Sustainability Appraisal of London Borough of Brent's Local Development Framework

Pre-Submission Core Strategy

Commentary on the informal consultation draft

August 2008

Prepared for London Borough of Brent
by
Collingwood Environmental Planning

CONTENTS

APPENDICES

TABLES

ABBREVIATIONS

AQMA	Air Quality Management Area
CEP	Collingwood Environmental Planning
CHP	Combined Heat and Power
DC	Development Control
DCLG	Department of Communities and Local Government
DPD	Development Plan Documents
EiP	Examination in Public
LBB	London Borough of Brent
LDD	Local Development Documents
LDF	Local Development Framework
LIP	Local Implementation Plan
NCR	North Circular Road
ODPM	Office of the Deputy Prime Minister
PAS	Planning Advisory Service
PPS	Planning Policy Statement
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UDP	Unitary Development Plan

1. BACKGROUND

Purpose of this report

1.1   The purpose of this report is to provide an initial commentary and recommendations, from a sustainability perspective, on the London Borough of Brent's (LBB's) evolving Core Strategy Development Plan Document (DPD) and the policies contained within it. This report has been drafted to accompany the "informal consultation" being conducted by LBB on a pre-Submission version of the Core Strategy[1]. It also aims to provide LBB's planning policy officers with initial views of the team responsible for the Sustainability Appraisal (SA) on the evolving revised draft prior to the completion of formal appraisal on the Submission version which is likely to be completed by October 2008.

1.2   The Core Strategy is one of two DPDs being prepared by LBB as part of their Local Development Framework (LDF). A separate SA Commentary has also been prepared for a pre-Submission version of the Site Specific Allocations (SSA) DPD. The background to and reason for the revision of these two DPDs which were both previously Submitted but subsequently withdrawn is described under **Context and background to this report**, below.

1.3   In addition, LBB also previously produced a suite of policies for the management of development within a Preferred options version of a Development Polices DPD (June 2007). However this DPD is not being progressed at present until the Core Strategy is finalised.

Context and background to this report

1.4   In November 2007 Brent submitted its Core Strategy DPD and SSA DPD to the Secretary of State, with the intention of proceeding to an Examination in Public (EiP) in May 2008. The Submission versions of these DPDs were accompanied by SA Reports, prepared by Collingwood Environmental Planning (CEP) in association with LBB, which comprised full SA Reports on the Preferred Options versions with an Annex detailing the appraisal of the changes between the Preferred Options and Submission stages.

1.5   Although they were submitted together, the draft Core Strategy and SSA DPDs were developed over different timescales. Due to this, and the different appraisal methods adopted, separate SA Reports were originally developed for each. The SA Report on the Preferred Options version of the Core Strategy DPD was completed in October 2006, and the SA Report on the Preferred Options version of the SSA DPD was completed in June 2007. The June 2007 SA Report also included an appraisal of the

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[1] Note that the version of the pre-Submission Core Strategy DPD considered within this commentary was the version made available to CEP on 29th July 2008

Preferred Options version of the Development Control Policies DPD. The additional SA Annex was produced by LBB in November 2007 and covered final alterations made to the Submission versions of both the Core Strategy and the SSA DPDs.

1.6 Prior to the proposed EiP the appointed Inspector prepared a "preliminary note" and requested an "exploratory" meeting with LBB to discuss certain concerns he had about the soundness of the Core Strategy, and to explore the options for progress. Following this meeting, LBB asked the Secretary of State to withdraw the Core Strategy and SSA DPD's, and this was agreed[2].

1.7 The Council is now in the process of making revisions to the Core Strategy and SSA DPDs. In response to the Inspector's concerns, and in line with requirements of the new PPS12[3], the revised DPDs will seek to map out implementation in more detail and provide a more "Brent" focus to the overall spatial strategy and policies for the borough. Given the level of consultation on earlier versions of the Core Strategy, and in line with recommendations set out in PPS12 that the scale of consultation "should be proportionate", the intention is to consult with the public on the Submission versions of the Core Strategy and SSA DPDs towards the end of 2008, in order to hold the EiP early in 2009.

1.8 The changes being made to the Core Strategy DPD, and the SSA DPD are considered to be of a significant nature and it has been decided that the revised DPDs should be accompanied by a new SA Report. This SA commentary is therefore the first output of the ongoing SA of the pre-Submission Core Strategy DPD. As noted a separate commentary has been prepared for the pre-Submission SSA DPD. Where appropriate this SA will draw on the previous SA Reports and processes.

1.9 The SA methodology is expanded upon in Section 2 below.

Contents of this report

1.10 Following this section, **Section 2** of this report sets out a brief introduction to the background and SA methodology. The intention is that this provides sufficient information to those who are new to the LDF and SA processes.

1.11 **Section 3** of this report describes the key differences between the previous Submission Core Strategy (November 2007) and the current pre-Submission version of the Core Strategy (August 2008).

1.12 Sections 4 and 5 provide a commentary on the pre-Submission Core Strategy. **Section 4** sets out comments on the 'Spatial Vision' and 'Spatial Strategy' for Brent (chapters 4 and 5 of the pre-Submission Core Strategy respectively). **Section 5** sets

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[2] The Inspector's preliminary note and related documents, as well as a more complete description of the developments leading to the drafting of revisions to the Core Strategy and SSAs, are available through the LBB website: http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-160.

out comments on the Local Cross Cutting policies (chapter 6 of the pre-Submission Core Strategy). These sections are structured to follow the contents of the pre-Submission Core Strategy. In each case the commentary us based around three elements:

- Summary comments at the level of each grouping of policies (e.g. Housing, Urban Design), drawing on the previous SA Report (October 2006), and SA Annex (November 2007) to provide a short overall commentary on the sustainability implications of each set of policies based on the policies in the November 2007 Submission Core Strategy. Where policies are entirely new this stated in the text.

- Comments setting out if, and in which ways, the revised and new policies impact upon the overall sustainability assessment.

- Specific recommendations are then provided on a policy by policy basis for those policies which are new or significantly revised between the November 2007 Submission Core Strategy and the August 2008 pre-Submission Core Strategy. As noted, the key differences between the two documents are set out in Section 3.

1.13   **Section 6** provides a short summary of the next steps in the SA process.

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[3] http://www.communities.gov.uk/planningandbuilding/planning/regionallocal/localdevelopmentframeworks/pps12/

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2. SUSTAINABILITY APPRAISAL METHOD

Sustainability Appraisal of Development Plan Documents

2.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA will consider the DPD's implications, from a social, economic and environmental perspective, by assessing options and the revised draft DPDs against available baseline data and sustainability objectives.

2.2 SA is mandatory for Local Development Documents (LDDs) under the requirements of the Planning and Compulsory Purchase Act (2004)[4], which includes DPDs. Article 19 (5) states that the local planning authority must also "(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal". The Act also requires that SA is an integral part of the LDF production process.

2.3 Planning Policy Statement (PPS) 12: Local Spatial Planning (DCLG, 2008[5]) states (paragraph 4.43) that "*the Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.*" PPS12 also set out more flexible consultation procedures for Local Authorities in relation to LDDs.

2.4 The Government's guidance on Strategic Environmental Assessment (SEA)[6] indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004[7] – the SEA Regulations.

2.5 In November 2005 the Government published guidance entitled *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents[8]*. While SEA and SA are distinct processes, the SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.

2.6 The guidance advocates a five stage process to undertaking SA, with each stage are dived into a number of tasks:

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[4] http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs
[5] http://www.communities.gov.uk/planningandbuilding/planning/regionallocal/localdevelopmentframeworks/pps12/
[6] ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.
[7] Statutory Instrument 2004 No. 1633.
[8] ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

- Stage B: Developing and refining options.

- Stage C: Appraising the effects of the preferred options.

- Stage D: Consultation on the preferred options and SA Report.

- Stage E: Monitoring implementation of the DPDs.

2.7   The SA process is illustrated in Table 1. This also includes comments on how these relate to the SA of the revised DPDs.

2.8   Since the publication of the official Government guidance in 2005, a considerable amount of good practice documentation and other guidance has been developed by a wide range of organisations[9], and this SA will seek to reflect best practice in SA of DPDs as appropriate.

Introduction to proposed Sustainability Appraisal method

2.9   The SA process for the revised Brent DPDs will follow the SA process set out in Government guidance.   However this will be adapted to reflect the particular circumstances of this appraisal. As noted in Section 1, the SA of the pre-Submission DPDs follows on from the large amount of SA work completed in the preparation of the previous Submission versions of the DPDs, including the development of and consultation on a single SA Scoping Report (June 2005) and two SA Reports, one to accompany the Preferred Options Core Strategy DPD (October 2006), and the other to accompany the Preferred Options Development Control Policies and SSA DPDs (June 2007). In addition LBB produced an SA Annex in November 2007 in response to late alterations between the Preferred Options and Submission versions of the DPDs.

2.10   The SA of the revised DPDs will draw on the findings of and use as much as is appropriate the outcomes of this previous appraisal work. For example, it is not intended to produce a new Scoping Report, rather, the collation and analysis of baseline context which was prepared for the previous Scoping Report in 2005, updated in 2006 and again in 2007 will remain largely relevant, requiring only to be updated, once more, to reflect new data available, such as that through the latest Brent Annual Monitoring Report (2006 - 07). Similarly the appraisal objectives and framework set out in the previous Scoping Report and SA Reports are expected to remain largely unchanged, with modifications only where key new data and/or sustainability issues have arisen.

2.11   Whereas previously two SA Reports were prepared due to the divergent timescales in the drafting of the DPDs, it is intended that, as the DPD revisions are being

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[9] For example: Planning Advisory Service (PAS) December 2007 – Local Development Frameworks: Guidance on Sustainability Appraisal. http://www.pas.gov.uk/pas/aio/51863

progressed simultaneously, one combined SA Report will be produced to include the SAs of the both the Submission versions of the Core Strategy and SSA DPDs. These will be included in separate parts within the SA Report, with a third part detailing the sustainability context and evidence base which supports both appraisals.

Proposed programme

2.12   The SA of the revised DPDs is to be carried out simultaneously with LBB's work on the DPDs. This commentary and recommendations, and that on the revisions to the SSA DPD, represent the first step towards the formal appraisal of the Submission version of the Core Strategy and SSA DPDs. More detailed appraisal, including the completion of appraisal matrices to record the potential performance of policies against sustainability objectives for new and revised policies and revisions to appraisal matrices from the previous SA Report for policies which are unchanged or subject to minor modifications, will be undertaken prior to the formal consultation on the Submission version on the Core Strategy, which is expected to take place late 2008 or early 2009. This consultation will be accompanied by a combined SA Report for the Submission Core Strategy DPD and the Submission SSA DPD.

2.13   This commentary is intended to accompany informal consultation between 4th August and 15th September 2008 with selected stakeholders by LBB alongside a pre-Submission version of the Core Strategy DPD.

2.14   Following this commentary a draft combined SA Report will be produced, by end October 2008, which is intended to accompany a final draft of the Submission versions of the Core Strategy and SSA DPD to be considered by the LBB Planning Committee and Executive in November 2008. In the light of this, revisions may be made to both the DPDs and the SA Report prior to formal consultation and submission to the Secretary of State in early 2009.

