring about greater movement for pedestrians and cyclists. Development will help to define a regenerated employment area to the east.</li> <li>Reason for not selecting alternatives:</li> <li>The Council is intent on changing the character of this area as part of its wider regeneration plans. Such uses could be incorporated within a mixed scheme.</li> </ul>	Creating a mixed use development on this relatively large site is likely to have wider sustainability benefits, for example through supporting local employment opportunities associated with the housing provision, and thus providing opportunities to reduce the need to travel. The proposed allocation seeks to address the poor public transport accessibility at the site. The potential sustainability benefits of not selecting the alternative uses are reflected in the planning justification. Use of the site purely for either bulky goods retail or industrial employment would potentially be less able to support broader regeneration objectives, and could generate travel need and vehicle movements, and other potential sources of environmental impacts (e.g. noise, air pollution). Due to the potential for relatively significant positive and negative impacts associated with development on the scale of this site, it warranted more detailed appraisal – see Table C2 below.
W6	Amex House	0.5	<ol> <li>Mixed residential and workspace for creative industries</li> <li>Industrial employment uses</li> </ol>	<ul> <li>Allocation will go some way to achieving Brent's expected housing growth targets. Combination of land uses. Is complementary with the Wembley Masterplan that envisages a cycle running adjacent to the brook through the site, identified as having an "intimate pocket" of green space. Proposed bridge across the railway about 200m east supports this type of development by way of improving its connectivity.</li> <li>Reason for not selecting alternative:</li> <li>Site should seek to exploit the river setting that has potential to add significant environmental quality to a housing development</li> </ul>	The proposed allocation, including mixed residential and workspace for creative industry, is potentially more likely to support broader regeneration goals in the Wembley Growth area. The potential sustainability benefits of not selecting the alternative use are reflected in the planning justification. Use for industrial employment is less likely to provide the opportunity to incorporate environmental enhancements of the frontage onto Wealdstone Brook, and could generate travel need and vehicle movements, and other potential sources of environmental impacts (e.g. noise, air pollution).
W7	Chesterfield House	0.33	<ol> <li>Mixed use hotel development, with retail and food &amp;drink</li> <li>As per extant planning permission: retail/restaurant use and B1 offices, with basement parking</li> </ol>	Redevelopment will contribute to the regeneration of Wembley and a prominent site within the town centre. Hotel developments are encouraged within Wembley and the site benefits from good access to public transport services and the town centre. Outstanding architecture will help to secure the regeneration of the existing town centre in the light of the activity around the Wembley Stadium. The site benefits from excellent public transport accessibility with a selection of rail and bus services within walking distance.	The proposed mixed use allocation of this site is potentially the best opportunity to meet the broader regeneration objectives for Wembley. The very good public transport accessibility and proximity to Wembley High Road would support hotel and retail use of this site, and may help to stimulate the local economy and improving the general character of the area, with economic and social sustainability benefits. A retail/restaurant and office use, with additional parking may generate significant local traffic, with

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			3. Residential development	<ul> <li>Reasons for not selecting alternatives:</li> <li>Despite the extant planning permission, there appears to be little prospect of this form of development coming forward in this location, although such uses would, in principle be supported by planning policy.</li> <li>Although such uses would generally be supported by planning policy, there maybe constraints in terms of creating sufficient residential amenity if within a building of similar scale to that which has been permitted. Furthermore, no such proposals have come forward for this site.</li> </ul>	negative consequences for local air quality and noise levels. However, a residential allocation particularity if provided with limited parking provision would be likely to generate significantly less traffic than the other options, which would result in less potential environmental impact. LBB concluded that all three options would be supported from a planning perspective. The sustainability implications of the options are also likely to be similar. However the level of noise and air quality pollution associated with this site could represent a constraint on residential development, or at least require significant mitigation.
W8	Brent House and Elizabeth House	1	<ol> <li>Mixed residential, retail and office</li> <li>Office uses</li> <li>Retail</li> </ol>	<ul> <li>Elizabeth House is within a poor condition and despite its current occupation is ripe for mixed use redevelopment. Brent House however is likely to be within continued occupations for at least a further 10 years, by which time it may also be available for alternative development. A high quality redevelopment will contribute to the regeneration of Wembley and a prominent site within the town centre. New retail activity and vitality will help to secure the regeneration of the existing town centre in the light of the activity around the Wembley Stadium, while new dwellings will contribute to the delivery of the Council's growth strategy. The site benefits from excellent public transport accessibility with a selection of rail and bus services within walking distance.</li> <li>Reasons for not selecting alternatives:</li> <li>A lot of previous Brent council office uses will move to proposed civic centre and be dispersed throughout other council buildings. Also at a time when office market is not so buoyant, Wembley Masterplan area fulfils councils quota.</li> <li>The area is already served by numerous retail outlets.</li> </ul>	The proposed mixed use allocation of this site is potentially the most likely option to help deliver broader regeneration objectives for the Wembley regeneration area. As the site has frontage onto the Wembley High Road, some parts may be less suitable for residential development due to potential noise pollution and poor amenity, which further supports mixed use. Retail and office use, with additional parking may generate significant local traffic, with negative consequences for local air quality and noise levels. However, where residential development is provided with limited parking provision this could limit the generation of additional traffic. A mix of uses may therefore offer greater benefits with potentially fewer negative environmental impacts than sole use for office or retail space.
W9	Wembley High Road	2	1. Mixed residential, retail, food & drink and office	The existing units are located within a prime position between the emerging Wembley Regeneration Area and the existing town centre. They currently present however a disparate environment and a low quality	The proposed mixed use allocation is potentially more likely to deliver wider regeneration benefits for the Wembley regeneration area. Sustainability benefits are likely in terms of improving the quality of townscape, as
			2. Purely family sized	townscape. A high quality redevelopment, having regard	well as providing local employment opportunities at a

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			residential development	<ul> <li>for other local proposals, will contribute to the regeneration of Wembley at a prominent site within the town centre. New retail activity and vitality will help to secure the regeneration of the existing town centre in the light of the activity around the Wembley Stadium. New affordable offices can provide local employment and enterprise opportunities. The site benefits from excellent public transport accessibility with a selection of rail and bus services within walking distance.</li> <li>Reasons for not selecting alternative:</li> <li>Although this can be delivered as part of a mixed scheme, the Council is seeking a wider mix of uses to regenerate the town centre with new commercial and retail floor space.</li> </ul>	highly accessible site. The site's location between Wembley High Road and the Chiltern Line railway, could mean that parts of it are less suitable for residential development due to potential noise pollution and poor amenity, which further supports mixed use. An additional alternative use not considered could be to redevelop the site purely for office use, however this is potentially less likely to deliver broader regeneration benefits.
W10	Wembley Chiltern Embankments	3.4	<ol> <li>In accordance with an agreed masterplan for the cutting sites that must consider how development will relate to the existing mixed use redevelopment for residential, retail, office and open space.</li> <li>Remain as railway embankments</li> </ol>	<ul> <li>This allocation has been carried over from the adopted Unitary Development Plan 2004. Development here can help contribute to the regeneration of Wembley town centre, taking advantage of excellent access to public transport services. However, this development must have careful regard for existing dwellings, particularly along Mostyn Avenue; be subject to an assessment of the nature conservation value of the embankments; include mitigation measures for loss of land of value, including public access and a green link through the site.</li> <li>Reasons for not selecting alternative:</li> <li>This would no doubt be the popular choice and the council is willing to entertain this proposal. However the land benefits from little protection and the owners are keen to bring forward a development.</li> </ul>	The proposed mixed use allocation is potentially more likely to deliver regeneration benefits for the Wembley regeneration area. The close proximity to Wembley High Road may result in the retail, office and leisure use of the southern portion of the site leading to adding to local traffic and noise levels. However, this could be mitigated due to the sites excellent public transport facilities. Development of the site may result in a loss to local biodiversity, public access and a green link. Developing the northern portion of the site for housing may impact on an existing residential area, generating increased traffic flow or changing the character of the area. An additional alternative not considered is developing the site as a public park or green space. Part of the site is in an area deficient in open space, developing this land would increase local open space and improve local biodiversity, without adding to local traffic, air pollution and noise levels. However, this allocation would be likely to miss the potential regenerative effects of the proposed allocation.
Alpert	ton Growth Area		L		
A1	Alperton House	0.75	<ol> <li>Mixed residential, food &amp; drink and workspace</li> <li>Employment use</li> </ol>	This site is within a prominent location within the Alperton growth area that can contribute to the provision of residential development which may also enable the provision of workspace. Together with food and drink uses, that make best use of the canal side location, a	The proposed mixed use allocation is likely to provide the best opportunity to realise broader regeneration objectives at this canal side area. Mixed use, including commercial, residential and workspace, could provide particular sustainability benefits such as the provision of

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			<ol> <li>Education</li> <li>Housing</li> </ol>	<ul> <li>genuinely mixed use development is possible here.</li> <li>Reasons for not selecting alternatives:</li> <li>Alperton is designated as a growth area, and the Council intends to deliver a change in character. Workspace as part of wider mix of uses would be preferable</li> <li>This site would not support a school use, but some form of educational facility could be brought forward as part of a mixed scheme.</li> </ul>	local employment opportunities, and reduced need to travel need including car use. A mixed use development is also appropriate given the good access by public transport and proximity to Ealing High Road primary shopping frontage and one tree hill recreation park. The planning justifications for selecting the proposed allocation also reflect the reasons why this use is likely to be the most beneficial in sustainability terms. Sole employment or educational use may provide less opportunity to support regeneration of the area. Housing use only may also be less likely to provide the opportunity to regenerate the local economy. Allocating the site for housing, particular where parking is limited, could generate less traffic and noise and disturbance than the alternatives – particularly a mixed use allocation including food and drink use.
A2	Minavil House and Unit 7 Rosemont Road	0.5	<ol> <li>Mixed B1, office and work space with residential</li> <li>Industrial units</li> <li>Local needs/Bulky goods retail</li> </ol>	<ul> <li>Contributing to the Alperton growth area while enabling the provision of new managed affordable workspace. The inclusion of Unit 7 will help achieve significant environmental improvements and provide a high quality canal side setting for development.</li> <li>Reasons for not selecting alternatives: <ul> <li>Alperton Growth Area allocation makes residential a priority. Such a use could come forward as part of a mix, subject to the sequential approach.</li> <li>Alperton Growth Area allocation makes residential a priority. Such a use could come forward as part of a mix, subject to the sequential approach.</li> <li>Alperton Growth Area allocation makes residential a priority. Such a use could come forward as part of a mix, although would require careful consideration of servicing and deliveries.</li> </ul> </li> </ul>	The proposed mixed use allocation, including workspace and residential, is likely to provide the best opportunity to improve the townscape quality of the area, notably the canal frontage, as well as helping to realise broader regeneration objectives. The proximity of the site to recreational and retail facilities, together with good access to public transport, would also support mixed use. The planning justifications for selecting the proposed allocation also reflect why this use is likely to be the most beneficial in sustainability terms. A bulky goods retail allocation could add to local traffic volumes, decrease local air quality and increase noise levels, and while industrial use may create more employment, it may offer less opportunity to realise broader regeneration objectives.
A3	Former B&Q and Marvelfairs House	2.6	<ol> <li>Mixed residential, B1 and A3 commercial</li> <li>Bulky goods retail</li> <li>Industrial employment units</li> </ol>	High quality mixed use development at this prominent location will contribute to the regeneration of Alperton. Introducing higher value uses into the area will improve the local environment and development new workspace that reflects the current and projected demand. Development can exploit the canal side location for introducing residential development in Alperton growth area. Reasons for not selecting alternatives:	The proposed mixed use allocation is most likely to contribute to the broader regeneration of the Alperton Growth Area. Sustainability benefits from high quality mixed use development on this site area may include improved townscape quality and the provision of local employment opportunities. Good public transport access and proximity to recreational facilities also supports a mixed use.

Appendix

Site

No.

A4

A5

Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			<ul> <li>Alperton Growth Area allocation makes residential a priority. Such a use could come forward as part of a mix, subject to the sequential approach.</li> <li>Alperton Growth Area allocation makes residential a priority. Such a use could come forward as part of a mix, although would require careful consideration of servicing and deliveries.</li> </ul>	The planning justifications for selecting the proposed allocation also reflect why this use is likely to be the most beneficial in sustainability terms. Bulky goods retail and industrial employment uses may generate significant travel need, including car use and other vehicle movements, and lead to other environmental impacts, such as noise pollution. While there may be benefits from additional employment opportunities from these uses, they may contribute less to broader regeneration goals.
Atlip Road	1.9	<ol> <li>Mixed family housing, employment and A3 commercial</li> <li>B1 Work - Live Affordable Housing to support work-live</li> <li>Housing &amp; Industrial</li> <li>Housing</li> </ol>	<ul> <li>The possibility of introducing higher value uses to improve the local environment and development new workspace that reflects the current and projected demand. Introduction of new cross canal pedestrian access. Exploiting the canal side location for introducing residential development and A3 uses in Alperton growth area.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council is seeking a wider mix of uses across the site within this accessible location, including food and drink</li> <li>The Council is seeking a wider mix of uses across the site within this accessible location, including food and drink</li> <li>The Council is seeking a wider mix of uses across the site within this accessible location, including food and drink</li> <li>The Council is seeking a wider mix of uses across the site within this accessible location, including food and drink</li> <li>The Council is seeking a wider mix of uses across the site within this accessible location, including food and drink</li> </ul>	The proposed mixed use allocation is likely to have sustainability benefits through the provision of local employment opportunities, and health and wellbeing benefits from improved pedestrian access to the canal- side. Mixed use is further supported by good public transport, and proximity of primary shopping frontage on Ealing Road. The alternative uses are also likely to have some sustainability benefits, such as provision of affordable homes, and the creation of employment opportunities, however they may be less likely to provide an opportunity to enhance the canal-side and contribute to the broader regeneration of the Growth Area.
Sunleigh Road	1.6	<ol> <li>Mixed residential and employment</li> <li>Industrial uses</li> </ol>	<ul> <li>Introducing higher value uses to improve the local environment and development new workspace that reflects the current and projected demand. Exploiting the canal side location for introducing residential development in Alperton growth area.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council intends to change the character of Alperton, particularly on the water front. Existing industrial use generates unacceptable traffic</li> </ul>	The proposed mixed use allocation is likely to provide the best opportunity to contribute to the broader regeneration of the Alperton Growth Area. An industrial allocation would be less likely to contribute to changing the character of the Growth Area, and may be more likely to generate negative impacts, such as noise pollution, travel need / vehicle movements and associated environmental impacts. The planning justification for selecting the proposed

				Alperton, particularly on the water front. Existing	associated environmental impacts.
				industrial use generates unacceptable traffic	The planning justification for selecting the proposed
				impacts of large commercial vehicles using heavily	allocation also reflects why this use is likely to be the
				parked streets.	most beneficial in sustainability terms.
A6	Woodside	2.4	1. Mixed residential and	Introducing higher value uses to improve the local	The proposed mixed use allocation is likely to offer the
	Avenue		B class workspace	environment and development new workspace that	
			2. Education – new	reflects the current and projected demand. Exploiting	Alperton Growth Area. Sustainability benefits are likely

