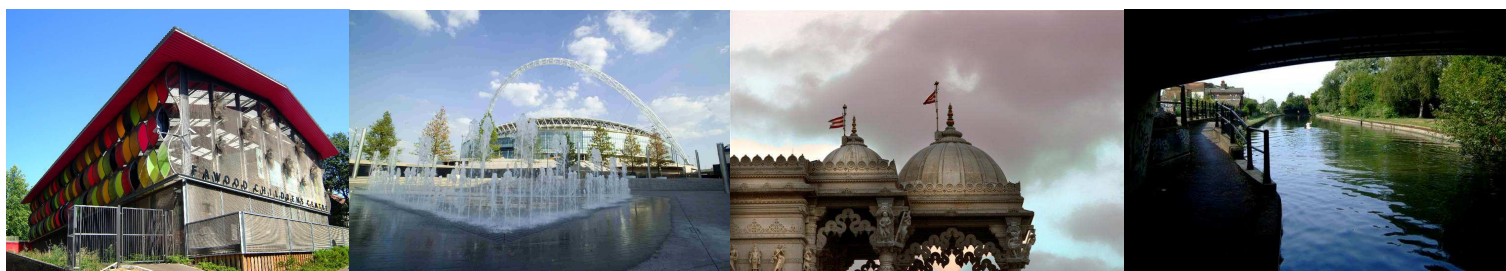


London Borough of Brent's Core Strategy & Site Specific Allocations

Submission Annex

Sustainability Appraisal Annex to:

- Core Strategy Preferred Options, Sustainability Appraisal Report, October 2006
- Development Policies and Site Specific Allocations Preferred Options, Sustainability Appraisal Report, June 2007



November 2007

Prepared by London Borough of Brent
&
Collingwood Environmental Planning



Introduction

The Sustainability Appraisal (SA) of both the Core Strategy and Site Specific Allocations Development Plan Documents Preferred Options was carried out on behalf of the Council by Collingwood Environmental Planning. The SA of the Core Strategy was published in October 2006 whilst the SA of the Site Specific Proposals was published along with that of the Development Policies DPD Preferred Options in June 2007.

There is a requirement, as set out in Planning Policy Statement 12 on Local Development Frameworks, to submit a final sustainability report, having taken into account any changes as a result of the public participation on Preferred Options. Where changes to the DPDs are minimal then guidance indicates that updating of the SA report can be in the form of an annex.

In the case of both Brent's Core Strategy and Site Specific Allocations DPDs, the changes being made are minimal so, consequently, it is considered that the updating to a final report is most usefully done in the form of an annex to the existing reports. This document, therefore, when taken together with the two original SA reports produced at Preferred Options stage, comprises the Final SA report for both the Core Strategy and Site Specific Allocations DPDs.

Changes since Preferred Options DPD stages

Part 1 Core Strategy

Although no new policy has been introduced since that proposed in the Preferred Options document, it has been concluded that the changes to the Business, Industry and Warehousing section have required a re-appraisal of two policies; these are revised policies BIW2 and BIW4. This re-appraisal is set out in Part 1 of this annex below.

In addition to the need for the above re-appraisal, certain policy content has been moved from that proposed in the Development Policies Preferred Options document into the Core Strategy submitted DPD, because of the likely strategic spatial implications of policy. These 'moved' policies are included in the Core Strategy as policies CP UD1 (Priority Enhancement Areas), CP UD2 (Tall Buildings) and CP TC2 (Brent Retail Need Allocations & Town Centre Opportunity Sites).

The SA of these 'moved' policies was undertaken as part of the appraisal of Development Policies, and set out in the SA report on Development Policies and Site Specific Allocations published in June 2007. The relevant policies which were appraised at this time are draft policies DP UD13 (Priority Enhancement Areas), DP UD12 (High Buildings) and DP TC1 (Brent Retail Need Allocations). For this reason the full appraisal report covering both Site Specific Allocations and Development Policies is made available as part of this final SA report. The relevant part of the appraisal report dealing specifically with these policies is also included in part 1 of this annex.

Part 2 Site Specific Allocations

Since sites were consulted upon at Preferred Options stage, a number of new sites have been proposed. It has been necessary to appraise these and the results of this appraisal are included in Part 2 of this annex. Certain sites have been included in the Submission version of the Site Specific Allocations DPD whilst other sites have not been included. At the same time a number of sites that were proposed at Preferred Options stage have now been excluded from the submitted DPD for various reasons. These a Development Plan Documents e also set out in part 2 with reasons for their exclusion.

Part 1 Core Strategy

Sustainability Re- appraisal

Former Policy CP BIW 2 has split and formed Policy CP BIW 2 and CP BIW 3. The re-appraisal will focus on the new Policy CP BIW 2.

Former Policy CP BIW 3 has become Policy CP BIW 4. A new criterion has been introduced to promote the delivery of intensified land use incorporating efficient movement. This annex will concentrate on re-appraising of this criterion because the remaining part of the policy continues the principle in the Core Strategy Preferred Options, and hence the findings remain as before.

CP BIW 2 Office Development

Proposals for office development (B1a) should comply with the sequential approach to development (see policy CP TC2). Office development is encouraged within the borough's town centres and in addition in the Wembley Regeneration Area and the First Central site in Park Royal.

CP BIW 4 Regeneration of Designated Employment Areas

Subject to CP BIW 1, the Council supports the regeneration of Strategic and Borough Employment Areas where it is satisfied that 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.

Summary of potential effects

Table 1.1 summarises the appraisal of proposed new employment policies in the submission Core Strategy DPD which previously had not been subject to sustainability appraisal. These new policies reflect a continuation of the key principle formed part of the Core Strategy Preferred Option which is to protect and expand employment and business opportunities. While the new policies reflect the key principle, they also emphasise specifically on promotion of business development at Wembley and Park Royal; and encouraging better land use for employment uses.

The overall effects of the new policies in the Strong Local Economy section are mixed. While encouraging business developments in Wembley and Park Royal, and promoting intensification of land use, are likely to have beneficial economic effects, particularly in creating employment opportunities, they will also potentially have negative environmental impacts.

