

London Borough of Brent's Draft Core Strategy Preferred Options

Sustainability Appraisal Report Part B: Appraisal of the Core Strategy

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



October 2006

Prepared for London Borough of Brent

by

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CONTENTS

PART A: Sustainability Context (included in separate volume)

How to Find Your Way Around the Sustainability Appraisal Report	vii
How to Comment on the Sustainability Appraisal Report	ix
Non-Technical Summary	1
PART A: SUSTAINABILITY CONTEXT	3
1. Background	5
Location of Brent	5
Brent's Local Development Framework	5
Purpose of the Sustainability Appraisal and Sustainability Appraisal Report.....	9
Purpose of this Sustainability Appraisal Report	10
Compliance with the SEA Directive and Regulations.....	11
Consultation on the Sustainability Appraisal Report	12
2. The Appraisal Methodology	13
Overview of approach adopted	13
Programme and responsibility.....	15
Sustainability Appraisal Scoping Report	17
Appraisal of alternatives and preferred options.....	18
Development of Sustainability Appraisal Report.....	20
Stakeholder involvement - who was involved, when and how?	21
Difficulties encountered in compiling information or carrying out the appraisal	22
3. Sustainability Objectives, Baseline and Context	25
Links to other plans, programmes and sustainability objectives	25
Descriptions of the environmental, social and economic baseline characteristics and the predicted future baseline.....	29
Environmental, economic and social problems identified	55
Sustainability problems identified.....	55
Sustainability Appraisal Framework	59

PART B: APPRAISAL OF THE CORE STRATEGY

PART B: Appraisal of the Core Strategy	63
4. Core Strategy Issues and Options	65
Introduction.....	65
Compatibility of the DPD and sustainability objectives.....	65

Main issues and options considered - how they were identified and the sustainability issues considered in choosing the preferred options	69
5. Appraisal of the Core Strategy Preferred Options	84
Introduction to the appraisal of the Draft Core Strategy Preferred Options	84
Detailed appraisal of the significant social, environmental and economic effects of the Draft Core Strategy Preferred Options.....	87
Cumulative effects of the Draft Core Strategy	125
Potential overall effects of the Draft Core Strategy.....	127
What difference the SA has made	129
6. Implementation and Monitoring of the Core Strategy	131
Links to other tiers of plans and programmes and the project level	131
Proposals for monitoring.....	131
Next steps.....	137

APPENDICES

(included in separate volumes)

APPENDICES TO PART A: SUSTAINABILITY CONTEXT

- Appendix 1: Scoping Report Consultees
- Appendix 2: Summary of Consultees Comments on Sustainability Appraisal Scoping Report
- Appendix 3: Appraisal Proformas
- Appendix 4: Review of Relevant Plans and Programmes
- Appendix 5: Baseline Data
- Appendix 6: Sustainability Objectives, Criteria, Indicators and Targets
- Appendix 7: Significance Criteria

APPENDICES TO PART B: APPRAISAL OF THE CORE STRATEGY

- Appendix 8: Core Strategy Issues and Options
- Appendix 9: Appraisal of Core Strategy Preferred Options

TABLES

(in Part B of the SA Report only)

Table 9 : Compatibility of the DPD and sustainability objectives	68
Table 10 : Spatial Strategy Policies - alternative options not selected, reasons and SA comments	74
Table 11 : Maintaining a Quality Environment Policies - alternative options not selected, reasons and SA comments	75
Table 12 : Meeting Housing Needs Policies - alternative options not selected, reasons and SA comments	78
Table 13 : Connecting Places Policies - alternative options not selected, reasons and SA comments	79
Table 14 : A Strong Local Economy Policies - alternative options not selected, reasons and SA comments	80
Table 15 : Enabling Community Facilities Policy - alternative options not selected, reasons and SA comments	83
Table 16 : Policies included in the Draft Core Strategy Preferred Options	86
Table 17 : Spatial Strategy policies –appraisal summary	90
Table 18 : Spatial Strategy Policies – summary of mitigation and enhancement	98
Table 19 : Promoting a Quality Environment policies - appraisal summary	101
Table 20 : Promoting a Quality Environment Policies – summary of mitigation and enhancement	104
Table 21 : Meeting Housing Needs policies - appraisal summary	109
Table 22 : Meeting Housing Needs – summary of mitigation and enhancement	112
Table 23 : Connecting Places appraisal summary	114
Table 24 : Connecting Places – summary of mitigation and enhancement	116
Table 25 : A Strong Local Economy and Meeting the Needs of the Community appraisal summary	120
Table 26 : A Strong Local Economy / Community Facilities – summary of mitigation and enhancement	124
Table 27 : Key cumulative effects of the Draft Core Strategy	125
Table 28 : Significant sustainability effects associated with the Draft Core Strategy and potential indicators	135

FIGURES

(in Part B of the SA Report only)

Figure 27 : Example appraisal matrix	85
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ABBREVIATIONS

AMR	Annual Monitoring Report	LGA	Local Government Association
AQMA	Air Quality Management Area	LPA	Local Planning Authority
BAP	Biodiversity Action Plan	LIP	Local Implementation Plan
BEA	Borough Employment Area	MOL	Metropolitan Open Land
BREEAM	BRE (Building Research Establishment) Environmental Assessment Method	NO	Nitric Oxide
CEP	Collingwood Environmental Planning	NO ₂	Nitrogen dioxide
CMS	Convention on Migratory Species	NVQ	National Vocational Qualifications
CO	Carbon Monoxide	ONS	Office of National Statistics
CO ₂	Carbon Dioxide	ODPM	Office of the Deputy Prime Minister
DC	Development Control	PCT	Primary Care Trust
DCLG	Department for Communities and Local Government	PM ₁₀	Particles measuring less than 10 microns
Defra	Department for Environment Food and Rural Affairs	PPG	Planning Policy Guidance
DETR	Department for Transport, Local Government and the Regions	PPS	Planning Policy Statement
DfT	Department for Transport	PTAL	Public Transport Accessibility Level
DPD	Development Plan Document	RSL	Registered Social Landlords
DTI	Department of Trade and Industry	SA	Sustainability Appraisal
EA	Environment Agency	SAP	Standard Assessment Procedure
EEC	European Economic Community	SCI	Statement of Community Involvement
EC	European Commission	SD	Sustainable development
EIA	Environmental Impact Assessment	SEA	Strategic Employment Area
EU	European Union	SEA	Strategic Environmental Assessment
GPD	Gross Domestic Product	SFRA	Strategic Flood Risk Assessment
GIS	Geographical Information System	SINC	Sites of Importance for Nature Conservation
GLA	Greater London Authority	SOA	Super Output Areas
GOL	Government Office for London	SO ₂	Sulphur dioxide
GP	General Practitioner	SPD	Supplementary Planning Document
GQA	General Quality Assessment	SPG	Supplementary Planning Guidance
HA	Housing Association	SRDF	Sub Regional Development Framework
Ha	Hectare	SSSI	Site of Special Scientific Interest
IMD	Index of Multiple Deprivation	SUDS	Sustainable Urban Drainage
LA 21	Local Agenda 21	TPO	Tree Preservation Order
LBB	London Borough of Brent	UDP	Unitary Development Plan
LB Brent	London Borough of Brent	UNFCCC	United Nations Framework Convention on Climate Change
LDD	Local Development Document	VAT	Value Added Tax
LDF	Local Development Framework	WFD	Water Framework Directive
LDS	Local Development Scheme	WLWDA	West London Waste Disposal Authority (known as WestWaste)
LEA	Local Education Authority		
LES	Local Employment Site		

PART B: APPRAISAL OF THE CORE STRATEGY

4. CORE STRATEGY ISSUES AND OPTIONS

Introduction

- 4.1 Sections 4 to 6 of the SA Report (Part B) present the findings of the SA of the Draft Core Strategy Preferred Options and in particular Stage B of the SA process – Developing *and Refining Options* (see Section 2 of the SA Report which describes the Stages in the SA process). Sections 4 to 6 broadly cover the different tasks which make up Stage B of the SA process, namely:
- **Section 4:** testing the DPD objectives against the SA objectives (task B1) and developing the DPD options (task B2);
 - **Section 5:** predicting and evaluating the effects of the DPD (tasks B3 and B4), mitigating the adverse effects and maximising the beneficial effects (task B5); and
 - **Section 6:** proposed measures to monitor the significant effects of the DPD implementation (Task B6).
- 4.2 See Sections 1 to 3 (Part A) of the SA Report, the Sustainability Context, for details of the findings of the tasks broadly under Stage A of the SA process, as well as background on the LB Brent LDF and SA.

Compatibility of the DPD and sustainability objectives

Purpose of testing the compatibility of the objectives

- 4.3 The Government's SA guidance recommends that the DPD objectives are tested against the sustainability objectives to ensure they are consistent. Whilst the aim should be to achieve consistency between plan objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, the Borough (including members) will need to determine where the priorities should lie.

Objectives of the DPD

- 4.4 The Draft Core Strategy Preferred Options include key objectives that aim to enable the achievement of the Spatial Vision for Brent (Chapter 4 of the Draft Core Strategy). This vision is stated to be the spatial expression of four Brent strategies (i.e. Community Strategy, Corporate Strategy, Regeneration Strategy and the Vision for Wembley) and has also been developed from the views gathered during the consultation process on Issues and Options papers¹.
- 4.5 The Draft Core Strategy objectives are²:

¹ LB Brent consulted the public on the Issues & Options papers between September and October 2005 as part of the LDF process.

