

London Borough of Brent's Draft Core Strategy Preferred Options

Sustainability Appraisal Report Non-Technical Summary

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



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Prepared for London Borough of Brent

by

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Abbreviations

| | |
|-----------------|-------------------------------------------------|
| AQMA | Air Quality Management Area |
| CEP | Collingwood Environmental Planning |
| CO ₂ | Carbon Dioxide |
| DCLG | Department for Communities and Local Government |
| DPD | Development Plan Document |
| EC | European Commission |
| LB Brent | London Borough of Brent |
| LDD | Local Development Document |
| LDF | Local Development Framework |
| ODPM | Office of the Deputy Prime Minister |
| PPS | Planning Policy Statement |
| SA | Sustainability Appraisal |
| SEA | Strategic Environmental Assessment |
| UDP | Unitary Development Plan |

How to comment on the Sustainability Appraisal Report

Details on how to comment on the Sustainability Appraisal Report are provided below.

Public consultation on the Draft Core Strategy DPD Preferred Options and its Sustainability Appraisal Report runs from **30th October 2006** for six weeks.

All the comments must be received by **11th November 2006**.

Comments can be provided by:

Post: Policy and Research Team
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Via the web: www.brent.gov.uk/planning.nsf

When you comment please include:

- Your full name
- Full postal address
- Your email address
- Where possible, the pages, section titles and paragraph numbers (and/or appendix numbers) of the Sustainability Appraisal Report your comments / concerns relate to; and
- Any suggested detailed amendments to the Sustainability Appraisal Report to reflect your comments / concerns and any amendments to the preferred options you think should be made as a result.

SUSTAINABILITY APPRAISAL REPORT

NON-TECHNICAL SUMMARY

Background

Introduction

1. The Sustainability Appraisal of the London Borough of Brent's Draft Core Strategy Development Plan Document (DPD) Preferred Options is detailed in a Sustainability Appraisal Report. A Non-Technical Summary of the Sustainability Appraisal Report has been prepared (i.e. this report), setting out an overview of the process and what changes it has brought about. The Non-Technical Summary also provides contact details and how to comment on the Sustainability Appraisal Report during the public consultation period on the Draft Core Strategy DPD Preferred Options. For further details see the main Sustainability Appraisal Report.
2. LB Brent commissioned Collingwood Environmental Planning (CEP) in December 2004 to undertake the Sustainability Appraisal of the first three DPDs being prepared in LB Brent. The Sustainability Appraisal of the evolving Draft Core Strategy DPD Preferred Options has been undertaken by CEP independently of the London Borough of Brent, whilst working closely with them.

London Borough of Brent

3. The London Borough of Brent (LB Brent) is located in North West London and covers approximately 4,325 hectares. It extends from Kenton and Kingsbury in the north to Harlesden, Queens Park and Kilburn in the south. LB Brent is bounded by seven other London boroughs. The location and boundaries of LB Brent are illustrated in Figure 1.

Figure 1: Location of London Borough of Brent



Source: London Borough of Brent

Brent's Local Development Framework

4. LB Brent commenced the preparation of its Local Development Framework (LDF) in September 2004. This will eventually replace the current Unitary Development Plan (UDP) which was adopted in January 2004. The LDF will comprise a suite of documents which taken together will provide the Council's vision, objectives, policies and proposals for meeting social, economic and environmental development aims. In replacing the UDP, the LDF for LB Brent will provide the framework and policies for the Borough in all aspects of land use and spatial planning.
5. Initially, the DPDs to be produced in LB Brent will include a:
 - Core Strategy DPD;
 - Development Control Policies DPD; and
 - Site Specific Allocations DPD.
6. The Core Strategy DPD is the first DPD to be produced by the Borough. The DPDs, together with the spatial development strategy prepared by the Major of London, form the statutory development plan within LB Brent.
7. The objectives included in the Draft Core Strategy DPD Preferred Options are summarised below (see the Draft Core Strategy for the full wording of the objectives):
 - i) Achieving Sustainable Development;
 - ii) Encouraging Sustainable Development Practices;
 - iii) Reducing the Need to Travel;
 - iv) Protecting and Enhancing the Natural and Built Heritage and Environment of the Borough;
 - v) Meeting Housing Needs
 - vi) Meeting the Impacts of Housing Development;
 - vii) Meeting Employment Needs and Aiding the Regeneration of Industry and Business;
 - viii) Regenerating Areas Important to London as a Whole;
 - ix) Revitalising Town and Local Centres;
 - x) Promoting Tourism and the Arts;
 - xi) Protecting, Providing, and Enhancing Open Space and Leisure and Recreational Activities;
 - xii) Meeting the Community's Diverse Needs
 - xiii) Treating Waste as a Resource;
 - xiv) Creating a Safe and Secure Environment;

What do we mean by Sustainable Development?

8. The term sustainable development encompasses the simple idea of ensuring a better quality of life for everyone, now and for generations to come. A widely-used international definition is *'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*¹.
9. The UK Government and Devolved Administrations have clearly set out in the new Shared Framework what sustainable development means for them and the approach they will take to pursue their goal. They offer the following interpretation:

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations... that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible."

10. Sustainable development is also central to the reformed planning system: *'Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.'*²

Sustainability Appraisal

11. The purpose of the Sustainability Appraisal is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of the DPD. The Sustainability Appraisal considers the DPD's implications, from a social, economic and environmental perspective, by assessing options and the preferred options for the DPD against available baseline data and sustainability objectives.
12. Sustainability Appraisal is mandatory for DPDs under the requirements of the Planning and Compulsory Purchase Act (2004). Sustainability Appraisals of DPDs should also fully incorporate the requirements of the European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 – the SEA Regulations.