The key, potentially positive, sustainability effects arising from the new policies:

- Policy BIW 2 reflects some positive impacts in the social aspect of the sustainability objectives. It especially meets the objective to reduce poverty and social exclusion by creating new job opportunities through promoting new business developments in areas of needs (Wembley & Park Royal).

- Policy BIW 4 is likely to have very positive effects on reducing the need to travel through encouraging more efficient use of land.
- Both policies perform very well against the sustainability objectives in the economic aspect and the effects are mostly very positive that are likely to have benefits to the borough's economy.






The key potentially negative sustainability effects arising from the new policies are:

- Policy BIW 4 could potentially increase noise level by creating intensification of land use.
- Both new policies appear to have adverse environmental effects on the existing air and noise qualities.

Table 1.1: Summary of re- appraisal

Objective	Policy No.		Comments on predicted effects
	BIW 2	BIW 4	
Social			
S1. To reduce poverty and social exclusion	+	+	Policy BIW 2 directs business developments to Wembley and Park Royal which is located within highly deprived areas. New business developments in these areas should increase job opportunities for the local community and consequently help to reduce social exclusion. Policy BIW 4 is likely to have similar effects, i.e. that employment opportunities would be optimised by intensifying employment land uses (maximising land capacity).
S2. To improve the health of the population	0	0	No significant social effects identified.
S3. To improve the education and skills of the population	+	0	Although Policy BIW 2 could make no direct contributions to improve education and skills of population, it is in association with BIW 3 which requires business developments to deliver training and employment opportunities for Brent residents. No significant social effects identified for Policy BIW 4.
S4. To provide everybody with the opportunity to live in a decent home	0	0	No significant social effects identified.
S5. To provide everybody with good quality surroundings	0	-	BIW 4 - Intensification of land uses could increase actual noise level.
S6. To reduce crime and anti-social activity	+	0	BIW 2 - Redevelopment of vacant building/ sites in Wembley Regeneration Areas and Park Royal could reduce the fear and the actual level of crime.
S7. To encourage a sense of local community; identity and welfare	0	0	BIW 2 – help to foster a sense of pride in the Wembley regeneration Areas building upon its new image as a National destination for tourists.
S8. To improve accessibility to key services especially for those most in need	0	+	Policy BIW 2 encourages business type of developments to be located in Wembley and town centres well served by public transport. Policy BIW 4 also requires developments to secure efficient movement. Intensifying developments in one location where there is a mix of uses/ services and efficient movement design will help to relieve traffic pressures from new developments on other locations.
Environmental			
EN1. To reduce the effect of traffic on the environment	+	++	By directing development to locations well served by public transport, the policies should contribute to traffic reductions that new developments will produce.
EN2. To improve water quality; conserve water resources and provide for sustainable	0	0	No significant environmental effects identified.

Objective	Policy No.		Comments on predicted effects
	BIW 2	BIW 4	
sources of water supply			
EN3. To improve air quality	--	-	Part of Policy BIW 2 could contribute to poorer air quality locally by directing business developments to Park Royal which is an existing AQMA. Policy BIW 4 may also worsen air quality by intensifying developments.
EN4. To conserve and enhance biodiversity	0	0	No significant environmental effects identified.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	0	Policy BIW 2 promotes the diversity of Wembley by directing business development to the area. Redevelopment as business park would enhance the townscape.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	No significant environmental effect identified.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	--	All new developments consume energy during construction and occupation and, consequently, increase emissions. However, directing development to areas well served by public transport could help reduce the need to travel and cut down greenhouse gas emissions.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	No significant environmental effects identified.
EN9. To conserve and enhance land quality and soil resources	+	++	The new elements in these policies all encourage redevelopments of Brownfield land and efficient use of land hence help to reduce development pressure on Greenfield land.
Economic			
EC1. To encourage sustainable economic growth	++	++	BIW 2 promotes locations for business uses and should increase employment opportunities for local people. BIW 2 will especially enhance the image of Wembley as a business location. BIW 4 requires an efficient use of employment land and should increase business opportunities.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	++	+	Same as EC1.
EC3. To reduce disparities in economic performance and promote regeneration	++	+	BIW 2 will help to reduce disparities by facilitating business type of developments Wembley and Park Royal, serving some of the most deprived areas in the Borough.
EC4. To encourage and accommodate both indigenous and inward investment	++	++	Policies have identified locations for employment uses and encourage efficient land use to maximise the site capacity for employment uses.
EC5. To encourage efficient patterns of movement in support of economic growth	+	++	Policy BIW 2 and BIW 4 meet this objective by directing employment uses to locations well served by public transport as well as requiring developments to secure efficient movement.
Overall comments on Policies			
The overall effects of the new policies in the Strong Local Economy section are mixed. While encouraging business developments in Wembley and Park Royal, and promoting intensification land use are likely to have beneficial economic effects, particularly in creating employment opportunities, they will also potentially have negative environmental impacts.			

Objective	Policy No.		Comments on predicted effects
	BIW 2	BIW 4	
Policy specific comments			
Key: Major positive:  Minor positive:  Neutral: 0 Minor negative:  Major negative:  Uncertain: ? Mixed: 			

Summary of mitigation and enhancement

Table 1.2 represents the mitigations and enhancement comments and recommendations arising from the re-appraisal of the new policies.

Table 1.2: Summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
BIW 2	The implementation of Urban Design policies in Core Strategy and forthcoming details development policies will support and enhance this policy.
BIW 4	The implementation of Urban Design policies in Core Strategy and forthcoming details development policies will support and enhance this policy. In particular, Core Policy UD 2 addresses the acceptable locations for tall buildings in the borough and requires such developments to be built exceed the minimum sustainability standards for the areas where they are located.

Sustainability Appraisal of Policies moved from Development Policies Preferred Options DPD to Core Strategy

This section repeats the sustainability appraisal findings for those policies carried over from the Development Policies DPD Preferred Options to the Submission Core Strategy. There have been no significant changes to these policies so further SA is not required. The following presents the summaries of the sustainability findings of the appraisal of the Development Policies in Preferred Options stage prepared by Collingwood Environmental Planning.