² Reproduced verbatim from the Draft Core Strategy (Version 15, September 2006)

1. **Achieving Sustainable Development;** through prioritising locations, land-uses and mixed-use development with particular regard to parking and public transport to aid the creation of a sustainable and inclusive future for Brent residents, businesses, workers and visitors focusing on the importance of social cohesion.
2. **Encourage Sustainable Development Practices;** through design, construction and demolition with particular regard given to energy, water and waste efficiency as well as minimising potential effects on climate change.
3. **Reducing the Need to Travel;** through placing emphasis on meeting needs locally and the promotion and improvement of walking, cycling and public transport, whilst recognising that car ownership is important to many and that it is planned for accordingly.
4. **Protecting and Enhancing the Natural and Built Heritage and Environment of the Borough;** by respecting and enriching the special character of the Borough.
5. **Meeting Housing Needs;** secure housing at the locations and of the size, density and tenure needed to meet Borough and Regional needs as appropriate.
6. **Meeting the Impacts of Housing Development;** secure provision / contributions to satisfy the needs arising from new housing development; including education, health facilities, open space and play areas.
7. **Meeting Employment Needs and Aiding the Regeneration of Industry and Business;** creating a climate of certainty that appropriate employment sites and premises are available whilst acting as an attractor to new inward and indigenous investment, and improving employment and training opportunities.
8. **Regenerating Areas Important to London as a Whole;** securing regenerative development in locations such as Wembley, Park Royal, South Kilburn and Willesden Junction where the benefits will be felt both within and beyond the Borough boundary.
9. **Revitalise Town and Local Centres;** through the maintenance and enhancement of their vitality and viability, by improving accessibility and securing new development proposals.
10. **Promoting Tourism & the Arts;** for the benefit of Brent residents, businesses, workers and visitors and maximise their regenerative effect. Special regard is to be had to the role of Wembley as a key attractor.
11. **Protecting, Providing, and Enhancing Open Space and Leisure and Recreational Activities;** for the enjoyment of Brent residents now and in the future.
12. **Meeting the Community's Diverse Needs;** continue to deliver a more responsive, sensitive and fair service to all members of Brent's diverse

community securing, including the provision of a range of community facilities and services for all.

13. **Treating Waste as a Resource;** ensuring that there is an appropriate network of facilities for integrated waste management.
 14. **Creating a Safe and Secure Environment;** embrace a design-led approach to reduce crime and fear of crime.
- 4.6 These objectives are relevant to all three DPDs being initially prepared, but particularly the Core Strategy. The respective objectives for the three DPDs will be refined during their development.

Compatibility of the sustainability and DPD objectives

- 4.7 The results of testing the DPD objectives against the sustainability objectives are included in Table 9. Note that details of the Sustainability objectives are included in Table 8 in Section 3 of the SA Report.
- 4.8 Generally the DPD objectives and the sustainability objectives are predominantly compatible, with a few areas of potential conflict although the significance of these will partly depend on how they are implemented through the DPD. The areas of potential conflict are mainly between those DPD objectives seeking to promote built development, such as housing and employment, and some of the sustainability objectives relating to the environment. This is due to the potential increase in emissions, resource use and waste generated as a result of both the construction and operation of these new homes and business uses. It should be possible to reduce the scale of these potentially negative effects through conditions applied by the DPD policies (as well as other forthcoming DPDs) by promoting sustainable construction and access to public transport for example. However, there is still likely to be a net increase in emissions, resource use and waste compared with the present baseline. This will be particularly significant where current problems or standards are being exceeded (e.g. air quality within AQMAs, water resources and noise nuisance levels in certain areas).
- 4.9 Where some DPD objectives have been identified as being potentially incompatible with a sustainability objective, this may not cause significant effects in practice as it is only intended to identify a potential conflict. For example, whilst *Revitalise Town and Local Centres* and *Aiding the Regeneration of Industry and Business* may result in an increase in local traffic and therefore impacts on air quality and climate change, it may be partly the case that these local journeys replace longer journeys to shopping centres or places of work further afield.

Table 9: Compatibility of the DPD and sustainability objectives

DPD Objectives		Sustainability Objectives																					
Key: Positive compatible: + Neutral: 0 Possible conflict: -		Social								Environment									Economic				
		S1. Prosperity & Social Inclusion	S2. Health	S3. Education & Skills	S4. Housing	S5. Quality of Surroundings	S6. Crime Prevention & Community Safety	S7. Community Identity	S8. Accessibility	EN1. Traffic	EN2. Water Quality & Resources	EN3. Air Quality	EN4. Biodiversity	EN5. Landscape	EN6. Historic Environment & Cultural Assets	EN7. Climate Change	EN8. Waste Management	EN9. Land & Soil	EC1. Growth	EC2. Employment	EC3. Regeneration	EC4. Investment	EC5. Efficient Movement
1.	Achieve Sustainable Development	+	0	0	+	0	0	+	+	+	0	0	0	0	0	0	0	+	+	+	+	+	
2.	Encourage Sustainable Development Practices	0	0	0	0	+	0	0	0	0	+	+	0	0	0	+	+	0	0	0	0	0	
3.	Reducing the Need to Travel	0	-	0	0	0	0	0	+	-	0	-	0	0	0	+	0	0	0	0	0	-	
4.	Protecting & Enhancing the Natural and Built Heritage & Environment of the Borough	0	0	0	0	+	0	+	0	0	0	0	+	+	+	0	0	0	0	0	0	0	
5.	Meeting Housing Needs	+	-	-	+	+	0	+	0	-	-	-	0	0	0	-	-	0	+	+	+	+	-
6.	Meeting the Impacts of Housing Development	+	+	+	+	+	+	+	+	0	0	0	0	+	0	0	0	0	0	+	+	0	
7.	Meeting Employment Needs and Aiding the Regeneration of Industry and Business	0	0	+	0	0	0	0	0	-	-	-	0	0	0	-	-	0	+	+	+	+	+
8.	Regenerating Areas Important to London as a Whole	+	0	0	0	+	0	+	+	-	0	-	0	0	0	-	-	+	+	+	+	+	+
9.	Revitalise Town and Local Centres	0	0	0	0	+	+	+	+	-	0	-	0	0	0	-	-	0	+	+	+	+	+
10.	Promoting Tourism & the Arts	+	0	+	0	+	0	+	0	0	0	0	0	0	+	0	0	0	0	+	+	+	-
11.	Protecting, Providing, and Enhancing Open Space and Leisure and Recreational Activities	0	+	+	0	+	0	+	0	0	0	0	+	+	0	0	0	0	0	0	+	+	0
12.	Meeting the Community's Diverse Needs	+	+	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	+	+	0	
13.	Treating Waste as a Resource	0	0	0	0	-	0	0	0	+	0	+	0	0	0	+	+	0	0	0	0	0	0
14.	Creating a Safe and Secure Environment	0	+	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	+	+	0	

- 4.10 The objective of *Reducing the Need to Travel* (DPD objective 3) is in principle a very sustainable objective, however the DPD objective was modified during the preparation of the Draft Core Strategy to add “whilst recognising that car ownership is important to many and that it is planned for accordingly”. This modification has sustainability implications and therefore this objective has been scored as both compatible and a possible conflict. Planning for car ownership could potentially undermine efforts elsewhere to support other modes of transport and the benefits this brings to those without a car for whom accessibility to facilities and employment can be a particular problem. As a result, it is recommended that this part of the *Reducing the Need to Travel* objective is revised.
- 4.11 *Meeting Housing Needs* (DPD objective 5) and to a lesser extent *Meeting Employment Needs and Aiding the Regeneration of Industry and Business* (DPD objective 7), *Regenerating Areas Important to London as a Whole* (DPD objective 8) and *Revitalise Town and Local Centres* (DPD objective 9), all potentially conflict with some of the sustainability objectives such as those relating to traffic, water quality and resources, air quality, climate change and waste management. This is due to the potential increase in emissions, resource use and waste generation resulting from additional development. *Meeting Housing Needs* also has the potential to conflict with the health and education sustainability objectives due to the potential stress could put on existing health and education services.
- 4.12 Other potentially incompatible objectives include the DPD objective on *Treating Waste as a Resource* which includes the aim to develop a network of facilities for integrated waste management which could conflict with some sustainability objectives, particularly on the quality of surroundings local to these sites.
- 4.13 Some of the potential conflicts identified are inevitable as delivering some of the objectives of the DPD will involve a trade-off between different aspects of sustainability. In the case of *Meeting Housing Needs*, the higher level policy set out in the London Plan requires the Borough to deliver a certain level of growth and therefore the priority for the DPD is to maximise the benefits and mitigate the negative effects.

Main issues and options considered - how they were identified and the sustainability issues considered in choosing the preferred options

Developing the issues and options

- 4.14 The consideration of issues and options in the development of the Draft Core Strategy DPD is described in this section. In Autumn 2005 LB Brent produced a series of Issues and Options papers under the title ‘*A New Plan for a Better Brent –*

*Your Views. Issues and Options Papers*³. These papers sought to help the council make an informed choice as to how suitable land could best be developed, and for which purposes, and how the environment could best be protected through the LDF (all the LB Brent DPDs, not just the Core Strategy). These papers covered a broad range of topics to be considered within the LDF:

- strategic planning objectives and priorities;
- townscape;
- environmental protection;
- planning for more and better housing;
- transport, employment;
- town centres and shopping;
- leisure and tourism;
- open space and biodiversity; and
- community facilities and waste.

- 4.15 These Issues and Options papers were available for public consultation through LB Brent's website, and LB Brent attended all of Brent's Area Consultative Forums throughout September 2005. Comments received went towards developing the preferred options for the Core Strategy DPD.
- 4.16 At this stage, the production of the DPD was still at an early stage and the 'options' included in the papers were mainly presented as questions to elicit consultees' priorities for different measures, rather than as clearly discrete alternatives. These, therefore, did not lend themselves easily to a comparison of their sustainability performance. Therefore, the SA at this stage only provided an initial commentary on the sustainability issues raised by the Issues and Options papers and the key challenges and the sustainability strengths and weaknesses they raised.
- 4.17 The SA commentary only considered alternatives and options where it was relevant to do so (e.g. where there were sufficiently distinct and realistic options to appraise and where there are likely to be significant sustainability effects). In certain policy areas, options may have been foreclosed by higher level decisions, for example by policies in the London Plan, that limit the Borough's scope in considering certain levels of alternatives and options.
- 4.18 The SA commentary focused on the Strategic Planning Objectives and Priorities in more detail than the other LDF issues included in the Issues and Options papers. Where possible, options / priorities under the Strategic Planning Objectives and

³ Refer to Issues and Options section on the LB Brent LDF web-page:
<http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/29ce9562ca0cf33380256f5800503b06!OpenDocument>

Priorities were compared against each of the sustainability objectives. The results are presented in matrices (see Appendix 8). Only comments on the sustainability strengths and weaknesses were included for issues that did not have clear options / priorities to allow such a comparison. The Strategic Planning Objectives and Priorities considered included (see Appendix 8):

- Priorities in considering the future development of the Borough
- The scale and pace of regeneration in the Borough
- Location of Major Regeneration Areas
- Priority land uses or themes
- Spatial expressions of priorities

4.19 For the other issues, as well as the Strategic Planning Objectives and Priorities, a brief summary was produced on the key sustainability issues they raised (note that many of the Issues and Options papers already include discussion on the sustainability implications of the LDF issues). The SA commentary, including the comparison of the options, was provided to LB Brent to inform the subsequent development of the Preferred Options.