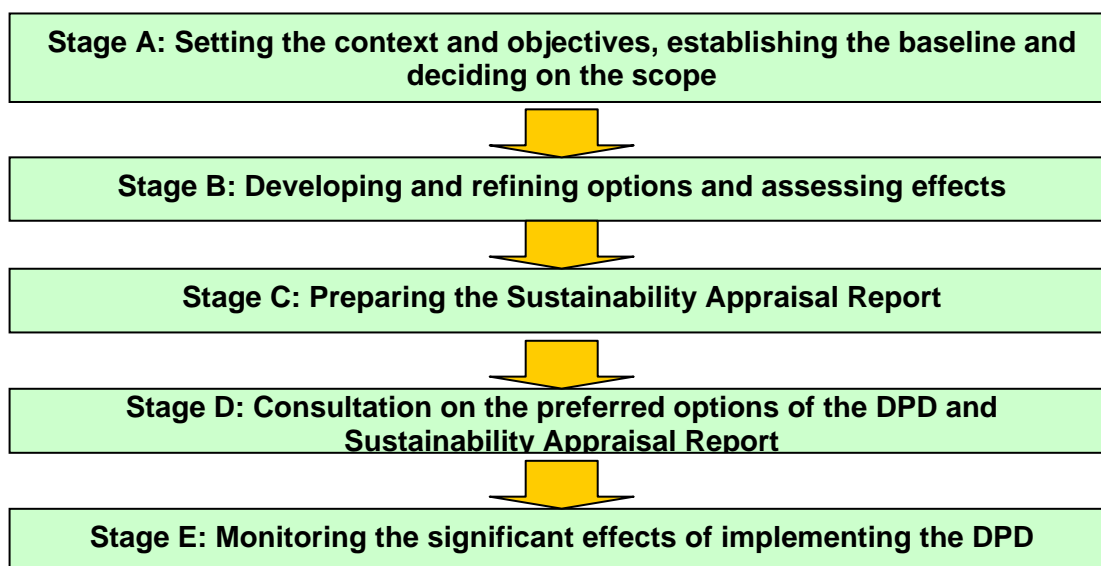
¹ From 'Our Common Future (The Brundtland Report)' – Report of the 1987 World Commission on Environment and Development.

² Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

The appraisal methodology

13. The approach adopted to undertake the Sustainability Appraisal was based on the process set out in Government guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (November 2005)³. The Government guidance advocates a five stage process to undertaking Sustainability Appraisal, with each stage divided into a number of tasks (see Figure 2).

Figure 2: Key Stages in the Sustainability Appraisal Process



14. The level of detail and the scope of the Sustainability Appraisal was agreed at an early stage by involving key stakeholders in the Sustainability Appraisal process as part of the consultation on a Sustainability Appraisal Scoping Report (June 2005). This report was produced to set out the initial context and findings of the Sustainability Appraisal and the proposed approach to the appraisal process.
15. Stakeholder involvement is a fundamental part of the Sustainability Appraisal. It enables those potentially affected by, or with a professional or personal interest in, the effects of the DPD in question to engage with and input to the Sustainability Appraisal process. Stakeholders, both within and outside the Borough have been involved throughout the Sustainability Appraisal process.

The Sustainability Appraisal Report

16. The Sustainability Appraisal Report is one of the key outputs from the Sustainability Appraisal process and is made available at the same time as the public consultation on the Preferred Options. The report is made up of four main parts, including:
- **A Non-Technical Summary** (i.e. this report); which sets out in relatively simple language and in a précis form, an overview of the Sustainability Appraisal process and its key findings and recommendations.

³ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

- **Part A: Sustainability Context**; which provides background information relevant to the appraisal, such as baseline data and the policy context for the DPD. This part also sets out the methodology and other issues.
- **Part B: Appraisal of the Core Strategy**; which presents the findings of the appraisal of alternatives and preferred options, as well as an appraisal of compatibility of the objectives of the DPD against the Sustainability Objectives.
- **Appendices** (to Part A and Part B); which provide detailed information and supporting documents relevant to the report.

Sustainability Context

17. Part A of the Sustainability Appraisal Report presents information on the context of the Borough and the current situation and issues in terms of sustainability (see Figure 2). It includes details of the findings of Stage A of the Sustainability Appraisal process as summarised below.

Relationship to other plans, programmes and objectives

18. The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship with these other documents and their requirements are explored to enable the LB Brent to take advantage of any potential synergies and to deal with any inconsistencies and constraints. The plans, programmes and sustainability objectives that need to be considered include those at an international, national, regional and local scale.
19. The preparatory work for the DPD had already considered a number of planning policies and guidance documents. In order to meet the Sustainability Appraisal's requirements it was necessary to consider a broader range of policies and documents, particularly those with environmental protection and / or sustainability objectives.
20. In general no major inconsistencies between policies were identified, although several plans were the source of policies, conditions, etc that provided the context within which the DPD has to be framed. Plans and programmes of particular relevance include the London Plan, as the spatial strategy for London, the Sustainable Development Framework for London and the various Mayoral strategies, as well as the various LB Brent plans, strategies and guidance, including the Community Plan.
21. The objectives contained within these plans and programmes will provide the direction for spatial planning within LB Brent. Many of the objectives of these plans and programmes are related to the sustainability objectives. These sustainability objectives will provide a framework within which the policies formulated within the DPD should produce the desired outcomes of these plans in a sustainable manner.