Table 1: Proposed Sustainability Appraisal stages and tasks

DPD Pre-Production	Comments on SA of revised Submission DPDs
SA Stage A: Setting the context & objectives, establishing the baseline & deciding on the scope	Included in SA Scoping Report (June 2005), with information updated for the SA Reports on the Core Strategy and Development Policies and SSA October 2006 and June 2007respectively.
Tasks	
• Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the DPDs **(Task A1)**	
• Collect relevant social, environmental and economic baseline information and produce characterisation of the DPD area **(Task A2)**	Information, including baseline, plan and programme review and issues to be reviewed and updated as appropriate in light of any new data and information available since June 2007, and included in new SA Report (proposed October 2008).
• Identify key sustainability issues for the SA to address **(Task A3)**	
• Develop the SA framework, including defining the sustainability objectives, indicators and targets **(Task A4)**	
• Produce Scoping Report and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible solutions **(Task A5)**	Consultation bodies to be updated via the SA Commentary (August 2008).
DPD Production	
SA Stage B: Developing and refining options	Included in previous SA Reports (October 2006, June 2007) plus Annex (November 2007).
Tasks	
• Test the DPD objectives against the sustainability objectives **(Task B1)**	
• Develop the DPD options **(Task B2)**	
• Predicting the effects of the DPD including options **(Task B3)**	To be reviewed (e.g. for revised Core Strategy DPD Objectives), updated as appropriate and included in new SA Report (proposed October 2008). This Commentary Report presents initial work on tasks B3 – B5.
• Evaluating the effects of the DPD including options **(Task B4)**	
• Mitigating adverse effects and maximising beneficial effects **(Task B5)**	
• Proposing measures to monitor the significant effects of the DPDs implementation **(Task B6)**	
SA Stage C: Preparing the SA Report	Revised SA Report to be prepared for the Submission Core Strategy and SSA DPDs (proposed October 2008)
Tasks	
• Preparing the SA Report **(Task C1)**	
SA Stage D: Consultation on the draft DPD and SA Report	Consultation on the Submission DPDs and the SA Report is expected late 2008 or early 2009.
Tasks	
• Public Participation on the draft DPD and SA Report **(Task D1)**	
• Assessing the significant changes **(Task D2)**	
DPD Examination	
Tasks	
• Submission of DPD, Pre-Submission Consultation Statement and SA Report to Secretary of State	
• Assessing significant changes made as a result of representations, if necessary **(Task D2 cont.)**	
DPD Adoption and monitoring	
Tasks	
• Make the DPD and SA Report available for public viewing and produce an adoption statement	
• Making decisions and providing information **(Task D3)**	
SA Stage E: Monitoring implementation of the DPDs	
Tasks	
• Developing aims and methods for monitoring **(Task E1)**	
• Publishing results of monitoring the sustainability effects of the DPD in the annual monitoring reports as new information becomes available	
• Responding to adverse effects **(Task E2)**	

3.   CHANGES   TO   THE   PRE-SUBMISSION   CORE STRATEGY

Introduction

3.1   As noted in Section 1 above, LBB prepared and submitted Core Strategy and SSA DPDs to the Secretary of State in November 2007. However following a preliminary review by, and meeting with the appointed Inspector, LBB asked the Secretary of State to withdraw the DPDs, and this was agreed. The withdrawal was permitted to enable LBB to prepare a revised Core Strategy DPD (and SSA DPD) to respond to specific concerns raised by the Inspector in his "preliminary note"[10], and to allow the new Core Strategy to reflect revised guidance for preparing Local Development Frameworks included in the new PPS12 (June 2008).

Overview of changes to the pre-Submission Core Strategy

3.2   Table 2 compares the policies included in the November 2007 Submission Core Strategy with those in the pre-Submission Core Strategy (version dated 29th July 2008)[11]. Changes have also been made in a number of cases to the supporting text included within the Core Strategy document, to reflect the policy changes.

3.3   Through mergers with other policies, and deletions, the number of policies has been reduced from 39 policies in the November 2007 Submission Core Strategy, to 25 in the pre-Submission Core Strategy. The majority of deletions have been made to minimise the repetition of national guidance or policies in the London Plan.

3.4   There are eight entirely new policies, all within the Spatial Strategy for Brent section. These include a new policy on Placemaking, and a series of area-specific policies. These have been introduced to provide the Core Strategy with a greater "Brent" focus, and to give a clearer indication of how and where, spatially, change is expected.

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[10] The note can be accessed at: http://www.brent.gov.uk/tps.nsf/Files/LBBA-73/$FILE/Preliminary%20Note%20for%20Exploratory%20Meeting%20encl.2.pdf
[11] Note that throughout this commentary where the "pre-Submission Core Strategy" is referred to it is this version i.e. the version CEP received on 29th July 2008.

Table 2: Comparison of November 2007 Submission draft Core Strategy and July 29th 2008 pre-Submission Core Strategy DPD

Submission Core Strategy (November 2007)	Pre-Submission Core Strategy (29th July 2008)	Notes on changes
Introduction	*Introduction*	No significant change
Brent context	*Brent context*	No significant change
Planning policy context	*Planning policy context*	No significant change
Spatial vision for Brent	*Spatial vision for Brent*	The Core Strategy Objectives have been amended and added too.
Spatial strategy for Brent	*Spatial strategy for Brent*	
CP SS 1 - Key Principles For Development	Deleted	
CP SS 2 - Population and Housing Growth	CP1 – Population and Housing Growth	Housing growth has been divided by the 5 key growth areas.
CP SS 3 - Focus for Growth	Deleted.	The list of growth areas is now in CP1.
CP SS 4 - Commercial Regeneration	CP2 – Commercial Regeneration	Policy text slightly amended.
	CP3 – North West London Co-ordination Corridor	New policy and supporting text.
	CP4 – Placemaking	New policy and supporting text.
CP SS 5 - Wembley as a Focus for Growth	CP5.- Wembley	Amended policy text and new supporting text. Inclusion of targets.
	CP6 - Alperton	New policy and supporting text. Targets included under this policy.
	CP7 – Burnt Oak / Colindale	New policy and supporting text. Targets included under this policy.
	CP8 – South Kilburn	New policy and supporting text. Targets included under this policy.
	CP9 – Church End	New policy and supporting text. Targets included under this policy.
	CP10 – Park Royal	New policy and supporting text. Targets included under this policy.
	CP11 – North Circular Road Improvement Area	New policy and supporting text.
CP SS 6 - Infrastructure to Support Development	CP12 – Infrastructure to Support Development	Amended policy text. Inclusion of targets. Large amount of new supporting text, setting out different infrastructure needs: transport; open space and sport; community facilities; social; utilities.
CP SS 7 - Sustainable Communities	Deleted.	
CP SS 8 - Meeting Local Community Needs	Policy merged into CP12.	Part of CP SS8 about the Council's intention to carry out a Local Need Assessment of key growth areas has been merged into CP12.
CP SS 9 - Protecting and Enhancing the Natural and Built Environment	CP13 – Protecting and Enhancing the Suburban Character of Brent.	Policy modified to focus on Brent's suburban character.
CP SS 10 - Implementation	Deleted.	
Core Policies	*Local Cross-Cutting Policies*	
Promoting a Quality Environment	*Environmental Quality*	
A Better Townscape – By Design	A Better Townscape – By Design	

Submission Core Strategy (November 2007)	Pre-Submission Core Strategy (29th July 2008)	Notes on changes
CP UD 1 - Spatial Design Strategy Priority Enhancement Areas	CP14 – Spatial Design Strategy	Policy text amended.
CP UD 2 - Tall Buildings	Merged / deleted	First half of tall buildings policy text has been merged into appropriate area policies in the Spatial Strategy. Remainder deleted.
CP UD 3 - Design Quality Protocol	Deleted.	Policy deleted, supporting text unchanged.
Towards a Sustainable Brent, 2020	Towards a Sustainable Brent, 2020	
CP SD 1 - Sustainable Design & Construction - Mitigation	CP15- Sustainable Design and Construction – Mitigation & Adaptation.	Policy text amended.
CP SD 2 - Brent Strategic Climate Mitigation Measures	CP16 – Brent Strategic Climate Mitigation and Adaptation Measures.	Policy and supporting text amended.
Environmental Protection	Protecting and Enhancing Brent's Environment	
CP ENV 1 - Climate Change Adaptation	Merged into CP16.	
CP ENV 2 - Protecting & Enhancing Brent's Environment	Deleted.	Policy deleted, supporting text amended.
Enhancing Open Space and Biodiversity	Enhancing Open Space and Biodiversity	
CP OS 1 - Protection and Enhancement of Open Space and Biodiversity	CP17 - Protection and Enhancement of Open Space and Biodiversity	Policy amended.
CP OS 2 - Promotion of Biodiversity and Nature Conservation	Policy merged into CP17.	
Dealing with Waste	Dealing with Waste	
CP W 1 - Sustainable Waste Management	CP18 – Sustainable Waste Management	Policy amended.
Meeting Housing Needs	*Planning for More and Better Housing*	
Planning for More and Better Housing		
CP H 1 - Housing Provision	Deleted.	
CP H 2 - Sustainable Housing Development	Deleted.	
CP H 3 - A Balanced Housing Stock	C19 – A Balanced Housing Stock.	Policy amended. New supporting text included. Housing figures modified.
CP H 4 - Affordable Housing Provision	Deleted.	
Connecting Places		
CP TRN 1 - Prioritising Investment	Deleted.	
CP TRN 2 - Reducing the Need to Travel	Deleted.	
CP TRN 3 - Parking & Traffic Restraint	Deleted.	
CP TRN4 – Transport Links in London	Deleted	

Submission Core Strategy (November 2007)	Pre-Submission Core Strategy (29th July 2008)	Notes on changes
A Strong Local Economy	*A Strong Local Economy*	
Business Industry and Warehousing	Business Industry and Warehousing	
CP BIW 1 - Strategic Employment Areas and Borough Employment Areas	CP20 – Strategic Employment Areas and Borough Employment Areas.	Amended policy text. New supporting text.
CP BIW 2 - Office Development	Merged into CP20	
CP BIW 3 - Principles of business, industrial and warehousing development	Deleted.	
CP BIW 4 - Regeneration of Designated Employment Areas	CP21 – Regeneration of Designated Employment Areas.	Policy content remains unchanged.
Town Centres and Shopping	Town Centres and Shopping	
CP TC 1 - Network of Town Centres	No longer a policy.	Policy text has been maintained, but considered a general statement rather than a policy. Policy reference deleted.
CP TC 2 - Brent Retail Need Allocations & Town Centre Opportunity Sites	CP22- Brent Retail Need Allocations	Minor policy amendment.
CP TC 3 - Principal Retail Location	CP23 – Town Centres and the Sequential Approach to Development	Some policy TC3 text merged into a new policy. Supporting text amended.
CP TC 4 - Preferred Locations	Deleted.	
CP TC 5 - Exceptional Locations	Deleted.	
Culture, Sport and Tourism	Culture, Sport and Tourism	
CP CST 1 - Promoting Culture, Sport and Tourism	CP24 – Promoting Culture, Sport and Tourism	Policy amended.
Enabling Community Facilities		
	Protecting Community Facilities	
CP CF 1 - Meeting the needs of the Community	CP25 – Protection of Community Facilities	Policy amended.

4.   COMMENTARY ON SPATIAL VISION AND STRATEGY

4.1   This section provides comments on the 'Spatial Vision' and 'Spatial Strategy' for Brent (chapters 4 and 5 of the pre-Submission Core Strategy respectively).   The comments relate to the text and policies in the pre-Submission Core Strategy, however they draw upon previous SA findings, in particular the SA Report on the Draft Preferred Options Core Strategy (October 2006), and the SA Annex Report (November 2007), which were prepared to accompany the previous Submission Core Strategy (November 2007).