4.20 A summary of the recommendations under each of the Strategic Planning Objectives and Priorities is provided below.

Strategic Planning Objectives and Priorities: Summary of recommendations

Priorities in considering the future development of the Borough:

Elements of many of the priorities could be incorporated into an overall strategy and opportunities should be sought to realise the potential offered for “win-win-win” solutions.

The scale and pace of regeneration in the Borough:

As part of developing the DPDs, consideration needs to be given to the scope for securing the necessary facilities and services in advance of new development and any increase in the number of residents. A potentially critical issue in terms of infrastructure, particularly under a changing climate, is the sustainability of water supplies in the South East generally and the ability to meet the growth in demand.

Existing policy and guidance places certain requirements on developers to incorporate environmental improvements and sustainable construction principles into new development proposals. The scope to extend this approach and increase standards is explored elsewhere in the Issues and Options Papers and this SA commentary. It is recommended that further consideration, as part of developing the DPDs, is given to the appropriate scale and pace of regeneration spatially across the Borough and to test options for a differentiated approach whereby the opportunities for mixed, residential led development is limited in certain locations, but promoted elsewhere.

Location of major regeneration areas:

It is suggested that one of the challenges for the DPDs is to translate the spatial implications of the Brent Regeneration Strategy 2001-2021 and two-year Action Plans into policy, although the preparation of the LDF also provides an opportunity to review the strategy if necessary.

Clearly it is important to consider the likely success of regeneration in delivering the types and scale of benefits desired, to those that need it most, in the desired locations and for the anticipated duration.

The Borough has been working on collating information sources to provide the evidence base for regeneration initiatives and it will be important to use this data to monitor progress in the priority areas such as South Kilburn and St Raphael's / Brentfield to inform policy development. It is likely to meet the priorities in the Regeneration Strategy that a combination of the above options / priorities is needed to realise the Borough's vision.

It should also be recognised that environmental improvement is an important part of successful regeneration. It is noted that the environment does not feature explicitly in the Regeneration Strategy as an aim of regeneration programmes. Environmental improvements can contribute to economic and social well-being. There is potential for regeneration activity to deliver a full range of environmental outcomes, and to increase the contribution it makes to sustainable development. The role of environmental improvements should therefore be considered further as policy is developed.

Priority land uses or themes:

By promoting a particular theme in the DPDs, such as promoting sustainable objectives or providing sustainable communities, it would be possible to combine the positive aspects of some of the land use priorities suggested in the Issues and Options Paper. Whilst it may be appropriate to focus on employment generating uses in certain locations, mixed use development with an appropriate emphasis on affordable housing has many sustainability benefits. This should not be done at the expense of protecting important assets of the borough.

Spatial expressions of priorities:

It is likely that a combined strategy to concentrate development in major town centres and at major public transport interchanges will provide the most sustainable solution. But this would need to be coupled with policies to protect some areas / assets and to promote sustainable construction to minimise the resource use and emissions resulting from new development.

Refining the Preferred Options

- 4.21 During the subsequent refinement of the Preferred Options, alternative options were considered which drew on the Issues and Options papers and took into account the responses received upon them, including the feedback given through the SA commentary.
- 4.22 The respective sustainability effects of these options were considered throughout the SA process, through the use of appraisal 'proformas' (see Appendix 3), which provided a template for those writing policy to consider the alternative options and potential sustainability strengths and weaknesses associated with them. In addition regular meetings were held with LB Brent to discuss emerging policy options. This included two Assessment Workshops in March and May 2006. At both of these alternative policy approaches were discussed with internal LB Brent officers and external stakeholders in the light of the key sustainability issues identified by the SA.
- 4.23 As the Draft Core Strategy Preferred Options evolved, details on the alternative options not selected were recorded, along with the reasons why they were rejected and the preferred options were selected. Boxes are included in the Draft Core Strategy which details the final version of the "alternative options not selected".

- 4.24 In many cases the 'preferred' options presented in the Draft Core Strategy are dictated by higher level policies or targets. Thus, for example the Draft Core Strategy has limited options in relation to the provision of new homes, or the location of Strategic Industrial sites, as these are dictated by the London Plan. Equally the preferred policy for Sustainable Communities reflects central government policy in this area.
- 4.25 For some policies or measure proposed, the range of alternative options that could be investigated was limited by their nature leaving a relatively straightforward choice in sustainability terms. For example, Policy SD1: *Climate Adaptation Infrastructure* includes within the preferred option the proposal to develop a climate adaptation strategy for the Borough. The 'rejected' alternative reported in the Draft Core Strategy is to not develop an adaptation strategy.
- 4.26 The tables below (Table 10 to Table 15) summarise the alternatives options considered at part of developing the Draft Core Strategy and the reasons given by LB Brent why they were not selected. A commentary from the perspective of the SA is then provided on each of the Preferred Options policies, the alternative options considered and reasons given why they were not selected. To fully understand the context to these comments it is necessary to read them alongside the Preferred Options policies in the Draft Core Strategy, these are also reproduced in the matrices in Appendix 9.

Table 10: Spatial Strategy Policies - alternative options not selected, reasons and SA comments

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

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

Table 11: Maintaining a Quality Environment Policies - alternative options not selected, reasons and SA comments

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

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

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

Table 12: Meeting Housing Needs Policies - alternative options not selected, reasons and SA comments

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

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

Table 13: Connecting Places Policies - alternative options not selected, reasons and SA comments

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

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
Traffic Restraint	<p>requirement of both national government policy and the London Plan.</p> <p>An alternative to relating standards to public transport accessibility is to apply the same standard across the Borough.</p>	in excessive on-street parking and potential under-investment in development opportunities.	term would be for the provision, and thus use of alternative modes, including walking and cycling to allow the progressive restriction of parking in all areas – with the aim of encouraging and supporting modal shift which would have significant sustainability benefits for the Borough.
CP TRN4: Transport Links in London	To not prioritise the strategic links but to prioritise on purely local grounds.	This would result in key strategic routes not being implemented with a consequential impact on the ability to meet strategic aims and objectives in promoting public transport and walking.	The reasons for not selecting this alternative are supported from a sustainability perspective.

Table 14: A Strong Local Economy Policies - alternative options not selected, reasons and SA comments

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

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

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Core Strategy)	SA comments
CP TC5: Network of Town Centres	Below Major centre, an option is to identify an alternative network.	PPS6 requires that LPAs consider a network of town centres and their relationship in the hierarchy and to consider the need for regeneration to strengthen them. In addition deficiencies in the network should also be highlighted by promoting centres to function at a higher level in the hierarchy, or by designating new centres. Wembley and Kilburn are the London Plan identified Major Centres. Their position is fixed. Below Major centre, therefore, an option is to identify an alternative network. However, regular monitoring of the town centres such as the level of floorspace, the number of multiples, level of vacancies, etc. means that the hierarchy identified is based on the best available evidence.	The network may evolve over time, however it is supported that the network of town centres is a fixed issue.
CS CT1: Promoting Leisure and Tourism	Allowing leisure and tourist facilities to locate anywhere in the Borough without good access.	This would attract business away from town centres and result in decentralisation of network infrastructure. By focusing leisure and tourism facilities in town centres with better transport links, these uses are more accessible to a wider range of users and supported by complementary uses, such as shops, restaurants, information bureaux, and other leisure activities. Also, the impacts of these facilities can be more easily managed, rather than being dispersed throughout the borough where residential character and amenity may be compromised and impacts on surrounding uses may be greater	This alternative would be considered a less favourable approach from a sustainability perspective, potentially leading to significant increases in travel need and associated environmental and social impacts. Thus, the reasons for rejecting this alternative are supported.
	Leisure and tourism facilities not promoted and no contributions sought	As a borough it would be a missed opportunity to help raise the local economy and promote regeneration, particularly as tourism revenue accounts for 6.4% of the UK's total GDP. Leisure and tourism facilities help make Brent an enjoyable and a pleasant place to be, and would be advantageous for developers who impact on existing infrastructure and resources to help contribute towards improving public realm, the creation of high quality environments, and boosting the local economy.	This alternative is also not considered favourable from a sustainability perspective as leisure and tourism play an important role in the physical, cultural and social well-being of the Borough.

Table 15: Enabling Community Facilities Policy - alternative options not selected, reasons and SA comments

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

5. APPRAISAL OF THE CORE STRATEGY PREFERRED OPTIONS

Introduction to the appraisal of the Draft Core Strategy Preferred Options

- 5.1 The methodology adopted for the Sustainability Appraisal (SA) of the Draft Core Strategy Preferred Options is described in Section 2 of this SA Report. A summary of the findings of the appraisal of the version of the Preferred Options which was issued for public consultation is presented in this section. During the development of the Preferred Options, the SA process has led to a series of changes being made to earlier drafts of the Core Strategy and therefore measures to improve the sustainability performance of the policies have already been incorporated. Consequently, what is presented here is a description of the residual effects and proposed mitigation and enhancement measures relevant to the latest version of the Preferred Options and any outstanding SA recommendations.
- 5.2 A detailed appraisal was undertaken of each policy, or collections of policies, in the Preferred Options document. Each of the sustainability objectives and criteria were considered (see Section 3). The results were presented in a series of matrices, see Appendix 9 (also see Figure 27 for an example of a blank appraisal matrix), these matrices included:
- a score against each objective (or each individual criteria in the case of the Spatial Strategy policies);
 - a commentary on the likely positive and negative effects of the policy under each objective;
 - potential enhancement and mitigation measures under each objective; and
 - an overall summary commentary on the potential effects of the policy(ies) and potential enhancement and mitigation measures, including recommendations on improving or clarifying the policy or supporting text from a sustainability perspective, mitigating the potential negative effects and enhancing the potential positive effects of the policy.
- 5.3 These matrices have been summarised below, but for a more detailed commentary and explanation on the scores, reference should be made to the detailed appraisal matrices included in Appendix 9. The scores have been brought together here to allow summary conclusions to be drawn, to make cross-policy comparisons and to help assess policy compatibility and cumulative impacts.
- 5.4 The Draft Core Strategy policies have been subdivided in this Section to follow the Chapters of the Core Strategy:

- Spatial Strategy
- Promoting a Quality Environment
- Meeting Housing Needs
- Connecting Places
- A Strong Local Economy
- Enabling Community Facilities

Figure 27: 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:			

- 5.5 For each of the Chapters in the Draft Core Strategy, a summary matrix of the appraisal of the potential effects is included with a separate table summarising the potential mitigation and enhancement measures and SA recommendations.
- 5.6 The policies included in the Spatial Strategy are listed in Table 16. The full wording of the policies is included in Appendix 9, as well as in the Draft Core Strategy.