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			primary school 3. Industrial uses	<ul> <li>the canal side location for introducing residential development in Alperton growth area.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council's current position is to redevelop existing school sites and reconfigure school buildings to deliver new primary facilities.</li> <li>The Council intends to change the character of Alperton, particularly on the water front. Existing industrial use generate unacceptable traffic impacts of large commercial vehicles using heavily parked streets</li> </ul> </li> </ul>	through the provision of housing in a canal-side setting, especially where they are linked with opportunities for local employment. Using the site for a primary school would offer benefits in terms of meeting the Boroughs' education needs, however it could also generate considerable travel need, including car use. Allocating the site for industrial uses may provide greater employment opportunities but also lead to adverse affects through traffic generation, and noise.
Α7	Mount Pleasant / Beresford Avenue	1.7	<ol> <li>Mixed residential, work/live, workspace</li> <li>Industrial employment uses</li> <li>Bulky goods retail</li> </ol>	<ul> <li>This industrial area is becoming increasingly marginalised with ageing buildings, poor pedestrian and vehicular access and vacant and derelict units. The canal side location raises the possibility of introducing higher value uses to improve the local environment and development of new workspace.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council intends to change the character of Alperton, particularly on the water front. Existing industrial use generates unacceptable traffic impacts of large commercial vehicles using heavily parked streets. New appropriate workspace could be provided as part of a mix.</li> <li>The Council intends to change the character of Alperton, particularly on the water front. Such use could technically be incorporated, but would require careful consideration of vehicular movement, servicing and deliveries.</li> </ul> </li> </ul>	The proposed mixed use allocation is potentially the most likely to positively contribute to the regeneration of the Growth Area. Mixed use, including residential, also benefits from proximity to primary shopping frontage on Ealing Road and local centre shopping frontage on the corner of London Park Avenue. The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms. While providing employment opportunities, industrial and bulky good retail uses could generate additional travel need / vehicle movements and are less likely to contribute to broader regeneration objectives in the Alperton Growth Area.
A8	Northfields Industrial Estate	0.8 <sup>2</sup>	<ol> <li>Mixed employment and residential</li> <li>Employment</li> <li>Employment/ Zero Energy Housing</li> <li>Employment/ Affordable Housing</li> </ol>	<ul> <li>This industrial estate is reaching the limits of suitability due to restrictions to loading space and vehicular movement into, out of, and around the estate. Some of the buildings are no longer suitable for occupation. An innovative solution entailing a much more intensive use of a constrained site is encouraged.</li> <li>Reasons for not selecting alternatives:</li> <li>Such a use would be supported by policy. There appear to be physical constraints on the site that would not support large scale modern shed</li> </ul>	Due to its relatively large scale, carefully planned mixed use development on this site, in line with the proposed allocation, provides an opportunity for significant sustainability benefits, for example through the provision of local employment opportunities linked with the housing development, which can reduce travel need including car use. Due to a lack of amenities in close proximity to this site, some sustainability benefits will depend on the delivery of allocations on other sites in the Alperton area,

<sup>2</sup> 0.8 hectares within Alperton Growth Area – a further 8 hectares of land is outside of the Growth Area and is designated a Strategic Industrial Location by the Mayor of London

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
				scheme. • Seeking a wider mix of uses.	especially the provision of retail and other local amenities. If these are not provided, residential use of this site may generate negative sustainability impacts, through increased need to travel, and a lack of community cohesion. Residential development will also need to take account of the high noise levels from the North Circular Road to the south east of the site. In the wider context of the Alperton Growth Area, and given proposed allocations on other sites, the planning justification for the proposed allocation also reflects the potential sustainability benefits. However the other alternative mixed uses (employment and zero energy housing, and employment and affordable housing) could achieve similar sustainability benefits. For example, social benefits from the provision of affordable housing, and a contribution towards helping minimise the Borough's contribution to Climate Change from zero-energy housing. Due to the potential opportunity for significant positive and negative impacts associated with development on the scale of this site, it warranted more detailed appraisal – see Table C3 below.
Churc	h End Growth Area	1			
CE1	Church End Local Centre	1.4	<ol> <li>Mixed residential, retail and public open space / market space</li> <li>Employment/ retail uses</li> </ol>	<ul> <li>To provide for the retention of the local market as well as the redevelopment of an underused and physically constrained location while contributing to the regeneration of Church End.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council is seeking more appropriate uses for the town centre, particularly residential and retail to help change the character of the area an significant improve the physical environment</li> <li>The Council is seeking a wider mix of uses to support the town centre regeneration</li> </ul> </li> </ul>	The proposed allocation is the most likely to contribute to wider regeneration impacts. Sustainability benefits are likely through the provision of amenity / open space in an area of open space deficiency and provision for a market space which may help create local employment and business opportunities and reinforce community identity. While sole use for employment and retail use may create more employment opportunities, this may generate additional travel need and car use, especially as the site has relatively poor public transport accessibility, and perhaps more importantly, does not include provision for amenity / open space in this area of open space deficiency.
CE2	Ebony Court	0.2	<ol> <li>Residential with open space</li> <li>Housing &amp; community uses</li> </ol>	Redevelopment of underused site to provide much needed family housing and to contribute to the regeneration of Church End. Reasons for not selecting alternatives:	The proposed allocation is considered the most likely to contribute to wider regeneration impacts. Sustainability benefits are likely to arise from the provision of amenity/open space in this area of open space deficiency. The family housing proposed as part of the

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			3. Housing & employment/ retail uses	<ul> <li>Family housing is the priority for this site. Size and context of this site could not support enough floorspace for both uses.</li> <li>Seeking to create environment for family sized housing. Unlikely to work alongside employment uses.</li> <li>Retail more suitable within the heart of the town centre</li> </ul>	allocation is likely to have sustainability benefits from increased provision of social/affordable housing, for which there is an identified need. Residential use would require improvements to public transport access, to avoid the generation of more traffic and car journeys which may otherwise result, due to the sites relatively poor access to public transport. The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms. As LBB consider that the site is not large enough to accommodate both housing and community uses, this alternative has not been assessed as a reasonable option for use allocation.
CE3	White Hart PH and Church	0.4	<ol> <li>Mixed residential, indoor market and open space. Existing church use would be maintained.</li> <li>Housing</li> <li>Housing &amp; retail uses</li> </ol>	<ul> <li>Redevelopment of underused site to provide affordable housing and to contribute to the regeneration of Church End.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council is seeking wider mix of uses in this accessible location.</li> <li>The Council is seeking inclusion of Church of Miracle Signs and Wonders as it generally resists the loss of community facilities.</li> </ul> </li> </ul>	The proposed allocation is likely to provide the best opportunity to achieved broader regeneration goals. The provision of affordable housing and open space is likely to have sustainability benefits including improved health and well being of the local community if the open space is used for exercise and recreation, and increased access to good quality and affordable homes. Provision for an indoor market could enhance community identity and provide local employment / business opportunities. While the site has relatively low public transport accessibility, mixed use development may provide opportunities to reduce travel need, by providing local employment and amenities. Maintaining church use may have local amenity and community benefits. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
CE4	Homebase	0.9	<ol> <li>Mixed residential, light industrial and affordable workspace</li> <li>Bulky goods retail</li> <li>Industrial employment</li> </ol>	<ul> <li>The current use is of a retail disposition and not strictly industrial employment. The allocation could seek to enable the development of workspace through family sized residential development within the Church End growth area.</li> <li>Reasons for not selecting alternatives:</li> <li>Seeking wider mix of uses, but can be included as part of a mixed scheme.</li> </ul>	A mixed use allocation is the most likely to meet the need for a broader mix of local amenities in this area and support regeneration more broadly. Mixed use including residential and affordable workspace is likely to provide sustainability benefit by reducing travel need and car use, where provision of homes and employment opportunities are linked. The planning justification for selecting the proposed allocation is also likely to reflect why this use is

Site No.

CE5

CE6

e	Site name	Site	Use options	LBB justification for proposed allocation and	SA Comments on use options
		size (ha)	Option 1 is in all cases is proposed allocation	reasons for not selecting alternative uses	
					potentially the most beneficial in sustainability terms While they may generate more employmen opportunities, industrial use and bulky goods retail uses are more likely to generate additional travel need and vehicle movements, and associated impacts, and may conflict with identified community needs.
5	Chancel House	0.8	<ol> <li>Mixed residential and employment uses, including affordable workspace</li> <li>Office uses</li> <li>Industrial employment</li> </ol>	<ul> <li>This proposal will contribute to the delivery of the Council's growth strategy, help regenerate Church End and enable the provision of new employment floorspace and a community based education centre, through the development of new residential units, including family sized homes. Pedestrian access between the town centre and Neasden underground station will also be provided.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council would prefer such a use to be closer to public transport or within a major centre</li> <li>The Council is seeking to improve the character of the area</li> </ul>	The proposed allocation is likely to provide the bes opportunity to achieve broader regeneration goals The provision of residential use together with affordable workspaces could reduce travel need and enhance community identity. While potentially creating greater employmen opportunities, sole use for offices or industria employment may lead to increased travel need and vehicle movements and associated impacts, especially as the site has relatively poor public transpor accessibility. The planning justification for selecting the proposed allocation also reflects the reasons why this use may be the most beneficial in sustainability terms.
6	Asiatic Carpets	2.3	<ol> <li>Mixed residential, light industrial and affordable workspace</li> <li>Housing</li> <li>Employment uses</li> </ol>	<ul> <li>Redevelopment of large vacant industrial building in order to increase the supply of family housing, introduce a new supply of light industrial units and contribute to the regeneration of Church End.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council is seeking mix of uses in this location to account for the loss of employment area.</li> <li>The Council is seeking to rationalise employment uses and deliver family sized homes within the growth area.</li> </ul>	A mixed use allocation is the most likely to meet the need for a broader mix of local amenities in this area and support regeneration more broadly. Mixed use including residential and affordable workspace may provide sustainability benefit by reducing travel need and car use especially where the provision of homes and employment opportunities are linked. While potentially creating greater employmen opportunities, sole use for employment may lead to increased travel need and vehicle movements and associated impacts, especially as the site has relatively poor public transport accessibility. The planning justification for selecting the proposed allocation also reflects the reasons why this use may be the most beneficial in sustainability terms.
ıth	Kilburn Growth A	rea	•		·
1	Queen's Park Station Area	0.6	1. Mixed residential, community, retail and	Re-use of redundant commercial and industrial buildings; increase in residential density taking	The proposed mixed use allocation is likely to provide the greatest opportunity to achieve broader

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			3. Open space	<ul> <li>South Kilburn; good selection of existing local amenities including open space, convenience stores, restaurants, bars and other leisure facilities; good selection of existing community facilities nearby including schools, GPs, library etc.</li> <li>Reasons for not selecting alternatives: <ul> <li>Would require subsidy from mixed development.</li> </ul> </li> <li>Site not suitable for sizable open space. Public space could be provided as part of a mixed scheme.</li> </ul>	also has good public transport access and a good selection of existing local amenities, which may support residential use in line with that included within the adopted South Kilburn SPD. As the site has relatively high day and night time noise levels careful planning and high-quality design will be necessary to be able to appropriately incorporate residential development. Sole use for community facilities could have a bigger effect in improving local community wellbeing and identity. Although the site is not in an area of open space deficiency, sole use for the provision of open space could result in an improvement to local health, providing it leads to an increase in exercise and recreation. However, the proposed mixed use allocation may support these uses (albeit on a smaller scale) while also providing regeneration benefits. The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms.
SK2	British Legion, Marshall House and Albert Road Day Centre	1.1	<ol> <li>Mixed use residential and community use</li> <li>Community use</li> <li>Open space</li> </ol>	<ul> <li>The sites would benefit from a comprehensive approach and their inclusion as an SSA would assist in the delivery of the South Kilburn masterplan, as it will allow them to come forward and assist implementation Reasons for not selecting alternatives:</li> <li>Would require subsidy from mixed development.</li> <li>Site not suitable for sizable open space. Public space could be provided as part of a mixed scheme.</li> </ul>	The proposed mixed use allocation is likely to provide the greatest opportunity to achieve broader regeneration objectives. The site also has good public transport access and a good selection of existing local amenities, which may support some additional residential use. Due to proximity to the railway, the site has high noise levels at all times of the day, and careful planning and high-quality design will be necessary to be able to appropriately incorporate residential development. Sole use for community facilities could have a bigger effect in improving local community wellbeing and identify. Although the site is not in an area of open space deficiency, sole use for the provision of open space could result in an improvement to local health, providing it leads to an increase in exercise and recreation. However, the proposed mixed use allocation may support these uses (albeit on a smaller scale) while also providing regeneration benefits.

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					The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms.
SK3	Former Mercedes Garage, Malvern Road	0.15	<ol> <li>Residential</li> <li>Employment use</li> <li>Education use</li> </ol>	<ul> <li>Increasing the supply of residential development, including affordable housing and contributing to the regeneration of South Kilburn.</li> <li>Reasons for not selecting alternatives: <ul> <li>South Kilburn is a designated as a growth area. Surrounding uses would not sit well with industry.</li> <li>Site is not large enough to support a school use. Council has other plans for school sites</li> </ul> </li> </ul>	The proposed allocation is the most likely to contribute to wider regeneration of the South Kilburn Growth Area, and may have sustainability benefits from increased provision of social/affordable housing. The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms. Sole employment use could generate additional traffic levels, and associated noise and environmental impacts. As LBB considers the site not large enough to accommodate a new school this alternative has not been assessed as a reasonable option for use allocation.
SK4	Canterbury Works	0.7	<ol> <li>Mixed office space, community and residential</li> <li>Industrial employment uses</li> <li>Community facilities</li> </ol>	<ul> <li>The development will contribute to the redevelopment of the South Kilburn SPD and Masterplan. The development will increase the supply of affordable residential accommodation and new offices in the area.</li> <li>Reasons for not selecting alternatives: <ul> <li>Intensifying industrial use on this site would not sit well with surrounding uses or the plans for this growth area.</li> <li>Would require subsidy as part of a mixed scheme.</li> </ul> </li> </ul>	The proposed mixed use allocation is the most likely to contribute to the wider regeneration of the area, and have sustainability benefits, especially where contributions from affordable residential and commercial use enable the provision of community facilities. While providing employment opportunities, sole use for industrial employment may cause significant traffic and noise impacts, and is less likely to support broader regeneration. Sole use for community facilities community could offer social benefits to this deprived ward, potentially encouraging a sense of community identity and welfare.
Burnt	Oak / Colindale Gr	owth Ar	ea	I	
B/C1	Oriental City	5.7	<ol> <li>Mixed residential, retail, food &amp; drink leisure and community facilities – including a new primary school (as per extant planning permission)</li> <li>Retail</li> </ol>	<ul> <li>This development will contribute to the delivery of the Council's growth strategy while also providing a new primary school to help meet the existing and projected demand primary school places. The mix of uses allows for an efficient use of land while mitigating between possible conflicting uses.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council is seeking to change the character of the area.</li> </ul>	B/C1 is considered together with B/C2, as sites are adjacent and proposed uses complimentary. The mix of uses included in the mixed use allocation for each site is potentially the most likely to help meet wider regeneration objectives. The potential for conflict between uses is noted in the proposed allocation, for example noise and disturbance from the food and drink allocation could conflict with residential use, and bulky good retail may create
B/C2	Sarena House /	4.5	1. Mixed residential,	This development will contribute to the delivery of the Council's growth strategy while may also providing a	significant vehicle use, which may conflict with and present a danger for primary school use.