Baseline characteristics

22. The collection and assessment of information and data about the current and likely future state of the LB Brent area was used within the Sustainability Appraisal to help identify sustainability problems and predict the DPD's effects. Baseline topics and subtopics, covering the economic, social and environmental dimensions of sustainability, focused on the key issues facing LB Brent and the potentially significant effects the DPD could have. Where available, key trends and targets were identified, along with any difficulties and limitations in the data.
23. Much data already existed for LB Brent and the sources used included the Annual Monitoring Report 2004-2005, data held and collated by the Borough for monitoring purposes, other plans and programmes and established data sources, such as the Office of National Statistics.
24. The data is organised in the Sustainability Appraisal Report under the 22 sustainability objectives (see section below) and is presented in a number of formats including a description of the key data and trends illustrated by maps and graphs and tables including historic data, targets where applicable and comparisons with neighbouring authorities and London and / or the UK as a whole.

Key sustainability problems and issues

25. Many of the key sustainability problems and issues facing LB Brent have previously been identified within existing reports, strategies and plans. However, further problems and issues have emerged through the Sustainability Appraisal process, which has also sought to identify the evidence to support the selection of key issues from the baseline data.
26. Some of the key sustainability problems and issues facing LB Brent's community include (see Table 1):
 - high levels of unemployment and low incomes;
 - relatively low levels of higher education attainment;
 - deprivation, exclusion and inequalities;
 - high incidence and fear of crime;
 - poor condition of the housing stock and overcrowding;
 - relatively high property prices;
 - the lack of green space, trees and wildlife habitats;
 - the poor quality of the townscape and public realm;
 - poor air quality; and
 - poor energy efficiency, which combined with low incomes results in fuel poverty.

27. However, whilst LB Brent does face some key sustainability problems, it also offers some key opportunities including:
- very good public transport links, especially with Central London;
 - broad cultural diversity, it is the second most ethnically diverse local authority in the country and over 120 languages are spoken in the Borough; and
 - several major regeneration areas, including Wembley where the redevelopment of the National Stadium will be the catalyst to regeneration in the area and South Kilburn where LB Brent has obtained significant Government funding.

The sustainability appraisal framework

28. The establishment of sustainability objectives and criteria is central to the Sustainability Appraisal process and provides a method for sustainability effects to be described, assessed and compared. The sustainability objectives used for the Sustainability Appraisal of the DPD were based on those already developed and agreed following consultation for the appraisal of the adopted LB Brent UDP, although they were modified slightly to reflect the particular needs and issues identified in the DPD.

Table 1: Summary of key sustainability problems

| Social |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London. |
| 2. Disparity in social and economic conditions both between wards within Brent and with other areas. |
| 3. Health inequalities and limited access to health facilities. |
| 4. Low educational attainment and projected shortfall of school places. |
| 5. Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards. |
| 6. High incidence of crime and fear of crime. |
| 7. Inadequate provision of and access to essential services and amenities. |
| Environmental |
| 8. Mixed quality of the built environment and the need for improved architectural design quality. |
| 9. Pressure on biodiversity and habitats and lack of green space, particularly in southern wards. |
| 10. Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner. |
| 11. Contaminated land and soils present a potentially significant restriction / cost in developing brownfield / derelict sites |
| 12. Water quality and pollution are key issues for the watercourses running through Brent and availability of water resources is an issue generally in London and the South East. |
| 13. Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent. |
| 14. Quality of and access to open spaces and parks, including open air sport grounds. |

| |
|------------------------------------------------------------------------------------------------------------------------------------------------|
| 15. The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment. |
| 16. The need to reduce energy use and CO ₂ emissions, increase energy efficiency and switch to renewable energy sources |
| 17. Poor air quality along major roads and in the south of Brent, with much of southern Brent designated an Air Quality Management Area (AQMA) |
| 18. Noise nuisance, both from domestic and industrial sources as well as from noise and vibration from major road routes in the Borough |
| Economic |
| 19. Unemployment and insufficient job opportunities for local people |
| 20. Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership. |
| 21. The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space |
| 22. The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal. |
| 23. The need to support development in existing centres and ensure the health of town-centres. |

29. There were 22 objectives used in total, organised under the three dimensions of sustainability: social; environmental; and economic (see Table 2). They covered a broad range of topics such as:
- to reduce poverty and social exclusion;
 - to minimise the production of waste and use of non-renewable materials; and
 - to offer everybody the opportunity for rewarding and satisfying employment.
30. Each objective was broken down into a number of sub-objectives or criteria for the purposes of the appraisal where more detailed analysis was appropriate (see Part A of the main Sustainability Appraisal Report) and indicators identified to monitor the objective.