Table 16: Policies included in the Draft Core Strategy Preferred Options

Spatial Strategy for Brent
<p>Key Principles for Development CP SS1: Key Principles for Development</p> <p>Regeneration & Growth / Appropriate Level of growth CP SS2: Population and Housing Growth</p> <p>Key Locations for Regeneration & Growth CP SS3: Focus of Growth CP SS4: Commercial Regeneration</p> <p>Destination Wembley CP SS5: Wembley as a Focus for Growth</p> <p>Infrastructure to Support Development CP SS6: Infrastructure to Support Development</p> <p>Sustainable Communities CP SS7: Sustainable Communities</p> <p>Local Benefits CP SS8: Meeting Local Community Needs</p> <p>Protection and Conservation CP SS9: Protecting the Built and Natural Environment</p> <p>Implementation CP SS10: Implementation</p>
Other Core Policies (and chapter headings)
<p>Promoting a Quality Environment 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>Meeting Housing Needs CP H1: Housing Provision CP H2: Sustainable Housing Development CP H3: A Balanced Housing Stock CP H4: Housing Provision</p> <p>Connecting Places 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>A Strong Local Economy 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 CP TC3: Exceptional Locations CP TC4: Town Centre Opportunity Sites CP TC5: Network of Town Centres CP CT1: Promoting Leisure and Tourism</p> <p>Enabling Community Facilities CP CF1: Meeting the Needs of the Community</p>

Detailed appraisal of the significant social, environmental and economic effects of the Draft Core Strategy Preferred Options

Spatial Strategy

Summary of potential effects

- 5.7 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. Table 17 summarises the appraisal of each policy to enable comparison of policies by objective and an overview of the effects of all the Spatial Strategy policies together (see Appendix 9 for further details).
- 5.8 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 Core Strategy, and for the forthcoming DPDs to be prepared by the Borough.
- 5.9 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.

5.10 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.

5.11 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.

5.12 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).

5.13 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.

5.14 Further details are included below 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.

Table 17: Spatial Strategy policies –appraisal summary

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
Social												
S1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	++	++	+	+	++	++	++	0	+	Generally the effects of the Spatial Strategy policies are positive against this objective. Due to their focus on regeneration, provision of affordable housing, community amenities and services to meet local needs. There is some uncertainty over the significance of the potentially positive effects on the affordability of services. From the policy text it is hard to predict whether services and amenities will necessarily be accessible and affordable for those currently most in need, as the policy focus is on new facilities associated with meeting the increased demands of new development.
	Will it improve affordability of essential services?	+	+	+	0	+	+	+	+	0	0	
S2. To improve the health of the population	Will it improve access to high quality health facilities?	+	+	+	0	+	+	+	++	0	+	Generally the effects of the Spatial Strategy policies are positive against this objective. This is mainly due to the provision of health facilities, but also alleviation of deprivation through regeneration, provision of affordable housing, employment etc and increasing exercise and healthier lifestyles through the provision of facilities / open pace and promotion of walking and cycling. To realise all the positive effects, new health, sport and leisure facilities will need to be phased to meet the increase in population and more than meet increased demand associated with population growth to improve the current situation for existing residents.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	?	0	0	+	+	+	+	+	0	
	Will it reduce health inequalities?	+	+	+	+	+	+	+	+	+	+	
	Will it reduce death rates?	0	?	0	0	0	0	0	0	0	0	
S3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	+	0	0	0	+	0	+	Generally the effects of the Spatial Strategy policies are positive against this objective. This is mainly due to the provision of education facilities. To realise the positive effects, new education facilities will need to be phased to meet the increase in population and more than meet implied increased demand associated with population growth. Some uncertainty (SS2 and SS10) as it will depend on new facilities exceeding increased demand (SS2) and on successful delivery of planning obligations to provide appropriate education facilities. Positive effect of policy SS4 arises as supporting text refers to use of S106 agreements to provide training for local people to meet employment demands.
	Will it improve access to high quality educational facilities?	+	+	0	0	+	+	+	++	0	+	
	Will it help fill key skill gaps?	0	+	0	+	0	0	0	+	0	0	
S4. To provide everybody with the	Will it increase access to good quality and affordable	+	++	++	0	+	0	++	0	0	+	Generally the effects of the Spatial Strategy policies are positive against this objective. This is mainly due to aim of the policies to deliver new homes for the borough , including a high proportion of

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
opportunity to live in a decent home	housing?											affordable homes and mix of tenure, sizes etc to met Brent's needs. Major positive effects predicted for several policies (e.g. SS1, SS2 and SS3) against certain criteria. A caveat on the affordability criteria for SS2 as there is some risk that broader regeneration could generally increase property values (across borough, and in specific locations) which may exacerbate affordability problems for some existing residents. Homelessness is not specifically mentioned in the Spatial Strategy, but affordable housing provision may increase opportunities for accommodation for the homeless.
	Will it encourage mixed use and range of housing tenure?	++	++	+	0	+	0	+	0	0	+	
	Will it reduce the number of unfit homes?	++	+	+	0	0	0	0	0	0	0	
	Will it reduce homelessness?	?	+	0	0	0	0	0	0	0	0	
S5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	+	+	0	+	++	+	++	++	+	Generally the effects of the Spatial Strategy policies are very positive against the criteria of improving neighbourhood satisfaction and amenity / sense of place. However against the noise criteria there is the potential for negative effects from policies SS2, SS3, SS4 and SS5. These are predicted to be of minor significance, and it is expected that the causes leading to these negative effects such as increased population and density and traffic can be partly mitigated by the Urban Design (UD) policies and the forthcoming development control policies. The focus of growth on Wembley could be a significant source of noise pollution due to the likely traffic generation created by a regional centre, although there is a major focus on public transport, as well as specific noise nuisance associated with the use of the stadium and other leisure facilities.
	Will it improve residential amenity and sense of place?	++	+	+	0	+	+	+	++	+	+	
	Will it reduce actual noise levels?	+/-	-	-	-	-	?	+	?	0	0	
	Will it reduce noise concerns?	+/-	-	-	-	-	?	+	?	0	0	
S6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	0	+	0	0?	0/+	0	+	0	0	The role of spatial planning in reducing crime depends on design to minimise crime, improve safety and reduce fear of crime and on the beneficial effects in the long-term of regeneration reducing disparities and exclusion which are causal factors in some crime. As these effects are hard to predict there are some uncertainties associated with the predicted effects against this objective. However SS1 and SS3 are predicted to have positive effects and there are no negative effects likely to be associated with this objective.
	Will it reduce the fear of crime?	+	0	+	0	0?	0/+	0	+	0	0	
S7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+/?	0	+	0	0	+	0	+	0	+	Generally the effects of the Spatial Strategy policies are positive against this objective. In particular all the Spatial Strategy policies are predicted to have a positive effect on the criteria of fostering a sense of pride in the area. There could be some risk under the criteria of community communication and understanding for an influx of new population to
	Will it foster a sense of pride in area?	+	+	+	+	+	+	+	+	+	+	
	Will it increase the ability of people to influence decisions?	+/?	0	0	0	0	0	0	0	+	+	

Objective	Criteria	Policy No.										Comments	
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10		
	Will it improve ethnic relations?	+/?	0	0	0	0	0	0	0	0	0	lead to some loss of existing community cohesion.	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	+/?	0	0	0	0	0	0	0	0	0		+
	Will it encourage people to respect and value their contribution to society?	+	+	0	0	0	0	+	+	0	0		+
S8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	+/-	+	+	+	++	++	++	0	++	Generally the effects of the Spatial Strategy policies are very positive against this objective as there is a strong emphasis on providing community facilities. In particular policies SS6, SS7 and SS8. There is one mixed score (SS2) which reflects the likely increased pressure on existing services that would result from population increase. Although the Spatial Strategy does emphasis meeting community needs there is some risk that certain services may be over-stretched by increased demand, especially in the short-term, which could have an effect on access and affordability.	
	Will it improve the level of investment in key community services?	0	+	0	0	+	++	++	++	0	+		
	Will it make access more affordable?	+	+	+	0	+	+	+	++	0	?		
	Will it make access easier for those without access to a car?	+	+	+	0	+	+	++	++	0	+		
Environmental													
EN1. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+/-	-/-	--	-	-	++	+	+	+	+	The Spatial Strategy policies have mixed effects against the criteria under this objective. The positive effects result from the proposed focused growth on well connected centres, promotion of public transport, walking and cycling facilities and services within communities thus negating the need to travel to access services. However policies SS1 – SS5 are predicted to have some mixed and negative effects, of major significance in the case of SS3, against the criteria to reduce traffic volumes and increase the proportion of journeys using modes other than the car. These effects are predicted because, regardless of the efforts made to increase public transport provision and locate services and amenities close to communities, the increased development of housing and associated population will generate traffic. This will occur both during construction, and occupation.	
	Will it increase the proportion of journeys using modes other than the car?	++	+/-	+	+/-	+/-	+	+	+	0	+		
	Will it encourage walking or cycling?	?	0	+	+	?	+	+	+	+	+		
EN2. To improve water	Will it improve the quality of inland water?	?	0/-	-?	?	?	0	+	0	0	0	Policies SS2, SS3, SS4 and SS5 have predicted negative effects against the criteria of reducing water consumption. Although policies	