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
	Grove Park/ Edgware Road Wembley West End		affordable workspace and community 2. Bulky goods retail	<ul> <li>new primary school to help meet the existing and projected demand primary school places. The mix of uses allows for an efficient use of land while mitigating between possible conflicting uses.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council is seeking to change the character of the area.</li> </ul>	Sole use for retail or bulky goods retail combined with the sites relatively poor access to public are likely to generate large amounts of traffic, and associated environmental impacts and congestion. The proposed allocation including school/residential use may also generate significant vehicle movements, however restricting parking associated with new homes, and encouraging non-car school related journeys may help mitigate this. Due to the scale of the combined development at these sites and the potential conflicts between the proposed uses in this setting, they warranted more detailed appraisal – see Tables C4 and C5 below.
B/C3	Capitol Way	3.8	<ol> <li>Mixed bulky goods retail / car show-room and residential. Also includes small scale light industrial / work- live space.</li> <li>Bulky goods retail</li> <li>Industrial employment uses</li> </ol>	<ul> <li>This development will contribute to the delivery of the Council's growth strategy while also securing a supply of affordable employment floorspace. The mix of uses will help to manage the relationship between new development and the surrounding employment area.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council is seeking to change the character of the area.</li> </ul> </li> <li>The Council is seeking a greater mix of uses.</li> </ul>	The proposed mixed use allocation is considered most likely to deliver wider regeneration benefits in the Burnt Oak / Colindale area. While mixed use can have sustainability benefits, such as through the provision of local employment opportunities, bulky goods retail or a car showroom, as proposed, are likely to generate travel need, vehicle movements, car parking requirements, and associated increase in air pollution and noise levels. In addition careful planning and high-quality design will be necessary to appropriately incorporate residential use on this site, particularly given the relatively high noise levels from the Edgware road. However, sole use for bulky goods retail or industrial employment is likely to generate proportionally more impacts associated with noise / traffic generation, whilst offering less opportunity to contribute to the broader regeneration of the area.
B/C4	3-5 Burnt Oak Broadway	0.65	<ol> <li>Mixed residential and retail</li> <li>Bulky goods retail</li> <li>Family housing</li> </ol>	<ul> <li>This development will contribute to the delivery of the Council's growth strategy and deliver new retail floorspace to help diversify the retail offer in the area.</li> <li>Reasons for not selecting alternatives: <ul> <li>Although such a use could be seen as acceptable in policy terms, the Council has identified the site as part of the Burnt Oak growth area, and would therefore prefer a wider mix of uses, including residential development.</li> <li>Although the Council will be seeking a mixed</li> </ul> </li> </ul>	Mixed use development can have sustainability benefits for example by reducing the need to travel through the provision of local employment opportunities, and is potentially more likely to deliver wider regeneration benefits in the Burnt Oak / Colindale area. Careful planning and high-quality design will be necessary to enable residential development to be incorporated on this site, particularly given relatively high noise levels from the Edgware road. Sole use for bulky good retail is likely to increase travel need to and within the area, including vehicle

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
				development with some family sized housing, the site is not suitable for a development of just family sized units. This is due to the nature of the sites in relation to the Edgware Road.	movements, and might require additional parking provision. Family housing while having potential sustainability benefits in meeting an identified need for this size of housing in the Borough is less likely to deliver broader regeneration.
					The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms.
Park F	Royal Growth Area				
PR1	Former Guinness Brewery	8	<ol> <li>Employment / industrial warehousing (in line with planning guidance for site)</li> <li>Mix of distribution/ storage and general industrial uses</li> <li>Hospital and medical- related employment uses / Education &amp; creative industry/ media uses</li> </ol>	<ul> <li>The site is designated as a Strategic Industrial Location by the London Plan. The Council is seeking to establish more intensive and efficient use of industrial land to further mix of skilled and semi skilled industrial employment and to support the industrial nature of Park Royal while regenerating the western gateway of the estate.</li> <li>Reasons for not selecting alternatives: <ul> <li>Acceptable on site and supported by SPD. The Council wishes to keep all acceptable options open while recognising the extant permission on site. However, the land is designated as Strategic Industrial Land by the Mayor of London and considering demand for logistics space in the medium term, the site is likely to come forward for industrial warehousing uses.</li> <li>Acceptable on site and supported by SPD – which promoted such uses as part of the Central Middlesex Hospital redevelopment. The Council wishes to keep all acceptable options open while recognising the extant permission on site. However, the land is designated as Strategic Industrial warehousing uses.</li> </ul> </li> </ul>	LBB concluded that all three use options could be supported from a planning perspective. Providing a mix of skilled and semi-skilled employment is likely to increase job-opportunities for local people, especially where opportunities are linked to skill development or made explicitly accessible to those living in the area. A mix of employment uses is also potentially the most likely to provide an opportunity to support broader regeneration objectives in Park Royal. However, the proposed allocation is quite general and LBB has stated it wishes to "keep options open" for the site. While the sustainability implications of the alterative options are likely to be similar to the proposed allocation, use for distribution and storage may create additional freight traffic in the area and on routes to / from the site. There are also likely to be different types of employment associated with the alternative allocations, which may have an implication for the local area and local job creation. Education use would help meet an identified need for new school places in the Borough, and given the importance and potential effects of school provision, this site has been considered in more detail as a possible site for school use, see section 9.
PR2	First Central	6	<ol> <li>Mixed B1 office and hotel with residential</li> <li>Residential</li> </ol>	This proposal will ensure the delivery of the interchange between the Central and Piccadilly Underground Lines at Park Royal Station. The completion of this interchange will help to sustain a long term office market in the location. The proposal will entail the completion of the remaining office blocks to help diversify the employment offer within Park Royal and continue to	A mixed use allocation is the most likely to provide the opportunity to deliver the underground interchange at Park Royal, which is likely to provide broader regeneration benefits. If the interchange is provided, there could also be significant sustainability benefits particularly in relation to reducing the need to travel by

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
				<ul> <li>regenerate the Western Gateway of the estate.</li> <li>Reasons for not selecting alternatives:</li> <li>Will undermine the Council's determination to bring forward the station interchange. The Council do not consider this to be a housing opportunity site, but the housing may enable the interchange.</li> </ul>	car and improving public transport accessibility The planning justifications for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
.PR3	Former Central Middlesex Hospital	2.5	<ol> <li>Mixed residential (key worker housing), employment and hospital expansion</li> <li>Mixed - commercial &amp; general housing</li> </ol>	<ul> <li>Whilst recognising this site's worth to improved health facilities and key worker accommodation, part of the site is identified as a Strategic Employment location by the London Plan. The Council is seeking to establish more intensive and efficient use of industrial land to further a mix of skilled and semi skilled industrial employment and to support the industrial nature of Park Royal.</li> <li>Reasons for not selecting alternatives:</li> <li>Not a housing opportunity site. SIL. Housing only acceptable if medically related key worker accommodation.</li> </ul>	The proposed mixed use allocation including key worker residential development is likely to offer the best opportunity to enable redevelopment of the hospital, while supporting a mix of employment opportunities. Where the hospital site is redeveloped and improved / expanded services enabled, there are likely to be sustainability benefits. Key worker housing will also have sustainability benefits by reducing the need to travel and providing improved housing for those on relatively low incomes. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
Rest o	f Borough		•		
1	Metro House	1	<ol> <li>Residential (including family housing)</li> <li>Education</li> <li>Commercial e.g. hotel</li> </ol>	<ul> <li>There is high demand for family sized residential development and a shortage of suitable sites. Despite the proximity of Kingsbury town centre and the underground station, due to the existing character and townscape this site does not necessarily lend itself to high density development.</li> <li>Reasons for not selecting alternatives: <ul> <li>Pressure for schools is generally further south than this location. Site next door is a school.</li> <li>There are sequentially more preferable sites for hotel development.</li> </ul> </li> </ul>	The need for increased supply of family housing has been identified as a key sustainability issue during the SA. Given that LBB indicate that this site is not suitable for high-density, and that it is adjacent to an existing school, the sustainability benefits of the proposed allocation are likely to reflect why this use is potentially the most beneficial in sustainability terms. A commercial allocation, such as a hotel, could potentially provide a range of skilled and semi-skilled employment to the local area. There could also be some negative consequences of such an allocation, including effects on air quality and noise levels due to an increase in traffic volumes. A commercial allocation would be likely to generate more traffic than a residential or education allocation, especially where residential / school provision is delivered with restrictions on parking. Education use would help meet an identified need for new school places in the Borough, and given the importance and potential effects of school provision, this site has been considered in more detail as a

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
2	Garages at Barnhill Road	0.1	<ol> <li>Residential (extant planning permission)</li> <li>Garages</li> <li>Open space</li> </ol>	<ul> <li>The garages are no longer of use and attract fly tipping and other forms of criminal and anti-social behaviour. The redevelopment of this constrained site could present social and environmental benefits and increase the supply of residential units. Subject to a full tree survey, this could be considered to outweigh the needs to protect the trees on site. Planning permission for 6 houses and 3 flats was secured in 2007.</li> <li>Reasons for not selecting alternatives:</li> <li>It has been demonstrated that garages in this location appear not to serve any use, and attract forms anti social behaviour.</li> <li>This site is not within an area of open space deficiency. The Council Parks service is likely to prioritise the management of new parks where an existing deficiency exists.</li> </ul>	<ul> <li>possible site for school use, see section 9.</li> <li>The proposed allocation for this site is likely to lead to sustainability benefits through improved amenity value of this section of River Brent and bringing back into use a derelict site. However careful planning and design will be required as it is adjacent to a site of nature conservation importance, and any loss or damage to this would be considered negative from a sustainability perspective.</li> <li>Allocation for open space may provide a better opportunity to protect and enhance the adjacent site of borough conservation importance, however the site is not located in an area of open space deficiency. The need to provide homes is recognised and the proposed allocation stresses the need to protect the conservation value of the adjacent site.</li> <li>Limited sustainability benefit would be likely from maintaining garages on the site, although restored garages may provide informal work and storage space for local residents.</li> </ul>
3	Dollis Hill Estate	1.7	<ol> <li>Mixed school expansion and employment / workspace</li> <li>Maintain as employment land</li> <li>Housing</li> </ol>	<ul> <li>There is an increasing demand for school space expansion. Some of the existing employment premises are approaching the limits of being useful and occupancy varies across the site. A range of sizes of new workspace making a more efficient use of land reflecting current and expected patterns of demand would be more appropriate.</li> <li>Reasons for not selecting alternatives: <ul> <li>As time goes on, the overall viability will begin to decline as the condition of the buildings deteriorate and are not able to meet modern operation standards.</li> <li>Apart from the loss of employment land, this would significant constrain the ability of to expand and improve the local schools the meet demands for school places. Increasing the supply of adjacent housing would only exacerbate this problem while further restricting opportunities to expand.</li> </ul> </li> </ul>	The proposed mixed use allocation including school expansion and employment workspace has potential sustainability benefits in meeting the local community need for additional school places, and providing local employment opportunities. An expansion of school places and employment use on the site may increase travel need and car use and associated impacts, however it is recognised that the proposed allocation seeks public transport improvements. While potentially creating greater employment opportunities, sole use for employment may lead to increased travel need and vehicle movements and associated impacts, especially as the site has relatively poor public transport accessibility. Sole use as housing land may not offer the same regenerative effect as a mixed use allocation, by providing housing without associated employment. In addition, sole housing use may put considerable pressure on local resources, including water, open space and also existing schools.
4	Dollis Hill House	0.2	1. Community, including food & drink,	The building has been out of use for some time as restoration activity has ceased. An acceptable use that	The sustainability benefits of the proposed allocation could include the protection and restoration of the listed

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			conference and hospitality facilities (in line with planning guidance for site) 2. Open space 3. Community facility	<ul> <li>can viably deliver the restoration of the building should be encouraged.</li> <li>Reasons for not selecting alternatives: <ul> <li>This would require the clearance of the site and the loss of the opportunity to restore the building.</li> <li>On its own, it is difficult to see how a community facility would raise the capital to restore the building.</li> </ul> </li> </ul>	<ul> <li>building, together with the provision of community facilities.</li> <li>However the proposed allocation use may generate travel need and parking provision could cause damage to the parkland setting of the site. Equally food and drink use and hospitality facilities may cause noise and disruption.</li> <li>Although the site is not in an area of open space deficiency, it is likely that if more open spaces were provided and more people were to use this open space, that there would be health benefits to the local area.</li> <li>There would also be a visual improvement to the area if more open space were provided.</li> <li>Use as a community facility could potentially offer significant community benefits to this deprived ward, for example by contributing to community identity.</li> </ul>
5	Priestly Way, North Circular Road	5.1	<ol> <li>Regeneration of industrial estate including accessibility improvements</li> <li>Residential development</li> </ol>	<ul> <li>The site suffers from poor access and egress to the North Circular Road and poor circulation through the estate. Vehicles are required to use the NCR to get from one end of the estate to another, requiring a dedicated traffic signal system.</li> <li>Reasons for not selecting alternatives:</li> <li>The land is designated as Strategic Industrial Land for which there is demonstrated demand. Furthermore, it is difficult to demonstrate that this would present an acceptable living environment baring in mind the Councils wider aspirations for the NCR.</li> </ul>	Sustainability benefits of the proposed allocation include the opportunity to improve public / pedestrian access to Welsh Harp, which could have health and wellbeing effects, and the provision of local employment opportunities in an area of identified need. Negative effects could arise from impact of additional traffic on the North Circular Road, and the impact of any development on Welsh Harp, which is dedicated Metropolitan Open Land, a SSSI and an area of Grade 1 nature conservation value, however this would also be true of housing use. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms. Location in proximity to the North Circular Road is likely to make residential use inappropriate from a sustainability perspective, due to noise pollution and poor air quality.
6	Neasden Lane/Birse Crescent	0.25	<ol> <li>Mixed retail and residential with car park</li> <li>Car park</li> <li>Residential development</li> </ol>	Regeneration of Neasden town centre by development of a greater density of higher value land use to provide new and improved retail accommodation. It will also create a greater population to contribute to improved natural surveillance and increased footfall within the town centre. Reasons for not selecting alternatives: • The Council is seeking a mixed development to	Sustainability benefits of the proposed mixed use allocation include the opportunity to improve the vitality of the town centre and support broader regeneration objectives in this deprived area of the Borough, while potentially reducing travel need. Conversely, the allocation could increase car use by providing car parking facilities, potentially negating the reductions in travel need by promoting and facilitating car use.

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
				<ul> <li>support the economic regeneration of the town centre, in particular a retail use.</li> <li>The Council is seeking a mixed development to support the economic regeneration of the town centre.</li> </ul>	Careful planning and high-quality design will be required to enable residential use to be appropriately incorporate on this site, due to high day and night time noise levels and poor air quality (due to proximity to North Circular Road). Sole use for a car park is unlikely to bring significant
					benefit, and may encourage unsustainable travel in the surrounding area by facilitating and promoting car use. Residential development will provide additional homes, and where parking is restricted potential traffic generation from such development may be minimised. However proximity to the North Circular Road, and the sites location in Neasden Town centre may conflict with sole residential use.
					The planning justification for the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
7	Neasden Lane/North Circular Road	0.1	<ol> <li>Mixed retail / hotel and residential</li> <li>Residential development</li> </ol>	<ul> <li>Supporting the regeneration of Neasden town centre through mixed-use development. A hotel use can help to with visitor expenditure.</li> <li>Reasons for not selecting alternatives:</li> <li>The Council is seeking a mixed development to support the economic regeneration of the town centre.</li> </ul>	The proposed mixed use allocation is likely to offer the best opportunity to meet wider regeneration goals, and has potential sustainability benefits in improving vitality of the town centre. Hotel use may generate additional traffic. Careful planning and high-quality design will be required to enable residential use to be appropriately incorporated on this site, due to high day and night time noise levels and poor air quality (due to proximity to North Circular Road). Due to these noise and air quality constraints a mixed-use allocation including hotel and residential allocation. The planning justification for the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
8	Former Kingsbury Library and Community Centre	0.5	<ol> <li>Mixed residential and community</li> <li>Residential development</li> <li>Education – school</li> </ol>	Kingsbury library has been relocated to Kingsbury one- stop shop to improve accessibility by public transport, foot and cycling. The remaining buildings and services are in need of renewal with the possibility of diversifying the services offered, enabled by residential development.	Given the relocation of Kingsbury library, the proposed mixed use allocation is likely to bring sustainability benefits by ensuring the maintenance of community use on this site. The relatively poor public transport accessibility of the site is likely to generate additional travel need and car
			expansion	<ul><li>Reasons for not selecting alternatives:</li><li>There is a presumption against the loss of</li></ul>	use from residential development. Allocating the site for school expansion would be likely