Table 2: Sustainability objectives

| |
|----------------------------------------------------------------------------------------------------|
| Social |
| Prosperity and Social Inclusion S1. To reduce poverty and social exclusion |
| Health S2. To improve the health of the population |
| Education and Skills S3. To improve the education and skills of the population |
| Housing S4. To provide everybody with the opportunity to live in a decent home |
| Quality of surroundings S5. To provide everybody with good quality surroundings |
| Crime Prevention and & Community Safety S6. To reduce crime and anti-social activity |

| |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Community Identity S7. To encourage a sense of community; identity and welfare |
| Accessibility S8. To improve accessibility to key services especially for those most in need |
| Environmental |
| Traffic EN1. To reduce the effect of traffic on the environment |
| Water Quality & Resources EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply |
| Biodiversity EN4. To conserve and enhance biodiversity |
| Landscape & Townscape EN5. To maintain and enhance the character and quality of landscapes and townscapes |
| Historic Environment & Cultural Assets EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets |
| Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to the effects of climate change |
| Waste Management EN8. To minimise the production of waste and use of non-renewable materials |
| Land and Soil EN9. To conserve and enhance land quality and soil resources |
| Economic |
| Growth EC1. To encourage sustainable economic growth |
| Employment EC2. To offer everybody the opportunity for rewarding and satisfying employment |
| Regeneration EC3. To reduce disparities in economic performance and promote sustainable regeneration |
| Investment EC4. To encourage and accommodate both indigenous and inward investment |
| Efficient Movement EC5. To encourage efficient patterns of movement in support of economic growth |

Appraisal of the Preferred Options

Appraisal of alternatives

31. A key requirement of the Sustainability Appraisal is to consider reasonable alternatives as part of the appraisal process. An initial Sustainability Appraisal commentary on the key challenges and the sustainability strengths and weaknesses of the evolving issues and options was provided. These options were being considered as part of developing the LB Brent LDF in Autumn 2005. This provided an input to the evolving DPDs on the potential sustainability implications of the issues and options presented in the consultation document: '*A New Plan for a Better Brent – Your Views. Issues and Options Papers*'. The Issues and Options Papers included the following topics:

- Strategic Planning Objectives and Priorities
- A Better Townscape - By Design
- Environmental Protection
- Planning for More and Better Housing
- Transport

- Employment
- Town Centres and Shopping
- Leisure and Tourism
- Open Space and Biodiversity
- Community Facilities
- Waste

32. During the subsequent development of the Preferred Options, alternative options were considered which drew on the Issues and Options Papers and took into account the responses received in relation to them. The respective sustainability effects of these options were considered throughout the Sustainability Appraisal process.
33. The Preferred Options document includes details on the alternative options which were not selected and the reasons why they were not selected. The Sustainability Appraisal recommended some additional alternatives for those preparing the DPD to consider during its evolution and a commentary on these alternatives is provided in the main Sustainability Appraisal Report.

Appraisal of draft Preferred Options

34. During the development of the Draft Core Strategy Preferred Options, the Sustainability Appraisal provided commentaries at several key stages on the sustainability strengths and weaknesses of the policies and made suggestions for amendments to be made to both the wording of the policies and the supporting text.
35. Appraisal of the potential effects of the emerging final version of the Draft Core Strategy Preferred Options was undertaken. The policies were 'scored' using a five point scale to indicate the likely potential significant effects under each of the sustainability objectives (i.e. major positive effects, minor positive effects, neutral effects, minor negative effects and major negative effects, with additional categories for where the likely effects are uncertain or mixed). Proposed mitigation and enhancement measures and recommendations as to how policies could be improved were identified. The comments and scores were recorded in a series of matrices (see example blank matrix below).

Figure 3: Example appraisal matrix

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

36. The appraisal was an iterative process and the proposed mitigation measures and Sustainability Appraisal recommendations were incorporated by LB Brent officers, as far as they felt appropriate, in revisions of the DPD. Any outstanding or residual negative, as well as positive, effects were recorded as part of the final Sustainability Appraisal Report.

Summary of the overall likely significant effects of the DPD

37. The detailed appraisal focused on, and was structured around, the chapters in the draft DPD, namely:
- the Spatial Strategy for Brent;
 - Maintaining a Quality Environment;
 - Meeting Housing Needs;
 - Connecting Places;
 - A Strong Local Economy; and
 - Enabling Community Facilities.
38. These chapters each include a number of policies (see Table 3).

Table 3: Policies included in the Draft Core Strategy DPD Preferred Options

| Spatial Strategy for Brent |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>Key Principles for Development</i> CP SS1: Key Principles for Development</p> <p><i>Regeneration & Growth / Appropriate Level of growth</i> CP SS2: Population and Housing Growth</p> <p><i>Key Locations for Regeneration & Growth</i> CP SS3: Focus of Growth CP SS4: Commercial Regeneration</p> <p><i>Destination Wembley</i> CP SS5: Wembley as a Focus for Growth</p> <p><i>Infrastructure to Support Development</i> CP SS6: Infrastructure to Support Development</p> <p><i>Sustainable Communities</i> CP SS7: Sustainable Communities</p> <p><i>Local Benefits</i> CP SS8: Meeting Local Community Needs</p> <p><i>Protection and Conservation</i> CP SS9: Protecting the Built and Natural Environment</p> <p><i>Implementation</i> CP SS10: Implementation</p> |
| Other Core Policies (and chapter headings) |
| <p><i>Promoting a Quality Environment</i> CP UD1: Spatial Design Strategy CP UD2: Design Delivery Protocol CP SD1: Climate Adaptation Infrastructure CP SD2: Sustainable Design & Construction CP ENV 1: Climate Change CP ENV2: Protecting the Environment CP OS1: Protection and Enhancement of Open Space and Biodiversity CP OS2: Promotion of Biodiversity and Nature Conservation CP W1: Sustainable Waste Management</p> <p><i>Meeting Housing Needs</i> CP H1: Housing Provision CP H2: Sustainable Housing Development CP H3: A Balanced Housing Stock CP H4: Affordable Housing Provision</p> <p><i>Connecting Places</i> CP TRN1: Prioritising Investment CP TRN2: Reducing the Need to Travel CP TRN3: Parking and Traffic Restraint CP TRN4: Transport Links in London</p> <p><i>A Strong Local Economy</i> CP BIW1: Protection of Employment Land and Premises CP BIW2: Principles of Business, Industrial and Warehousing Development CP BIW3: The Re-use of Employment Land and Premises CP TC1: Principal Retail Location CP TC1: Other Preferred Locations</p> |