4.2   As with the previous SA commentary (July 2006) the focus of this commentary is on making general recommendations to improve the sustainability performance of the document based on an initial review of each policy, and accompanying supporting text.   The more detailed appraisal work which will follow over the coming months will provide a more rigorous appraisal of the policies against sustainability objectives.

General comments on the Spatial Vision and Strategy

4.3   The Spatial Vision for Brent is unchanged in the pre-Submission Core Strategy. However, the Core Strategy Objectives have been amended.   Previously 14 in number, there are now 12 Objectives in the pre-Submission Core Strategy.

4.4   Three objectives have been deleted from the previous Submission Core Strategy:

- Securing Sustainable Development Best Practices

- Regenerating Areas Important to London as a Whole

- Protecting, Providing and Enhancing Open Space and Biodiversity, promoting Sport and other Recreational Activities.

4.5   One objective is entirely new in the pre-Submission Core Strategy:

- Regenerating Run-down Parts of the Borough

4.6   The remaining objectives are largely the same, but their delivery text has in all cases been amended in the pre-Submission Core Strategy to provide greater detail on how they are to be achieved, and provide more specificity on which parts of the Borough are to be the main focus of intervention and change.   Removal of text "recognising that car usage is important to many people and that it be planned for accordingly" from Objective 3 – Reducing the Need to Travel and Improved Transport Choices is welcomed, as this gave explicit endorsement to allowing provision for increased car travel in the Borough.

4.7   The modifications to the objectives are generally expected to be very positive from a sustainability perspective.   The deleted objectives are all either to avoid duplication with the London Plan, or are reflected in the modifications to the remaining objectives

and these changes do not significantly modify previous SA Report conclusions. As part of the ongoing SA work between now and Submission of the Core Strategy the SA will include a re-assessment of the compatibility of the Core Strategy Objectives against the SA Objectives.

4.8   As indicated by Table 2 above, the Spatial Strategy has been substantially amended, with a much stronger focus on area specific policy, rather than the broader, and more generic guiding principles for development which were at the centre of the previous Submission Core Strategy Spatial Strategy.

4.9   Previous policies CP SS1 – Key Principles for Development, and CP SS7 – Sustainable Communities, have been deleted. Much of the content of these policies is reflected in the new area specific policies (CP5 to CP10), however certain aspects of previous policy CP SS7 have not been carried over into the pre-Submission Core Strategy, particularly those relating to environmental constraints (e.g. flood risk, air and noise pollution), and resource use (natural resources, energy, water and waste generation). Equally the need for green-networks, the value blue ribbon network and the need to enhance the value of Brent's rivers and waterbodies is no longer explicitly recognised. These aspects performed well against environmental objectives in the previous SA, however it is understood that they have been removed because they were considered a duplication of environmental policies in the London Plan.

4.10   In addition, previous policy CP SS9 – Protecting and Enhancing the Natural and Built Environment, has been amended to focus on the suburban character of Brent. The revised pre-Submission Core Strategy policy is entitled CP13 – Protecting and Enhancing the Suburban Character of Brent.

4.11   The proposed overall housing and population growth remains the same in the pre-Submission Core Strategy, however the new Spatial Strategy includes a number of entirely new policies, a general policy setting out principals for "Placemaking", and a policies relating to each of the Key Locations for Regeneration and Growth:

- Alperton; Burnt Oak/Colindale;

- South Kilburn;

- Church End;

- Park Royal; and

- North Circular Road Improvement Area.

4.12   The pre-Submission Core Strategy also includes much more detailed supporting text concerning Infrastructure to Support Development, sub-divided by:

- Transport infrastructure;

- Open space and sport;

- Community facilities;

- Social infrastructure; and

- Utilities infrastructure.

4.13 The Spatial Vision and Strategy are expected overall to have beneficial effects, particularly against social and economic objectives. As noted some specifically environmental policy criteria have been deleted in the pre-Submission Core Strategy to avoid duplication of policies in the London Plan. The focus of the Spatial Strategy is now predominantly on harnessing growth to achieve regeneration objectives and providing the policy direction to promote and guide location to key locations in the Borough.

4.14 The scale of development and change set out in the Core Strategy is likely to give rise to adverse environmental impacts and paragraph 5.5 notes that "there will be increased use of resources and pressure on the environment generally". While the Spatial Strategy no longer addresses these issues directly, minimising the impact of development in terms of resource use, greenhouse gas emissions and waste generation are key policy aims of Local Cross Cutting Policies CP15 – CP18, and as noted, are also one of the key policy areas addressed in the London Plan.

4.15 Environmental constraints, particularly flood risk, accounting for climate change are also addressed in the Local Cross-Cutting Policies (CP15 / CP16), and included in the London Plan, hence their omission for the Spatial Strategy is considered appropriate and .acceptable from a sustainability perspective.

4.16 The greater policy focus on specific areas in the pre-Submission Core Strategy is in response to comments from the appointed Inspector advising that the Core Strategy should provide a more "Brent" relevant strategic framework. From a sustainability perspective, focussing employment and housing development in the most accessible areas will create a more sustainable pattern of development. Policy CP13 seeking to protect the suburban character of Brent, together with the Local Cross-Cutting Policies should provide a sufficient level of policy direction to ensure that development across the Borough is in line with the pre-Submission Core Strategy objectives.

4.17 Specific recommendations on the Spatial Vision, Objectives and Spatial Strategy:

- The use of the terms "sustainable" or "sustainable development", for example "sustainable" in the Spatial Vision – "Brent is a dynamic and sustainable area", "sustainable development" in the first objective – "Achieving Sustainable Development" and "sustainable" in Policy CP5 - "a new sustainable community", should not be used without clarifications to explain what they mean in the context of how they are being used and what the definition of sustainable development is in the context of Brent. By including these terms in policy or objectives it does not automatically make them perform well against the SA objectives and

     inevitably the best that will be achieved will be a trade-off between different aspects of sustainability rather than fully achieving "sustainable development" which should be presented as an aspiration to work towards.

- We recommend that an alternative term to "run-down parts" of the Borough is used in Objective 2. This term does not provide a positive image of these parts of the borough and this objective could be presented in a positive light, for example "Realising the potential of those parts of the borough which would benefit from regeneration". It would be useful to also clarify which parts of the borough this objective relates to.

- Consider including full references to other locally relevant guidance / planning documents referred to in the Spatial Strategy (for example reference to the Park Royal draft Development Framework in supporting text to Policy CP4, and the South Kilburn SPD, referred to in supporting text to Policy CP8).

- Consider inclusion of specific text relating to the need for employment opportunities to be linked with local skill enhancements. Although it remains in supporting text to Policy CP20, the deletion of training / employment requirement from previous Policy CP BIW3 makes this particularly relevant.

Policy specific comments and recommendations on the Spatial Strategy

Policy CP 1- Population and Housing Growth

Policy CP 1- Population and Housing Growth
The Borough will plan for a population growth of up to 28,000 people by 2017. The provision of over 11,200 additional homes (including 1,030 re-occupied vacant homes) will be sought between 2007 and 2017. The Borough will aim to achieve the London Plan target that 50% of new homes should be affordable. Over 85% of the new homes will be delivered in the growth areas with the following minimum targets: - Wembley 5,000 - South Kilburn 1,500 - Church End 800 - Alperton 1,600 - Colindale 1,000 The Council will also promote additional housing as part of mixed use development in town centres where public transport access is good.

4.18   Policy CP1, represents a merger of previous Submission Core Strategy (November 2007) policies CP SS2 and CP SS3, however it differs in three key ways:

- the inclusion of the re-occupation of vacant homes within the policy housing growth provision (which previously was only included in supporting text);

- the statement that 85% of housing provision will be in the growth areas along with a break down of housing numbers by growth area; and

- the statement that additional housing will be promoted in town centres where public transport access is good.

4.19 The SA Report on the Preferred Options Core Strategy (October 2006) concluded that policies CPSS2 and CPSS3 were generally positive in terms of achieving social and economic objectives, but it pointed out that there could be potentially significant negative environmental impacts, due to the implications of construction, population increase and the associate consumption of materials, travel needs, waste, water and energy requirements / creation this implies. These overall conclusions are equally applicable to policy CP1 in the pre-Submission Core Strategy. However, it is acknowledged that the level of additional homes is dictated by the London Plan and therefore the option of avoiding the negative environmental effects by simply reducing housing numbers is not open to the Borough. The only option available is therefore to try to mitigate these negative effects as far as is possible. The achievement of positive social and economic effects will be dependant on regeneration impacts being suitable and accessible to local people.

4.20 In the pre-Submission Core Strategy, the inclusion of a reference to re-occupied vacant homes within the additional homes figure in the policy itself (this figure previously only appeared in supporting text) is welcomed from a sustainability perspective, as bringing currently unused residential space back into use, as a priority, is considered positive in terms of meeting social objectives with less potential environmental and resource use impacts than new development.

4.21 Recognition of the fact that the level of development proposed will generate waste, increase resource use and put pressure on the environment generally is included in the supporting text to policy CP1. This is welcomed, however the scale of growth is likely to cause negative effects even where it is mitigated. The deletion of policy CP SS7 means that a number of specific environmental criteria have been removed from the Spatial Strategy in the pre-Submission Core Strategy. This deletion has been made to avoid duplication of environmental policies set out in the London Plan, and these issues are also covered by the Local Cross-Cutting Policies, particularly CP15, CP16 and CP17.

4.22 The identification of specific housing provision by growth area is recognised as providing a clearer indication of how and where the growth aims will be delivered in the Borough. Focussing development (housing and employment) in those areas with best public transport accessibility is the preferred spatial option from a sustainability perspective, and that 85% of new homes are to be delivered in growth areas, and additional housing 'promoted', as part of mixed used development in town centres where public transport access is 'good' is welcomed.

4.23 Specific recommendations on Policy CP1:

- As stated in Policy CP1, the London Plan sets a strategic target of 50% affordable homes provision which the borough will also aim to achieve. The

London Plan (Policy 3A.9) also states that DPD policies should set an overall target appropriate to the local area, based on an assessment of local needs and a realistic assessment of supply. Supporting text in the London Plan (paragraph 3.53) notes that there will be some sites that are capable of achieving more towards meeting the overall 50% London-wide affordable housing target and some less. It is noted that Brent intends to participate in the West London Sub Regional Strategic Housing Market Assessment (SHMA) which will be undertaken after the London SHMA is published by the GLA and that this will provide an up to date assessment of all housing need in the Borough, including the affordable element[12]. In the light of this, it is recommended that consideration is given to the inclusion of a note in the supporting text to Policy CP1 (e.g. paragraph 5.2) explaining that these assessments will be undertaken and that they will inform future affordable housing policy in the borough. It is acknowledged that in setting a target for affordable housing other factors need to be considered and that whilst a higher target is certainly justifiable on purely housing needs grounds in Brent, this has to be balanced with the need to potentially cross subsidise the refurbishment/construction of social rental units with new market homes, particularly in regeneration areas, and to meet the growth areas' objective of ensuring high quality homes by requiring compliance with Code for Sustainable Level 4.

Policy CP2 – Commercial Regeneration

Policy CP 2 - Commercial Regeneration

Park Royal, Staples Corner, Wembley/Neasden and East Lane will be promoted as strategic industrial/ business locations where redevelopment for incompatible uses will be resisted, new development for business and industry will be encouraged, and investment in new infrastructure, such as transport improvements will be focused. In addition mixed use development, including employment generating uses, will be promoted in town centres and in the Wembley regeneration area.