Summary of potential effects

Promoting a Quality Environment

The key potentially positive effects of the DP UD policies (*A Better Townscape – By Design*) are:

- Enhanced **quality of public realm, townscape and landscapes**, together with protection and **promotion of environmental quality and biodiversity** in the context of new development.
- These enhancements are expected to have beneficial effects on a number of social factors, in particular aiding **the reduction of crime and anti-social activity**, and **promoting local community identity and welfare**.
- Minor positive effects are also predicted for **improved health**, as design for safer and ‘clearer’ urban spaces can **increase physical activity** through walking and cycling, as well as having **positive effects on wellbeing**.
- Specific policies (UD17 and UD18) are expected to have significant positive effects on the protection and enhancement of the historic environment, by offering a high level of **protection for listed buildings and conservation areas**.
- The above noted positive effects are predicted to, indirectly create an urban environment and built fabric which **encourages communities in which people will choose to live and work**. This in the medium to long-term is predicted to have positive effects on the economic health of the borough.

No negative effects are expected arising from the DP UD policies. This reflects the nature of these policies, which seek to set specific criteria to help implement the higher level policies set out in the Core Strategy Preferred Options.

A Strong Local Economy

The key potentially positive sustainability effects arising from the *Strong Local Economy* policies include:

- Emphasis on the protection of local employment areas, and the provision of an appropriate mix of flexible work-spaces, such as work-live and home-working, is likely to **protect local employment and provide additional employment opportunities** in the local area.
- The encouragement provision of facilities to enable all sections of the population to work (such as childcare), can also **impact positively on poverty and social exclusion**.
- Where local businesses are able to thrive and more people are able to work close to home, or in the borough, **community identity, pride and**

wellbeing can be improved. Crime may also be reduced where centres become more vibrant, perhaps especially due to the **protection of existing retail space** in town centres.

- Culture, Sport and Tourism policies are particularly predicted to have a strong positive effect on community identity and welfare, and the promotion of cultural assets. As noted above the greatest local benefit is likely to come from the promotion of relatively small scale, locally specific cultural, leisure and tourism facilities.
- Promoting and protecting local markets may also lead to the **regeneration of certain areas**, and can help in the **establishment of new retail businesses**.
- By protecting local employment, and providing facilities for employees near to work, some **travel need can be reduced** to employment elsewhere, and during the working day.
- This, in turn may have positive environmental effects, **reducing traffic related air-pollution, and helping to mitigate for climate change**.
- Supporting local and new businesses will also bring about **economic development** benefit for the borough.

Table 1.3: Carried over Development Policies – appraisal summary

Objective	Policy No.			Comments on predicted effects
	UD 12	SD1	TC1	
Social				
S1. To reduce poverty and social exclusion	0	+	0	SD1/2 – homes and developments built to higher standards of construction and to be more efficient will assist in exclusion issues such as fuel poverty and ill-health due to poor heating / damp etc.
S2. To improve the health of the population	0	+	0	SD1/2 – see S1.
S3. To improve the education and skills of the population	0	0	0	UD12 - No significant effects are predicted. SD1 - No significant effects are predicted.
S4. To provide everybody with the opportunity to live in a decent home	0	+	0	UD12 - Improved urban design should have a positive effect generally on the quality of housing. SD1/2 – See S1
S5. To provide everybody with good quality surroundings	+	0	0/+	UD12 - All policies seek to improve or ensure some specific aspect of urban design, thereby contributing to the quality of surroundings.
S6. To reduce crime and anti-social activity	0	0	0	SD1 - No significant effects predicted.
S7. To encourage a sense of local community; identity and welfare	0	0	0/+	SD1 - No significant effects predicted.
S8. To improve accessibility to key services especially for those most in need	0	0	+	SD1 - No significant effects predicted.
Environmental				
EN1. To reduce the effect of traffic on the environment	0	0	-/+?	SD1 - No significant effects predicted.

Objective	Policy No.			Comments on predicted effects
	UD 12	SD1	TC1	
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	+	0	SD1 – developments required to address water demand and use efficiency.
EN3. To improve air quality	0	+	-/+?	SD1 – developments required to address air quality issues.
EN4. To conserve and enhance biodiversity	0	+	0	SD1 – developments required to consider environmental protection policies in relation to climate change adaptation and mitigation – this is likely to include habitat and biodiversity.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	+	0/+	UD12 – requires buildings to be of “outstanding” architectural and urban design quality and to fit in with existing surroundings. SD1 – particularly in the long-term, the effects of higher standards in building and materials is likely to be more attractive and resilient urban environments.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	SD1 - No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	+/+ +	-/+?	SD1 - Central aim of the policy, however significant positive effect will depend on the implementation of other policies referred to.
EN8. To minimise the production of waste and use of non-renewable materials	0	+	0	UD12 - No significant effects are predicted. SD1 – developments required to consider material / resource efficiency and operational waste – through other policies.
EN9. To conserve and enhance land quality and soil resources	0	+	0	SD1 – in longer term by designing spaces and development able to adapt to climate change effects likely effect is to protect land quality.
Economic				
EC1. To encourage sustainable economic growth	0	+	+	UD Other policies – mixed scores given as none explicitly encourage economic growth however a better quality, more useable, user friendly and safe local public realm, buildings and spaces is likely in the long-term to encourage people to want to remain in Brent, as well as providing an attractive environment for people to live, work and establish businesses. SD1 – more resilient and adaptable developments, designed to be comfortable for use with climate change effect taken into account, are more likely to offer the development foundations for sustainable economic success in the borough.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	+	No significant effects predicted. SD5 – see above
EC3. To reduce disparities in economic performance and promote regeneration	0	0	+	UD12 - See EC1. SD1 - No significant effects predicted.
EC4. To encourage and accommodate both indigenous and inward	0	0	+	UD12 - No significant effects predicted, however this objective does relate to EC1 and EC3. SD1 - No significant effects predicted.