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
quality; conserve water resources and provide for sustainable sources of water supply	Will it reduce water consumption?	-/+	-	-	-	-	0	+	0	0	0	<p>elsewhere (UD, SD and ENV polices and forthcoming development control policies) will mitigate these predicted effects. As with objective 9 above, the increased number of dwellings and rising population will lead to a net increase in water consumption in the Borough – even if reduced consumption per-capita is realised.</p> <p>There is some uncertainty over the significance of the potentially positive effects on water quality given the strategic nature of the Spatial Strategy. SS7 is likely to have positive effects as it specifically seeks to recognise the importance of waterways and waterbodies and promote the London Plan’s Blue Ribbon Network. Development at specific locations (SS3) may lead to localised water quality issues.</p>
EN3. To improve air quality	Will it improve air quality?	+	-/-	-	-	-	- /+?	+	+	+?	+?	<p>Some Spatial Strategy policies are likely to have positive effects (SS1, SS7 and SS8) and other negative effects (SS2, SS3, SS4 and SS5) against this objective. There is some uncertainty of this effect, as improving air quality in the Borough will depend largely on the impact the policies have on the overall level of traffic as well as the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.</p> <p>Policies SS2 and SS3 have the potential for negative effects, and SS5 has a mixed predicted effect – this relates to the comments for Objective 9, above, as traffic is the major contributing factor in air pollution in the borough.</p>
	Will it help achieve the objectives of the Air Quality Management Plan?	+	-/-	-	-	-	- /+?	+	+	0	+?	
	Will it reduce emissions of key pollutants?	+	-/-	0	-	-	- /+?	+	+	0	+?	
EN4. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	?	+/- ?	?	0	0	0	+	0	++	0	<p>Policy SS9 scores very positively as it has the primary aims of protecting the built and natural environment.</p> <p>For all other policies the effects are uncertain, mixed or neutral. Although the focus in on improving the quality of townscapes and ensuring regeneration there is limited explicit mention of conserving and enhancing biodiversity– although some of the policies could have potentially positive effects on it.</p> <p>There is no explicit mention of trees or woodland in any policy.</p>
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	?	0/- ?	0	0	0	0	+?	0	+	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	?	-?	?	?	?	0	+?	0	++	0	
	Will it encourage protection of and increase number of trees?	+?	+/- ?	0	0	?	0	+?	0	+?	0	
EN5. To maintain and enhance the	Will it improve the landscape and ecological quality and character of open	+/?	-?	0	0	?	+?	+	+	++	0	<p>Generally the Spatial Strategy policies score positively against this Objective.</p>

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
quality of landscapes and townscapes	spaces?											<p>There are no negative effects identified and a number of major positive effects predicted against the criteria of enhancing priority areas of townscape and public realm (SS1, SS2 and SS8).</p> <p>The level of development proposed may lead to a negative impact on landscape / townscape quality regardless of efforts to mitigate and manage such effects in other policies. SS3 has a potential mixed effect as high design / high rise development may have impact on skylines in specific locations. It is recognised this is likely to be controlled to an extent by other policies.</p>
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	+/-	++	+?	+	+?	+	++	+	+	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	+/-	+	0	+	0	+	+	+	+	
	Will it minimise visual intrusion and protect views?	?	-?	+/-	?	-?	0	0	0	0	0	
	Will it decrease litter in urban areas and open spaces?	0	0	0	0	-?	0	0	0	0	0	
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	?	+/-?	?	?	?	0	+	?	++	?	<p>Overall the Spatial Strategy policies are predicted to have limited significant effects against this objective. However there is some uncertainty as the impact on the historic environment is likely to be determined by more detailed policies and their implementation. The historic environment is only explicitly mentioned in policy SS7 however other policies could impact upon it, for example policies SS2, SS5, SS9 and SS10.</p> <p>While the supporting text to SS2 refers to need to protect 'valued' local areas, there is no explicit reference to historic value or conservation areas, and these may be impacted negatively upon by the scale of development proposed. This is either dealt with in other policies in the Core Strategy or is likely to be in the development control policies.</p>
	Will it protect listed buildings?	?	?	?	?	?	0	+?	?	+?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	?	?	?	?	0	+?	?	+?	0	
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	--	-	-	-	+/-	+	+	+?	+?	<p>There is the potential for negative effective against this objective, particularly in terms of greenhouse gas emissions and flood risk. However some policies have the potential for positive effects, particularly those which propose the location of facilities and services in proximity to residential areas, and seek to encourage the use public transport, walking and cycling and a reduction in the need to travel.</p> <p>The negative effects predicted, especially for SS2 and SS3, are a result of the likely environmental resource use and emissions related impacts associated with the construction, habitation and travel related to development (additional homes and population over the plan period).</p> <p>Even though there are policies within the DPD (such as UD and SD policies) which seek to mitigate these impacts which, these will have the effect of minimising an increase in emissions and energy consumption, rather than decreasing overall. Thus a negative score against these policies is appropriate. (Positive effects will be predicted</p>
	Will it lead to an increased proportion of energy needs being met from renewable sources?	+	+?	?	?	?	?	?	?	0	0	
	Will it reduce emissions of ozone depleting substances?	0	0	0	0	0	0	0	0	0	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	+	-	-	-	-	?	+	0	0	0	
	Will it reduce the risk	+	?	0	0	0	0	0	0	0	0	

Objective	Criteria	Policy No.										Comments	
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10		
	of damage to property from storm events?												for those policies which seek to mitigate for these impacts). Given the level of development proposed and even with the Growth Areas being located predominately outside flood risk areas and with the incorporation of sustainable drainage systems etc, it is likely that there will be a net increase in run-off etc and therefore the potential for an increase in flood risk.
EN8. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+/-	--	-	-	-	-	+	-?	0	0	Policy SS2 has the potential to cause significant negative effects under this objective due the level of proposed development and the resulting consumption of natural resources and generation of waste, both during construction and occupation. The criteria are seeking to reduce consumption of materials and resources and generation of waste. Even though there are policies within the DPD (such as UD and SD policies) which seek to mitigate for these impacts, these will have the effect of minimising the increase in the consumption of non-renewable materials and the generation of waste, rather than realising an overall decrease. Thus a negative score against these policies is appropriate. (Positive effects will be predicted for those policies which seek to mitigate for these impacts).	
	Will it reduce household waste?	+/-	--	-	0	-	0	+	0	0	0		
	Will it increase waste recovery and recycling?	+/?	+?	+?	?	+?	?	?	0	0	0		
	Will it reduce hazardous waste?	0	0	0	?	0	0	?	0	0	0		
	Will it reduce waste in the construction industry?	+/?	--	-	-	-	-	+	0	0	0		
EN9. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	+/- ?	+	+	+	+	++	0	++	+?	The Spatial Strategy policies generally score positively against this objective. The emphasis of the policies reflects national targets in relation to development on previously developed land, and minimisation the use of greenfield sites. There is the potential for both positive and negative effects for policy SS2 against the criteria to minimise development on greenfield sites as development on scale proposed could increase pressure on greenfield sites, although the London Housing Capacity Study indicates level of growth proposed can be accommodated (but not higher levels).	
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+/?	++	++	+	+	+	++	0	+	+		
	Will it ensure land is remediated as appropriate?	?	+?	?	0?	?	0	0	0	0	+		
	Will it minimise the loss of soils to development?	+/?	?	?	0	0	0	0	0	0	0		
	Will it maintain and enhance soil quality?	0	?	?	0	0	0	0	0	0	0		
	Will it reduce the risk of subsidence?	?	-?	?	0	0	0	0	0	0	0		
Economic													
EC1. To encourage sustainable	Will it encourage new business start-ups and opportunities for local people?	+?	+	+	++	+	+	0	+	0	0	The Spatial Strategy policies score very positively against the criteria under this objective. There are no negative effects predicted.	

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
economic growth	Will it improve business development and enhance productivity?	+	+	+	++	+	0	0	+	0	0	<p>The Vision and Objectives of the DPD set the framework for the Spatial Strategy policies and seek explicitly to bring about regeneration of the Borough, improving it as a place to work, live and learn. All of these factors and the policy and supporting text within the Spatial Strategy chapter are likely to achieve positive economic effects.</p> <p>However see Objective EC2 below. There remains some uncertainty over whether local people, and those most in need will benefit. Rapid economic expansion which does not meet the needs of local people is unlikely to meet the overall regeneration aims of the DPD.</p>
	Will it improve the resilience of business and the local economy?	+	+	+	+	+	0	0	0	0	0	
	Will it promote growth in key sectors?	+	+	0	+	0	0	0	0	0	0	
	Will it promote growth in key clusters?	+	+	0	+	0	0	0	0	0	0	
	Will it enhance the image of the area as a business location?	++	++	+	++	++	+	+	+	+	+	
EC2. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	+	+	++	+	+	0	+	0	+	<p>The supporting text Policy SS4 refers to use of S106 agreements to provide training for local people to meet employment demands. However apart from this reference there is some uncertainty that new opportunities will be available and suitable for local people. If all new employment opportunities are absorbed by incoming population and/or commuters, the net impact on locally deprived individuals and areas may be limited.</p>
	Will it provide job opportunities for those most in need of employment?	?	?	?	+	+	0	0	+	0	+	
	Will it help to reduce long hours worked?	0	0	0	?	0	0	0	0	0	0	
	Will it help to improve earnings?	0	+	?	+	+	0	0	0	0	0	
EC3. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	++	++	++	++	+	++	++	+	++	<p>Regenerations is a key aim of the Spatial Strategy. Thus all the SS policies (apart from SS9, whose focus is protecting the built and natural environment) are predicted to have at least a minor and in most cases a major positive effect in relation to this objective.</p> <p>However refer to Objective EC2 as there may be some uncertainty of over the delivery of these effects.</p>
EC4. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	+	0	+/- ?	+	0	0	+	0	0	<p>Generally the Spatial Strategy policies score positively against this objective. In particular the predicted effects against the criteria to encourage inward investment are very positive, as it is expected that to bring about the development aspirations of the Spatial Strategy, significant investment will be required in the Borough, both in terms of construction of housing and other development, but also infrastructure and services.</p> <p>The only minor negative effect predicted is associated with the protecting open spaces under policy SS9 which may in some cases limited inward investment and the availability of sites. However, from an overall sustainability perspective this would actually be considered a necessary and overall beneficial intervention.</p>
	Will it encourage inward investment?	+	++	++	++	++	+	+	+	+	+	
	Will it make land and property available for business development?	+	+	+	++	+	0	0	0	-	0	