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
				<ul> <li>community facilities.</li> <li>There are long term plans to remodel and expand Kingsbury High School upon one campus. The extent of this has yet to be determined.</li> </ul>	to generate traffic, especially given the sites relatively poor access to public transport.
9	Harlesden Plaza	1.5	<ol> <li>Mixed residential, open space and commercial, including a super market</li> <li>Car park</li> <li>Residential development</li> </ol>	<ul> <li>The Council's retail needs assessment identified this site as an opportunity to meet a perceived deficiency for a large supermarket in this area. Introducing a greater population within the town centre will support natural surveillance and eyes on the street.</li> <li>Reasons for not selecting alternatives: <ul> <li>Although parking could appear to be a problem within Harlesden, this would not represent an efficient use of land within this central and prominent location. Managed parking can be provided as part of a mixed use redevelopment.</li> <li>Although this use is supported by planning policy, this could be delivered alongside a wider mix of uses that can contribute to the overall vitality of regeneration within Harlesden.</li> </ul> </li> </ul>	Mixed use development, as proposed, is likely to have sustainability benefits by providing a greater opportunity to improve the public realm, increasing local service provision, and providing residential development close to services, potentially reducing travel need. The provision of open space could, if it results in more exercise and recreation locally, could help improve the health and well being of the local residents. While commercial development and a supermarket will provide employment opportunities, such and associated car parking provision on the site may conflict with other potential benefits, for example by increasing local traffic volumes, and causing noise and disruption (e.g. from late night opening). Sole use for a car park is unlikely to bring significant benefit, and may encourage unsustainable travel in the surrounding area by facilitating and promoting car use. Residential development while increasing the supply of homes, would not provide the opportunity for wider benefits, associated with employment provision and open space. Given the potential significance of sustainability effects associated with the allocation options for this site it warranted more detailed appraisal – see Table C6 below.
10	Former Willesden Court House	0.15	<ol> <li>Mixed residential and community</li> <li>Community Facility</li> <li>Public space</li> </ol>	<ul> <li>Enabling a new community facility through mixed use development on brownfield land within a short distance of a town centre.</li> <li>Reasons for not selecting alternatives:</li> <li>Will require subsidy from residential development</li> <li>Will not accommodate open space of useful size.</li> </ul>	The proposed mixed use allocation provides potential sustainability benefit by creating the opportunity to support new community facilities within a deprived area of the borough and walking distance of the town centre. The redevelopment of a brownfield site and provision of residential space close to an existing town centre may reduce travel need, especially where parking is restricted, however high levels of noise and poor air quality mean that high quality design will be necessary to enable residential use to be appropriately incorporated on this site. Designating the site as a public space, even if small in

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
					scale, could potentially offer recreational and health benefits to the local area, and may also foster a sense of community identity and wellbeing. Any development on brownfield should ensure potential biodiversity value of the land is not lost. Where mixed uses do enable community service provision, the planning justification for the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
11	Manor Park Road	0.25	<ol> <li>Residential with open space</li> <li>Industrial employment</li> <li>Community facility</li> </ol>	<ul> <li>Redevelopment of brownfield site on redundant industrial buildings within close proximity of town centre.</li> <li>Reasons for not selecting alternatives: <ul> <li>Site has been redundant for some time. Concerns as to whether a new development could be satisfactorily serviced by commercial vehicles. Policy supports re-use of redundant industrial buildings, particularly within town centre locations</li> <li>Unlikely to come forward without subsidy from higher value uses</li> </ul> </li> </ul>	The proposed allocation is likely to provide the best opportunity to redevelop this site and provide open space close to the town centre. The redevelopment of a brownfield site could lead to aesthetic improvement of the area, as well as the remediation of any possible land contamination. However potential biodiversity value of brownfield land could be lost through development. Sustainability benefits may include the opportunity to reduce travel need and car use by providing residential close to a town centre, and improved townscape in this deprived area. The provision of open space is likely to contribute to the health and wellbeing of local residents, especially given the site is in an area of open space deficiency. Sole use for industrial employment, while potentially creating greater employment opportunities, may generate increased commercial traffic and travel need as well as generating noise and air pollution. Allocating this site as a community facility may offer social benefits to deprived ward it is located in, helping to foster a sense of community identity.
12	Former Willesden Social Club and St Josephs Court	0.2	<ol> <li>Mixed residential and community</li> <li>Community facility</li> <li>Public space</li> </ol>	<ul> <li>This proposal can contribute to the regeneration of Harlesden by providing new homes within an improved setting than currently on the site, and deliver a new community facility.</li> <li>Reasons for not selecting alternatives: <ul> <li>Unlikely to come forward without subsidy from higher value uses.</li> </ul> </li> <li>Although a form of public space could be delivered as part of a mixed scheme, it is likely to be difficult deliver a substantial space on land within private</li> </ul>	The proposed mixed use allocation is likely to provide the best opportunity to meet broader regeneration objectives. Potential sustainability benefits include improved townscape, possible reduced travel need, and the opportunity to support the provision of a new community facility. Sole use for a community facility or public space would also provide sustainability benefit for local people however the planning justification for selecting the proposed allocation is also likely to reflect why this use
Site	Site name	Site	Use options	LBB justification for proposed allocation and	SA Comments on use options
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No.		size (ha)	Option 1 is in all cases is proposed allocation	reasons for not selecting alternative uses	
				ownership without a form of incentive.	is potentially the most beneficial in sustainability terms.
13	Sainsbury's Superstore	2	<ol> <li>Mixed residential and retail</li> <li>Supermarket</li> <li>Community facility</li> </ol>	<ul> <li>The proximity of local shops, services and forms of public transport would support the redevelopment of this brownfield site. Development proposals will be required to have careful regard for the existing dwellings along Draycott Avenue.</li> <li>Reasons for not selecting alternatives: <ul> <li>Location supports mixed use development.</li> <li>No identified shortage, but a facility could be provided as part of a mixed scheme.</li> </ul> </li> </ul>	There are potential sustainability benefits of mixed use as in the proposed allocation, such as the opportunity to reduce travel need by providing housing in proximity to services and amenities. Allocating the site solely for supermarket use could potentially provide additional employment to the local area. However, it may impact negatively on the viability of local independent retail outlets as well as causing increased traffic generation and associated impacts. A community facility could have positive effects for the local community, fostering a sense of community identity. However the site presents sustainability challenges too, such as proximity to a railway line (noise pollution, and a wildlife corridor) and the relationship of proposed development on the site with existing residential properties in the area. As a result of these factors the allocation options for this site warranted more detailed appraisal – see Table C7 below.
14	Clock Cottage	0.5	<ol> <li>Mixed residential and community</li> <li>Residential development</li> <li>Community facility</li> </ol>	<ul> <li>Re-use of locally listed building. Using value derived from residential development to enable a form of community facility.</li> <li>Reasons for not selecting alternatives: <ul> <li>This would result in the perceived loss of a community facility.</li> <li>Such a facility is unlikely to be delivered without subsidy.</li> </ul> </li> </ul>	The mixed use proposed allocation is the most likely to provide the opportunity to provide a community facility on this site, while protecting and enhancing the status of this locally listed building, and where this occurs sustainability benefits are likely. Residential use may generate traffic, especially where parking is not restricted to discourage car ownership and use. Allocating the site for sole residential use could improve access to quality affordable housing, however it may generate proportionately more traffic and associated impacts than a mixed use allocation, without bringing the benefits possible from community facilities provision. Sole use for a community facility would also provide sustainability benefits for the local community, for example enhancing community identity and welfare. However it is recognised that residential development may be required to facilitate community facilities provision.
15	Northwick Park	18.5	1. Mixed residential (key	Redevelopment of the hospital campus to deliver	The proposed mixed use allocation including residential

Site No.

16

Site name

Hospital

Morrison's Supermarket

Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
	worker), with retail/leisure and hospital redevelopment 2. Hospital/ Higher education facilities 3. Hospital	<ul> <li>buildings and facilities to meet current and future predicted standards of health care. Residential development is considered useful to help enable this.</li> <li>Reasons for not selecting alternatives:</li> <li>Without enabling residential development, this may be difficult.</li> </ul>	development is considered by LBB to offer the best opportunity to enable redevelopment of the hospital. Where the hospital site is redeveloped and improved / expanded services enabled, there are likely to be sustainability benefit such as increasing local access to health services, and potentially providing a mix of skilled and semi-skilled employment. Providing key worker housing may also have sustainability benefits, especially where those working at the hospital are able to live close by, thereby reducing travel need. However retail and leisure provision as well as increased housing also all are likely to generate traffic, and associated environmental impacts. This may outweigh any benefits from key-worker housing provision close to the hospital. Higher education provision may have sustainability benefits, in providing opportunities for life time learning and new skill development, where courses are accessible and affordable for local people A sole hospital use would be likely to generate the positive sustainability effects as noted above.
2.3	<ol> <li>Mixed residential (including family housing) and retail</li> <li>Supermarket</li> <li>Housing</li> </ol>	<ul> <li>Re use of customer car parking for residential development. Use of brownfield land in proximity to local shops and services and public transport.</li> <li>Reasons for not selecting alternatives: <ul> <li>No need to promote current use</li> <li>The Council wishes promote mixed use development.</li> </ul> </li> </ul>	The proposed mixed use development of this redundan car park area adjacent to a supermarket is likely to have sustainability benefits, such as potentially reduced travel need through provision of housing close to shops and services. Where family housing is provided this could help meet an identified need for these type of homes in the Borough. Careful planning and high-quality design will be necessary to enable residential development to be incorporated on this site due to relatively high day and night-time noise levels.

increase access to quality and affordable housing, but due to the poor public transport accessibility could				Maintaining or expanding supermarket use at this site could increase opportunities for skilled and semi-skilled employment to the area. However, an expanded supermarket would generate significant traffic volumes, decreasing local air quality and increasing noise levels. Allocating the site to a sole residential use could increase access to quality and affordable housing, but due to the poor public transport accessibility could
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Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options result in an increase in local traffic, with similar affects to those outlined above.
					Redeveloping this brownfield site is likely to lead to sustainability benefits as it will contribute to the character of the area and remediate any historical contamination.
17	Alpine House	1	<ol> <li>Mixed low carbon residential with light industrial / affordable workspace</li> <li>Industrial employment uses</li> <li>Bulky goods retail</li> </ol>	<ul> <li>The industrial building appears to be reaching the limits of modern employment uses. A mixed use development that also delivers modern commercial space will help to safeguard the site for employment uses, as well as delivering environmentally sustainable residential development. Site has planning permission for these uses.</li> <li>Reasons for not selecting alternatives: <ul> <li>Such development is unlikely to come forward without enabling residential development.</li> </ul> </li> <li>Although broadly acceptable in terms of retail land use policy, it's unlikely the Council would release industrial land for retail as the wider policy framework promotes the reuse of brownfield land for residential development. The Council wishes to promote an innovative mixed use development that retains part of the site within industrial/employment uses.</li> </ul>	The proposed allocation for mixed use including low carbon / zero emission housing with affordable workspace is likely to have significant sustainability benefits. Low carbon housing can help reduce the Boroughs CO <sub>2</sub> emissions and thus contribution to climate change. Affordable workspace combined with residential is likely to provide local employment opportunities, with local economic and social benefits, as well as potentially reducing the need to travel. Industrial use or bulky goods retail are less likely to deliver sustainability benefits, and are likely to generate noise, travel need / vehicle movements and related impacts. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
18	Bridge Road	0.1	<ol> <li>Residential</li> <li>Industrial employment uses</li> </ol>	<ul> <li>Re-use of brownfield land for residential development</li> <li>Reasons for not selecting alternative:</li> <li>Modern industrial workspace would not be satisfactorily served by commercial vehicles and may create impacts upon existing dwellings</li> </ul>	The proposed allocation for residential development is likely to offer the best opportunity to bring back into use these redundant buildings. Industrial use could lead to noise and commercial traffic causing disruption in this residential area. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
19	Stonebridge Schools	3.8	<ol> <li>Mixed education (primary) and residential, with new public open space (in line with outline planning permission)</li> <li>Open space</li> <li>Residential</li> </ol>	<ul> <li>This proposal can contribute to the regeneration of Stonebridge and deliver two new primary schools and a new public open space and outdoor play facilities. This site is not able to accommodate a new secondary school.</li> <li>Reasons for not selecting alternatives:</li> <li>This would result in the loss of the school capacity, which could not be supported unless an alternative site and opportunity to enable the school could be</li> </ul>	A mixed use allocation as proposed is likely to offer the greatest opportunity to provide new education facilities on this site. The delivery of two new primary schools as proposed in the allocation would deliver sustainability benefits by meeting an identified shortfall in school places in the Borough. There may be impacts, particularly in terms of traffic disruption in the local area, and travel need more generally.

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
			development	<ul> <li>found. This is unlikely.</li> <li>The site has not been considered as a means of meeting housing capacity and therefore the loss of the potential for a new school would not be acceptable. Residential development is considered as a means of enabling the new school development.</li> </ul>	<ul> <li>While sole use for open space would bring sustainability benefits in relation to quality of life, amenity and health there is an identified need for new primary school places.</li> <li>While school uses may provide benefits, it is also necessary to consider whether this site is the most suitable for a school site compared to others in the Borough.</li> <li>Due to the potential impacts associate with the proposed allocation (noise, travel need), and the need to consider the proposed allocation of a school on this site against other sites in the Borough, it warranted more detailed appraisal – see Table C8 below.</li> </ul>
20	Former Unisys and Bridge Park Centre	2.85	<ol> <li>Mixed community, B1, leisure and residential</li> <li>Housing &amp; Leisure Centre</li> <li>Education &amp; Leisure Centre</li> </ol>	<ul> <li>A comprehensive mixed use redevelopment on previously developed land. Requires improvements to pedestrian access across the North Circular. Configuration should mitigate against noise pollution from NCR – with the sports centre acting as a buffer at the northern edge of the site.</li> <li>Reasons for not selecting alternatives: <ul> <li>The Council requires a greater mix of uses</li> <li>Requires subsidy from development</li> </ul> </li> </ul>	The proposed allocation is likely to provide the best opportunity to redevelop this land and meet broader regeneration objectives. There are likely to be sustainability benefits relating to the provision of leisure and community facilities, particularly where these are accessible and affordable to local people, in this relatively deprived area of the Borough. Including residential in the use for this site is likely to enable the provision of other uses. A mix of residential and leisure facilities would also have benefits, however community uses will increase the potential for social benefit from the site's development such as an increased sense of community identity or cohesion. The proposed allocation notes that a SFRA has been completed and that noise and air pollution from the North Circular Road will require mitigation. Education use would help meet an identified need for new school places in the Borough, and given the importance and potential effects of school provision, this site has been considered in more detail as a possible site for school use, see section 9.
21	Land adjoining St John's Church	0.6	<ol> <li>Mixed residential and community</li> <li>Open space</li> <li>Education</li> </ol>	<ul> <li>Increasing the supply of affordable housing while enhancing and not detracting from the setting of the listed building.</li> <li>Reasons for not selecting alternatives:</li> <li>Would not create open space of valuable size due to remaining buildings on site.</li> <li>Site not big enough for new school.</li> </ul>	The proposed mixed use allocation is likely to provide the best opportunity to provide affordable housing and community facilities. The provision of affordable housing and community facilities for local people is likely to have sustainability benefits such as improving accessibility and availability of quality affordable housing, and enhancing community cohesion and identity.