Brent will target 10,000 new jobs in the Wembley Growth Area to 2026 and 11,000 jobs in the whole of Park Royal over a thirty year period.

4.24   Policy CP2 is the same as the previous Submission Core Strategy policy CP SS4, with the addition of employment targets for Wembley Growth Area to 2026 and for Park Royal over a thirty year period.

4.25   The SA Report on the Preferred Options Core Strategy (October 2006) predicted that policy CP SS4 would have very positive effects against economic objectives, due to the policy's aim of encouraging employment generating uses. Some negative impacts were also predicted against environmental objectives, primarily related to the generation of traffic relating to increased economic activity. For example, supporting

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[12] The last Brent Housing Needs Survey was undertaken in 2003 and is therefore out of date and not PPS 3 compliant, although is it likely that the level of affordable housing need has since increased in the borough.

text encouraging distribution businesses to locate in the Borough are likely to increase road transport and associated environmental impacts.

4.26 The inclusion of employment targets in the Wembley Growth Area (10,000 new jobs to 2026) and for the whole of Park Royal (11,000 new jobs over a thirty year period) in the pre-Submission Core Strategy policy CP2 are not expected to significantly change the sustainability effects as previously predicted, and focussing employment growth in areas most accessible by public transport is positive from a sustainability perspective as it should help minimise the expected increase in road traffic. Supporting text to CP2 maintains previous encouragement for distribution business in the Borough. The SA Report on the Preferred Options Core Strategy (October 2006) noted that while it is recognised that distribution is predicted to be a growth industry for the Borough, it is likely to create disproportionately lower employment relative to the land take required, as well as generating traffic and associate noise and air pollution.

4.27 Specific recommendations on Policy CP2:

- Consider whether distribution is an appropriate and beneficial growth sector for the Borough in the long-term. Alternative, lower GVA generating businesses may provider greater actual benefit to the borough in terms of employment creation, as well as less negative social and environmental impacts.

- Paragraph 5.11 of the supporting text refers to the fact that job opportunities must be "accessible" to local people. This is strongly welcomed. It is recommended that it is clarified that accessible should mean both physically accessible, but also appropriate to the skills and aspirations of local people.

- Also in Paragraph 5.11 it is recommended that the text referring to the need to avoid "excessive commuting" be amended to stress that the aim will be that level of commuting should be minimised, and in the long-term reduced.

Policy CP3 – North West London Co-ordination Corridor

Policy CP 3 - North West London Co-ordination Corridor
The Council will work with the borough's of Camden, Barnet and Harrow, and the GLA, to co-ordinate development in the growth areas of Wembley, Burnt Oak / Colindale and South Kilburn with major development in the rest of the corridor.

4.28 Policy CP3 is a new policy in the pre-Submission Core Strategy. It sets out the importance of a co-ordinated approach to managing development along the North West London Co-ordination Corridor, which is focussed on the main arterial transport routes: Edgware Road; A1 and M1; together with Kings Cross St Pancras to Luton and Euston to Milton Keynes rail lines. As part of the ongoing SA work between now and Submission of the Core Strategy the SA will review the Core Strategies of

adjacent boroughs (where these are available) as part of considering cumulative impacts in relation to specific issues, such as traffic growth.

4.29   Joint working between the three boroughs, and a co-ordinated approach to managing development with trans-boundary implications (both within and outside the Borough) is welcomed from a sustainability perspective, as explicitly addressing the wider implications of development (in this case on transport infrastructure in particular), can lead to mutually beneficial outcomes, for example in co-ordinating public transport exchange to maximise accessibility and minimise journey times between boroughs.

4.30   Specific recommendations on Policy CP3:

- Consider inclusion of specific text (either supporting, or in Policy CP3) to emphasise that a co-ordinated approach to development along the corridor should seek to maximise opportunities for effectively integrating public transport infrastructure.

- Consider text to emphasise the importance of maximising accessibility for local communities to employment opportunities close to them arising from development along the corridor, thereby actively seeking to reduce associated travel need.

Policy CP4 - Placemaking

Policy CP 4 - Placemaking

In preparing new area-based planning guidance, and in considering major development schemes within growth areas, regard will be had to the following:

a.   the allocation of sites for a range of uses (as set out in the Site Specific Allocations DPD) supporting development that is mixed in use and mixed in tenure, within areas where there is less single land-use zoning and vertical mixing of uses encouraged

b.   the needs of the community and the need for infrastructure, both social and physical, arising from development, such as
-    the creation of new open space (including new squares / public meeting places) or, if that is not practicable, contributions towards the significant improvement of existing open space close to the growth areas. New play areas will be required in all major housing developments.
-    school, health provision and sports facilities
-    public transport, walking and cycling infrastructure

c.   the council's Infrastructure and Investment Framework

d.   the contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. This will include the planting of trees and the provision of street furniture, waymarking, etc.

4.31   Pre-Submission Core Strategy Policy CP4 is a new policy not included in the previous Preferred Options Core Strategy. In addition to the policy text included above, Policy CP4 includes a number of specific targets relating to the production of additional planning guidance, the provision of community and other facilities, the planting of 500 trees by 2017, the expectation of delivery of at least one low carbon exemplar development in each growth area by 2017, and the expectation of at least one architectural competition for a development scheme in each growth area before 2017.

4.32   Policy CP4 is expected to have generally very positive effects from a sustainability perspective, particularly against environmental and social objectives. Explicit recognition in the policy, targets and supporting text of the need to provide appropriate physical and social infrastructure and facilities is considered very positive from a sustainability perspective. Targets relating to the creation additional guidance are also welcomed, particularly the public realm strategy. It is noted that the policy, and targets / new guidance are aimed specifically at the Growth Areas, rather than more widely across the borough. It is acknowledged that Local Cross Cutting Policy CP14 – Spatial Design Strategy seeks a high quality of design in development proposals "throughout Brent" which is welcomed in supporting design quality in all areas.

4.33   Specific recommendations on Policy CP4:

- The social infrastructure, public realm and transport outcomes sought for the Growth Areas in Policy CP4 would be equally important in other areas in the Borough. Although it is recognised that in practice securing funding for the much smaller scale development proposed outside the Growth Areas would be difficult, consideration could be given to modifying the policy such that it recognises that these factors are important across the Borough, or at least in some other district centres and in particular areas of low townscape or public realm quality which lie partly outside the Growth Areas. For example, the target to produce a Public Realm Strategy, could seek one for the Borough as a whole, rather than just for each Growth Area. It is acknowledged that Local Cross Cutting Policy CP14 does seek high quality urban design "throughout Brent".

- Whilst creating energy and architectural exemplars is welcomed, from a sustainability perspective creating a high level of energy / carbon efficiency and good level of design across all development would be more preferable than accepting less good quality / environmental standards generally with the exception of one exemplar in each growth area. It is recognised that this is the aim of policies CP15 and CP16, however consideration could be given to this aspect here, perhaps through a cross reference to the general expectations set out in these other policies. Consider additional supporting text to explain the potential benefits of exemplars in raising awareness of the benefits of better standards, thereby encouraging take up elsewhere.

- Supporting text paragraph 5.15 refers to "3 boroughs". It is unclear if these are the same three boroughs named in Policy CP3, and it is recommended that these are stated for clarity.

Growth Area Policies: Policy CP5 to CP10

Policy CP 5 - Wembley

Wembley, being the main focus for growth, will be developed as a new sustainable community where the stadium will be complemented by regeneration of the area as a regional sport, entertainment and leisure destination including new shops, offices, hotels, workspace for creative industries and community facilities, supplying 10,000 jobs (net) between 2007 and 2026.

The Wembley growth area will supply at least 5,000 new homes to 2017 and 5,000 further homes from 2017-2031. This will be supported by new infrastructure including school provision, health and sports facilities, new open space and transport provision, including appropriate parking facilities. Regeneration should provide a range of activities complementary to one another as well as to the Stadium such as retailing or leisure. Tall buildings will be appropriate across much of the Growth Area. Detailed guidance will be set out in the Wembley Masterplan 2008 and other planning guides.

The Council will continue to work with its partners to produce a Design Framework for implementing a comprehensive environmental improvement programme in Wembley town centre. Proposals are expected to significantly enhance the quality of shopping, leisure provision, and of the townscape and public realm in accordance with its Borough status.

Policy CP 6 - Alperton

Regeneration and renewal in Alperton will deliver at least 1,500 new homes by 2017. Development proposals should have regard to the canalside setting where relevant and respond to the new Framework to achieve the character set out in this design guidance. Development adjacent to Ealing Road should be mixed use providing commercial or community uses at ground level. New business space should have direct access from the main road network and proposals should ensure that there is no conflict with residential amenity.

Local secondary schools such as Alperton secondary school could be expanded while a new site for a 2-3FE primary school will be agreed and proposals made in the Alperton Framework.

The Framework will set out the Business floorspace that will be lost from the area where it is inappropriately located and will propose the amount of new and enhanced floorspace for creative and other industries.

Building heights and densities will comply with a new design code in the Alperton Framework, tall buildings will be suitable in a limited number of locations close to public transport interchanges.

Local bus services to the north of the canal will be enhanced.

Public open spaces will tend to be in the form of hard landscaped squares while nearby parks will be improved.

Policy CP 7 - Burnt Oak / Colindale

Development of sites along the Edgware Road will deliver at least 1,300 new dwellings by 2017. Development should be mixed in use and predominantly commercial at ground floor level on the Edgware Road frontage. Tall buildings over 30m will be acceptable but where appropriate development should respect the suburban residential character of adjoining areas whilst also having regard to the operational requirements of businesses in the Colindale industrial estate. A new primary school will be provided on redevelopment of the Oriental City site, or elsewhere in the growth area should an appropriate site come forward for development more quickly. Contributions will be sought towards the improvement of open space and the provision of a new swimming pool with associated leisure facilities nearby. A new health facility is required if the site at Roberts Court cannot be developed.

The Council will work with the GLA, TfL and partner boroughs to progress improvements to public transport, cycling and walking in the Edgware Road corridor.

Policy CP 8 - South Kilburn
The regeneration of South Kilburn will deliver 1,500 new homes alongside the renewal of 1400 affordable homes. Development proposals will be determined in accordance with the SPD for the area which supports high densities and tall buildings. Larger flat sizes for the redeveloped flats is supported.

Redevelopment should provide a new primary school, a new health facility, sports hall and other community facilities and substantially increase the quality of existing public open space within the area.

Policy CP 9 - Church End
Church End will be regenerated to provide at least 800 new homes together with new shops, business premises, a new market square (for a street-market), new expanded health facilities and a new park.

Policy CP 10 - Park Royal
The Council will work with its neighbouring boroughs, the GLA and the Park Royal Partnership to secure the objectives for Park Royal. Development proposals should be in accordance with general policy for Strategic Employment Locations apart from at Central Middlesex hospital where key worker housing and uses appropriate to a local centre meeting the needs of workers and visitors will be acceptable, and for the First Great Central development where enabling residential development will be acceptable where it helps to deliver the new station interchange and Brent's Fastbus proposals.

Development Proposals should be in accordance with the Park Royal Opprtunity Area Planning Framework, to which regard will be had in determining planning applications.

Tall buildings will be suitable at Central Middlesex Hospital and First Central sites.