Objective	Criteria	Policy No.										Comments
		SS1	SS2	SS3	SS4	SS5	SS6	SS7	SS8	SS9	SS10	
EC5. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	+/-	+/-	+	+/-	+	+	+	0	+	Policies SS1 – SS3 and SS5 have mixed scores against the criteria to reduce commuting. This is due to the impact of increased population and its likely traffic implications. In addition significant development at Wembley may generate some journeys within and from outside the Borough. It is recognised that it is expected that some of this impact will be offset as people substitute Wembley for current trips to centres partially or entirely outside the Borough, however it is predicted that the net effect of the development of a regional centre may be an increase in commuting.
	Will it improve accessibility to work by public transport, walking and cycling?	++	+	+	++	+/-	+	+	+	0	+	
	Will it reduce journey times between key employment areas and key transport interchanges?	++	0	+	+	+	0	+	0	0	+	
	Will it facilitate efficiency in freight distribution?	?	0	0	+/-	0	0	0	0	0	0	
<p>Overall comments on Spatial Strategy:</p> <p>The Spatial Strategy chapter scores generally positively. There is some uncertainty of scores, which are discussed against each objective above, however in general this uncertainty is a cause of the high-level of policy text within the Spatial Strategy. These uncertain effects are likely to be partly reduced by the implementation of the other policies in the Core Strategy and the forthcoming development control policies (see details of proposed mitigation and enhancement below).</p> <p>Policy SS2 has the greatest potential to cause negative effects, particularly when taken in isolation from the other Core Strategy (and forthcoming development control policies). These are potential negative effects are particularly for the environmental objectives, and are as a result of the predicted impacts of level of growth proposed and the associated construction and occupation effects on resource use, energy consumption, emissions, waste generation, traffic generation etc. Policies SS3, SS4, SS5 also have some potential negative effects, although the majority are of minor significance.</p> <p>Where a negative effects is predicted, the mitigation and enhancement comments provided in table below provide suggestions for how these effects may be mitigated.</p> <p>Key: Major positive: + Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: +/-</p>												

Summary of mitigation and enhancement

5.15 Table 18 represents the amalgamation of all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 18: Spatial Strategy Policies – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
SS1: Key Principles for Development	<p>As this policy sets out the principles of the Spatial Strategy, the effects will be dependant on the implementation via the other policies in the Core Strategy, as well as other DPDs and SPDs. Various references are included within the detailed comments in Appendix 9 to where the forthcoming development control policies will need to focus to ensure the positive effects are enhanced and the negative effects are minimised.</p> <p>More specific comments that could be included in the Submission version include:</p> <ul style="list-style-type: none"> • 2nd bullet point – amend “to ensure growth is sustainable” to “to ensure growth is as sustainable as possible”. • 7th bullet point – amend “all development should be sustainable” to “all development should contribute towards achieving sustainable development”. <p>These changes are proposed as development is always likely to be a compromise between the different dimensions of sustainability and delivering sustainable development is an aspirational concept.</p>
CP SS2: Population and Housing Growth	<p>The main mitigation and enhancement will be provided by the other policies in the Core Strategy which seek to minimise environmental effects of development and provide the infrastructure necessary to support it, as well as policies / guidance in other forthcoming DPDs and SPDs.</p> <p>Some minor additions and alterations are proposed within the comments in Appendix 9 to the supporting text to, in particular, enhance the positive effects.</p> <p>The phasing of the proposed development will be critical to both manage negative effects during construction, including the cumulative effects such as noise and dust on local people of several sites within a small area, and ensure that the infrastructure necessary is in place at the appropriate time. This is dealt with by several other policies in the Core Strategy, including SS6.</p>
CP SS3: Focus of Growth	<p>Focussing growth in a limited number of centres is generally a positive approach from a sustainability perspective. However it is very important that the possible localised negative environmental impacts are addressed through implementing other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.</p> <p>The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.</p> <p>Involving the local community and key stakeholders in planning for the regeneration of the growth areas will also be important, as highlighted in the supporting text.</p>
CP SS4: Commercial Regeneration	<p>Although it is recognised that storage and distribution is predicted to be a growth industry nationally, and for the Borough, and protecting industrial land restricts opportunities for high value uses particularly residential development, we would caution against it being encouraged as a focal industry for Brent. Distribution is likely to create disproportionately less employment relative to the land take of buildings, as well as generate traffic and associated noise and pollution. They may increase local GVA, but lead to limited benefit for local residents.</p> <p>The possible negative environmental impacts of development for business and industry are addressed explicitly through other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.</p> <p>The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.</p>
CP SS5: Wembley as a	<p>Focussing growth in Wembley is generally a positive approach from a sustainability perspective. However it is very important that the possible localised negative environmental</p>

Policy	Proposed mitigation and enhancement and SA comments
Focus for Growth	<p>impacts of focussed growth are addressed through implementing other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.</p> <p>Involving the local community and key stakeholders in planning for the regeneration of Wembley will also be important.</p> <p>The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.</p> <p>Access to Wembley by public transport, walking and cycling should be promoted as part of the “transport provision” rather than by car and therefore the reference to including “appropriate parking facilities” in the policy should be reconsidered and parking minimised with at least a clarification in the supporting text.</p>
CP SS6: Infrastructure to Support Development	<p>The supporting text (paragraph 5.3.2) refers to the need for a ‘critical mass’ of development in order to support new facilities, ensuring the infrastructure requirements of smaller scale sites are considered in addition to the “large-scale” residential development dealt with under this policy. The requirements for smaller site should be included in the development control policies.</p> <p>Provision of infrastructure to support development is generally positive in terms of sustainability. However it is very important that the possible localised negative environmental impacts of development are addressed through implementing other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and this will also need to be dealt with in more detail in the forthcoming development control policies.</p> <p>Involving the local community and key stakeholders in planning for infrastructure will also be important.</p> <p>The phasing of infrastructure improvements will be important to avoid negative effects, which is included in the policy wording.</p>
CP SS7: Sustainable Communities	<p>No significant mitigation / enhancement identified. Clearly in order to fully address sustainability in the Borough the existing housing / building stock will need to be improved not just the new developed which this policy inevitably focuses on. This is partly addressed within the DPD in relation to regeneration of existing estates etc, but will also require other actions beyond the scope of the DPD.</p> <p>Very specific and minor textual changes/comments that could be included in the Submission version include:</p> <ul style="list-style-type: none"> • 7th bullet - insert “and” between water and minimise; and • last bullet point – and “London Plan’s” before Blue Ribbon. <p>Detailed implementation of policy will be through many of the other Core Policies and the forthcoming development control policies.</p>
CP SS8: Meeting Local Community Needs	<p>There is a strong link / similarity between this policy and policy SS6: Infrastructure to support development.</p> <p>No significant mitigation / enhancement identified. Detailed implementation of policy will be through many of the other Core Policies and the forthcoming development control policies.</p>
CP SS9: Protecting the Built and Natural Environment	<p>No significant mitigation / enhancement identified. Detailed implementation of policy will be through other Core Policies (e.g. OS1 and OS2) and the forthcoming development control policies.</p>
CP SS10: Implementation	<p>The effects of this policy will be influenced by the implementation of the forthcoming Planning Obligations SPD, other policies in the Core Strategy and the forthcoming development control policies.</p>

Promoting a Quality Environment

Summary of potential effects

- 5.16 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. Table 19 summarises the appraisal of each policy to enable comparison of policies by objective and an overview of the effects of all the *Promoting a Quality Environment* chapter policies together (see Appendix 9 for further details).
- 5.17 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.
- 5.18 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.

5.19 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.

5.20 Further details are included below 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.

5.21 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.

Table 19: Promoting a Quality Environment policies - appraisal summary

Objective	Policy No.							Comments	
	UD1/2	SD1	SD2	ENV1	ENV2	OS1/2	W1		
Social									
S1. To reduce poverty and social exclusion	+	+?	+	+	+	+	+	0	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Improving the quality of natural and built environment is likely to have some beneficial effects on poverty and social exclusion by, for example, enhancing quality of life and wellbeing, promoting regeneration and alleviating fuel poverty.
S2. To improve the health of the population	+	+?	+?	+	+	+	+	0	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Positive health effects are likely to result from, for example, increased opportunities for sport and recreation (e.g. OS1 and OS2), an enhanced environment, preventing pollution

Objective	Policy No.							Comments
	UD1/2	SD1	SD2	ENV1	ENV2	OS1/2	W1	
								and remediation of contaminated (e.g.ENV1) and increased resilience to climate change (e.g. SD1 and SD2). There is some uncertainty over the significance of the potentially positive effects of policies SD1 and SD2 as it is unclear the degree to which the health effects of climate change will be considered.
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	No significant effects are predicted.
S4. To provide everybody with the opportunity to live in a decent home	+	+	+	0/+	+	0	0	No significant negative effects are predicted. Improved urban design (e.g. UD1) and sustainable design and construction (e.g. SD1) should have a positive effect on the quality of housing.
S5. To provide everybody with good quality surroundings	+/ ++	0	+/ 0	0	+	+/ ++	+	Generally the effects of the policies are positive against this objective, in some cases this may be of major significance. No significant negative effects were identified. Policies UD1 / UD2 and OS1 / OS2 are likely to have a positive effects on the quality of surroundings in the Borough, including enhancing areas of low quality public realm and townscape and creating and enhancing open space, habitat.
S6. To reduce crime and anti-social activity	+	0	0	0	0	0	0	No significant effects are predicted for most of the policies. Policies UDS1 / UD2 are expected to have a positive effect on crime and fear of crime by creating communities which encourage pedestrian movement and passive surveillance and are designed with crime in mind.
S7. To encourage a sense of local community; identity and welfare	+	0	0	0	+	+	+	No significant effects are predicted for most of the policies. Some of the policies are likely to / could have a positive effect on community identity, particularly by fostering pride in the local area. There is some uncertainty over the likely significance of the potentially positive effects of policies ENV1, OS1, OS2 and W1 on developing community identity.
S8. To improve accessibility to key services especially for those most in need	+	0	0	0	0	0	0	No significant effects are predicted for most of the policies. Positive effects are predicted for policies UD1 / UD2. as design can play a important role in ensuring access to local services and ensuring public transport accessibility.
Environmental								
EN1. To reduce the effect of traffic on the environment	+	0	+	+	0	+	0	No significant negative effects are predicted. Several policies are likely to have a positive effect on reducing the effect of traffic on the environment by reducing the need to travel and promoting public transport, walking and cycling.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	+	+	+	0	+	+	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Several of the policies aim to promote water conservation, sustainable urban drainage and pollution prevention and therefore are likely to have a positive effect on water quality or water resources or both. However, the policies are focussed on minimising the effects of new development, although extensions and refurbishments are also referred to, and the retrofitting of existing properties would be required to significantly improve the overall performance of the Borough's housing stock – although this is outside the scope of the DPD.
EN3. To improve air quality	+	+	+	+	+	+	+/-	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted,