Objective	Policy No.			Comments on predicted effects
	UD 12	SD1	TC1	
investment				
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	-/+?	SD1 - No significant effects predicted.
Overall comments on Policies UD1 – UD12				
<p>A positive set of policies, with no negative scores. Scores are very positive against policies related to public realm, townscape and local urban environmental quality, and connected to this to against policies related to communities, reducing exclusion, reducing crime, with these latter effects particularly predicted in the medium to long-term.</p>				
Overall comments on Policies SD1 – SD7				
<p>The SD policies score positively against all objectives they are relevant to. There are a large number of zero scores (no effect predicted) reflecting the specific and focussed nature of the Development Policies.</p> <p>Some very positive effects are predicted. These are assigned where a policy specifically addresses a specific SA objective – for example policy SD4 and objective EN2 – both concerned with water demand and conservation.</p> <p>The objective which has the highest number of positive scores is EN7 – reducing contributions and vulnerability to climate change. This reflects the overall focus of the sub-chapter, as set out in the introduction and SD1.</p> <p>There is one possible negative effect predicted, however this is scored as “uncertain” – with a question mark – as the effect is not certain. This is for the possibility of some negative local air-quality impacts of an increase in small-scale biomass or other micro-generation initiatives in the borough – policy SD3. This issue is noted in Policy ENV1, further limiting the potential for a negative effect.</p>				
Overall comments on policies TC1 – TC8				
<p>Overall the predicted effects of these policies ARE positive against all relevant SA objectives. However these policies are predicted to have slightly more mixed effects than those of previous chapters, particularly against environmental objectives – reflecting the complex issues surrounding the balance between successful and thriving local businesses and town-centres, while protecting environmental needs and values.</p> <p>The social and economic effects predicted are to be minor in magnitude, and largely positive. Some possible minor negative social impacts are predicted for policy TC4 – car-boot and other recycling sales. This is due to the particular nature of these events, which can bring traffic, people and thus nuisance and dis-amenity to residential areas.</p> <p>As noted there are some mixed and minor negative effects predicted against the environmental SA objectives. These relate to the possible traffic impacts of certain business, employment and town-centre activities, for example enabling / encouraging an increase in retail space, while meeting a social / economic need, is likely to create additional journeys, even taking the proactive approach taken by policy to ensure these uses are located in existing centres. The minor negative scores thus recognises that all effort is being made to minimise negative impacts, but that some impact of such changes may occur all the same. Again policy TC4 has the highest number of negative scores, though none of these are expected to be major-negative.</p>				
Policy specific comments				
SD1:				
<ul style="list-style-type: none"> - Reference to and inclusion of information from the London and Brent Ecological Footprint studies is welcomed, as it draws attention in a clear manner to the need for new approaches if development at all levels is to meet sustainability objectives. - This policy cross-refers to a number of other policies in the chapter, and thus scores will depend on how these policies are implemented. - One of the additional documents suggested in the SA commentary has been included – this is welcomed. We would still suggest that reference might usefully be made to the Mayor’s forthcoming Climate Change Adaptation Strategy. - As noted in our SA commentary the policy text (bullets) could refer to a wider range of other policies than those noted, for example planting and landscaping (OS7), reducing travel need (TRN2). 				
TC1:				

Objective	Policy No.			Comments on predicted effects
	UD 12	SD1	TC1	
-				<p>As noted in the appraisal of the Core Strategy and in our SA commentary on the earlier draft Development Policies, we would recommend the inclusion of specific text, possibly within the supporting text to policy TC1 which recognises that while the focus of allocations will be as set out in policy, the Council will consider the impact on independent local services in all cases to ensure such impacts are minimised.</p> <p>The rationale for this inclusion would be that independent, locally or regionally owned retail businesses are much more likely to lead to long-term economic benefit to the borough, than retail outlets owned by national or international retail chains, who may provide some local employment, but from which most profit will be siphoned off to other parts of the country due to ownership and management chains involved.</p>
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+</p>				

Summary of mitigation and enhancement

Table 1.4 below bring together comments included in the above appraisals which concern the mitigation and enhancement recommendations arising from the appraisal. This text draws particularly from the text included under “overall comments” and “policy specific comments” in each matrix.

Promoting a Quality Environment – mitigation and enhancement

Given the highly positive effects predicted, and the lack of any significant negative effects of the Promoting and Quality Environment Policies, the mitigation and enhancement comments for policies in this aspect are relatively limited.

Table 1.4 Summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
UD policies: A Better Townscape – By Design	No potential negative effects identified for Policy UD12 hence specific mitigation and enhancement not required.
SD policies: Towards and Sustainable Brent, 2020	<p>SD1:</p> <p>Reducing travel need as an aspect of climate change mitigation was included in Core Strategy policy ENV1, however it does not appear within these policies at all – notably, this could perhaps be included in policy DP SD1, which could strengthen these policies.</p> <p>We suggest that reference might usefully be made to the Mayor’s forthcoming Climate Change Adaptation Strategy, as this will, when adopted be an important document for outlining the priorities in response to Climate Change in London.</p> <p>As noted in our earlier SA commentary, the policy text could refer to a wider range of other policies than those noted, for example planting and landscaping (OS7) and reducing travel need (TRN2).</p>

A Strong Local Economy – mitigation and enhancement

Some minor policy clarifications and text changes are suggested in Table 3, below which provides and overview of *Mitigation and Enhancement* recommendations for the draft *Strong Local Economy and Community Facilities* policies.

Table 1.5 brings together comments included in the above appraisals which concern the mitigation and enhancement recommendations arising from the appraisal. This text draws particularly from the text included under “overall comments” and “policy specific comments” in each matrix.

Table 1.5: Summary mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
TC policies:	TC1:

Policy	Proposed mitigation and enhancement and SA comments
Town Centres and Shopping	<p>We would recommend the inclusion of specific text, possibly within the supporting text to policy TC1 which recognises that while the focus of allocations will be as set out in policy, the Council will consider the impact on existing independent local services in all cases to ensure such impacts are minimised.</p> <p>The rationale for this inclusion would be that independent, locally or regionally owned retail businesses are much more likely to lead to long-term economic benefit to the borough, than retail outlets owned by national or international retail chains, who may provide some local employment, but from which most profit will be siphoned off to other parts of the country due to ownership and management chains involved.</p>

Part 2: Appraisal of Site Specific Allocations Proposed Post Preferred Options

Following consultation on the Site Specific Allocations (SSA) Preferred Options, new sites have been put forward and some sites have been removed in preparing Brent's Submission version. Therefore, an appraisal of these new sites has been undertaken.