4.34   Pre-Submission policies CP5 – CP10 are all new policies, with the exception of CP5 - Wembley, however this policy has been substantially re-written and supplemented by additional supporting text. The area specific policies set out the aims and priorities for development in each Growth Area, including new housing provision, social and physical infrastructure needs and details of delivery mechanisms / processes such as the Wembley Masterplan 2008 and development Frameworks. Each area specific

policy also has a number of development targets. For each Growth Area these include:

- Employment targets (Wembley only)

- New homes provision targets

- Area of retail space to be provided

- Social infrastructure and facilities, such as schools, health facilities and parks / open spaces

- Transport infrastructure needs, such as extended bus routes / services.

- Other aims, such as provision of district wide combined heat and power systems (Wembley, South Kilburn).

4.35   Generally Policies CP5 – CP10 are expected to have very positive effects against all sustainability objectives. Detailed analysis will be provided in the new SA Report to be drafted later in 2008, however a summary of potentially significant positive and negative effects are noted below.

4.36   Potential positive effects:

- All policies: policy text and targets specifying social infrastructure and amenity aims and needs, including school places, health facilities, parks and open spaces etc. are likely to have very positive social effects, by ensuring that provision is in line with demand.

- All policies: specific text and targets relating to employment provision, workspace needs etc. are likely to have positive economic and social effects, by providing employment opportunities locally, and encouraging new business start ups.

- All policies: policy text and targets specifying increased public transport provision are likely to have significant positive social and environmental effects, especially where this improves access to opportunities for those in deprived areas, and encourages modal shift from car use.

- Policies CP5 – Wembley and CP8 – South Kilburn: provision of district wide combined heat and power systems in these Growth Areas is likely to have positive environmental effects, especially in terms of climate change mitigation.

- Policy CP9 – Church End: provision for a new market square and street market is likely to have positive economic and social effects, by providing a local community focus and an opportunity to generate community cohesion / identity.

4.37   Potential negative effects:

- All policies – the physical impacts of the construction of development on the scale proposed in each Growth Area may have significant localised environmental and social impacts, such as through disruption, displacement and noise / air pollution.

- Policy CP5 – Wembley: Improving east-west road links may undermine efforts to reduce road traffic, by facilitating movement by road.

- Policy CP10 – Park Royal: support for "modern logistics" at Park Royal whilst making good use of the area's access to Heathrow, the West End and strategic road and rail connections may have negative social and environmental impacts where it leads to an increase in freight traffic.

4.38   Specific recommendations on Policies CP5 – CP10:

- A figure of 10,000 new jobs to be created in the Wembley growth area between 2007 and 2026 is noted in Policy CP2 and Policy CP5. In addition supporting text paragraph 5.18 notes that the council is producing a Wembley Masterplan 2008, which considers the "next phase" of development in the stadium area, beyond 2017. This refers to the aim of a *further* 10,000 new jobs in the Wembley Growth Area. It is not clear from the current text whether these "further" 10,000 jobs are *additional* to the 10,000 referred to in Policies CP2 and CP5 or not, and it is recommended that this be clarified.

- Supporting text paragraph 5.21 refers to "orbital links". The paragraph later refers to an orbital bus route but it is not clear if this is the same thing. It is recommended that any orbital movement should be predominantly public transport / cycling oriented and that the intended nature of "orbital links" referred to be clarified.

- Clarify what is meant by the term "sustainable community" in the context of Policy CP5 – Wembley.

- The development of an improved east-west road link is specified as a target for Policy CP5 – Wembley, and included in the supporting text. It is recommended that such links should strongly favour public transport connectivity / improved movement by bus, bicycle and foot. Consider inclusion of text to emphasise that improved east-west links will be predominantly public transport oriented, and that any road improvements should not impact negatively on existing public transport provision.

- Include text in policy CP6 – Alperton, or accompanying supporting text to ensure that development adjacent to, and increased / enhanced access to the Grand Union Canal protects and enhances the natural environment (habitats / biodiversity) as well as delivering an improved living and working environment.

- Consider the inclusion of text in the policies / targets to ensure that where new leisure and recreation facilities, including swimming pools are proposed that these are accessible and affordable to all residents / member of the public.

- Consider harmonising and clarifying the text in targets relating to improvements to bus services. Policy CP6 – Alperton target refers to "enhancement of" bus service provision, Policy CP7 – Burnt Oak / Colindale target refers to "increased" bus services and Policy CP9 – Church End target refers to bus routes being

"extended". Common language or clearer explanation could strengthen these important positive aspects.

- Strengthen text in supporting paragraph 5.34, or in Policy CP10 – Park Royal to help ensure that any expansion of "modern logistics" at Park Royal maximises the use of rail and water based transport. Consider inclusion of a policy targets to seek improved rail freight interchange at Park Royal.

- Target text to Policy CP9 – Church End seeks "re-provided" health facility. This term could be clarified.

Policy CP11 – North Circular Road Improvement Area

Policy CP 11 - North Circular Road Improvement Area

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

- Bring forward proposals that remove the houses most affected by noise and air pollution, with priority to those on the St Raphael's Estate facing the NCR.
- Use developments such as at Unisys/Bridge Park and Wembley Point to offer new focal points that also assist in providing alternative homes.
- Use small infill sites on the St Raphaels estate to relocate some homes
- Work with TfL to improve junctions, notably at Brentfield Road
- Create cycle paths and environmental barriers/open space on the dwellings removed
- Bring forward more detailed area plans to identify areas of change.

4.39 Policy CP11 is a new policy in the pre-Submission Core Strategy. It sets out proposals to improve living conditions and the quality of surroundings along the North Circular Road (NCR).

4.40 The policy is expected to have significant positive effects against social and environmental objectives, although these effects will be limited to the NCR corridor. Introducing measures to improve the environment for and reduce noise and air pollution effecting residents living close to the NCR will improve quality of life in this area.

4.41 One possible negative effect could arise from distress and disruption to those residents who are relocated or affected by improvement works and change. Significant care must be taken to ensure that those affected are provided with sufficient support and involvement in any plans and decisions.

4.42 Specific recommendations on Policy CP11:

- It is recognised that much of the traffic pressure on the NCR is strategic in nature and originates / is generated by development outside the Borough, however it is recommended that LBB consider inclusion of text in supporting paragraph 5.37 to emphasise that while traffic pressure will continue on the NCR, every effort will be made to manage transport demand and reduce reliance on the car for journeys

which originate within the Borough (e.g. by ensuring development in the Growth Areas minimises traffic generation).

- Include supporting text to ensure that local communities are involved in decision making about proposed changes and home relocations, to minimise distress and disruption.

- Consider text in Policy CP11 to ensure that junction improvements have as their aim better facilities and easier movement / permeability for pedestrians and cyclists.

- Additional supporting or policy text could be included to ensure that the removal of homes is not used to enable or justify widening of the NCR, even in the long-term. It is recognised that this is clearly not the aim of the policy however there may be some danger that transport pressures in future could lead to vacant land being exploited in this manner.

Policy CP12 – Infrastructure to Support Development

Policy CP 12 - Infrastructure to Support Development

The Council will set out, in an Infrastructure and Investment Framework, the infrastructure requirements necessary to support new development in the growth areas, and will indicate where and when this will be provided. It will also set out the scale of funding necessary to achieve this. Before granting planning permission for large-scale residential development, the Council will have to be satisfied that the infrastructure requirements arising from the scheme will be met by time of occupation. Contributions will be sought from development giving rise to the need for new infrastructure.

The Council will also bid for infrastructure funding from Government and other sources, such as the Community Infrastructure Fund.

4.43   Pre-Submission Core Strategy Policy CP12 corresponds with the previous Submission Core Strategy policies CP SS6 and CPSS8. However the policy text has been significantly added to, and there is considerable additional supporting text in the pre-Submission Core Strategy.   New supporting text sets out infrastructure requirements and expectations under the following sub-headings:

- Transport infrastructure

- Social Infrastructure

  o Education

  o Health

  o Open space and sport

  o Community facilities

- Utilities infrastructure

4.44   This expanded supporting text reflects the contents of previous Policy CPSS8 but provides greater clarity and detail of specific needs.

4.45   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that policies CPSS6 and CPSS8 were very positive, particularly against social objectives. The additional supporting and policy text is also generally very positive in that it provides much greater detail aimed at ensuring that communities and developments are provided with sufficient, attractive and appropriate facilities and amenities. This will contribute to meeting social, environmental and economic objectives, and should help improve quality of life for all. Improvements to public transport facilities and interchange, the provision of new education, community and health facilities, improved open space and sport facilities and supporting text stressing the importance of sufficient utilities infrastructure are all strongly supported from a sustainability perspective.

4.46   Policy text which explicitly seeks to ensure the phasing of infrastructure to be in place by the time of occupation of development schemes is particularly welcomed.

4.47   Specific recommendations on Policy CP12:

- The policy is aimed at meeting the infrastructure requirements of "large-scale residential development" and paragraph 5.39 states that a "critical mass" of development will be required prior to infrastructure development. Infrastructure needs of smaller developments could also be recognised in supporting text.

- Supporting and/or policy text could refer to the importance of involving existing communities and other local stakeholders in planning for infrastructure.

- Consider inclusion of text to ensure that new facilities are accessible to and affordable for all local residents. New facilities which are not accessible or affordable for local people may cause community tension, and generate travel need by encouraging trips from elsewhere in, or outside the Borough.

Policy CP13 – Protecting and Enhancing the Suburban Character of Brent

Policy CP 13 - Protecting and Enhancing the Suburban Character of Brent
The distinctive suburban character of Brent, especially the borough's built and natural heritage, will be protected from inappropriate development. New development, extensions and refurbishments will be required to have due regard to the character, design and scale of existing high quality neighbourhoods. Outside of the main town centres, and away from corner plots on main road frontages, the council will bring forward design guidance that limits development which would erode the character of suburban housing. Development of garden space and infilling of plots with out-of-scale buildings that do not respect the settings of the existing dwellings will not be acceptable.

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

4.48   Pre-Submission Core Strategy Policy CP13 represents a modification to previous Submission Core Strategy Policy CP SS9 – Protecting and Enhancing the Natural and Built Environment. The focus has been substantially changed, with new Policy CP13 seeking primarily to protect the Borough's suburban character and built and natural heritage from inappropriate development, compared to previous Policy CP SS9 which sought explicitly to protect and enhance the natural environment and nature conservation value, as well as the Borough's built heritage.

4.49   Policy CP SS9 was considered very positive, particularly against environmental objectives by the SA Report on the Preferred Options Core Strategy (October 2006). The new policy CP13 is also expected to have positive effects against social and environmental objectives, by providing protection for the character of Brent's distinctive suburban character, and seeking to restrict the development of back gardens in the Borough.

4.50   Previous Policy CP SS9 included specific text which sought to protect and enhance the quality and character of Brent's natural environment and provide new or improved open space and nature conservation value to meet existing deficiencies and the needs of the growing population. This text has been deleted in the pre-Submission Core Strategy Policy CP13. These issues are reflected in Local Cross Cutting Policy CP17, and this deletion also reflects the need for the Core Strategy not to duplicate environmental policies in the London Plan.

4.51   Specific recommendations on Policy CP13:

- Clarify / explain justification for the acceptability of loss to "corner plots on main road frontages". It is not clear why it would be any more acceptable for these plots to be eroded than others in the Borough.

- The text of Policy CP13 is considered somewhat unclear and could be clarified.

- Supporting text paragraph 5.40 states that criteria that will be used to protect key suburban neighbourhoods "will be set out in detail elsewhere in the LDF". It is recommended that a reference to where is included to clarify this.