Objective	Policy No.							Comments
	UD1/2	SD1	SD2	ENV1	ENV2	OS1/2	W1	
								<p>apart from the potential for local air quality impacts from energy recovery from waste (policy W1).</p> <p>Potential positive effects on air quality are predicted across all of the policies resulting from the promotion of energy efficiency, renewable energy, reducing the need to travel and creating habitats, for example</p>
EN4. To conserve and enhance biodiversity	+?	0	+	0	+	++	0	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>Policies OS1 and OS2, which aim to promote and protect biodiversity, are therefore predicted to have a major positive effect on biodiversity.</p>
EN5. To maintain and enhance the quality of landscapes and townscapes	++	0	+	0	+	++	-?	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted, although developing waste management facilities could have negative impact on local visual amenity.</p> <p>Policies UD1 and UD2 aim to promote high quality design and improve areas of poor townscape and public realm and policies OS1 and OS2 aim to promote the creation and enhancement of open space and habitats. These policies are therefore predicted to have a major positive effect on the quality of landscapes and townscapes.</p>
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	+	0	+?	0	+	+?	0	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>Policies UD1 / UD2 and ENV2 are predicted to have a positive effect on conserving and enhancing the historic environment, such as conservation areas and listed buildings.</p>
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+	++	++	+	+	+	+	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>Policies SD1 and SD2 and ENV1 specifically aim to address the need to mitigate for and adapt to climate change and are predicted to have positive effects under this objective, with policies SD2 and ENV1 predicted to have a major positive effect. The other policies in this chapter all have a positive effect on certain aspects of climate change mitigation adaptation. This includes</p>
EN8. To minimise the production of waste and use of non-renewable materials	+	+?	+	0	+	0	++	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>Policy W1 is predicted to have major positive effect on minimising waste and promoting the reuse of materials given the aim of the policy is to achieve sustainable waste management. Other policies are likely to have positive effects on both waste minimisation and the efficient use of resources (e.g. UD1, UD2, SD2 and ENV2) through , for example, promoting sustainable design and construction.</p>
EN9. To conserve and enhance land quality and soil resources	0	0/+	+	0	+	+	0	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>A key aim of policy ENV2 is the remediation and re-use of contaminated land. Other policies, such as OS1, are likely to have the effect of protecting greenfield sites from development.</p>
Economic								
EC1. To encourage sustainable economic growth	+	+	+	+	+	+	+?	<p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>Improvements to public realm, design standards, environmental quality of the Borough and resilience to</p>

Objective	Policy No.							Comments
	UD1/2	SD1	SD2	ENV1	ENV2	OS1/2	W1	
								climatic changes are all likely to have a positive effect on a successful economy, by providing an environment in which people want to live and work.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0/+?	0	+?	The policies are predicted to have limited effects on providing employment. Some positive effects on employment could result from improvements to the environmental amenity of the Borough.
EC3. To reduce disparities in economic performance and promote regeneration	+	0	+?	+	+	+?	0	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted Design (e.g. UD policies), quality of the natural environment (e.g. ENV2) and the protection and enhancement of open spaces (e.g. OS1 / OS2) are key elements in regeneration.
EC4. To encourage and accommodate both indigenous and inward investment	+	+?	+?	+	+	+/-	+?	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted, although protecting open space from development could restrict land available for business development. Generally the positive effects predicted result from improvements to public realm, design standards and environmental quality of the Borough which are likely to have a positive effect on making the Borough an attractive place to invest.
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	+?	+	0	+?	0	Limited significant effects predicted from the policies in this Chapter. Where effects are predicted, these are positive. No significant negative effects are predicted Policy ENV1 seeks to reduce the need to travel as a key way of mitigating against climate change.
Overall comments on Promoting a Quality Environment Chapter								
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.								
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.								
Some comments on how the policies may be enhanced (to improve the positive aspects) are included in the table below.								
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain: ? Mixed: +/-								

Summary of mitigation and enhancement

5.22 Table 20 represents the amalgamation of all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 20: Promoting a Quality Environment Policies – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
UD1: Spatial Design Strategy and UD2: Design Delivery Protocol	The need for focus ('particular regard') on the growth areas and areas of currently low townscape (UD1) is recognised, however care should be taken that this is not used as justification for compromised standards at other locations. This could be dealt with in more detail in the forthcoming Development Control Policies DPD. Although the need to concentrate on significant developments is recognised, the cumulative effects of many smaller schemes can also be significant from a sustainability perspective. Some recognition of this fact and how to address design issues within smaller schemes should be dealt with in more detail in the forthcoming Development Control Policies DPD.

Policy	Proposed mitigation and enhancement and SA comments
	<p>It is stated that a Design Delivery Protocol will be established (UD2), but no timescale is given. To have an impact on realising higher urban design standards from the adoption of the plan this will need to be developed as early as possible.</p>
<p>SD1: Climate Adaptation Infrastructure</p>	<p>If the Climate Adaptation and Carbon Management Programme is to have a significant impact in Brent's contribution to the ambitious national target of 20% reduction in Carbon emissions by 2010 it will need to be developed as early as possible.</p> <p>To reflect guidance in PPS1 and PPS2 and the London Plan alterations, the policy could include reference to targets to reduce carbon dioxide emissions e.g. "the council will seek to mitigate the effects of climate change locally to reduce carbon dioxide emissions by 25% by 2020 from 1990 baseline" (this is one of the figures in the London Plan alterations' mitigating climate change policy – 4A.2ii, which is working towards 60% in 2050. The Borough could obviously have its own targets or use the target for a different year). Alternatively or in addition, these London targets could be added to the text in para 6.2.4 or included more detailed policies within the forthcoming development control policies. It could also be decided that these targets are more relevant to include under policy ENV1 on Climate Change, or related development control policies.</p> <p>'Climate adaptation infrastructure' is not a term in common use and therefore further explanation of the scope and purpose of this policy in the supporting text would be beneficial. In addition, the final sentence of the policy - "to enable future connectivity between related sustainable infrastructure systems" - would benefit from further explanation in the supporting text to clarify what is expected of development and regeneration proposals. In the supporting text it could be explained that the Council has joined the Carbon Trust's Carbon Management Programme and will be mapping its own operational emissions to include actions for reducing it within a plan/strategy to 2011 and that current climate adaptation measures sought from development are considered ad-hoc and on a site by site basis which requires better coordination. Therefore there is a need for a shift in focus to a more strategic view of Brent's requirements and to better integrate relevant infrastructure.</p> <p>The proposed programme, to be developed with partners, will help achieve borough-wide improvements in energy efficiency and generation that will be beyond the scope of the DPD and the Borough's responsibilities. This could also consider the local implementation of the Mayor's Energy Strategy and forthcoming Climate Change Adaptation Strategy.</p>
<p>SD2: Sustainable Design and Construction</p>	<p>The policy would benefit from including a specific reference within the policy or supporting text to which Brent / London Checklists are being referred to. Para 6.2.5, the bullet points are mostly broad aspirations / objectives rather than "targets" ("eradicate 'fuel-poverty' in Brent by 2018" is the only real target, therefore it is suggested that it is rephrased. The Government's target for fuel poverty is to eradicate it by 2016 not 2018. There is limited specific supporting text to this policy (paras 6.2.6 – 6.2.7), perhaps some text could be added at a later stage (after the Preferred Options) to provide the context.</p> <p>Updating the Brent Sustainable Design and Construction SPG 19 to an SPD, in line with the London SPG and London Plan alterations and other developments, will ensure that sustainable design and construction in the Borough is in line with the latest good practice. A specific reference to this could be added to para 6.2.7.</p> <p>As part of preparing the development control policies, the measures included in the London Plan (further alterations) policy on sustainable design and construction should be used as a checklist to the topics that should be included:</p> <ul style="list-style-type: none"> • make most effective use of land and existing buildings • reduce carbon and other emissions that contribute to climate change • design new buildings for flexible uses throughout their lifetime • manage overheating • make most effective and sustainable use of water, aggregates and other resources • minimise energy use, use renewable energy, supply energy efficiently and incorporate decentralised energy systems where feasible • procure materials sustainably • ensure designs make the most of natural systems both within and around the building • reduce air pollution, • manage flood risk • ensure developments are comfortable and secure for users conserve and enhance the natural environment, particularly in relation to biodiversity and enable easy access to open spaces • avoid creation of adverse local climate conditions • promote sustainable waste behaviour in new and existing developments, including