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
					Developing the site as attractive and accessible open space would also have sustainability benefit for the local area as it in an area of open space deficiency. If the provision of open space led to an increase in exercise and recreation by local people, it is likely that there would be associated health and wellbeing benefits. As LBB does not consider the site big enough to house a new school, this alternative has not been assessed as a reasonable option for use allocation.
22	Roundtree Road	0.1	<ol> <li>Mixed residential and community</li> <li>Open space</li> <li>Community facility</li> </ol>	<ul> <li>Opportunity for new affordable homes</li> <li>Reasons for not selecting alternatives:</li> <li>Would not present useful open space. Barham Park is opposite.</li> <li>Would require subsidy from residential development</li> </ul>	The proposed mixed use allocation is most likely to deliver broader regeneration objectives. Where use of the site for residential development enables community facilities there are likely to be sustainability benefits, and where the housing provided is affordable this may also bring benefit to the community by improving the quality of housing available to those on lower incomes. Although not in an area of open space deficiency, allocating the site for open space could provide benefits to biodiversity and potentially for water storage / flood attenuation. Also where open space is used by local people for exercise/recreation there are likely to be health and wellbeing benefits. Using the site as a community facility could encourage a sense of community cohesion and identity. The planning justification for selecting the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
23	Vale Farm Sports Centre	4.5	<ol> <li>Recreation and sports facilities</li> <li>Public open space</li> <li>Education use on part of land</li> </ol>	<ul> <li>The current facilities are reaching the limits of use in terms of purpose and age while there remains an existing deficiency and increased projected demand for such facilities.</li> <li>Reasons for not selecting alternatives: <ul> <li>Would require alternative site for sports centre. Demand for sports facilities is greater</li> <li>Would result in loss of public open space</li> </ul> </li> </ul>	Sustainability benefits of proposed allocation are likely to arise from the enhancement of recreation and sport facilities, potentially leading to health and wellbeing benefits to the local area. Allocating the site as open space would be likely to have health and wellbeing benefits as well as positive effects on local biodiversity and, possibly, flood attenuation. Educational use would result in the loss in local recreational facilities, potentially reducing local opportunities for exercise. However education use would help meet an identified need for new school places in the Borough, and given the importance and potential effects of school provision, this site has been

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
					considered in more detail as a possible site for school use, see Section 9.
24	Wembley Point	1.2	<ol> <li>Mixed residential and office (subject to FRA)</li> <li>Office</li> <li>Hotel</li> </ol>	<ul> <li>Redevelopment will maximise the use of this site, with development on previously developed land.</li> <li>Reasons for not selecting alternatives: <ul> <li>A greater mix of uses is generally supported</li> <li>There are sequentially more preferable sites for hotel development</li> </ul> </li> </ul>	A mixed use allocation is likely to offer the greatest opportunity to redevelop the site for beneficial use, and improve pedestrian facilities. Where this is achieved, sustainability benefits are likely, through improvements to the public realm and in making walking more attractive, potentially reducing travel need. The site has high levels of noise and air pollution and would require careful planning and mitigation, particularly if it was allocated for residential uses. Sole use for hotel or office use may provide some benefits, such as employment opportunities, however both uses may generate proportionally greater travel need and traffic.
25	Vivian Avenue	0.7	<ol> <li>Limited mixed residential and community to enable improvements to existing sports / open space facilities</li> <li>Open space</li> <li>Community facility</li> </ol>	<ul> <li>By permitting limited development on the site, the remaining land can be brought back into practical use as a local amenity, including open space and sports facilities, while improving the accessibility, appearance and management of the land.</li> <li>Reasons for not selecting alternatives:</li> <li>Such uses will require enabling development</li> </ul>	Limited mixed use development as proposed is likely to offer the best opportunity to enable improvements to existing sports facilities and open space amenity. Where this is achieved, and these are brought back into use and accessibility is improved, there are likely to be sustainability benefits for local people such as improvements to quality of life, health and opportunities for sport and leisure. Sole use for the provision of open space, if feasible, could provide significant sustainability benefit for the local area as the site is within an area of open space deficiency, potentially improving biodiversity and flood attenuation, improving the public realm and increasing the opportunity for exercise and recreation with associated health benefits. A community use could have social sustainability benefits, such as providing opportunities to improve community identify and cohesion.
26	Old St Andrew's Church	0.8	<ol> <li>Community (shared place of worship)</li> <li>Due to the level of protection afforded to the Church, alternative site uses have not been considered.</li> </ol>	An opportunity to reconnect local residents and occupiers to an important visual, social and historic landmark in the borough, not withstanding its listed status.	Retaining the church for use as a shared place of worship is likely to offer the best opportunity to enhance and preserve this Grade 1 listed building, while providing for local community needs. Depending on the scale of meetings to be held in the building, there could be impacts resulting from travel need and congestion, and associated noise and air pollution.

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
27	Hawthorne Road	0.2	<ol> <li>Residential and amenity / open-space</li> <li>Industrial employment</li> <li>Bulky goods retail</li> </ol>	<ul> <li>Redevelopment of badly located industrial building. Increasing the supply of residential development including affordable housing</li> <li>Reasons for not selecting alternatives:</li> <li>The council would rather see the allocation of housing for this site</li> <li>This is not a priority and given the sites proximity to numerous services the preferred allocation takes precedence.</li> </ul>	The proposed residential allocation is likely to provide the best opportunity to deliver wider regeneration benefits such as improved amenity space and public transport improvements. In addition residential use in proximity to leisure, retail and other amenities may help reduce travel need. Industrial use or bulky goods retail are less likely to deliver sustainability benefits, and may generate noise, travel need / vehicle movements and related impacts. The planning justification for the proposed allocation is also likely to reflect why this use is potentially the most beneficial in sustainability terms.
28	Queens Parade and Electric House	0.07	<ol> <li>Mixed residential and retail / food &amp; drink</li> <li>Retail</li> <li>Public space</li> </ol>	<ul> <li>More intensive use of site to allow for diversification of retail off and increase the supply of residential units in the area.</li> <li>Reasons for not selecting alternatives: <ul> <li>Town centre location the council would like to see a mix of uses</li> <li>The land is too central to the shopping parade to set aside for public space</li> </ul> </li> </ul>	The proposed mixed use allocation is likely to provide the best opportunity to realise wider improvements to this site. There is potential conflict between residential and food / drink uses which could lead to disturbance / noise as well as traffic generation. However, where residential use is provided in proximity to improved retail facilities and other amenities reduced travel need may be achieved, leading to sustainability and community benefits. Sole use for retail development may create additional employment opportunities, however it is also likely to proportionately increase traffic generation and associated impacts. Improved public space would bring sustainability benefits related to health and quality of life, especially as the site is in an area of open space deficiency
29	Former Playground, Dudden Hill Lane	0.16	<ol> <li>Mixed residential and community / leisure or retail</li> <li>Community facilities</li> </ol>	As former Brownfield site which was given permission as a play area in 1981, it currently has no play equipment and is disused as a play area. The site is maintained by Brent's Park Service however no funding is available to redevelop as a playground. The site is not well positioned, being next to a main intersection and busy road, and to meet needs of local residents. Reasons for not selecting alternative: • Will require subsidy from residential development	The proposed mixed use allocation is potentially the most likely to enable improvements in the provision of community and play area / open space facilities. Where residential use does enable improvements to community and play area facilities this would have sustainability and local community benefits, particularly related to quality of life and health. Residential use, combined with a retail/leisure use may increase local traffic volumes, adversely affecting air quality and noise levels. Sole community use could potentially offer more services to the local residents, which is an important factor in this deprived ward, but may not offer the same

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
					regenerative opportunities as the proposed allocation.
30	Gaumont State Cinema	1.4	<ol> <li>Mixed community, cultural, retail and employment</li> <li>Place of worship</li> </ol>	An opportunity to reconnect local residents, occupiers and visitors with an important visual, social and historic landmark and listed building in the borough, as well as improve and diversity the uses available. Reasons for not selecting alternatives: Building would be suitable for such use however there are concerns about the impacts of parking for such a large attractor.	The proposed mixed use allocation could lead to reduced need to travel, including car use, (through provision of local amenities and employment) and could ensure the long-term viability of this local landmark and listed building. Whilst LBB has indicated that a place of worship could be a potentially suitable use for such a building, it raises concerns over the impacts of parking. From a sustainability perspective, there would be similar concerns arising from the potential negative effects of traffic, noise and air pollution on local residents. While the proposed allocation could generate traffic and disturbance (e.g. from retail use), if use as a place of worship leads to large gatherings occurring, particularly at anti-social hours, this could generate proportionately more disturbance to local residents. At the same tim there may be social and community benefits, particularly if such use is integrated with and involves the local community, and use as a place of worship may better preserve the status of this listed building, requiring less change to the internal fabric of the building compared to the proposed allocation. Due to the potentially significant sustainability effects and controversy associated with the development of this site the allocations warranted more detailed appraisal – see Table C9 below.
31	Kilburn Square	0.6	<ol> <li>Mixed residential, retail, community and market space</li> <li>Housing Office/ retail</li> </ol>	The redevelopment will introduce environmental improvements to Kilburn High Road, residents, occupiers and visitors, increase the residential density and improve the configuration of the market space. Reason for not selecting alternatives: The Council is seeking a wider mix of uses for this accessible location.	The proposed mixed use allocation is the most likely to contribute to the regeneration of the Growth Area. Improvements to community facilities and the provision of space for a market are likely to provide social and economic benefits to the local community, as well as providing an opportunity to reinforce community identity and reduce the need to travel. The planning justification for selecting the proposed allocation also reflects why this use is likely to be the most beneficial in sustainability terms. Sole use for housing would not provide local employment and community benefits and could therefore also increase the need to travel, while office and retail use, while providing more employment relatively to the other options, are less likely to contribute to the wider

Site No.

ite name	Site	Use options	LBB justification for proposed allocation and	SA Comments on use options
	size (ha)	Option 1 is in all cases is proposed allocation	reasons for not selecting alternative uses	
				regeneration of the area and again increase the need to

travel / generate traffic.

Overall SA Comments on alternatives to the Site Specific Allocations:

The potential alternative uses for the Site Specific Allocations have been identified by LBB through the completion of appraisal proformas. At this stage the SA has not proposed additional alternatives, however it is possible that different mixed or single uses may present a reasonable alternative for some sites.

In addition to the potential alternative uses that were identified for the Site Specific Allocations, a further option for all sites would be for them to remain in their current use. This equates to a "business as usual" option. In current use the sites will give rise to both positive and negative sustainability effects. For example a derelict, brownfield site may provide useful habitat for certain species, and thus have significant biodiversity value. Equally, run-down industrial sites, while potentially of aesthetical and environmental poor quality, may provide low-cost, flexible workspace for local businesses. At the same time maintaining sites in their current use may not generate additional traffic associated with increased residential or commercial development, which is a key potential impact arising from many of the proposed Site Specific Allocations. However, this would mean foregoing the benefits LBB is seeking from the proposing development of the sites as part of a wider regeneration objective, including provision of good quality and affordable housing, economic growth and provision of infrastructure, as set out in the objectives and targets in the Core Strategy DPD. As discussed below, in most cases development and regeneration of these sites has the potential to deliver significant sustainability benefits, however it is also important to recognise the sustainability value of some existing uses.

Overall the SA of the proposed Site Specific Allocations and their potential alternative uses indicates that the proposed allocations are also largely consistent with meeting sustainability objectives. However there are a number of sites for which the alternative uses also present potentially significant sustainability benefits, and also where the proposed use could result in some negative sustainability effects. For several of the sites the proposed allocation and the potential alternative uses have the potential to deliver very similar sustainability effects and there is not a clearly preferred options from a sustainability perspective, for example: W7: Chesterfield House; W8: Wembley High Street; A4: Altip Road; and Rest of the Borough sites 4: Dollis Hill House, 15: Northwick Park Hospital, and, 25: Vivian Avenue.

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

#### Wembley Growth Area

- W2: Wembley Park Former London Transport Sports Ground
- W5: Wembley Eastern Lands

Alperton Growth Area

• A8: Northfields Industrial Estate

Burnt Oak / Colindale Growth Area

Appendix

Site No.	Site name	Site size (ha)	Use options Option 1 is in all cases is proposed allocation	LBB justification for proposed allocation and reasons for not selecting alternative uses	SA Comments on use options
• B	/C1 & B/C2: Orie	ental City (	(B/C1) and Grove Park / Ec	dgware Road (B/C2) (these sites are adjacent)	
Rest	of Borough				
• R	est of Borough s	ite 9: Harl	lesden Plaza		
• R	est of Borough s	ite 13: Sa	insbury's Superstore		
• R	est of Borough s	ite 19: Sto	onebridge schools		
• R	est of Borough s	ite 30: Ga	umont State Cinema		
In add	dition sites where	e school d	evelopment was proposed	or considered as an alternative use have also b	een considered in more detail:
W2 –	Wembley Park -	- Former l	ondon Transport Sports G	round	
A6 – '	Woodside Avenu	ie			
PR1 -	- Former Guinne	ss Brewe	ry		
Rest	of Borough 1 – N	letro Hou:	se		
Rest	Rest of Borough 20 – Former Unisys and Bridge Park Centre				
Rest	of Borough 23 –	Vale Farn	n Leisure Centre		
These	e potential sites f	or school	development, and the sites	s selected are considered in more detailed appra	isal in Section 9.

# Sites Selected for more detailed appraisal

## Table C1: Wembley Site W2 – Wembley Park – Former London Transport Sports Ground

Site: W2 – Wembley Park – Former London Transport Sports Ground				
Business as	As option 2.			
usual				
Option 1	School building and improved dual use playing fields			
(proposed				

allocation)					
Option 2 <sup>3</sup>		Maintain as private playing fields.			
Option 3		Development of site frontage for mixed residential and commerce	cial uses and maintain remainder as open space		
Justification for proposed allocation (LBB)		There is both need, and shortage of suitable sites, for a new school. This site presents an opportunity in terms of excellent public transport accessibility while maintaining and improving access to sports and recreation facilities			
		nability strengths and weaknesses objectives as a prompt			
e eg e e e e	Streng		Weaknesses:		
Option 1	<ul> <li>Soci altho plac addi</li> <li>Prop into for th</li> <li>May busi</li> <li>Alloo likely surfa</li> <li>High</li> </ul>	al benefits likely from increased provision of education facilities, bugh this may principally address additional demands for school es from growth. The Wembley area has an identified need for tional school places at both primary and secondary levels. bosed allocation would bring open space / recreational facilities public use. This is likely to have health and wellbeing benefits he local community. The create local skilled and low-skilled employment, as well as ness for local suppliers (such as caterers). Cation seeks to maintain integrity of green infrastructure which is y to have associated environmental benefits / services such as ace water drainage and biodiversity. In level of public transport accessibility is likely to help minimise ative local traffic impacts.	<ul> <li>Possible increase in car traffic and congestion at peak times due to children being brought to and from school, with consequent reductions in local air quality and increase in noise levels.</li> <li>As the site is close to a residential area, noise and nuisance could affect local residents at the start and end of the day and at breaktimes.</li> <li>Development of school on site will result in net loss of open space, which may have impacts on existing biodiversity value of site.</li> </ul>		
Option 2			<ul> <li>Open space remains inaccessible to public, preventing use for recreation / exercise.</li> <li>Would not provide opportunity to contribute to regeneration objectives.</li> <li>Maintaining the current use would not provide an opportunity to enhance the currently poor aesthetic value of the site.</li> <li>No opportunity to increase education provision and provide wider health and wellbeing benefits to local community.</li> </ul>		
Option 3	work • Incre	create local skilled and low-skilled employment, as well as space for local businesses. eased supply of homes, which may have social benefits, icularly if affordable.	<ul> <li>Potential for negative effects from increases in local traffic associated with access for commercial and residential units.</li> <li>Residential units could be adversely affected by noise and air pollution from existing rail line and busy road.</li> </ul>		

<sup>3</sup> This option is considered to equate to "business as usual" for this site.

Would maintain some open space and therefore the associated
environmental benefits such as flood attenuation and biodiversity /
habitat, especially where design incorporated SUDS.

This site is in an area with an identified deficiency in both primary and secondary school places, as well as being located in a very deprived ward, and as such is likely to benefit from increased access to educational and recreational facilities, benefits that would not arise from the potential alternative uses for the site. The site has good public transport accessibility which should help ensure these benefits are accessible to the wider community, as well as helping to minimise impact on local traffic levels and other associated traffic related impacts.

The green space at the centre of the site is relatively small, but it is likely that it provides environmental benefits to the surrounding area, including (but not limited to) flood attenuation, biodiversity and air quality. The proposed allocation is expected to maintain these benefits (albeit with a reduced area of open space) and provide public access to open space currently inaccessible.

The traffic implications of residential, commercial or school development on the site could be significant, as the site is located adjacent to two busy roads. The current noise levels at the site would require that any residential development on the site would need to be designed in order to minimise the negative impact on the residents.