Refining the Submission Site Specific Allocations:

At the Preferred Options stage, the preferred option for each site were put to public consultation; after consultation some site allocations have been withdrawn due to commencement of development and/ or representations received.

A number of representations received at Preferred Options stage recommended additional site allocations. These are listed in Tables 2.1, 2.2 and 2.3 by area and are appraised within this Annex.

The appraisal of additional sites included the use of appraisal proformas which considers key economic, environmental and social issues, opportunities and constraints of each site, and the potential sustainability strengths and weaknesses associated with them. A summary of these opportunities and constraints have been included in Tables 2.4, 2.5, and 2.6.

Based upon the information provided in appraisal proformas and key issues in Table 2.7, the Council have decided to include in the Submission stage some of the additional sites proposed during the Preferred Options consultation (Table 2.8). The sites that were proposed at Preferred Options stage but rejected and not included in the submission document are shown in Table 2.9, with reasons for rejection.

Additional Sites recommended after Preferred Options consultation:

Table 2.1: Sites in Brent’s North Planning Team Area

Site no.	Site Name	Ward	Area ha	Recommended Option
SSA 112	Clock Cottage	Kenton	0.47	Residential institution, residential, community or ancillary uses.
SSA 117	Multi-Use Games Area, Roe Green Park	Fryent	1	Swimming pool
SSA 118	Greenhouse Garden Centre	Sudbury	2.5	Residential with amenity area
SSA 122	Remploy House, 415 Edgware Road	Dollis Hill	0.4	Flexible use of site

Table 2.2: Sites in Brent’s South Planning Team Area

Site no.	Site Name	Ward	Area ha	Recommended Option
SSA 113	Wembley Point	Stonebridge	1.1	Redevelopment of the site to retain the office building in its current use; develop part of the site not in functional flood plain for a residential development and other complimentary uses.
SSA 114	Homebase	Dudden Hill	0.9	Mixed use redevelopment including residential and light industrial units including a proportion of managed affordable workspace and amenity space.
SSA 116	Dudden Hill Playground	Willesden Green	0.04	Small mixed use development with community, leisure or retail use on the ground floor with residential above.

Table 2.3: Sites in Brent’s West Planning Team Area

Site no.	Site Name	Ward	Area ha	Recommended Option
SSA 119	Artesian Close, Industrial Estate	Stonebridge	0.5	Mixed use including residential
SSA 120	Former Palace of Arts & Industry	Tokynton	5.8	Mixed use including residential, commercial, retail, leisure and hotel development
SSA 121	Harrow / Roundtree Road	Sudbury	0.1	Residential over community or retail use.
SSA 123	Chiltern Railway Cutting North, Wembley	Stonebridge	2.3	Residential with improved pedestrian links and nature/recreation provision
SSA 124	Chiltern Railway Cutting South Wembley	Stonebridge	3.3	Retail and active frontages facing the High Road with residential led mix of other town centre sites

Appraisal of key sustainability issues of the additional sites recommended during/after Preferred Options consultation

An appraisal was undertaken of each additional site recommended after Preferred Options consultation against a series of issues/ constraints and opportunities using the proformas and GIS information (footnoteⁱ). The information contained with the proformas have been summarised in Tables 2.1-2.3. The appraisal criteria varied depending on the proposed use of the site (i.e. Housing, Mixed- Use, Economic and Community) but included:

- Access to most deprived areas
- Location of sites in growth/ strategic employment areas
- Location of site areas that are a priority for regeneration
- Sites that will result in the loss of open space
- Sites that are located in areas of open space deficiency
- Accessibility by public transport (PTAL)
- Sites located in the proximity of nature conservation importance sites/ SSI's
- Sites located in flood risk areas
- Sites that affect listed buildings or are within a Conservation Area
- Sites located within an existing MOL boundary
- Sites within an Air Quality Management Area
- Noise levels
- Sites located in Greenfield land

Some criteria were not appropriate to the site / proposal, in these circumstances a '-' (dash) represents this.

ⁱ Figures: 31, 32, 33, 34, 35, 36 within Brent's Development Policies and Site Specific Allocations DPD's Preferred Options- SA report Part C

Table 2.4: Economic Criteria, Constraints and Opportunities

Site no.	Site Name	Area Team	Recommended Use	Is the site in or within easy access of the most deprived wards?	Is the site in an area that is a priority for regeneration or within a Strategic Employment Area?	If the site includes retail: is the site located in a town centre or edge of centre location?	Planning Guidance
112	Clock Cottage	North	Residential institution/ community or ancillary uses	No	No	No	
113	Wembley Point	West	Residential	-	Periphery of Park Royal and Stonebridge Opportunity Areas	No	
114	Homebase	South	Mixed use	Yes	Church End Regeneration Area	No	
116	Dudden Hill Playground	South	Residential / community	Yes	No	Edge of Willesden Green Town Centre	
117	Multi-Use Games Area	North	Community (Swimming pool)	No	No	In proximity to Kingsbury Town Centre	
118	Greenhouse Garden Centre	North	Residential	-	No	No	
119	Artesian Close Industrial Estate	West	Mixed use	Yes	Stonebridge Regeneration Area	No	
120	Former Palace of Arts	West	Mixed use	Yes	Wembley Regeneration Area	Edge of Wembley Town Centre	
121	Harrow/ Roundtree Road	West	Residential	-	No but adjacent to a major estate regeneration area	No	
122	Remploy House, 415 Edgware Road	North	Flexible use	Yes	Strategic Employment Area	No	
123	Chiltern Railway Cutting North	West	Residential	-	Wembley Regeneration Area	Wembley Town Centre	

124	Chiltern Railway Cutting South	West	Retail	Yes	Wembley Regeneration Area	Wembley Town Centre	
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Table 2.5: Social Criteria, Constraints and Opportunities