5. COMMENTARY ON THE LOCAL CROSS-CUTTING POLICIES

5.1   This section provides comments on the Core Strategy 'Local Cross Cutting Policies' (chapter 6 of the pre-Submission Core Strategy). The comments relate to the text and policies in the pre-Submission Core Strategy, however they draw upon previous SA findings, in particular the SA Report on the Draft Preferred Options Core Strategy (October 2006), and the SA Annex Report (November 2007), which were prepared to accompany the previous Submission Core Strategy (November 2007).

5.2   Due to the significant difference in the number of policies between the Submission Core Strategy and the current pre-Submission Core Strategy (discussed below) this commentary will seek to draw out implications and recommendations relating to both the content of the new / amended policies as well as the deletion of previous policies. However, it should be noted that this commentary is only intended as a summary of key changes and initial recommendations, and the SA Report when completed in autumn 2008 will provide much greater detail and analysis of these changes.

General comments on the Local Cross-Cutting Policies

5.3   The Local Cross Cutting policies in the pre-Submission Core Strategy replace the previous Submission Core Strategy issue specific policies. The number of policies has been reduced from 29 to 12 in the pre-Submission Core Strategy, as indicated in Table 2 above.

5.4   The general structure of the policies remains the same as in the previous Submission Core Strategy. However the previous Submission Core Strategy "Connecting Places" (TRN) policies have been deleted. This is due to the fact that the majority of their content is reflected in Brent's Local Implementation Plan (LIP), and that additional supporting text on Transport Infrastructure relating to Policy CP12 – Infrastructure to Support Development in the Spatial Strategy has been drafted to address transport priorities in the Borough.

5.5   A further significant change is the deletion of the Submission Core Strategy Environmental Protection policies, CP ENV1 – Climate Change Adaptation, and CP EN2 – Protecting and Enhancing Brent's Environment. CP ENV1 has been merged into pre-Submission policies CP15 and CP16. CP ENV2 has been deleted to avoid duplication of environmental policies in the London Plan, and new supporting text in the pre-Submission Core Strategy refers explicitly to London Plan policies 4A.14 – 4A.20 which aim to prevent and mitigate significant environmental impacts from development. Ongoing work on the SA will consider fully this modification, however the deletion of ENV2 initially appears appropriate from a sustainability perspective.

5.6   The pre-Submission Core Strategy Local Cross-Cutting Policies are organised by the following sections:

- Environmental quality (previously Promoting a quality environment)

- Planning for more and better housing (previously Meeting housing needs)

- A strong local economy

- Protecting community facilities (previously Enabling community facilities)

5.7   The significant reduction in the number of the policies is for two reasons. Firstly to avoid duplication with National policy, or policies in the London Plan, especially where previous (Submission Core Strategy) policies did not have specific Brent relevance, and; secondly due to the greater level of detail provided by the new / expanded Spatial Strategy policies.

5.8   The majority of the supporting text to the Local Cross Cutting Policies is unchanged from that in the previous Submission Core Strategy. As a result the commentary below focuses specifically on the policies themselves, and comments are only provided on the supporting text where this has been changed.

Policy specific comments and recommendations on the Local Cross-Cutting Policies

Environmental Quality

A Better Townscape – By Design

Policy CP 14 - Spatial Design Strategy

Policy CP 14 - Spatial Design Strategy

A high quality of urban design is expected in development proposals throughout Brent, which should significantly enhance the character of the local townscape and public realm taking account of features that comprise suburban distinctiveness, and their particular needs/sustainability issues;

Priority Enhancement Areas

Particular regard will be had to the design of proposals within the Borough's 'Growth Areas', in 'Areas of Low Townscape or Public Realm Quality', as well as Brent's 'Transport Corridors & Gateways' (See Map). Development proposals in these areas are expected to:

a. Optimise use of sites with high public transport accessibility, through a sustainable intensity and mix of development – but, the highest densities / intensities will only be permitted if the design is of an exemplary or exceptional standard;

b. Respond positively to development guidance produced during the plan period, and in collaboration with its partners, for areas of Low Townscape or Public Realm Quality, and the Transport Corridors & Gateways.

c. Where opportunities arise, open up attractive views and important local landmarks from the main Borough Gateways, and Transport Corridors.

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d. Make a contribution towards implementation of key public realm measures commensurate with the scale of the proposed development.

In priority enhancement areas the council will establish a design quality protocol to which development should adhere. This protocol will apply to all major development and other sensitive sites.

5.9 Pre-Submission Core Strategy Policy CP14 corresponds with previous Submission Core Strategy Policy CP UD1 – Spatial Design Strategy.

5.10 The previous Submission Core Strategy *A Better Townscape – By Design* chapter previously included two additional policies: CP UD2 – Tall Buildings, and; CP UD3 – Design Quality Protocol:

- Policy CP UD2 has been integrated across the new area specific policies (CP 5 – CP10) which identify where tall buildings are appropriate and this deletion is not expected to have significant effects from a sustainability perspective.

- Policy UD3 has been deleted, however all related supporting text has been maintained in the pre-Submission Core Strategy. This is also not expected to have a significant effect on the sustainability of the Core Strategy, as the supporting text still sets out the intention to develop a Design Quality Protocol, and previous Policy CP UD3 simply set out some key elements that the proposed Protocol will include.

5.11 The SA Report on the Preferred Options Core Strategy (October 2006) concluded that Policy CP UD1 would have positive effects across many sustainability objectives in that it seeks to promote high quality design and aims to improve areas of poor townscape and public realm quality. The modifications to Policy CP14 are not predicted to significantly change these conclusions.

5.12 Specific recommendations on Policy CP14:

- Bullet point b) – it appears "by the Council" has been omitted from this sentence after the words "development guidance produced…". This would clarify this point.

- Although the need to concentrate on major developments is recognised, consider additional supporting text to recognise the cumulative effect of and need for design issues to be addressed in smaller schemes.

- The SA Report on the Preferred Options Core Strategy (October 2006) noted that no timescale is provided for the establishment of the Design Delivery Protocol and that to have an impact on realising improved urban design standards from the adoption of the plan this will need to be developed as soon as possible. This remains the case in the pre-Submission Core Strategy.

Towards a Sustainable Brent, 2020

Policy CP 15 - Sustainable Design & Construction - Mitigation & Adaptation

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Policy CP 15 - Sustainable Design & Construction - Mitigation & Adaptation

All new development, extensions and refurbishment proposals are expected to contribute towards achieving sustainable development, including climate change mitigation and adaptation.

Major proposals (10 or more dwellings & 1,000m² or more floorspace) and proposals for sensitive uses (education, health & housing) in Air Quality Management Areas, should submit a Sustainability Statement demonstrating how sustainable design & construction measures are used to mitigate, and adapt to, climate change at the design stage, including meeting or exceeding London Plan targets.

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

Within the Wembley Energy Action Area (EAA) and in the Housing Growth Areas, major schemes are required to achieve a minimum Level 4 rating (in relation to the Code for Sustainable Homes) commensurate with their scale. Where developments are phased over a long timescale, developments will be expected to meet the Code Level, Bream or renewable policy at the time of development.

Low-Carbon / (Code Level 5) and Zero-Carbon / (Code Level 6) schemes should include in their statement, feasible measures for influencing operational lifestyle issues.

5.13   Pre-Submission Core Strategy Policy CP15 – Sustainable Design & Construction: Mitigation and Adaptation, is broadly the same as previous Submission Core Strategy Policy CP SD1 – Sustainable Design & Construction: Mitigation.

5.14   Specific details of what Sustainability Statements for major proposals should address has been removed from previous Policy CP SD1, however reference to the need to meet or exceed targets for sustainable construction in the London Plan is included. In the new Policy CP15 all new developments and major proposals, through Sustainability Statements, are expected to address climate change adaptation as well as mitigation, and this addition is welcomed. Other policy elements are unchanged between the previous Submission Core Strategy and the pre-Submission Core Strategy.

5.15   The supporting text is also largely unchanged, however previous Submission Core Strategy text which set out a broad definition of sustainable development have been removed. As noted in the overall comments on the Spatial Strategy above, it is recommended that description of what sustainable development means in the context of the Core Strategy and Brent is included in the text either in this section, or in the Spatial Strategy.

5.16   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that policy CP SD1 (which in the Preferred Options Core Strategy was number CP

SD2, but with content only slightly changed) was very positive from a sustainability perspective, with no negative effects predicted. The changes are not likely to change this conclusion, and the new Policy CP15 is also therefore expected to have positive effects, particularly against environmental objectives.

5.17   Specific recommendations on Policy CP15:

- As well as addressing climate change mitigation and adaptation proposals in AQMAs should also be required to adapt to, not exacerbate and seek to improve existing poor air quality.

- Consider the re-inclusion of text setting out briefly what sustainable development means in the context of the Core Strategy. It is recognised that national and London policy documents (such as UK Sustainable Development Strategy) set the framework for sustainable development in the Borough, however a brief description may benefit this policy, especially given the wording of the policy which seeks to encourage contributions towards "achieving sustainable development".

- It is recognised that there is reference to existing sustainable design and construction guidance (London and Brent) in supporting text paragraph 6.26 which also recognises that sustainable construction is required to meet targets beyond climate change mitigation and adaptation. Consider inclusion of additional policy, or supporting text which emphasises the importance of sustainable construction in achieving wider environmental and social goals, such as waste reduction, water demand efficiency, human health and wellbeing (e.g. through reduced fuel poverty) etc.

Policy CP 16 - Brent Strategic Climate Mitigation and Adaptation Measures

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Policy CP 16 - Brent Strategic Climate Mitigation and Adaptation Measures

The Council's own measures within its Carbon Management Strategy will be complemented by a 'Climate Change Strategy' which will take a Borough-wide view of requirements to meet its strategic mitigation obligations by linking carbon reductions from the Council's own corporate operations, and from local community / business / other partnership initiatives, with reductions from ongoing development activity in Brent. It will also take a strategic view of Borough wide climate adaptation infrastructure needs by 2012 to ensure the security of supplies such as water and energy.

It will facilitate assessing any cumulative impacts of development upon these supplies. A key development and regeneration consideration will be the ability of development proposals to embody or contribute to relevant Borough wide objectives and targets in the Strategy's Action Plan.

In particular, proposals will be expected to connect to, provide, or contribute towards, decentralised energy networks (heating & cooling) and renewables infrastructure, in key Growth Areas of the Borough such as Wembley, and in the regeneration of Town centres/Industrial areas to offset carbon emissions from new development. The Wembley Energy Action Area will be extended to include the areas in the 2008 Masterplan.

5.18   The Core Strategy policies on climate change mitigation and adaptation and sustainable construction have evolved significantly between the Preferred Options Core Strategy, the previous Submission Core Strategy and the pre-Submission Core Strategy. A full audit trail of these changes and their implications from the perspective of the SA is not possible in the context of this commentary. However as part of the ongoing SA work a more complete review and assessment will be completed. This commentary represents some initial conclusions and suggestions.

5.19   Pre-Submission policy CP 16 – Brent Strategic Climate Change Mitigation and Adaptation Measures, represents a partial merger of previous Submission Core Strategy policies CP SD2 – Brent Strategic Climate Change Measures, and CP ENV1 – Climate Change Adaptation. These correspond with Preferred Options Core Strategy policies CP SD1 – Climate Adaptation Infrastructure and CP ENV1 – Climate Change.