#### Table C2: Wembley site W5 – Wembley Eastern Lands

Site: W5 W	/embley Eastern Lands			
Business as A mix of industrial and retail warehousing uses and a waste management facility in proximity of the New National State usual				
Option 1 (proposed allocation)Mixed use employment-led development including leisure, offices, amenity/open space, and residential develop Council is seeking the assembly and the comprehensive development of the site. Alternatively, the creation of an a buffer between the existing industrial and new non-industrial uses will be sought.				
Option 2	Industrial Employment			
Option 3		Bulky Goods Retail		
Justificatio proposed allocation (	and public transport accessibility. A mix of uses will deliver jobs	Wembley is the main focus for growth. This is a major opportunity for a new urban quarter taking advantage of the new Stadium and public transport accessibility. A mix of uses will deliver jobs and homes and bring about greater movement for pedestrians and cyclists. Development will help to define a regenerated employment area to the east.		
	of sustainability strengths and weaknesses inability objectives as a prompt			
		Weaknesses:		
Business as usual	low cost industrial / warehousing space, which may encourage local	<ul> <li>Would not provide an opportunity to meet wider regeneration goals in the Wembley area.</li> <li>Poor quality of public realm may deter use by local people,</li> </ul>		

		<ul> <li>and access to and from the site by foot or bike is currently poor.</li> <li>Would not provide opportunity to deal with any existing noise and nuisance caused by current industrial uses.</li> <li>Would not provide opportunity to improve public transport provision.</li> </ul>
Option 1	<ul> <li>Employment led development and provision of new office space should increase local employment opportunities.</li> <li>Mixed use development could maximise the regenerative potential of the site and generate public realm, amenity/open space and leisure improvements.</li> <li>Potential for reduced travel need through co-location of homes, amenities and employment.</li> <li>Opportunity to improve public transport accessibility and facilities for walking and cycling.</li> <li>Opportunity to address any existing noise and nuisance caused by current industrial uses.</li> <li>May provide opportunity to improve surface water management on the site, for example through incorporation of SUDS in new development.</li> </ul>	<ul> <li>Extant poor public transport accessibility could be compounded by high density of development, leading to increased congestion on local roads and associated noise and air pollution.</li> <li>Proximity to existing industrial use could lead to noise and air pollution impacting on proposed residential use.</li> <li>Residential development in close proximity to Wembley Stadium may be impacted by noise and traffic disruption on event days.</li> </ul>
Option 2	<ul> <li>Sole use for industrial employment may provide proportionately more jobs to the local area.</li> <li>Opportunity to improve public transport accessibility and facilities for walking and cycling.</li> <li>Opportunity to address any existing noise and nuisance caused by current industrial uses.</li> <li>May provide opportunity to improve surface water management on the site, for example through incorporation of SUDS in new development.</li> </ul>	<ul> <li>May be less likely to provide opportunity to meet broader regeneration objectives for Wembley, as will not provide amenity, leisure or residential space.</li> <li>Sole use of industrial employment may proportionately increase commercial traffic generation and increase local air and noise pollution.</li> </ul>
Option 3	<ul> <li>Bulky goods retail may provide a larger number of low-skilled jobs than mixed use development.</li> <li>Opportunity to improve public transport accessibility and facilities for walking and cycling.</li> <li>Opportunity to address any existing noise and nuisance caused by current industrial uses.</li> <li>May provide opportunity to improve surface water management on the site, for example through incorporation of SUDS in new</li> </ul>	<ul> <li>May be less likely to provide opportunity to meet broader regeneration objectives for Wembley, as will not provide amenity, leisure or residential space.</li> <li>The nature of bulky good retail is likely to require proportionately greater road traffic accessibility and parking than other employment uses, cars associated with customers and commercial vehicles associated with deliveries.</li> <li>May be less likely to contribute to the public realm</li> </ul>

development.	improvements required for the area.

All development options on this site offer opportunities to improve the public realm, townscape and accessibility (especially public transport, walking and cycling). A mixed use allocation, including residential and employment, may provide the best opportunity in this regard, as well as delivering broader regeneration benefits. While the alternative uses may create greater employment in the area, they may also generate traffic, and in particular commercial vehicle movements, which would have air pollution, noise and congestion impacts.

The site currently has relatively poor public transport accessibility, and redevelopment will provide an opportunity to improve public transport infrastructure, as well as facilities for walking and cycling. Where this is achieved car use may be reduced bringing environmental and health benefits. In its current use, although the site has poor visual amenity, it is likely to provide low-cost premises for local businesses, which may be lost through redevelopment. Development should seek to provide replacement, low-cost premises to avoid loss to local businesses and low-skill employment.

<b>Site:</b> A8 – N	lorthfield	Is Industrial Estate			
Business as		Industrial estate consisting of large scale retail warehousing and manufacturing facilities.			
usual					
Option 1 (proposed		Mixed use redevelopment for intensified industrial employment a	Mixed use redevelopment for intensified industrial employment and enabling residential development with amenity/open space.		
allocation)					
Option 2		Employment use			
Option 3		Employment/Zero energy housing			
Justification for proposed allocation (LBB)		This industrial estate is reaching the limits of suitability due to restrictions to loading space and vehicular movement into, out of and around the estate. Some of the buildings are no longer suitable for occupation. An innovative solution entailing a much more intensive use of a constrained site is encouraged.			
	/	nability strengths and weaknesses			
		bbjectives as a prompt			
Coning Cucia	Streng		Weaknesses:		
Business as usual	may	Ild maintain current warehousing and manufacturing uses which be providing significant local low-skilled employment prtunities.	<ul> <li>Continued local disruption due to vehicle movements associated with current industrial use, particularly for residents along Beresford Avenue to north of site, and at junction to North Circular Road.</li> <li>Would not provide regenerative opportunities associated with the canal, and, where these are realised potential benefits to visual amenity, public realm quality, biodiversity and local wellbeing, recreation and health.</li> </ul>		

### Table C3: Alperton site A8 – Northfields Industrial Estate

Option 1	<ul> <li>The redevelopment of the canal side and provision of open space will improve local amenity, providing opportunity for recreation and exercise improving the health and wellbeing of local residents. As the site is in an area of low townscape quality opportunity to improve public realm.</li> <li>Mixed use development may be more likely to support wider economic regeneration of the area and may provide opportunities to reduce travel need, especially where employment is suitable for local people.</li> <li>Depending on how it is realised in practice, "intensified" industrial use may offer opportunity to introduce new technologies / types of use which could reduce noise and air pollution.</li> <li>Providing a buffer strip between development and the canal could provide an opportunity to improve local biodiversity.</li> </ul>	<ul> <li>Noise levels at the site (due particularly to proximity to North Circular Road) would require significant mitigation to enable residential use.</li> <li>Increased density and residential development on the site, combined with relatively poor access to public transport, may lead to adverse affects on local traffic, with congestion, noise and air pollution impacts.</li> <li>Flood risk is an issue on parts of the site, which will restrict certain types of development, especially residential.</li> <li>Lack of local amenities, however other allocations in this area seek to address this.</li> </ul>
0 // 0	• Opportunity to reduce / manage current traffic impacts, particularly associated with existing industrial uses.	
Option 2	<ul> <li>Sole use for employment could provide proportionately more jobs, supporting economic regeneration.</li> <li>May provide opportunity to reduce / manage current traffic impacts, particularly associated with existing industrial uses.</li> <li>Depending on type of employment activity move from current industrial use may offer opportunity to introduce new technologies / types of use which could reduce noise and air pollution.</li> </ul>	<ul> <li>Less opportunity to provide regeneration benefits to wider area, such as improved access and restoration of the canal and associated recreation and biodiversity benefits.</li> <li>May have significant negative effects on traffic, especially given that the site is already constrained, is adjacent to the North Circular Road and has relatively poor public transport accessibility.</li> </ul>
Option 3	<ul> <li>Zero-energy residential development could help reduce the impact of development on Brent's contribution to climate change by minimising additional energy use and CO<sub>2</sub> emissions.</li> <li>Employment use could aid the economic regeneration of the area and provide local jobs – leading to reduce travel need where these are suitable for local residents.</li> </ul>	<ul> <li>No provision envisaged for increased open and amenity space. Less opportunity to increase access for recreation and biodiversity value on the site.</li> <li>Noise levels at the site (due particularly to proximity to North Circular Road) would require significant mitigation to enable residential use on whole site.</li> <li>Flood risk is an issue on parts of the site, which will restrict certain types of development, especially residential.</li> <li>Lack of local amenities, however other allocations in this area</li> </ul>
		seek to address this.

Mixed use development, as proposed for this site, may provide the best opportunity to realise wider regeneration goals, and enhance the amenity and biodiversity value of the canal frontage. This is likely to bring wider sustainability benefits such as improved health and wellbeing etc.

The site is significantly adversely affected by its proximity to the North Circular Road, and any increases in vehicular movement, both private car and

commercial should be avoided. Residential and industrial development should therefore be accompanied by a step-change in public transport, walking and cycling provision.

In addition noise and air pollution associated with the North Circular Road present a significant challenge for residential use on this site, and it will be important to ensure these are adequately mitigated to avoid significant negative impacts on quality of life and health of residents.

Site: B/C1:	Oriental	City		
Business as usual		Retail warehouse buildings including the Oriental City shopping units (now disused) set back from the Edgware Road.		
Option 1 (proposed allocation)		Mixed use development including residential, retail (for bulky goods), food and drink and community facilities (in particular for a primary school) and leisure and re-provision Chinese and Far eastern commercial floorspace and community facilities		
Option 2		Retail		
Justification for proposed allocation (LBB)       This development will contribute to the delivery of the Council's growth strategy while also providing a meet the existing and projected demand primary school places. The mix of uses allows for an efficient between possible conflicting uses.         Summary of sustainability strengths and weaknesses       Using sustainability objectives as a prompt				
	Streng		Weaknesses:	
Business as usual Option 1	<ul> <li>Ther</li> <li>Likel provretai facili</li> <li>Mixel need gene</li> <li>The has</li> </ul>	d contributing to local traffic. re may be some biodiversity value of brownfield parts of the site ly to aid the regeneration of surrounding area for example by iding a range of employment opportunities and space for local I and food/drink businesses as well as community and leisure ities. ed use development may provide opportunities to reduce travel d, however provision of bulky goods retail floor-space is likely to erate travel need, as well as commercial vehicular traffic. provision of leisure facilities could benefit the local area which poor access to recreational facilities. Id help to meet recognised need for primary school places.	<ul> <li>May attract anti-social behaviour at site as is currently derelict.</li> <li>Would not contribute to the regeneration of the wider area.</li> <li>Relatively poor access to public transport is likely to lead to increased local car traffic noise levels and local air pollution. This may be exacerbated by the Chinese and Far Eastern floorspace attracting customers from outside the borough. It is noted that there are bus stops close to the site which could help mitigate this impact where services are increased to meet demand.</li> <li>Poor connectivity to adjacent residential area could result in isolation of new residential development, and reduce the benefits to the surrounding area.</li> <li>The adjacent road could pose noise and air pollution issues for any residential development.</li> <li>Food and drink uses may have localised noise impacts,</li> </ul>	

## Table C4: Burnt Oak Colindale site B/C1 – Oriental City

		particularly where there is proposed to be night-time use.
Option 2	<ul> <li>Likely to provide local employment in a deprived ward.</li> <li>Increase amount of primary retail frontage may increase service and amenity provision.</li> </ul>	<ul><li>community facilities.</li><li>Sole use for retail may result in relatively greater travel need,</li></ul>
		exacerbating local traffic and associated impacts.

The site is currently largely derelict so new development will provide opportunities for sustainability benefit, and mixed use development proposed may be most likely to enable provision of community facilities while supporting the broader regeneration of the area.

While it is noted that there are bus stops close to the site, it remains constrained by relatively poor accessibility to public transport, and the noise and air pollution from the adjacent busy road. This is particularly an issue for residential and school use. As these are included in the proposed allocation mitigation will be necessary to minimise negative effects on residents and pupils.

Relatively poor public transport accessibility also means that development at the site may disproportionately generate additional car travel, however a mixed use allocation may provide the best opportunity to minimise increased travel need and facilitate public transport, walking and cycling facility improvements.

### Table C5: Burnt Oak / Colindale site B/C2 – Sarena House / Grove Park / Edgeware Road

Site: B/C2 - Sare	na House / Grove Park / Edgware Road	
Business as usual	Industrial and retail warehousing buildings set back from the Edgware Road, primary school on part of the site and shop units with residential above.	
Option 1 (proposed allocation)	Mixed use development including residential and workspace including a proportion of managed affordable workspace and community facility. Proposals should include the provision of amenity/open space.	
Option 2	Retail	
Justification for proposed allocation (LBB)	help meet the existing and projected demand primary school places. The mix of uses allows for an efficient use of land w	
	tainability strengths and weaknesses ty objectives as a prompt	
Strengths: Weaknesses:		Weaknesses:

Business	Avoid contributing to local traffic.	May attract anti-social behaviour at site as parts of it currently
as usual	• There may be some biodiversity value of brownfield parts of the site	derelict.
		Would not contribute to the regeneration of the wider area.
Option 1	<ul> <li>Likely to aid the regeneration of surrounding area through provision of workspace and potential employment opportunities, a community facility and amenity/open space.</li> <li>Mixed use development may provide opportunities to reduce travel need.</li> </ul>	<ul> <li>Relatively poor access to public transport could lead to increased local car traffic, noise levels and local air pollution. It is noted that there are bus stops close to the site which could help mitigate this impact where services are increased to meet demand.</li> </ul>
	<ul> <li>Would help to meet recognised need for primary school places.</li> <li>The provision of open space may increase the opportunity for recreation / exercise, providing health benefits, and could also provide environmental benefits of for example to biodiversity and flood attenuation.</li> </ul>	<ul> <li>Poor connectivity to adjacent residential area could result in isolation of new residential development, and reduce the benefits to the surrounding area.</li> <li>The adjacent road could pose noise and air pollution issues for any residential development.</li> </ul>
	• Affordable workspace may help local small businesses, providing opportunities for local employment and economic activity.	• The busy road adjacent to the site may cause adverse effects to any residential units included in the allocation.
Option 2	<ul> <li>May provide local employment, potentially increasing local economic activity.</li> <li>Retail use will be less impacted upon by poor air quality and noise pollution from adjacent roads.</li> </ul>	• Likely to provide less opportunity to improve or change the character of the surrounding area, in particular the provision of open / amenity space and community facility as in proposed allocation.
		<ul> <li>Due to relatively poor public transport accessibility sole use for retail development could lead to significant increases in travel need, with congestion, local air quality and noise levels implications.</li> </ul>

The mixed use allocation proposed may be most likely to enable provision of community facilities while supporting the broader regeneration of the area. Provision of open and amenity space may particularly bring local community wellbeing and health benefits as well as improving visual amenity and public realm improvement. A mix of uses is also likely to support increased primary school provision, which addresses an identified need for primary school places.

While it is noted that there are bus stops close to the site, it remains constrained by relatively poor accessibility to public transport, and the noise and air pollution from the adjacent busy road. This is particularly the case for residential and school use. As these are included in the proposed allocation mitigation will be necessary to minimise negative effects on residents and pupils.

Relatively poor public transport accessibility also means that development at the site may disproportionately generate additional car traffic, however a mixed use allocation may provide the best opportunity to minimise increased travel need and enable public transport, walking and cycling facility improvements.