CP TC3: Exceptional Locations
 CP TC4: Town Centre Opportunity Sites
 CP TC5: Network of Town Centres
 CP CT1: Promoting Leisure and Tourism
Enabling Community Facilities
 CP CF1: Meeting the Needs of the Community

39. Generally the DPD Preferred Options performed very well against the sustainability objectives and the majority of effects identified were positive. Nevertheless, there were some potentially negative effects identified under certain objectives, mainly under the environmental dimension of sustainability. However, these tended to be limited to certain criteria and, where possible in the appraisal, measures were identified to either manage or reduce many of these potential negative effects. These mitigation measures were often already provided for either by other policies in the Draft Core Strategy or will be provided for by the forthcoming development control policies.

40. The potential effects identified in each chapter and the policies it contains are summarised below. These are explored in more detail in the main Sustainability Appraisal Report.

Spatial Strategy for Brent

41. The Spatial Strategy chapter generally scores positively against the sustainability objectives. However, given the strategic nature of the policies, there is some uncertainty over several of the potential effects.

42. The *Principles for Development* (SS1) and *Sustainable Communities* (SS7) policies provide the overarching principles behind any development in the Borough and how it is proposed that the planning policies will contribute towards sustainable development. These policies provide a strong sustainability context to the rest of the Draft Core Strategy, and for the forthcoming DPDs to be prepared by the Borough.

43. The key potentially positive sustainability effects arising from the Spatial Strategy policies include:

- **Regeneration** of areas (including housing estates and town centres, suffering from both physical and social deprivation) which should help to alleviate poverty, achieve social equity and improve quality of life for the most deprived residents;
- **Concentrating growth** in a few well connected centres with good infrastructure provisions should minimise the need to travel and make the most efficient use of the existing resources and assets;
- Provision of a significant number of **affordable homes** should assist in alleviating the current need and associated deprivation – approximately 5,000 affordable units would

be provided over the plan period (10 years). These will also be of a mixture of tenure and dwelling types to meet the Borough's needs;

- **Provision of infrastructure** phased to meet the increase in population (including transport, health, community and education facilities) should help to meet the increase in demand likely from the proposed level of growth;
- Emphasis on **prioritising public transport, walking and cycling** and improving transport nodes should help not only to accommodate the impact of growth, but also partially to address existing problems of congestion, noise and poor air quality. However, these are likely to continue to be a major challenge for the Borough;
- Improvements to the **public realm and protection of open space** from development, with the focus of development on the reuse of brownfield and previously developed land, rather than use of greenfield sites;
- Seeking to **protect and improve the environment**, minimise the generation of waste and use of natural resources, energy and water, along with respecting the physical and environmental constraints of the Borough. This along with an emphasis on, for example, high quality design, a design-led approach and mitigating and adapting to climate change, should all provide a range of environmental, as well as social and economic benefits; and
- **Commercial regeneration** of key locations as well as the promotion of mixed use and employment-generating uses in town centres should result in economic and social benefits.

44. Whilst the majority of effects arising from implementing the Spatial Strategy are likely to be positive, there is the potential for some significant negative effects. These effects are likely to arise mostly as a consequence of the level of growth and development being proposed in the Borough. Clearly given the role of the London Plan in setting the respective levels of growth within each Borough, the options for LB Brent in this regard are limited and as a consequence they have sought to focus on, where possible, minimising the negative effects through the policies proposed in the Preferred Options.
45. Policy SS2, which sets out the proposed level of population and housing growth in the Borough, is likely to have the largest number of major negative potential effects of all the policies in the Spatial Strategy. These effects are particularly on the environmental objectives, and are caused by the predicted impacts of both construction and habitation / operation of the new development proposed. These effects include increased resource use, energy and water consumption, air and noise pollution and vehicle traffic and congestion.
46. Policies SS3, SS4, SS5 also have some negative effects, although the majority are of minor significance and are related to those arising from the proposed growth in the Borough (policy SS2).

47. The potential negative effects arising from the Spatial Strategy policies, as an inevitable consequence of the level of population increase and economic regeneration proposed, include:

- An increase in **vehicle traffic and congestion**, and associated pollution. Other policies seek to manage this as far as possible, through the promotion of public transport, walking and cycling and concentrating housing, employment, retail and leisure facilities in the Growth Areas to reduce the need to travel. However, this is set against the context of a trend of increasing traffic, between 1997 and 2004 Brent recorded an 8.6% increase in traffic flow, which was already set to continue to increase with rising car ownership.
- An increase in **noise pollution and nuisance**, due to extra construction activity, increased traffic and high density development and mixed use development for example. Other more detailed policies seek to manage this as far as possible, for example the urban design and sustainable construction policies, both in the Draft Core Strategy and forthcoming Development Control Policies DPD. These impacts will also depend on the success of managing traffic and promoting public transport, walking and cycling.
- An increase in **resource use and consumption, emissions and waste generation**. The level of growth proposed will result in an approximate 10% increase in the number of households over the plan period (10 years). Whilst the Draft Core Strategy, and forthcoming Development Control Policies, will seek to mitigate this by, for example, including policies to minimise water and energy use, waste production (both construction and domestic), emissions from transport and energy generation, there will be an inevitable net increase. Details are included in the Sustainability Appraisal Report on the approximate amount of carbon dioxide, aggregates, waste and water and sewage that would be used / emitted during the construction and / or occupancy from the number of new homes proposed.

48. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each Spatial Strategy policy, and other recommendations arising from the Sustainability Appraisal. Overall, given the strategic nature of the Spatial Strategy, most of the mitigation requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies. Some minor textual changes are proposed to some of the policies or their supporting text and the need to involve the local community and key stakeholders in planning for the proposed growth at a local level is highlighted.

Maintaining a Quality Environment;

49. This chapter generally performs very well against the sustainability objectives and the effects are likely to be mostly positive, with a very limited number of negative effects predicted.
50. The chapter provides several cross cutting policies aiming to deliver the promotion of a quality environment focussing on the conditions under which the level of growth proposed

in the Spatial Strategy should be implemented. The policies cover topics including: design quality and delivery; climate change mitigation and adaptation; sustainable design and construction; environmental protection; open space and biodiversity; and waste management.

51. The key potentially positive sustainability effects arising from the *Promoting a Quality Environment* policies include:

- Enhanced **public realm, landscape and townscape**, particularly in areas of currently low quality, which in turn could have **social and economic benefits**. These include: alleviation of deprivation and enhanced community identity; enhanced quality of life and wellbeing of the local residents; and provision of the conditions to attract economic development and employment uses.
- Improved **health** as a result of better quality, greater provision and easier access to open spaces and outdoor play areas, opportunities for sport and recreation, promotion of walking and cycling and enhanced environmental quality;
- Ensuring new development adapts to the potential impacts of **climate change** and does not exacerbate it in the future. This includes the identification of mechanisms to meet energy and carbon emission targets, reducing the need to travel, minimising flood risk and promoting sustainable urban drainage and waste management;
- Improved **environmental performance of new development** including pollution prevention and remediation and re-use of contaminated land.
- Requirements for **sustainable design and construction** and **sustainable waste management** to minimise consumption of materials and resources, pollution and waste generation, and promote energy efficiency, renewable energy, recycling and water conservation;
- Integration of **public transport and infrastructure** considerations into development proposals and reducing the need to travel to minimise air pollution and congestion resulting from new development; and
- Conserving and enhancing **biodiversity**, improving provision in areas of deficiency and promoting wider access to nature conservation.

52. The key potentially negative sustainability effects arising from the *Promoting a Quality Environment* policies are very limited, but include:

- Potentially restricting the **availability of land** for residential, industrial and business uses by providing new, and protecting existing, open space; and
- Local environmental impacts, for example visual, light, smell, air-borne or noise pollution, which may result from developing **waste management facilities** in particular generating energy from waste schemes.

53. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each *Promoting a Quality Environment* policy, and other recommendations arising from the Sustainability Appraisal. Overall, most of the mitigation

requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies. Some minor textual changes are proposed to some of the policies or their supporting text, generally to enhance their positive effects and / or improve clarity. This is particularly the case with the sustainable design and construction (SD2) and climate change (SD1 and ENV1) policies. It is recommended that most of these can be addressed within the more detailed forthcoming development control policies.

54. The policies in the *Promoting a Quality Environment* chapter, as elsewhere in the Draft Core Strategy, focus on the effects of new development, although extensions and refurbishments are also referred to within some policies. The retrofitting of energy efficiency and water conservation measures to existing properties would be required to significantly improve the overall performance of the Borough's housing stock,. Although this is mainly outside the scope of the DPD, it is important to put the positive effects of the policies in this context and highlight the need for other mechanisms to address this wider issue.

Meeting Housing Needs

55. This chapter generally performs very well against the sustainability objectives and the effects are likely to be mostly very positive, with a limited number of negative effects. The negative effects that are predicted mostly result from the *Housing Provision* policy (H1). This sets the number of additional homes required during the plan period and therefore raises some similar environmental effects as policy SS2, *Population and Housing Growth*, in the Spatial Strategy (see above).
56. The four core housing policies cover the areas of housing capacity, sustainable housing development, a balanced housing stock and affordable housing provision. Collectively, they aim to provide more housing in Brent that better meets its residents' diverse accommodation needs in compliance with the requirements of the London Plan. It seeks to do this without causing harm to the environment and existing amenities, and in a way which is able to respond to future occupiers' changing needs. The new housing must be built on 'brownfield land' and designed and constructed so as to minimise the use of scarce resources, such as water and energy, provide a good residential environment and cope with future climatic change. These requirements are partly dealt with in the *Meeting Housing Needs* policies, but also by other policies in the Draft Core Strategy (e.g. the *Spatial Strategy* and *Promoting a Quality Environment*) and the forthcoming development control policies.
57. The *Meeting Housing Need* policies are likely to cause some similar positive effects as some of the policies in the Spatial Strategy as they relate to, but provide more detail on, these policies. The key potentially positive sustainability effects arising from the *Meeting Housing Needs* policies include:
- Provision of a significant number of **additional homes**, a large proportion of which will be required to be **affordable homes**. Existing affordable homes would also generally be protected from development. This will increase access to good quality housing

and help alleviate some of the borough's key social exclusion and deprivation problems;