Site no.	Site Name	Area Team	Recommended Use	Will the site result in the loss of open space?	Is the site within an area of open space deficiency?	Is the site within 200m of a bus stop / 400m from train station?	PTAL score of site	Distance to a GP	Is the site within the catchment of a school
112	Clock Cottage	North	Residential institution/ community or ancillary uses	No	No	194m to bus stop	1a	194m	-
113	Wembley Point	West	Residential	No	No	16.86m to bus stop & 123.33m to train station	3-4	444.93m	Brentfield Primary, Oakington Manor
114	Homebase	South	Mixed use	No	Yes	86m to bus stop	3	820m	Leopold Primary, St Josephs RC
116	Dudden Hill Playground	South	Residential / community	Yes	Yes	42m to bus stop	4	414m	Covent of Jesus Mary, St Mary Magdalen, St Andrews & St Francis
117	Former Kingsbury Pool (part of newly developed Multi-Use Games Area)	North	Community (Swimming pool)	In part	No	56m to bus stop	2	-	-
118	Greenhouse Garden Centre	North	Residential	Yes	No	945m to bus stop	1a	1545	Fryent Primary, Woodfield School
119	Artesian Close	West	Mixed use	No	No	66m to	1a-2	556m	Brentfield

	Industrial Estate					bus stop			Primary
120	Former Palace of Arts	West	Mixed use	No	Yes	Bus stops are located around the 5.8 ha site, 494m to train station	4-5	723m	St Josephs RC, Copland Community School
121	Harrow/ Roundtree Road	West	Residential	No	No	27m to bus stop & 23.88m to train station	4	882m	Sudbury School
122	Remploy House, 415 Edgware Road	North	Flexible use	No	Yes	165 to bus stop	2	1069m	Our Lady of Grace RC, John Kelly
123	Chiltern Railway Cutting North	West	Residential	Yes	Yes	Bus & train directly adjacent	4	-	-
124	Chiltern Railway Cutting South	West	Retail	Yes	-	Bus & train directly adjacent	4	-	-

Table 2.6: Environmental Criteria, Constraints and Opportunities

Site no.	Site Name	Area Team	Recommended Use	Will the site affect an SSSI or other site of nature conservation importance?	Is the site within Zone 2 or Zone 3 of the floodplain?	Is the site located within an existing MOL boundary?	Is the site within an Air Quality Management area?	Estimated day time maximum noise levels in vicinity	Is the site on previously developed land?	Is the site contaminated/ does it require remediation?	Does the site affect a listed building, conservation area?
112	Clock Cottage	North	Residential institution/ community or ancillary uses	Site is located adjacent to a site of important nature conservation	No	No	Yes	50-55db	Previously developed	Adjacent to potentially contaminated sites	Locally listed building
113	Wembley Point	West	Residential	No	Southern site zone 3b, majority zone 2	No	Yes	60-65db	Previously developed	Potentially contaminated	No
114	Homebase	South	Mixed use	No	No	No	Yes	60-70db	Previously developed	Potentially contaminated	No
116	Dudden Hill Playground	South	Residential / community	No	No	No	Yes	60-65db	No	In close proximity to potentially contaminated land	No
117	Multi-Use Games Area	North	Community (Swimming pool)	Yes	No	No	No	55-60db	Recently developed	No	No
118	Greenho	North	Residential	Yes	No	No	No	55-60db	Previously	No	No

	use Garden Centre								developed		
119	Artesian Close Industrial Estate	West	Mixed use	Borders on site of nature conservation importance	No	No	Yes	50-60db	Previously developed	Potentially contaminated	No
120	Former Palace of Arts	West	Mixed use	No	Adjacent to zone 2	No	No	35-50db	Previously developed	Potentially contaminated	No
121	Harrow/Roundtree Road	West	Residential	No	No	No	Yes	65-70db	Previously developed	Potentially contaminated	No
122	Employ House, 415 Edgware Road	North	Flexible use	No	No	No	Yes	55-65db	Previously developed	Potentially contaminated	No
123	Chiltern Railway Cutting North	West	Residential	Site of important nature conservation	No	No	No	50-55db	-	Potentially contaminated	No
124	Chiltern Railway Cutting South	West	Retail	Site of important nature conservation	No	No	no	50-55db	-	Potentially contaminated	No

Table 2.7: Summary of key issues for all proposed sites

Key Issues/Criteria	Summary of Appraisal Findings	SA Comments
Access to most deprived areas	<p>North: Majority of sites propose a residential/ community use, are not within easy access to the most deprived wards, with the exception of Remploy House.</p> <p>South: Both mixed/ community uses are within or close proximity to the most deprived wards.</p> <p>West: Sites which propose mixed or retail uses are within or in close proximity to the most deprived wards.</p>	Promoting growth and regeneration in the most deprived parts of the borough is an important objective of the Core Strategy. Where community or employment uses are proposed the council should seek to improve access from the most deprived wards.
Location of sites in growth/ strategic employment areas & areas that are a priority for regeneration	<p>North: Majority of sites are not located within growth areas, Remploy House is the only site located within a strategic employment area.</p> <p>South: Homebase mixed use proposal is within Church End Regeneration Area.</p> <p>West: All proposed sites are within or within close proximity of Wembley and Stonebridge Regeneration Areas</p>	<p>CPSS4 supports commercial regeneration, in particular sites in Park Royal, Staples Corner, Wembley/Neasden and East Lane. Policies CPSS3 & CPSS5 also support growth in Wembley, South Kilburn, Church End, Alperton, Burnt Oak/Colindale.</p> <p>North area sites are generally small or propose community/ residential uses. Remploy House would result in the loss of employment land within a strategic employment area.</p>
Sites that will result in the loss of open space	<p>North: Greenhouse garden centre proposal will result in the loss of open space.</p> <p>South: Dudden Hill Playground will result in the loss of existing open space.</p>	Inclusion of any site that will result in the loss of open space should have regards to CPOS1 which aims to protect open space from inappropriate development.