5.20   A number of specific measures included in CP ENV1 have now been deleted. These set out example measures rather than concrete policy expectations. The inclusion of adaptation in Policy CP15, supporting text suggesting that developers refer to the GLA's Adapting to Climate Change checklist for development together with the intention to develop a Brent Climate Change Strategy is felt to justify these deletions.

5.21   The majority of supporting text remains unchanged, with the exception of the deletion of text describing the cumulative effect on flooding of increased hard surface area in the Borough, for example through the paving of resident's driveways.

5.22   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that Preferred Options Core Strategy policies CP SD1 and CP ENV1 were positive from a sustainability perspective, but that in practice the actual effects would largely depend on detailed proposals set out in the proposed Carbon Management Strategy and Climate Change Strategy and their implementation plans. This conclusion remains unchanged.

5.23   Specific recommendations on Policy CP16:

- Clarify when the proposed Climate Change Strategy will be adopted. The impact of these policies will depend on what is included in this strategy.

- Rather than just referring to the GLAs "Adapting to Climate Change, a checklist for development" in supporting text, consider whether the policy should explicitly require developers to use this checklist.

Enhancing Open Space and Biodiversity

Policy CP 17 - Protection and Enhancement of Open Space and Biodiversity

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Policy CP 17 - Protection and Enhancement of Open Space and Biodiversity

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. Support will be given to the enhancement and management of open space for recreational, sporting and amenity use, and the improvement of sites for biodiversity and nature conservation. New or improved provision will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created. This includes new parks in Church End and Wembley and improvements to existing open spaces in Alperton, South Kilburn and Burnt Oak/Colindale growth areas.

5.24   Pre-Submission Core Strategy Policy CP17 corresponds with previous Submission Core Strategy Policy OS1, with the addition of policy text to identify specific areas where new or improved parks and open spaces are expected.

5.25   Previous Submission Core Strategy Policy OS2 – Promotion of Biodiversity and Nature Conservation has now been deleted. This policy overlapped to a certain extent Policy OS1 and the London Plan also includes specific policy on biodiversity (e.g. Policy 3D.14). As a result this deletion is not considered significant from a sustainability perspective.

5.26   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that policy CP OS1 (appraised together with OS2) was very positive from a sustainability perspective, with no negative effects predicted. Pre-Submission Policy CP17 is expected to have the same effects, and the addition of text identifying specific areas where new or improved parks / open spaces are expected, should improve the likelihood of beneficial effects in the Borough.

5.27   Specific recommendations on Policy CP17:

- The SA Report on the Preferred Options Core Strategy (October 2006) recommended that in planning new or enhanced areas of open space, consideration could be given to accessibility by public transport, walking and cycling and the need to involve local residents and businesses in the process. This recommendation remains valid.

Dealing with Waste

Policy CP 18 - Sustainable Waste Management

Policy CP 18 - Sustainable Waste Management

Existing waste management sites will be safeguarded unless the impact from continuing waste operations is considered to be unacceptable and/or alternative sites can be secured.

> Brent will work with other boroughs that comprise the West London Waste Authority (WLWA) (10), to develop policies and identify sites for development, in line with the waste projections and apportionment figures for the boroughs in the London Plan, to facilitate new, or redevelopment of, existing waste management facilities

5.28   Pre-Submission Core Strategy Policy CP18 corresponds with previous Submission Core Strategy Policy CP W1. However the focus of the policy has been modified by the removal of policy text relating to the role of developments in the minimisation of waste and in the provision of waste and recycling facilities. Policy CP18 focuses solely on the provision of waste management sites. The supporting text remains largely unchanged, with the minor addition of reference to specific London Plan policies relating to waste management sites.

5.29   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that Policy CP W1 was generally positive from a sustainability perspective, although the potential for negative local environmental impacts from certain types of waste facility was noted. Direct positive effects were identified relating to the policy text which has now been deleted, and this deletion may thus reduce some of the positive effects predicted.

5.30   Detailed waste management strategy for the Borough will be set out in the proposed Joint Waste Development Plan Document.

5.31   Specific recommendation on Policy CP18:

- While the revised focus of this policy reflects waste management policy in the London Plan, it is recommended that text is included to encourage developments which maximise the reuse of materials, and design which increases ease of and opportunities for residents and businesses to recycle waste. This could be achieved through reference to further specific London Plan policies, such as 4A.3 – Sustainable design and construction, which seeks to promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes.

- London Plan policy 4A.21, also not currently referred to in the pre-Submission Core Strategy includes a specific target (95% by 2020) for the recycling and reuse of construction, excavation and demolition waste. Reference to this policy is also recommended.

Planning for More and Better Housing

Policy CP 19 - A Balanced Housing Stock

Policy CP 19 - A Balanced Housing Stock

> The Plan seeks to maintain and provide a balanced housing stock in Brent by protecting existing accommodation that meets known needs and ensuring that new housing appropriately contributes towards the wide range of Borough household needs including:
>
> a. An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) on suitable sites providing 10 or more homes and in house subdivision/conversion schemes.
> b. Non-self contained accommodation to meet identified needs
> c. Care and support accommodation for those unable to live independently

5.32   The previous Submission Core Strategy contained four policies relating to housing:

CP H1 – Housing Provision

CP H2 – Sustainable Housing Development

CP H3 – A Balanced Housing Stock

CP H4 – Affordable Housing Provision

5.33   These four policies have been replaced by one policy in the pre-Submission Core Strategy, with new supporting text explaining that "as most of the Core Strategy's housing objectives can be satisfactorily delivered through the employment of the relevant London Plan policies, it is considered necessary only to propose one 'locally distinctive' housing policy". Housing provision and affordable housing is also explicitly considered in the Spatial Strategy Policy CP1 – Population and Housing Growth, and in each of the area specific policies CP5 – CP10.

5.34   Policy CP19 – A Balanced Housing Stock is the same as previous Submission Core Strategy Policy CP H3 of the same title. However a requirement / expectation of Lifetime Home Standards that 10% of units should be designed and constructed to wheelchair accessible or adaptable standards has been removed. This requirement is set out in the London Plan policy 3A.5, and it is included in the supporting text, together with reference to this London Plan policy, and a commitment that the Council will ensure this policy is applied to all relevant proposals. This deletion in Policy CP19 is not expected therefore to have any significant implications from a sustainability perspective.

5.35   All supporting text to previous Submission Core Strategy Policy CP H2 has also been deleted from the pre-Submission Core Strategy. This reflects the fact that Policy CP H2 itself duplicated London Plan policies (e.g. the application of the London Plan Density Matrix) and repeated policy content from elsewhere in the Core Strategy (e.g. CP15 - Sustainable Design and Construction).

5.36   Elsewhere in the Planning for More and Better Housing section, supporting text has been updated to provide reference to relevant London Plan policies, and to bring housing data up to date with latest figures.

5.37   The SA Report on the Preferred Options Core Strategy (October 2006) (considering all previous Housing policies together) concluded that the housing chapter performs very well against sustainability objectives and that the effects are likely to be mostly positive. The only negative effects were environmental impacts associated with the scale of housing proposed, which is reflected in our comments on Policy CP1 above.

5.38   Ongoing SA work will consider fully the sustainability implications of the changes and deletions in the Planning for More and Better Housing section, however the conclusion of this initial review is that the changes are not likely to significantly change the SA Report on the Preferred Options Core Strategy (October 2006) conclusions, and that the deletions / amendments proposed are understood and justified.

5.39   Specific recommendations on Policy CP19:

- No specific recommendations.

A Strong Local Economy

Policy CP 20 - Strategic Employment Areas and Borough Employment Areas

Policy CP 20 - Strategic Employment Areas and Borough Employment Areas
Strategic Employment Areas are designated for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generis uses that are closely related, having regard for the provisions of Preferred Industrial Locations and Industrial Business Parks (SELs) within the London Plan.
The council will protect its Borough Employment sites for the same range of uses as SEA's.

B1 office space is acceptable in SEA and BEA's where it is ancillary to other industrial and warehousing uses. Purpose-built offices are promoted in town centres and the Wembley Regeneration Area and are acceptable otherwise where proposals fulfill the requirements of the sequential approach such as the First Central site in Park Royal.

Proposals for other uses will be strongly opposed except where the Council and relevant partners are satisfied under the provision of Policy CP 21 'Regeneration of Designated Employment Areas'.

Policy CP 21 - Regeneration of Designated Employment Areas
The regeneration of Strategic and Borough Employment Areas is supported where proposals will not undermine the employment land hierarchy. Redevelopment will be expected to deliver:
-   New employment floor space that is fit for modern usage for a range of B use classes including business parks, 'starter' and 'move on' units for small and medium enterprises, and studios for artists and cultural and creative industries;
-   Intensified land use, including efficient movement and use of loading and delivery areas; and
-   Significant environmental improvements in terms of the public realm generated, exemplar urban and architectural design and impacts upon on sensitive surrounding uses and mitigating for climate change.

5.40   Policy CP20 in the pre-Submission Core Strategy represents an amalgamation of previous Submission Core Strategy policies CP BIW1 – Strategic Employment Areas and Borough Employment Areas and CP BIW2 – Office Development. Policy CP21 corresponds very closely with previous Submission Core Strategy Policy BIW4.

5.41   There has been some minor modification of the policy text, however this is not considered significant from a sustainability perspective.

5.42   Previous Submission Core Strategy Policy CP BIW3 – Principles of Business, Industrial and Warehousing Development has been deleted along with accompanying supporting text. This deletion is to avoid duplication with London Plan policies, and due to overlaps with policies elsewhere in the Core Strategy.

5.43   One potentially significant effect of this deletion is that the policy requirement that new business, industrial and warehousing development should demonstrate that it will deliver training and employment opportunities for Brent residents is no longer included. However specific supporting text remains which states that the Council will use planning obligations to seek to ensure that skills, training and ultimately employment opportunities from major development will benefit local people. Ensuring that employment opportunities are suitable for local people and that they have the skills to access them is considered very positive from a sustainability perspective, in that it is likely to reduce the need to travel and have positive localised social and economic effects.

5.44   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that policy Preferred Options Policy BIW1 (appraised together with Preferred Options policies BIW2 and BIW3) were likely to have strong positive effects against social and economic objectives, but mixed and negative effects against environmental objectives, particularly due to construction and traffic generation from increased business and industry activity (such as B8 industrial uses – storage and distribution).

5.45   Previous Submission Policies BIW2 and BIW4 were modified significantly between the Preferred Options and Submission Core Strategy and were appraised by LBB in the SA Report Annex (November 2007). The SA Annex concluded that these policies would have positive economic effects, particularly in creating employment opportunities, but negative environmental effects, particularly from encouraging business developments in Wembley and Park Royal.

5.46   As the changes in the pre-Submission Core Strategy represent an amalgamation of previous policies BIW1 and BIW2, and an essentially unchanged BIW4 the overall sustainability effects are not expected to change significantly.

5.47   Specific recommendations on Policy CP20 and CP21:

- The SA Report on the Preferred Options Core Strategy (October 2006) noted that although it is recognised that storage and distribution is predicted to be a growth

industry nationally, and for the Borough, and protecting industrial land restricts opportunities for high value uses particularly residential development, it is recommended that consideration be given to the inclusion of text which recognises the potential negative impacts of distribution in terms of traffic generation, noise and air pollution.