- Provision of a **mixture of tenure, dwelling types and size** of new homes to meet the Borough's needs, a proportion of which will incorporate lifetime home standards and disability access, will also increase access to good quality housing and help alleviate some of the borough's key social exclusion and deprivation issues;
- **Provision of infrastructure**, including community facilities and amenities, along with any new housing which will prevent stress on existing services and assist accessibility to services;
- Seeking to protect and improve the **local environment, landscape and townscape** through new housing development, with the focus of development on the reuse of brownfield and previously developed land, rather than use of greenfield sites, minimising the use of non-renewable resources and generation of waste, and maximising energy and water conservation. In addition to the direct positive environmental effects, this will also have other social and economic benefits by making the Borough a more attractive place to live and work and fostering pride and respect in the local area;
- Emphasis on **travel efficiency** by reducing the need and length of travel between home, work, education, shopping and leisure opportunities. This should help not only to accommodate the impact of growth, but also to partially address existing problems of congestion, noise and poor air quality, as well as having a positive effect on quality of life and wellbeing. However, these are likely to continue to be major challenges for the Borough; and
- Promoting **regeneration**, an increased population, improved public realm and a better quality and mix of housing should increase inward investment and employment and therefore have a long term positive effect on the local economy reducing disparity with surrounding areas.

58. The negative impacts of the *Meeting Housing Needs* policies generally relate to the environmental impacts associated with the construction and occupation of housing development on the scale proposed in the Borough (as referred to above under the Spatial Strategy), see policy H1 Housing Provision. It is recognised that policy H2 Sustainable Housing Development and others elsewhere in the Draft Core Strategy – notably Urban Design (UD1 and UD2) and Sustainable Development policies (SD1 and SD2) explicitly seek to address the impact of increased development in the Borough, however it is likely that some negative impacts will be inevitable.

59. The key potentially negative sustainability effects arising from the *Meeting Housing Needs* policies include:

- An increase in **vehicle traffic and congestion**, and the associated pollution. Whilst other policies seek to manage this as far as possible, the provision of housing on the scale proposed will inevitably increase traffic and associated negative environmental impacts, including air pollution, above current levels.

- The level of housing proposed and demand on sites may **conflict with other land-uses**, restricting business / employment generating development opportunities;
- An increase in **commuting to jobs** beyond the Borough, as the population increases in the Borough it may not be phased to match the number or types of jobs required. Conversely, there is some risk that new developments and new housing provision may attract new residents from outside the Borough which will limit the positive effects for existing residents from new employment opportunities.
- Regeneration within the Borough may result in a disproportionate **increase in house prices** and therefore reduce housing affordability for local residents.

- An increase in **resource use and consumption, emissions and waste generation** – as already highlighted under the Spatial Strategy policies.

60. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each *Meeting Housing Needs* policy, and other recommendations arising from the Sustainability Appraisal. Overall, most of the mitigation requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies. Some minor textual changes are proposed to some of the policies or their supporting text.

Connecting Places

61. This chapter generally performs very well against the sustainability objectives and the effects are likely to be mostly very positive. Many of the positive effects relate to reducing dependence on the private car by reducing the need to travel and by promoting walking, cycling and public transport as viable alternative modes. The key potentially positive sustainability effects arising from the *Connecting Places* policies include:

- Improved **equality of access** in the Borough, including improving affordability, by improving transport facilities for those without access to a car, and making access safer, easier and quicker for those using public transport, walking and cycling;
- Promotion of **public transport, walking and cycling** through investing in new transport infrastructure will have a range of potential social, environmental and economic effects, including
 - beneficial **health** effects as a result of more active lifestyles;
 - **crime prevention** benefits as a result of passive surveillance;
 - reduced **air and noise pollution** (including positive impact on habitats and species).
- The beneficial effects of **reducing the need to travel**, which will help accommodate a growing population and economic prosperity, as well as:
 - improve the **quality of life and wellbeing** of the local community,
 - improve the **accessibility** of employment, services and facilities;

- mitigate the effects of **climate change**.

- Improved **environmental amenity and reduced congestion** through the use of parking and traffic restraint;
- Improved satisfaction, **sense of community and residential amenity** by reducing traffic which has a significant negative effect on communities, making walking unsafe and unpleasant, creating noise, air and visual pollution; and
- Improved long term **viability of the local economy** by reducing congestion and journey times and improving efficiency of movement. These factors are also likely to play an important role in promoting **regeneration**.

62. There are only limited potentially negative sustainability effects arising from the *Connecting Places* policies, these include:

- **Noise and disturbance** in town centres as a result of increased densities of development to benefit from the good public transport accessibility;
- Localised effects on the **environment and amenity of local residents** associated with transport infrastructure development; and
- **Increased connectivity**, via bus and cycle routes, could encourage commuting out of the Borough rather than benefiting the local economy.

63. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each *Connecting Places* policy, and other recommendations arising from the Sustainability Appraisal. Overall, most of the mitigation requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies. Some minor textual changes are proposed to some of the policies or their supporting text.

A Strong Local Economy

64. The overall effects of the *Strong Local Economy* chapter are perhaps more mixed than other sections of the Draft Core Strategy. This reflects the emphasis on protection and expansion of employment and business opportunities and the development of town centres, including a regional centre at Wembley. While such developments are likely to have beneficial economic effects and create employment they will also potentially have negative environmental impacts, as well as effects on resource use, energy use and waste generation. In the case of certain employment uses, and the development of a regional retail centre there could also be significant traffic implications.
65. These impacts are reflected in Preferred Options supporting and policy text within the chapter which seeks to ensure that development is accessible by a range of transport modes, and located in proximity to population centres. However in some cases (such as B8 industrial uses – storage and distribution) and the creation of a regional retail centre (TC1) it is predicted that negative effects will occur in spite of the mitigation proposed within others policies.