	<p>West: Chiltern Railway Cutting, North & South, will result in the loss of existing open space</p>	
<p>Sites that are located in areas of open space deficiency</p>	<p>North: Greenhouse Garden Centre & Remploy House.</p> <p>South: Homebase and Dudden Hill Playground.</p> <p>West: The Former Palace of Arts & Chiltern Railway Cuttings.</p>	<p>CPOS1 encourages the provision for new open space in areas of deficiency. Proposals which are within areas of deficiency may require improvements/ contributions to open space.</p> <ul style="list-style-type: none"> • With the exception of Remploy House (Strategic Employment Area) Greenhouse Garden Centre is located within existing open space and therefore its development appears inappropriate to the Borough's needs. • Dudden Hill Playground proposal will result in the loss of open space in an area which is deficient. • Chiltern Railway Cutting will result in the loss of open space in an area which is deficient.
<p>Accessibility by public transport/ PTAL</p>	<p>The following sites would require improvements to accessibility by public transport and/or have low PTAL scores.</p> <p>North: 112 Clock Cottage, 117 Multi-Use Games Area, 118 Greenhouse Garden Centre, 122 Remploy House.</p> <p>South: 114 Homebase</p> <p>West: 119 Artesian Close</p>	<p>CPSS7 supports development in locations accessible by public transport. Where a site is not easily accessible / has low PTAL scores contributions should be sought in accordance with CPTRN1.</p>
<p>Sites located in the proximity of nature conservation importance & Metropolitan Open Land</p>	<p>North: Clock Cottage and Multi-Use Games Area are located in proximity and/or within an area of important nature conservation. Greenhouse Garden Centre is located within Metropolitan Open Land.</p> <p>West: Artesian Close is in close proximity to a site of important nature conservation. Whilst the Chiltern Railway Cuttings are within a site of important nature conservation.</p>	<p>CPOS2 aims to protect existing habitats.</p>
<p>Sites located in flood risk</p>	<p>North: No proposals are located within zone 2 or 3 of the</p>	<p>PPS25 requires that all planning applications for new development proposals of 1 hectare or greater in flood risk zone 2/3 or 1 hectare or</p>

areas	<p>floodplain.</p> <p>South: Wembley Point is within zone 3b and 2 of the floodplain.</p> <p>West: Former Palace of Arts is adjacent to zone 2 of the floodplain.</p>	greater should be accompanied by a flood risk assessment.
Sites that affect listed buildings or are within a Conservation Area	<p>North: Locally Listed- Clock Cottage</p>	DP UD17 & DP UD18 (preferred options) alterations should not be unsympathetic to the building/ areas character.
Sites within Air Quality Management Areas:	A large number of allocations are within an AQMA.	DP ENV1 (preferred options) states that the potential impact on air quality will be taken into account in the assessment of planning applications.
Sites that affect noise levels	Complaints in noise have risen in Brent since 2002, reported in the AMR there seems to be a correlation between noise complaints and housing density.	DP ENV2 (preferred options) states that the council will consider potential adverse impact – especially potential noise generating uses near or within areas of existing sources of significant noise.
Sites within contaminated land	A large number of sites are within potentially contaminated land as a result of historic industrial uses	DP ENV4 (preferred options) Development will be permitted where the extent of contamination is known and mitigation measures will render it acceptable for the proposed use.

Table 2.8: Sites included after Preferred Options stage

Site no.	Site Name	Preferred Use	Issues	Amendments/ Mitigation
112	Clock Cottage	Residential institution, residential, community or ancillary uses	<ul style="list-style-type: none"> • Locally Listed building • Directly adjacent to a site of important nature conservation • Not within access of most deprived wards • Low PTAL score 1 • The site is located within an AQMA and the average noise levels in the vicinity of the site are higher than those recommended by WHO • The site is adjacent to contaminated land 	<ul style="list-style-type: none"> • Any development should retain the Clock Cottage stabling block and have regard to its locally listed status by ensuring there is no adverse impact on its setting or on the setting of Kenton Grange. • In taking forward proposals for sites within or adjacent to areas of importance for nature conservation, it should be done in accordance with the relevant Core Strategy policies and Development Policies. This includes requiring appropriate buffer strips along the sites in accordance with the relevant policies. • Access to the site should be improved as part of any development, the low PTAL score should be reflected in choosing a low density development. • Possible contamination of the site should be investigated. • Development within an AQMA should incorporate adaptation measures to protect the indoor environment from poor external air quality and include measures to reduce emissions. • Development should have regards to noise levels in the vicinity of the site and also the potential increase in noise levels as a result of the development. Mitigation measure should be incorporated to development that may affect noise and vibration levels.
113	Wembley Point	Redevelopment of site to	<ul style="list-style-type: none"> • Southern part of site in flood risk 	<ul style="list-style-type: none"> • Sequential test is required

		retain the office building in its current use; develop part of the site for a residential development and other complementary uses	<p>zone 3b- the majority of site is in flood risk zone 2</p> <ul style="list-style-type: none"> • Site may be potentially contaminated • The site is located within an AQMA and the average noise levels in the vicinity of the site are higher than those recommended by WHO 	<ul style="list-style-type: none"> • Include reference to potentially contaminated land- study will be required as part of application/ condition • See proposed mitigation for air quality and noise issues under site 112 above.
114	Homebase, Church End	Mixed use redevelopment including residential (of which a significant proportion should be family sized) and light industrial units including a proportion of managed affordable workspace and amenity space.	<ul style="list-style-type: none"> • The site area is deficient in open space • The site is located within an AQMA and the average noise levels in the vicinity of the site are higher than those recommended by WHO 	<ul style="list-style-type: none"> • Allocation should contribute to improving landscaping surrounding and within the site. Any development should contribute to open/amenity space for the site. • See proposed mitigation for air quality and noise issues under site 112 above.
116	Dudden Hill Playground	Small mixed use development with community, leisure or retail use on the ground floor with residential above	<ul style="list-style-type: none"> • Loss of open space within an area of open space deficiency • The site is close and accessible to the most deprived wards • The site is located within an AQMA and the average noise levels in the vicinity of the site are higher than those recommended by WHO 	<ul style="list-style-type: none"> • The loss of open space in this area will require contributions towards the provision of a new facility within close proximity of the site. • See proposed mitigation for air quality and noise issues under site 112 above.