Town Centres and Shopping

Policy CP 22 - Brent Retail Need Allocations

Policy CP 22 - Brent Retail Need Allocations

Hierarchy of Comparison Floorspace Allocations:

(Subject to impact assessment and sequential approach, see Policy CP 23)

a. Between 41-51% of the requirement should be met in Wembley
b. Between 26-36% of the requirement should be met in Kilburn
c. Up to 23% should be divided up between each of the District Centres

Hierarchy of Convenience Floorspace Allocations:

1) Wembley
2) District Centres which currently lack a large food superstore, such as Cricklewood, Kingsbury and Harlesden
3) Neasden – as a local centre in need of regeneration

Policy CP 23 - Town Centres and the Sequential Approach to Development

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

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

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

5.48   Pre-Submission Core Strategy Policy CP22 is the same as previous Submission Core Strategy Policy CP TC2, with only minor wording changes, and a moderate increase in the upper percentage range of the floorspace requirement to be met in Wembley and Kilburn. Policy CP23 contains much of the text from previous Submission Strategy Policy TC3, together with new text setting out the sequential order of centres.

5.49   Previous Submission Core Strategy Policy CP TC1 – Network of town Centres, remains unchanged, however it is now not considered a "policy", but a general statement of intent. Previous Submission Core Strategy Policies TC4 and TC5 have now been deleted. These policies set out in detail the criteria for preferred and exceptional locations for retail and other town centre uses. These have been deleted to avoid duplication of policies in the London Plan, particularly Policies 2A.8, 3D.1, 3D.2 and 3D.3.

5.50   Supporting text remains largely unchanged in the pre-Submission Core Strategy, the only significant change noted being the deletion of text which recognised that retail development proposals may come forward on sites which overlap / adjoin the Borough boundary.

5.51   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that the Town Centre policies were largely positive against sustainability objectives, and that there were no significant negative effects. Preferred Options Policy TC1 (previous Submission Policy TC3) – Principal Retail Location, which has now formed part of Policy CP23 was predicted to have some negative effects due to resource use and traffic generation associated with major retail development. The changes are not expected to modify significantly these conclusions.

5.52   Specific recommendations on policies CP22 and CP23:

- The SA Report on the Preferred Options Core Strategy (October 2006) noted that it is vital that retail and associated development at Wembley, and other centres in the Borough, is complementary and not conflicting with existing local services. This remains the case, and consideration could be given to the inclusion of additional supporting or policy text which seeks to ensure this. It is recognised that major retail development and other large scale town centre uses are likely to attract important external investment to the Borough. There is some risk however that much of this benefit may also leave the Borough, as retailers of a scale suitable for a major location are likely to be national, or multinational, companies. The implications of this factor for local regeneration / benefit will be considered more fully through the ongoing SA work.

Culture, Sport and Tourism

Policy CP 24 - Promoting Culture, Sport and Tourism

Policy CP 24 - Promoting Culture, Sport and Tourism
Wembley will be promoted as a Strategic Cultural Area for London. Culture, sports and tourism activities, will also be encouraged in town centres in accordance with the sequential approach to development (see also Policy CP 23 'Town Centres and the Sequential Approach to Development').

5.53   Pre-Submission Core Strategy CP24 corresponds with previous Submission Core Strategy Policy CP CST1. However some previous policy text is deleted:

- Text stating that culture, sports and tourism activities will be encouraged in locations easily accessible by walking, cycling and public transport.

- Text setting out a broad statement of intent that facilities will be promoted and protected for the enjoyment and health of residents and visitors, and to enable Brent to become a showcase for entertainment and cultural diversity while balancing environmental impacts of increase tourism.

5.54   Both of these policy aspects are reflected in supporting text (as they were previously), and it is assumed these deletions are to simplify the policy and reduce duplication.

5.55   The supporting text remains largely unchanged, with minor modifications to include reference to specific relevant London Plan policies and the pending Brent Sports Facilities Improvement Strategy.

5.56   The SA Report on the Preferred Options Core Strategy (October 2006) concluded that Policy CP CST1 was very positive from a sustainability perspective. Some negative and mixed effects were predicted in relation to increased trip generation, waste generation and resource use associated with some culture, sport and tourism activities. The changes in the pre-Submission Core Strategy are not expected to modify these conclusions.

5.57   Specific recommendations on Policy CP24:

- Consider re-inclusion of specific policy text to encourage culture, sport and tourism facilities to be in location accessible by public transport, walking and cycling, as this was considered a very positive aspect of previous policy CP CST1.

Protecting Community Facilities

Policy CP 25 - Protection of Community Facilities

Policy CP 25 - Protection of Community Facilities
In order to ensure that the continuing needs of Brent's diverse community are met, existing community facilities, falling within the D1 use class, will be protected or appropriately replaced, or adequate compensation should be made for their loss.

5.58   Pre-Submission Core Strategy CP25 replaces previous Submission Core Strategy CP CF1. The policy text is entirely new, and the policy title has also been changed from CP CF1 – Meeting the Needs of the Community, to CP25 – Protecting Community Facilities.

5.59   Significant modification has also been made to the supporting text to Policy CP25. This is assumed to reflect the inclusion of additional text relating to community facilities provision in the Spatial Strategy, Policy CP12 – Infrastructure to Support Development, and related supporting text.

5.60   The new policy CP25 is predicted to have positive effects, particularly against social objectives.   However, the suggestion that "adequate compensation" may be appropriate in place of the loss of community facilities is potentially contrary to the overall intentions of the policy.   Although it is accepted that community facilities cannot always be protected, the complexities of measuring and understanding the significant well-being and community cohesion benefits of community facilities may mean that this loss outweighs any potential "compensation".

5.61   Previous Submission Core Strategy Policy CP CF1 sought to provide new, as well as protect existing community facilities, and while it is recognised that supporting text to Policy CP12 seeks, through planning obligations, the provision of "at least one major multi-purpose community building within each Growth Area" this change of policy emphasis is expected to reduce the significance of positive social effects predicted by the SA Report on the Preferred Options Core Strategy (October 2006) for Policy CP CF1.

5.62   Specific recommendations on Policy CP25:

- Clarify what "adequate compensation" may involve in practice.   It is recommended that this text be removed, or supported by text that stresses that protection and like-for-like replacement will be favoured and that only in exceptional circumstances will loss and compensation be acceptable, and in all cases this should be the result of consultation and engagement with the local community.

- Consider inclusion of policy text to reflect the need to meet existing needs and deficiencies in relation to community facilities.   It is recognised that the planning framework can only assist in meeting part of these needs however recognition of the need to provide new / tackle existing deficiencies in Policy CP25 would be welcomed from a sustainability perspective.

6. NEXT STEPS

6.1 The key next steps of the SA will involve:

- Reviewing and updating, as appropriate, the evidence base included in the SA Report on the Preferred Options Core Strategy (October 2006) and the SA Report on the Preferred Options SSA and Development Policies DPDs (June 2007) – as some time has passed since these reports were collated and the baseline and policy, plan and programme review will need to be revisited.

- Testing the revised Core Strategy Objectives against the sustainability objectives.

- Completing appraisal matrices to predict and evaluate the effects of the Core Strategy policies, including consideration with LBB of Core Strategy options. Proposal of mitigation and enhancement measures. As noted in sections 4 and 5 specific consideration will be given to:

  o Assessing the sustainability implications of policy deletions, modifications and mergers between the previous Submission Core Strategy and the pre-Submission Core Strategy, including consideration of the content of London Plan policies as appropriate.

  o Reviewing Core Strategies of adjacent boroughs as part of considering cumulative impacts, such as traffic generation.

- Reviewing measures to monitor the significant effects of the Core Strategy included in the Preferred Options SA Report, and modifying / updating as appropriate.

- Preparing the final revised SA Report.

APPENDIX 1   SUSTAINABILITY OBJECTIVES AND CRITERIA

Table 3: Sustainability objectives and criteria

Objective	Criteria
Social	
Prosperity and Social Inclusion S1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
	Will it improve affordability of essential services?
Health S2. To improve the health of the population	Will it improve access to high quality health facilities?
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?
	Will it reduce health inequalities?
	Will it reduce death rates?
Education and Skills S3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?
	Will it improve access to high quality educational facilities?
	Will it help fill key skill gaps?
Housing S4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?
	Will it encourage mixed use and range of housing tenure?
	Will it reduce the number of unfit homes?
	Will it reduce homelessness?
Quality of surroundings S5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?
	Will it improve residential amenity and sense of place?
	Will it reduce actual noise levels?
	Will it reduce noise concerns?
Crime Prevention and & Community Safety S6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?
	Will it reduce the fear of crime?
Community Identity S7. To encourage a sense of community; identity and welfare	Will it encourage engagement in community activities?
	Will it foster a sense of pride in area?
	Will it increase the ability of people to influence decisions?
	Will it improve ethnic relations?
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?
	Will it encourage people to respect and value their contribution to society?
Accessibility S8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?
	Will it improve the level of investment in key community services?
	Will it make access more affordable?
	Will it make access easier for those without access to a car?
Environmental	
Traffic EN1. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?
	Will it increase the proportion of journeys using modes other than the car?
	Will it encourage walking or cycling?
Water Quality & Resources	Will it improve the quality of inland water?

Objective	Criteria
	Will it reduce water consumption?
Air Quality EN3. To improve air quality	Will it improve air quality?
	Will it help achieve the objectives of the Air Quality Management Plan?
	Will it reduce emissions of key pollutants?
Biodiversity EN4. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency?
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?
	Will it maintain and enhance sites designated for their nature conservation interest?
	Will it maintain and enhance woodland cover and management?
	Will it encourage protection of and increase number of trees?
Landscape & Townscape EN5. To maintain and enhance the character and quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?
	Will it enhance the quality of priority areas for townscape and public realm enhancements?
	Will it maintain and strengthen local distinctiveness and sense of place?
	Will it minimise visual intrusion and protect views?
	Will it decrease litter in urban areas and open spaces?
Historic Environment & Cultural Assets EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites, features and areas of historical and cultural value?
	Will it protect listed buildings?
	Will it help preserve, enhance and record archaeological features and their settings?
Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?
	Will it lead to an increased proportion of energy needs being met from renewable sources?
	Will it reduce emissions of ozone depleting substances?
	Will it minimise the risk of flooding from rivers and watercourses to people and property?
	Will it reduce the risk of damage to property from storm events?
Waste Management EN8. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?
	Will it reduce household waste?
	Will it increase waste recovery and recycling?
	Will it reduce hazardous waste?
	Will it reduce waste in the construction industry?
Land and Soil EN9. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?
	Will it ensure that, where possible, new development occurs on derelict; vacant and underused previously developed land and buildings?
	Will it ensure land is remediated as appropriate?
	Will it minimise the loss of soils to development?
	Will it maintain and enhance soil quality?
	Will it reduce the risk of subsidence?
Economic	
Growth EC1. To encourage sustainable economic	Will it encourage new business start-ups and opportunities for local people?
	Will it improve business development and enhance productivity?

Objective	Criteria
	Will it improve the resilience of business and the local economy?
	Will it promote growth in key sectors?
	Will it promote growth in key clusters?
	Will it enhance the image of the area as a business location?
Employment EC2. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?
	Will it provide job opportunities for those most in need of employment?
	Will it help to reduce long hours worked?
	Will it help to improve earnings?
Regeneration EC3. To reduce disparities in economic performance and promote sustainable regeneration	Will it promote regeneration, reducing disparity with surrounding areas?
Investment EC4. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?
	Will it encourage inward investment?
	Will it make land and property available for business development?
Efficient Movement EC5. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?
	Will it improve accessibility to work by public transport; walking and cycling?
	Will it reduce journey times between key employment areas and key transport interchanges?
	Will it facilitate efficiency in freight distribution?