66. The culture, leisure and tourism policy is generally a positive policy. From a sustainability perspective, efforts to promote business and cultural / leisure facilities related to local communities is particularly positive. Some tourism / leisure facilities will have very different potential effects to others. Conference facilities may, for example encourage increased travel to the area by car, whereas small local facilities may encourage more people to seek leisure opportunities in the Borough and thus improve local distinctiveness / vibrancy and reduce transport and related environmental impacts.

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

- Emphasis on improving **skills and qualifications** and providing employment for local people;
- Reducing **exclusion and deprivation** by providing suitable employment opportunities for local people through a vibrant local economy and enhanced local centres.
- **Environmental and local amenity improvements** through reuse / redevelopment of employment land;
- Protecting existing employment land uses is likely to ease **pressure on greenfield sites** for employment development ;
- **Reduction in crime** within vibrant local centres;
- Attracting new businesses interests through **high profile developments and regeneration**; and
- **Reducing need to travel** as a result of better local employment and services.

68. The key potentially negative sustainability effects arising from the *Strong Local Economy* policies include:

- Some industrial uses may have **localised environmental impacts**, and distribution uses may generate **freight / lorry traffic** which will be a cause of road traffic, air pollution and noise.
- A major centre at Wembley is likely to **generate trips** within and from outside Brent, some of this may be offset by reduced trips to other major centres outside the Borough.
- Increase **water consumption and pollution** by business and industrial land use;
- Increased retail activity may lead to increased **waste, resource use and packaging**;
- Protecting employment land uses may in some cases **restrict the availability of land** for housing development; and
- Increased industrial and business activity will increase **energy use**. Office developments may lead to increased use of air-conditioning, particularly in the long-term.

69. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each *Strong Local Economy* policy, and other recommendations arising from the Sustainability Appraisal. Overall, most of the mitigation requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies. Some minor textual changes are proposed to some of the policies or their supporting text.

Enabling Community Facilities

70. This chapter generally performs very well against the sustainability objectives and the effects are likely to be mostly very positive. The key potentially positive sustainability effects arising from the *Enabling Community Facilities* policies include:

- **Protecting and enhancing community facilities** which are a fundamental support mechanism for those most deprived and excluded access;
- Improved provision and protection of **health and education facilities**;
- **Reduced trips** to facilities elsewhere if local facilities are protected in accessible locations, and new local facilities provided;
- **Improved skill and education levels** will encourage local start-ups and other businesses to local in the Borough; and
- **Employment generation** from new education and health facilities.

71. There are no potentially negative sustainability effects predicted to arise from the *Enabling Community Facilities* policies, beyond the localised environmental and amenity impacts of the provision of new facilities.

72. Section 5 of the Sustainability Appraisal Report includes further details on the mitigation and enhancement proposed for each *Enabling Community Facilities* policy, and other recommendations arising from the Sustainability Appraisal. Overall, most of the mitigation requirements will be met either by other policies in the Draft Core Strategy or the forthcoming development control policies.

Implementation and monitoring

73. A key part of the Sustainability Appraisal process is establishing how the significant sustainability effects of implementing the DPD will be monitored. This will be linked to the Annual Monitoring Report required for the LDF. Some potential indicators, where they exist, have been proposed as a starting point for developing the DPD and sustainability monitoring programme. The majority of the indicators proposed are from readily available data sources. It is envisaged that the monitoring would be on an annual basis, although updates of some indicators will not be available that frequently.

Difference the process has made

74. The Sustainability Appraisal process and the development of the DPD were initiated at the same time and the Sustainability Appraisal has inputted to the evolving DPD

throughout. The Preferred Options DPD is therefore based on a spatial plan for the Borough underpinned by an assessment of the sustainability issues facing it. Whilst many of the policies within the DPD will have positive effects, some either negative effects or opportunities for further enhancement were identified through the Sustainability Appraisal process. Generally these recommendations have been incorporated in the Draft Core Strategy Preferred Options DPD, however some remain outstanding and these are described in the Sustainability Appraisal Report..

Next steps

75. The key next steps and outputs are as follows:

- Formal consultation on the Draft Core Strategy DPD Preferred Options, and this Sustainability Appraisal Report
- Amendments to the Preferred Options DPD in light of consultations to produce the Submission version of the DPD
- Appraisal of any significant changes, leading to either revisions to the SA Report, or an addendum to the Sustainability Appraisal Report, if changes are minor.
- Submission of the DPD to the Secretary of State for Independent Examination and the Examination in Public process
- Adoption of the final version of the Core Strategy DPD
- Adoption Statement – prepared by LB Brent to notify the public that the DPD has been adopted. This will include information on the main issues raised during consultation on the DPD and Sustainability Appraisal and how these were taken into account in developing the DPD and other information required as part of the Sustainability Appraisal.
- Ongoing monitoring and review

76. In addition, other DPDs are being developed in parallel to the Core Strategy DPD, such as the Site Allocation DPD and the Development Control Policy DPD. The Sustainability Appraisals of these DPDs will draw on the information and process included in this Sustainability Appraisal Report.