Site: RoB 9	- Harles	den Plaza		
Business as usual		A mix of single storey retail units, shops with flats above, Methodist Church, community centre and surface car park. State of public realm is poor, and some units / shops are empty and derelict.		
Option 1 (proposed allocation)		Mixed use development including supermarket, residential development, community space and public space. Development will be required to contribute to public transport, highway, car parking and public realm improvements.		
Option 2		Car park		
Option 3		Residential development		
	LBB) of sustai	in this area. Introducing a greater population within the town cernative nability strengths and weaknesses	opportunity to meet a perceived deficiency for a large supermarket ntre will support natural surveillance and eyes on the street.	
Using sustai		objectives as a prompt	Weaknesses:	
Business as usual Option 1	<ul> <li>usual of community.</li> <li>Maintain the provision of niche / specialist retail outlets with low rents, providing employment and services in this deprived ward.</li> </ul>		<ul> <li>May be less likely to contribute to the economic regeneration of the area.</li> <li>Visual amenity and quality of public realm remains poor.</li> <li>The high noise levels and road related air pollution on the site will impact negatively on residential development, requiring careful design and mitigation.</li> </ul>	
	<ul> <li>to enable improvements to the public realm.</li> <li>A mixed use allocation provides an opportunity to contribute to meeting the amenities and local services deficit in the area.</li> <li>Relatively good public transport accessibility, together with proposed contributions to public transport facilities should help reducing the need to travel by car. However this may be offset by increased parking and highway provision proposed.</li> <li>Open space provision may improve drainage and reduce flood risk through increased permeability, and increase local biodiversity by providing habitat.</li> <li>Supermarket development will create additional employment in the area, including low skilled employment.</li> </ul>		<ul> <li>The site is located at the centre of a busy one-way traffic system, composed of narrow roads with on-street parking. The inclusion of retail (particularly a supermarket) and housing in the allocation may adversely impact on local traffic, also increasing air pollution and noise levels.</li> <li>Supermarket development may adversely affect the viability of existing local retailers. This may have long-term negative effects on the community identity and the local economy.</li> <li>It is not clear if proposed allocation would result in the loss of the existing Methodist church. Where this is the case there could be negative social and community effects.</li> </ul>	

Option 2	• Increased availability of local parking may bring some benefit to the local economy through increased trade in local specialist shops and services.	<ul> <li>Likely to increase local traffic on already narrow and congested streets, increasing local air pollution and noise levels.</li> <li>Increased parking provision would not maximise opportunity to</li> </ul>
		<ul><li>encourage reduced car traffic enabled by existing good public transport access.</li><li>Unlikely to have wider regenerative effects.</li></ul>
Option 3	<ul> <li>Increased provision of homes may help ensure good quality dwellings for all, including affordable housing.</li> <li>A residential development and implied increased population density may increase demand for local shops and services facilitating the regeneration of the area.</li> <li>Residential development on the site is likely to support improvements to public realm and townscape.</li> </ul>	<ul> <li>Sole use for residential without the provision of additional services/facilities us less likely to provide an opportunity to regenerate the area</li> <li>Unless parking / car ownership is actively discouraged residential development could significantly increase traffic in</li> </ul>

The mixed use allocation may offer the greatest potential for regenerative benefits for the local area, addressing existing amenity and service shortfalls, such as open space deficiency. However mitigation and careful design would be required to incorporate residential development on this site, due to impacts from local roads. A supermarket development, as proposed, may provide some economic benefits, however it could also negatively affect the viability of existing local retail businesses.

Using the site as a car park, given the sites central location in a deprived area with an acknowledged retail deficit, is unlikely to provide an opportunity to support regeneration or improve existing public realm quality or services and amenity provision. While increasing the supply of homes, sole use for residential development is also unlikely to provide an opportunity to support broader regeneration objectives, and may exacerbate local deprivation by increasing pressure on existing infrastructure.

All potential uses may increase car traffic in the area, and it will be important to actively discourage car use, particularly in relation to a supermarket and residents of new housing development.

Site: RoB 1	3 – Sainsbury's Superstore			
Business a usual				
Option 1 (proposed allocation)	Mixed use redevelopment including residential and retail de	Mixed use redevelopment including residential and retail development.		
Option 2	Residential development			
Option 3	Community facility			
	Development proposals will be required to have careful rega	ic transport would support the redevelopment of this brownfield site. ard for the existing dwellings along Draycott Avenue.		
	Strengths:	Weaknesses:		
Business as usual	<ul> <li>Would maintain the biodiversity value of the adjacent wild corridor.</li> <li>Avoid potential conflict of uses and impact on existing dwellings.</li> </ul>	<ul> <li>Extant surface car parking and relationship of site with public transport may not be maximising opportunities to reduce car travel need.</li> </ul>		
Option 1	<ul> <li>Mixed use development may provide an opportunity reduce traneed, and where development is well integrated with the sirelatively good public transport accessibility, modal shift to putransport may be encouraged.</li> <li>Increased supply of homes may help ensure access to good quadwellings for all including affordable housing.</li> <li>A residential allocation would be well served by open space a recreational facilities, providing the opportunity for recreation a exercise, potentially improving the health and quality of life residents.</li> <li>Retail portion of development may provide local employm potentially stimulating and helping to diversify the local economy.</li> </ul>	<ul> <li>te's levels which would impact negatively on residential use. Day and night time noise levels recorded at the site would require mitigation for residential uses.</li> <li>Unless parking / car ownership is actively discouraged residential development could significantly increase traffic in the area, causing localised congestion and adding to existing noise and air quality problems.</li> <li>Significant development on the site could impact on existing adjacent residential area, both during construction and in the long term. The concerns of local residents will need to be considered, for example through active involvement in decision making.</li> <li>Potential impact on the wildlife corridor that runs along the railway line adjacent to the site could impact negatively on local biodiversity.</li> </ul>		
Option 2	<ul> <li>Increased supply of homes may help ensure access to good quality</li> </ul>	ality • The site is adjacent to a railway line which may generate noise		

	<ul> <li>dwellings for all including affordable housing.</li> <li>Relatively good public transport accessibility may provide an opportunity to significantly restrict parking and vehicle use associated with residential development which may avoid an increase in traffic levels and associated noise / air pollution due.</li> </ul>	<ul> <li>levels which would impact negatively on residential use. Day and night time noise levels recorded at the site would require mitigation for residential uses.</li> <li>Unless parking / car ownership is actively discouraged residential development could significantly increase traffic in the area, causing localised congestion and adding to existing noise and air quality problems.</li> <li>Potential impact on the wildlife corridor that runs along the railway line adjacent to the site could impact negatively on local biodiversity.</li> <li>Significant development on the site could impact on existing adjacent residential area, both during construction and in the long term. The concerns of local residents will need to be considered, for example through active involvement in decision making.</li> <li>Residential development alone could provide fewer regeneration benefits to the area, as employment and business opportunities will not be created.</li> </ul>
Option 3	Community facilities provision may improve community identity and cohesion, as well as the local wellbeing.	<ul> <li>Although a community facility is likely to have local social and community benefits, it may not have wider regenerative effects as does not provide employment / increased economic activity or provide affordable housing.</li> <li>The site is adjacent to a railway line which may generate noise levels which would impact negatively on community use.</li> <li>Unless parking is restricted a community facility could increase traffic in the area, causing localised congestion and adding to existing noise and air quality problems.</li> <li>Potential impact on the wildlife corridor that runs along the railway line adjacent to the site could impact negatively on local biodiversity.</li> </ul>

Mixed use development may provide the greatest opportunities to promote wider regeneration in the area, as well as potentially reducing travel need, and supporting a more diverse local economy.

Sole use for residential development or a community facility would both be expected to have social and community sustainability benefits.

All uses may generate additional travel need in the area. Active measures to discourage car ownership and use would help mitigate this impact, and reduce potential negative effects.

The main differences between the options are economic and social. A mixed use development is likely to provide local employment while a residential development will not, and a community use may provide wider community benefits than other potential uses.

Although the site is in a deprived ward (within 10-20% most deprived) it also has relatively good public transport accessibility, access to open space and recreational facilities that any proposed allocation could utilise to enhance environmental, social or economic outcomes.

Site: RoB 1	9 – Stonebridge Schools			
Business a		Two primary schools (Our Lady of Lourdes RC primary school and the Stonebridge primary school) and open space.		
usual				
Option 1	Mixed use redevelopment to deliver two new primary schools and	Mixed use redevelopment to deliver two new primary schools and a new public open space and residential development.		
(proposed allocation)				
Option 2	Open space			
Option 3	Residential development			
Justificatio proposed allocation (	space and outdoor play facilities. This site is not able to accommodate a new secondary school. (LBB)			
-	f sustainability strengths and weaknesses nability objectives as a prompt			
	Strengths: Weaknesses:			
Business	Will maintain the sites function as a recreational facility.	• Does not increase the access to education in the borough.		
as usual	<ul> <li>Maintain the sites potential contribution to reducing flood risk by maintaining surface water attenuation / permeability, as well as potential biodiversity value of the site.</li> <li>Current open space provides limited recreational / s facilities.</li> </ul>			

## Table C8: Rest of Borough site 19 – Stonebridge Schools

Option 1	<ul> <li>Provision of additional primary school places meeting an identified need.</li> <li>The provision of improved open space in this area of open space deficiency could offer increased opportunity for recreation and exercise, potentially improving the health and wellbeing of the local population.</li> <li>Opportunity to improve / enhance biodiversity value of site.</li> <li>Residential development will increase supply of homes, which may help ensure good quality dwellings for all including affordable housing.</li> </ul>	<ul> <li>Loss of some open space, potential for reduced permeability of the site reducing its capacity to absorb rain/surface water. This may increase surface water run-off.</li> <li>Development of two primary schools likely to increase local traffic, leading to increased congestion, air pollution and noise levels. This may be exacerbated by the fact that the site has relatively poor levels of accessibility by public transport.</li> <li>Loss of some open / green space could impact negatively on local biodiversity.</li> </ul>
Option 2	• Provision of open space could improve biodiversity and the opportunity for recreation and exercise, potentially improving the health and wellbeing of the local residents.	• No opportunity to increase primary school place provision, or housing supply, which may have wider regeneration benefits
Option 3	Increased supply of homes may help ensure access to good quality dwellings for all including affordable housing.	<ul> <li>Unless parking / car ownership is actively discouraged residential development could significantly increase traffic in the area, causing localised congestion and adding to existing noise and air quality problems.</li> <li>Would not take opportunity to increase primary school place provision</li> </ul>

The proposed mixed use allocation may provide the best opportunity to realise broader regeneration objectives, while enabling the provision of additional primary school places, which addresses an identified need. Maintaining and improving facilities on the existing open space may improve public access and use, however some loss of open space is expected which may have negative impacts on biodiversity, and lead to increased surface water runoff.

Sole use for open space, where this lead to improved facilities would have potential health and wellbeing benefits for the local community. Residential use would increase the provision of homes, potentially increasing the opportunity of access to quality affordable homes.

Any use which increases travel need is likely to impact negatively on local traffic, air and noise pollution. The site has relatively poor public transport accessibility and it is important that development on the site seeks to improve provision of public transport, walking and cycling while actively discouraging car ownership and use.

# Table C9: South Kilburn site SK4 – Gaumont State Cinema

Site: SK4 -	- Gaumor	nt State Cinema		
Business a usual	Business as Local landmark listed building which is now vacant, previous uses include a bingo hall and cinema. usual			
Option 1 (proposed allocation)		Mix of uses including community facility, arts and culture, retail, entertainment and employment workspace to secure the long-term use of the listed building.		
Option 2		Place of worship		
Justification for proposed allocation (LBB)       An opportunity to reconnect local residents, occupiers and visitors with an important visual, social and historic landma building in the borough, as well as improve and diversity the uses available.				
		nability strengths and weaknesses objectives as a prompt		
	Streng	ths:	Weaknesses:	
Business as usual	<ul> <li>Avoid vaca</li> </ul>	d disruptive effects to local traffic, as the building is currently int.	• Could potentially result in the loss of a listed building if it falls into a state of disrepair due to long term lack of maintenance. Negative impact on local heritage, aesthetic and public realm quality.	
Option 1	<ul> <li>Good public transport accessibility could help to minimise increased car traffic and ensure that the benefits of the facilities proposed are available to the wider community.</li> <li>The provision of an arts and cultural centre within a deprived ward may improve local community quality of life and provide education and learning opportunities – where the facilities are available and affordable for all.</li> <li>Employment workspace likely to provide opportunities for local businesses and job creation.</li> <li>Redeveloping and preserving a local landmark may improve pride local people have with the area and act as a catalyst for further regeneration.</li> <li>Protection and enhancement of listed building with associated heritage benefits.</li> </ul>		<ul> <li>The site is located on a busy road, with high noise levels and low air quality. These factors may be exacerbated by uses which generate significant travel need, however public transport accessibility is relatively very good.</li> <li>Entertainment use may lead to night time noise and disruption to adjacent residents.</li> </ul>	

Option 2	<ul> <li>Would ensure protection and enhancement of listed building with associated heritage benefits.</li> <li>Church related activities may support certain community and spiritual needs, for example providing meeting space, and supporting the vulnerable (elderly, disadvantaged).</li> <li>Redeveloping and preserving a local landmark may improve pride</li> </ul>	area for services and related gatherings at certain times. Where this results in an increase in car travel to the area this will result in localised disruption, congestion, air and noise pollution. The area has relatively very good public transport
	local people have with the area and act as a catalyst for further regeneration.	

From a sustainability perspective a mix of uses would be likely to bring a broad range of potential benefits, particularly social and economic, while maintaining the landmark status of this listed building. However it is recognised that securing a mix used development of this building may not be economically feasible, and that the alternative use, as a place of worship, could provide some community benefits while also ensuring the protection and maintenance of the listed building.

Both mixed use and religious use of the building may create additional travel need, and associated pollution and disruption in the local area. This may particularly be the case for large religious gatherings, but also for entertainment uses.

While religious use (depending on actual uses) is likely to bring some community benefits, a mixed use cultural, arts and entertainment centre may better support local access to and involvement in cultural and community activities.

# **APPENDIX 12**

SA COMMENTS ON NEW SITES (AUGUST 2008)

# Summary of key issues for all new sites not included in previous Submission SSA DPD (November 2007) – as included in SA Commentary August 2008

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

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
use including residential sites)	in an area of open Space Deficiency; both are more than 400m from a public open space of 2ha or more and more than 1200m from a public space of more than 20ha. <b>Church End Growth Area</b> Chancel House is located in an area of Open Space Deficiency; it is more than 400m from public open space of 2ha. <b>Elsewhere in Brent</b> Stonebridge Schools is located and the former Willesden Social Club and St Joseph's Court are in an area of Open Space Deficiency; both are more than 400m from public open space of 2ha or more and more than 1200m from public open space of 20ha or more.	space should be sought as part of the development of any of these sites.	of open space deficiency. This requirement should ideally be included in the description of the preferred use of sites that are located in areas of open space deficiency.
Accessibility by public transport / PTAL score	Wembley Growth Area The sites in this area are generally well served by public transport. Chesterfield House, Brent House and Elizabeth House and Wembley High Road all have PTAL scores of 5. Church End Area Chancel House has a PTAL score of 3. Elsewhere in Brent Stonebridge Schools and the Former Willesden Social Club and St. Joseph's Court have a PTAL score of 2 and 4 respectively.	Development should generally occur in locations that are accessible by public transport, walking and cycling. Where a site is not accessible by public transport, walking and cycling contributions to improvements should be sought from developments.	Where accessibility by public transport is an issue, improvements should be provided as part of the development of a site or group of sites. Additionally, other forms of transport, namely walking and cycling should be facilitated. The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores.
Sites located in the proximity of nature conservation importance sites / SSSIs / MOL	None of the sites are located within an existing MOL boundary or site of nature conservation importance.	As none of the sites are located within an existing MOL boundary or site of nature conservation importance. With is unlikely to be a significant issue.	None necessary
Sites located in flood risk areas	None of the sites are located within flood risk zones 2 or 3.	In accordance with Government and London Plan policy, flood risk assessments (FRA) will be required for applications in flood risk zones 2 and 3 and a FRA is required for all development proposals over 1ha. Therefore Brent House and Elizabeth House, Wembley; Wembley High Road; and Stonebridge Schools which are 1ha or over will require FRAs.	Relevant applications should be accompanied by a Flood Risk Assessment and should include provisions for Sustainable Urban Drainage (SUDs), where appropriate.
Sites that affect listed buildings or are within a	Wembley Growth Area Brent House and Elizabeth House Wembley High Road are adjacent to	In taking forward proposals for any of the sites within or adjacent to listed buildings or	Development within or adjacent to a Conservation Area or