Table 2.9: Sites recommended after Preferred Options consultation but not included

Site no.	Site Name	Area Team	Preferred Use (recommended by consultee)	LB Brent Reasons for rejection
117	Multi-Use Games Area, Roe Green Park	North	Swimming pool	<ul style="list-style-type: none"> Recently developed as multi-use ball games area therefore little prospect of the site being brought forward as a swimming pool site in the short term, and other locations may now be more appropriate
118	Greenhouse Garden Centre	North	Residential with amenity area	<ul style="list-style-type: none"> Site is within Metropolitan Open Land, which is a strategic open space for London and is to be protected. The existing garden nursery is considered an acceptable use on MOL. The site has very poor public transport accessibility. Proposing new housing would substantially add to traffic and congestion problems within Birchen Grove, particularly as access would primarily be by private car
119	Artesian Close Industrial Estate	West	Mixed use including residential	<ul style="list-style-type: none"> Evidence base demonstrates demand for employment land in the borough and Strategic and Borough Employment Area designations should remain. Alternative, more suitable sites have been identified to meet housing targets and Council does not consider there to be outweighing need for residential development at this location that would undermine its employment land portfolio
120	Former Palace of Arts & Industry	West	Mix use including residential, commercial, retail, leisure and hotel development	<ul style="list-style-type: none"> Existing guidance ('saved' UDP 2004 policy relating to Wembley Regeneration Area and SPG documents)

				considered sufficient for site to come forward with proposed mix of uses
122	Remploy House, 415 Edgware Road	North	Flexible use of site	<ul style="list-style-type: none"> Difficulties in letting properties not considered sufficient reason for requiring site allocation setting aside Council's usual policy regarding Strategic Employment Areas
123	Chiltern Railway Cutting North, Wembley	West	Residential with improved pedestrian links and nature/recreation provision.	<ul style="list-style-type: none"> Site covered by 'saved' UDP 2004 policy relating to Wembley Regeneration Area considered sufficiently up-to-date guidance for the site. Loss of significant nature conservation value at site would not be considered acceptable due to outweighing local benefit as Council expects to exceed housing targets on more appropriate sites
124	Chiltern Railway Cutting South, Wembley	West	Retail and active frontages facing the High Road with a residential led mix of other town centre uses.	<ul style="list-style-type: none"> Site covered by saved UDP 2004 policy relating to Wembley Regeneration Area. This provides sufficiently up to date guidance for this site

General SA conclusions on the appraisal of the additional Site Allocations included after the Preferred Options stage:

- 12 sites were proposed during/after the Preferred Options consultation; of those, four new site allocations will be included in the submission stage.
- The inclusion of these sites does not significantly change the findings of the overall appraisal of the sustainability effects of the Site Specific Allocations DPD Preferred Options included in Table 39 of the SA report.
- The sustainability appraisal of the new sites has not found that any of those sites should not be included in the submission stage due to their significant sustainability implications.
- General mitigation and enhancement recommendations included in Table 39 of the SA report apply to the new sites included in this Annex. Key areas identified in the SA Report included: flood risk, resource use and waste production, minimising emissions from new developments and improving access to some sites.
- In addition, recommendations for the mitigation and enhancement of specific sites have been included in Table 4 of this Annex.

Table 2.10: Sites included in Preferred Options stage but excluded from submission

The following table lists the Site Specific Allocations that were included in the Preferred Options stage but have been excluded from the Submission stage together with LB Brent reasons for exclusion.

Site no.	Site Name	Area Team	Preferred Use	LB Brent reasons for exclusion from Submission
56	The Lancer Public House, Kenton Road	North	Mixed use development including residential and retail and or food and drink.	<ul style="list-style-type: none"> • Permission has been granted in line with the allocation. A subsequent permission for a rear extension has commenced.
58	Prince of Wales Public House, Kingsbury Circle	North	Mixed use including residential above new active frontage for retail and or food and drink	<ul style="list-style-type: none"> • Development has commenced on site from planning permission 05/1204 'Demolition of existing building and erection of 4-/5-storey building comprising 44 flats consisting of 26 x 1-bedroom & 18 x 2-bedroom self-contained flats on upper floors and retail unit on ground floor with associated car-parking spaces and servicing and subject to a Deed of Agreement dated February 16th 2006 under Section 106 of the Town and Country Planning Act 1990, as amended.'
82	387- 395 Chapter Road	South	Residential development, including amenity / open space	<ul style="list-style-type: none"> • Development has commenced on site from application 06/0994 'Demolition of existing buildings and creation of 38 dwellings, comprising a 3- and 5-storey building (block A-B) consisting of 28 self-contained flats, a 4-storey building (block C) consisting of 6 self-contained flats, a 3-storey building (block D) containing healthcare premises on the ground floor and 4 self-contained flats above, new electricity substation to rear of 24 Cooper Road, new vehicular access onto Cooper Road, new pedestrian access from Cooper Road to Chapter Road, provision of 4 car-parking bays and provision of external bin stores (as

				accompanied by Design Statement April 2006 and Ground Investigation Report April 2004) and subject to a Deed of Agreement dated 03/08/2006 under Section 106 of the Town and Country Planning Act 1990 (as amended)'
87	Kingsbury High School, Princes Avenue	North	Consolidation and reconfiguration of High School campuses – to improve and expand school buildings and free up space for improved sports and recreation facilities.	<ul style="list-style-type: none"> • The school requested the removal of the allocation.
98	South Way, Wembley	West	Continuation and completion of Stadium Access Corridor	<ul style="list-style-type: none"> • The council is seeking an alternative route for access to alternative event parking.
105	Brook Avenue, Wembley	West	Amalgamation and assembly of development parcels delivering a higher density residential use and amenity space.	<ul style="list-style-type: none"> • Existing permission and difficulties assembling land parcels would seem to prohibit a comprehensive development.
107	1-15 Holmstall Parade, Edgware Road	North	Provision of parking bays and landscaping to provide more attractive safer shopping environment	<ul style="list-style-type: none"> • Works have been completed.

Implications for findings in SA report

Most of the site allocations included in the Preferred Options but excluded from Submission have been excluded because development has already commenced or been completed.

The exclusion of these sites does not significantly change the key findings of the SA report or the general recommendations for mitigation and enhancement. In sustainability terms, site 105 presented the most issues of the excluded sites as it is located in a floodplain, in an area of open space deficiency and part of the site was in a conservation area.