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Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
Conservation Area	St. Joseph's RC Church, which is locally listed. Chesterfield House is not within a conservation area, and will not affect a listed building. <b>Church End Growth Area</b> Chancel House is not in a conservation area and does not affect a listed building. <b>Elsewhere in Brent</b> The former Willesden Social Club is located close to the Harlesden Conservation Area. Stonebridge Schools is not in a conservation area or does not affect a listed building.	Conservation Areas, it should be done in accordance with the relevant policies and not cause harm to the character and/or appearance of an area, or have an unacceptable visual impact on Conservation Areas, listed buildings etc.	listed building should have regards to the relevant policies and avoid any visual impacts or loss of character.
Sites within Air Quality Management Areas (AQMA)	All of the sites are within Air Quality Management Areas (AQMAs)	The potential impact on air quality should be taken into account in the assessment of planning applications.	Take into account when assessing planning applications, and where significant adverse impacts are predicted which cannot be satisfactorily mitigated, development will not be permitted. This will be an important factor in considering the impact of sites within the AQMA as well as in considering the appropriate use and design of the sites. Exposing additional residents to poor air quality could have significant health implications
Noise levels (Day time levels relevant to all sites, night time relevant to sites that include residential use)	<ul> <li>Wembley Growth Area</li> <li>Both Wembley High Road and Brent</li> <li>House and Elizabeth House are in areas where the maximum day time noise levels will not exceed 69db.</li> <li>The night time noise levels are not expected to exceed 59db.</li> <li>Church End Growth Area</li> <li>Chancel House is not expected to exceed 59db during the day and 49db during the night.</li> <li>Elsewhere in Brent</li> <li>The day time noise levels at the former Willesden Social Club and St Joseph's Court and Stonebridge</li> <li>Schools have an estimated maximum day time noise level of 64db and 54db respectively. The night time levels for the former Willesden Social Club and St. Joseph's Court are 54db.</li> </ul>	Development of any site should have regards to the noise levels in the vicinity of this site and also to the potential increase in noise levels as a result of the development.	Mitigation measures should be incorporated to new developments that may affect noise and vibration levels of existing or new residents. Noise and vibration levels should be an important factor in considering the appropriate use and design of the sites. Care should be taken not to expose additional residents to existing high levels noise pollution in order to avoid health and social implications.
Sites located in greenfield land	Wembley Growth Area Chesterfield House is located on a	The use of previously developed land and vacant	None identified

Key issues / criteria	Summary of Appraisal Findings	SA Comments	Mitigation and Enhancement
	brownfield site. Wembley High Road is most on brownfield land but there is some land on the site that is undeveloped. Brent House and Elizabeth House is located on an undeveloped site. <b>Church End Growth Area</b> Chancel House is on brownfield land. <b>Elsewhere in Brent</b> The former Willesden Social Club and St. Joseph's Court is located on brownfield land. Stonebridge Schools is on both greenfield and brownfield land.	or underused buildings should be optimised. The sites appear to respect this policy.	
Sites within contaminated land	<ul> <li>Wembley Growth Area</li> <li>Brent House and Elizabeth House may require remediation due to the presence of a petrol station.</li> <li>Wembley High Road is likely to require remediation, due to historic activities such as vehicle repairs.</li> <li>Chesterfield House does not require remediation.</li> <li>Church End Growth Area</li> <li>Chancel House does not require remediation.</li> <li>Elsewhere in Brent</li> <li>The former Willesden Social Club and St Joseph's Court may require remediation due to old building materials but the data is inconclusive to date. Stonebridge Schools does not require remediation.</li> </ul>	Policy seeks suitable remediation and re-use of contaminated land.	Possible contamination of sites should be investigated and remediation appropriate to the use of the site should be undertaken. This needs to be dealt with on a site by site basis.

# **APPENDIX 13**

# SA COMMENTS ON DRAFT SSA (NOVEMBER 2008)

# **Recommendations included in November 2008 SA Commentary and LB Brent Responses**

These comments were made on the draft SSA DPD, produced by LB Brent June 2008

SA Commentary November 2008	LB Brent Comments / Responses
Recommendations Overall Comments and Recommendations	
The Initial appraisal work has identified that the most common and significant potentially negative effect from the SSAs is the generation of traffic and travel need from additional development and/or changes of useWe recommend that the SSA text requires all proposed developments to assess transport impacts and demonstrate how traffic generation will be minimised, and to set out detailed provisions on how adequate public transport, walking and cycling infrastructure will be provided.	Text of this nature has been included in some allocations where it has been perceived to be an issue. Clearly, when proposals get to an application stage, transport impact assessments are required in relation to the nature and scale of proposals. Advice from transport planning colleagues suggests that "transport statements" are required for schemes of 50 or more units, and a "transport assessment" for 80 or more units. Officers feel that it may be inappropriate to apply a blanket coverage to all allocations, but fully recognise the impacts of traffic generation and mitigation that can be derived from applying appropriate parking standards and encouraging non car use. Outcome: do not include.
We recommend that the SSA text should identify potentially significant negative sustainability effects and require developments to identify potential negative impacts and demonstrate how they will be avoided or minimised	Having regard for the sustainability appraisal findings, where particular significant impacts are identifed the Council will consider how these can be incorporated in to allocation texts in time for submission to Secretary of State. Outcome: incorporate where possible and appropriate.
SSAs and Core Strategy Growth Area housing and ir	
Table 2 suggests that based on the number of homes likely to be delivered through the SSAs, the proposed increase in provision of GP services included in Core Strategy Growth Area policy targets would, overall, meet demand. However, the targets may be insufficient in relation to demand from new residential development in certain areas, in particular Wembley We recommend that targets for the provision of new GP services in the Core Strategy Growth Area policies are assigned using the same calculation / ratio used to ascertain implied demand for new GPs in the Growth Areas from population increases related to SSAs including residential development.	The calculation for new doctors is based upon a standard application of 1 new doctor for every 1500 new residents - the methodology for this is explained within the Infrastructure Investment Framework. In reality, the provision of services on the ground will need to be more sophisticated and delivered in partnership with the Primary Care Trust. For example, in some parts of the borough, some of the existing GPs are approaching retirement age. As developments come forward, officers will ensure that space is delivered with development for the required number of new doctors, at a price that the PCT can afford. Outcome: no change.
We also recommend that infrastructure targets included in the Core Strategy Growth Area policies (from the Infrastructure Investment Framework) are considered wherever appropriate in the Allocation text for all sites.	The relevant core policy for every growth area is replicated within the SSA document, outlining the infrastructure requirements for each growth area. It is methodologically possible to include information on the infrastructure demands derived from individual developments, we question the worth of this as in practice this will result in schemes requiring "0.12 doctors", for example. There is greater value in being able to flexibly plan on a growth area basis and be able to apply phasing for delivery in relation to new residential developments. The s106 standard charge and the forthcoming Community Infrastructure Levy will support the Council in accounting for infrastructure demands and meeting provision. Outcome: no change.
Issues specific comments - During the initial appraisal work the draft proposed SSAs have been	

SA Commentary November 2008 Recommendations	LB Brent Comments / Responses
considered against a number of sustainability criteria. The comments and recommendations below relate to criteria where our initial findings have identified specific recommendations for modifications to the SSA text on a specific site or collection of sites	
Flood risk	
The initial appraisal work indicates that part of Rest of Borough sites 2 – Garages and Barnhill Road is located in flood risk zone 2, but the that current draft text and "flood risk" notes do not include specific mention of the need for FRA. We recommend that for this site, the text on the site should include specific reference to the location of the site in a Flood zone 2 area, and the requirement for FRA.	Accepted. Outcome: This shall be reviewed and changed accordingly.
We recommend inclusion of text in all SSAs which encourages potential developers to draw on Brent's SFRA as well as seek advice from and consult the borough and the Environment Agency.	This is addressed within the Core Strategy supporting text, drawing upon the London Plan, requiring all developments over 1ha or within a flood zone to require a flood risk assessment. All site allocations have a section of text referring to flood risk, including text that flood zones are reviewed every quarter by the Environment Agency. Outcome: no change.
Other mitigation and enhancement requirements	
Allocations which will result in the loss of open space	
We recommend that in all cases where an allocation may result in a net loss to open space, appropriate conditions should require the provision of replacement open space, or where this is not possible enhancements to existing open space. Note that the London Plan includes a target of no net loss of open space, which we would recommend the borough follows as a minimum. <b>Allocations on sites in areas of open space deficience</b> We recommend that, where not already the case, contributions to new open, amenity and sports space should be sought as part of the development of all sites located in areas of open space deficiency. Developments should be required to demonstrate how they will contribute to meeting and reducing current open space deficiency. Supplementary planning guidance and other site or area specific guidance	There are a very small number of site allocations that may result in the loss of some private or public open space, or a play area. In all cases, the text refers to the need to make improvements to the accessibility or use of such space, or make off site improvements. Outcome: no change. Many parts of the borough are defined as being deficent in open space, including the growth areas. The Council recognises that further development could exacerbate this situation, but that the delivery of significant sections of new open space may be difficult to secure. Therefore the Council's intenetion is to support the creation of some new open spaces with improvements to the quality, accessibility and facilities
should also set out requirements for open space protection and provision.	within existing open spaces. The infrastructure investment framework has informed the process of calcultating the supply of open space in relation to the London Plan's standards. This is further reflected within the Core Strategy. Contributions for open space improvements are sought through the s106 standard charge (see SPD) and are likely to be sought from the forthcoming Community Infrastructure Levy. Outcome: no change.
Allocations on sites with poor Public Transport Acce	
We recommend that in all allocations on sites where access to public transport is poor, improvements should be provided as part of the development of a site or group of sites. A requirement for developments to demonstrate how this will be achieved, together with provision of walking and cycling infrastructure should be included in the Allocation, and / or "Notes" text on all sites where this is an issue.	Improvements are sought depending on the nature and scale of development. Growth Areas are generally accompanied by plans to make improvements to local public transport infrastructure including new or diverted bus services and station improvements - and the Council will work with partners at TFL and London Buses to plan for improvements. The infrastructure investment framework will detail public transport improvements, road improvements and new infrastructure for walking and cycling. In

SA Commentary November 2008 Recommendations	LB Brent Comments / Responses	
	some cases, particular reference is made to improvements within large Site Specific Allocations where public transport has been considered. Outcome: no change.	
Allocations on sites impacting on areas of nature co	nservation importance	
<ul> <li>The initial appraisal work has identified the following sites do not include text in draft Allocation text or "notes" requiring the protection or enhancement of the designated or protected sites they are located on or adjacent to:</li> <li>Wembley sites W7 – Chesterfield House and W9 – Wembley High Road are located adjacent to green chains</li> <li>Burnt Oak / Colindale site B/C1 – Oriental City is adjacent to an area of Nature Conservation Importance – Grade II.</li> <li>Rest of Borough site 22 – Roundtree Road is adjacent to site of Nature Conservation Importance – Grade I.</li> <li>Rest of Borough sites 4 – Dollis Hill House and 19 – Stonebridge Schools are adjacent to site of Nature Conservation Importance – Grade II.</li> <li>We recommend that the Allocation text for these, and all other sites on or adjacent to sites of nature conservation importance should require development proposals to demonstrate what measures will be taken to protect and enhance the nature conservation value.</li> </ul>	Accepted. Reference will be made to sites of Nature Conservation Importance within document. Outcome: This will be reviewed and changes made accordingly.	
Allocations on sites affecting listed buildings / conservation areas		
<ul> <li>Initial appraisal work has identified that the following sites do not include text in the draft Allocation or "notes" recognising or requiring protection of either an adjacent listed building or location in or adjacent to a conservation area:</li> <li>South Kilburn site SK5 – Kilburn Square is located close to a listed building.</li> <li>Rest of the borough sites 9 – Harlesden Plaza and 28 – Queens Parade are partly or wholly within a conservation area.</li> <li>Rest of the borough sites 11 – Manor Park Road is adjacent to a conservation area.</li> <li>We recommend that text is included in the Allocations in relation to these sites to recognise the potential impact of development on either listed buildings or conservation areas, and require potential developments to demonstrate how this impact will be avoided or minimised, and the setting of listed buildings and conservation areas</li> </ul>	Accepted. Reference will be made to sites within conservation areas or that impact upon listed buildings. Outcome: This will be reviewed and changes made accordingly.	
Allocations on sites within areas of low townscape of	uality	
We recommend that the Allocation text for sites in areas of low townscape quality should seek to ensure public realm improvements to their area, for example through reference to proposed Public Realm Strategies. Area or site design guidance, where proposed, should seek to coordinate public realm improvements.	The design quality of any development will be expected to contribute to townscape and urban design improvements. Furthermore, where sites are within an identified growth area, they are likely to be addressed by wider guidance, such as the Wembley Master Plan, that will require comprehensive public realm strategies. Furthermore, there are place making policies within the	

SA Commentary November 2008	LB Brent Comments / Responses	
Recommendations	core strategy Outcome: no change	
core strategy. Outcome: no change. Allocations on sites within or adjacent to Metropolitan Open Land (MOL) boundary		
<ul> <li>The initial appraisal work has identified that the following sites are within or adjacent to an MOL boundary but do not include text in the draft Allocation or "notes" recognising this.</li> <li>Rest of borough site 4 – Dollis Hill House is within an existing MOL boundary.</li> <li>Rest of borough site 15 – Northwick Park Hospital is adjacent to an existing MOL boundary.</li> <li>We recommend that Allocation text for all sites which could affect MOL includes a requirement for development proposals to demonstrate how the will maintain and protect the quality and character of MOL.</li> </ul>	Accepted. Reference will be made to sites within or adjacent to MOL. Outcome: This will be reviewed and changes made accordingly.	
Allegations on sites within an AOMA		
Allocations on sites within an AQMA		
We recommend that for all sites within and AQMA, the Allocation text should include a requirement for development proposals to incorporate adaptation measures to protect the indoor environment from poor external air quality and to demonstrate that they will include adequate mitigation measures so as not to exacerbate existing poor air quality. This will particularly be the case for sensitive uses, such as health, education and housing.	Much of the south of the borough is within AQMA and this is referred to within the Core Strategy. London Plan policy 4A.19 "Improving Air Quality" requires that measures are taken at application stage. Including further text within the SSAs could be duplication. Outcome: No change.	
Allocations on sites with exposure to high noise leve	ls	
We recommend that for all sensitive (e.g. housing, health, education) sites exposed to high levels of day time noise Allocation text should require development proposals to demonstrate how mitigation measures will be incorporated to protect residents and users from noise pollution, and to ensure that new development does not exacerbate existing noise levels.	Clearly within London, nearly all development, particularly for sensetive uses will require consideration of noise pollution. London Plan policy 4A.20 <i>Reducing Noise and Enhancing Soundscapes</i> provides for addressing noise pollution. Forthcoming Development Policies DPD will also address noise pollution. Outcome: no change.	
Allocations on sites located on Greenfield land (not	previously developed)	
<ul> <li>The initial appraisal work has identified that two sites are located on Greenfield land. These are:</li> <li>Wembley site W2 – Former London Transport Sports Ground.</li> <li>Church End site CE3 – Mayo Road and St Mary's Open Space.</li> <li>The draft Allocation text for these sites recognises the Greenfield status of the sites.</li> <li>From a sustainability perspective we would encourage the allocation of sites to avoid any impact on open and greenspace in the borough. In the case of these two sites the Allocation text does seek to improve access and quality of open space and this is welcomed.</li> </ul>	No change	
Allocations on sites at risk of land contamination		
Reflecting the nature of previous land-use in much of the borough, a large number of sites are located on land that has a risk of contamination. In all cases investigation and, where contamination is identified remediation, will be required before redevelopment can occur. The current draft Allocations text does not generally	This information would arise from screening opinions and scoping reports of the EIA process. Considering that there is no scientific analysis of land contamination completed in the preperation of the Site Specific Allocations, this would be difficult to incorporate. Outcome: no change.	

SA Commentary November 2008 Recommendations	LB Brent Comments / Responses
identify whether sites are considered likely to require investigation and potential remediation. We recommend that for all sites potentially requiring remediation, the Allocation text should state that investigation and where appropriate remediation will be required before development can occur.	