Policy	Proposed mitigation and enhancement and SA comments
	<p>support for local integrated recycling schemes, CHP schemes and other treatment options.</p> <ul style="list-style-type: none"> • encourage major developments to incorporate living roofs and walls where feasible • reduce adverse noise impacts
<p>ENV1: Climate Change</p>	<p>The policy would benefit from including a more comprehensive list of potential types of climate change mitigation and adaptation than that included in the policy would include:</p> <p>Mitigation:</p> <ul style="list-style-type: none"> • promoting zero and low carbon development to contribute to the borough's carbon dioxide reduction target • maximising the energy efficiency of development • incorporating decentralized renewable energy generation within developments (see policy DC ENV7); • reducing the need to travel, and in particular journeys by private motor car (see policies DC ENV 1); • promoting the use of alternative fuels for transport (see policy DC ENV 1); • seeking to reduce harmful emissions from new development and refurbishments (see policy CP SD2) <p>Adaptation:</p> <ul style="list-style-type: none"> • conservation and recycling water, and other materials • reducing flood risk and surface run-off and incorporating sustainable drainage (see policy DC ENV6) • incorporating flood resilience where appropriate • minimising overheating, heat island effects and solar gain in summer <p>This list could be incorporated in the existing policy or reflected in the more detailed development control policies. It is also recommended that the requirement for climate proofing is included as a general requirement applicable to both mitigation and adaptation, as it is relevant to both, rather than just being included under adaptation.</p> <p>It would be helpful to include more details in the supporting text on how is it intended that climate proofing of development will be undertaken – it could for example be part of the “Sustainability and Climate Mitigation and Adaptation Strategy” that is to be prepared under policy SD2.</p> <p>The policy applies only to ‘new’ development, however some of mitigation and adaptation measures would also be relevant to refurbishments. As part of regeneration schemes, improvements to existing housing stock could also be achieved. Other mechanisms will be required to achieve significant improvements to the existing housing stock via retrofitting this is likely to be beyond the scope of the DPD. The proposed Climate Adaptation and Carbon Management Programme should help deliver this.</p>
<p>ENV2: Protecting the Environment</p>	<p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy. Consideration, as part of developing the development control policies and through implementation, could be given as to how to encourage / ensure that the beneficial social and environmental effects of higher standards designed to protect the environment can benefit all in the Borough. Controlling and realising enhancements through new development is clearly more straightforward in the context of the DPD, ensuring that retrofitting of existing properties for example and smaller schemes in existing run-down areas meet similar standards could help ‘cascade’ benefits to all in Brent, especially those most in need.</p> <p>In the last sentence of the policy it states that best practice in terms of sustainability should be achieved “wherever possible” – if there are circumstances when it would be acceptable not to achieve these standards these could be clarified in the supporting text. From a sustainability perspective, The policy would be strengthened if this qualification was removed.</p>
<p>OS1: Protection and Enhancement of Open Space and Biodiversity and OS2: Promotion of Biodiversity</p>	<p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.</p> <p>Ideally there would be a presumption against any loss of open space to development, but from the explanation in para 6.4.4 it is understood why the term ‘inappropriate’ has been used to allow for development related to the use of the site, the appropriateness of which can be assessed on a case by case basis..</p> <p>In planning new or enhanced areas of open space, consideration could be given to accessibility by public transport, walking and cycling and the need to involve local residents and businesses in the process. These could be dealt with in the forthcoming development</p>

Policy	Proposed mitigation and enhancement and SA comments
and Nature Conservation	control policies or subsequent guidance (e.g. in the form of SPDs).
W1: Sustainable Waste Management	The approach proposed in the policy is consistent with national and London waste policy, including the Mayor's waste and energy strategies. More detailed policies will be set out in the proposed Joint Waste Development Plan document – with Ealing, Harrow, Hillingdon, Hounslow and Richmond. The potential impacts of different types of waste management facility and potential sites should be considered in more detail as part of the SA of the DPD. Localised impacts of waste management facilities, particularly waste-to-energy plants, would need to be assessed in more detail on a case by case basis to ensure local problems with visual, light, smell, air-borne or noise pollution are avoided/mitigated. Depending on the scale of facility, EIA may be required at the site level.

Meeting Housing Needs

Summary of potential effects

- 5.23 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).
- 5.24 Table 21 summarises the appraisal of each policy to enable comparison of policies by objective and an overview of the effects of all the *Meeting Housing Needs* chapter policies together (see Appendix 9 for further details).
- 5.25 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.
- 5.26 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 indirect 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.

5.27 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.

5.28 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.

5.29 Further details are included below 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.

Table 21: Meeting Housing Needs policies - appraisal summary

Objective	Policy No.				Comments
	H1	H2	H3	H4	
Social					
S1. To reduce poverty and social exclusion	+	+	+ / ++	+ / ++	The effects of the policies are positive against this objective. No significant negative effects are predicted. Providing a mix of good quality, appropriate housing, with sufficient affordable units is likely to tackle some of the Borough's key exclusion and deprivation issues. However, the provision of new housing alone will not be sufficient, and broader regeneration will be required to address all issues of poverty and social exclusion.
S2. To improve the health of the population	+	+	0	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Policies H1, H2 and H4 and supporting text refer to need to provide community facilities and amenities along with any new housing, therefore access to health facilities is likely to improve.
S3. To improve the education and skills of the population	0	0	0	0	No significant effects are predicted. However, policy H2 does aim to improve travel efficiency, including to educational facilities.
S4. To provide everybody with the opportunity to live in a decent home	++	+	++	++	Very positive effects predicted as the housing policies seek explicitly to meet housing needs in the Borough. No significant negative effects are predicted.

Objective	Policy No.				Comments
	H1	H2	H3	H4	
S5. To provide everybody with good quality surroundings	+	++	+	+	All the housing policies are predicted to have positive effects as the main aim of policies is to enhance the provision and quality of the housing stock, and associated local environments, townscape and public realm. No significant negative effects are predicted.
S6. To reduce crime and anti-social activity	0	+	0	0	Generally, some minor positive effects are likely from the housing policies on reducing crime etc. Policy H2 explicitly refers to incorporate designing out crime within housing developments. The benefits could spread to areas of regeneration more widely rather than just the new homes themselves. Benefits to deprivation and social exclusion should also have a positive effect on crime and anti-social behaviour.
S7. To encourage a sense of local community; identity and welfare	0	+	+	0	Positive effects predicted in the case of policies H2 and H3. Where the physical quality of areas and their environments improve, this should have a knock on effect on the sense of community. Also refer to Objective S5.
S8. To improve accessibility to key services especially for those most in need	+?	+	+	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Policies H1, H2 and H4 and supporting text refer to need to provide community facilities and amenities along with any new housing. Uncertainty associated with affordability of facilities.
Environmental					
EN1. To reduce the effect of traffic on the environment	-	+	0	0	Provision of housing on the scale proposed by H1 will result in an increase in population, resource use, traffic and associated negative environmental impacts vis-à-vis the current baseline regardless of the design requirements and measures to minimise resource use. Policy H2 does explicitly refer to need to promote travel efficiency and reduce the length of journeys between home, work, educational, shopping and leisure opportunities.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	-	+	0	0	Refer to Objective EN1. Policy H2 is predicted to have a positive effect as seeks to maximise water conservation. Larger schemes are expected to incorporate sustainable design and construction measures, including use of 'grey water' and sustainable urban drainage (SUDS).
EN3. To improve air quality	-	+	0	0	Refer to Objective EN1. Travel efficiency and maximising energy efficiency, required by Policy H2, which will partly address the effects on emissions of increased population / housing in the Borough.
EN4. To conserve and enhance biodiversity	-/+	+	0	0	The level of housing required (policy H1) could pose a threat to biodiversity, however the focus on previously used land (policy H2) should minimise this risk (although the value of these sites will need to be assessed as some may be of nature conservation value). Housing development should also provide an opportunity to create habitat through landscaping, planting schemes etc.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	++	+	0	Policy H2 refers to the need to complement and / or enhance the local environment / townscape and is therefore predicted to have a positive effect. Policy H1 emphasises the need to enhance the environment and secure developer contributions to achieve this. The policies overall are therefore predicted to have a positive effect with no significant negative effects (although more detailed policies will need to specify the requirements for determining the suitability of tall residential buildings which could impact on visual amenity / townscape etc).
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	+?	+?	0	0	Within the policies housing developments are expected to complement the local environment / townscape, however no mention is made of historic environment or listed buildings. Therefore the effects are uncertain.
EN7. To reduce contributions to climate change and	-/+	+	0	0	Refer to Objective EN1. New homes are to be designed to a high standard, minimise energy

Objective	Policy No.				Comments
	H1	H2	H3	H4	
reduce vulnerability to climate change					efficiency etc and therefore reduce the potential negative effects of additional homes.
EN8. To minimise the production of waste and use of non-renewable materials	-	+	0	0	Refer to Objective EN1. The level of housing proposed (policy H1) will consume resources and generate waste, although policy H2 seeks to ensure these negative effects are minimised.
EN9. To conserve and enhance land quality and soil resources	++	+	0	0	Policy H1 emphasises the re-use of previously developed land and protection to greenfield sites and therefore will have a positive effect on efficient use of land, remediation etc..
Economic					
EC1. To encourage sustainable economic growth	+	+	+	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. The positive effects are likely to be indirect. Increased population and larger workforce, improved public realm and a better mix of housing are all likely in the long term to have positive knock-on effects for the local economy.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	+/-	0	0	0	Policy H1 could have both positive and negative effects as there is a risk that new housing may attract new residents from outside the Borough who will compete with the existing residents in the local job market and limited positive effect will accrue to existing residents. This may be particularly the case for those currently in the most deprived areas. No significant negative effects are predicted for the other policies.
EC3. To reduce disparities in economic performance and promote regeneration	++	+	++	++	Regeneration is one of the main aims of the policies and all the policies are predicted to have a positive effect, mainly of major significance. No significant negative effects are predicted.
EC4. To encourage and accommodate both indigenous and inward investment	+	+	+	+	Development of housing on the scale proposed will require inward investment. However minor positive effects given for all policies for reason given under Objective EC1 above and because of potential conflicts with the demand for land for business development.
EC5. To encourage efficient patterns of movement in support of economic growth	+/-	+	+	0	Increased population and housing provision (policy H1) in the Borough may increase the level of commuting to jobs elsewhere – especially where the population increase is not matched by a similar rise in the number of suitable jobs. However, policies H2 and H3 seek to provide an appropriate mix of accommodation, and uses, and H2 specifically emphasises travel efficiency and the need to reduce journey length, including travel to work, and are therefore predicted to have positive effects.
Overall comments on the Meeting Housing Needs chapter:					
This chapter generally performs very well against the sustainability objectives and the effects are likely to be mostly positive, with a limited number of negative effects predicted. The main negative impacts relate to the potential environmental impacts associated with the construction and occupation of the new housing development on the scale proposed in the Borough (as reflected also in appraisal of Policy SS2). It is recognised that policy H2 (and others elsewhere in Core Strategy – notably the UD and SD policies) explicitly seek to address the impact of increased development in the Borough, however it is likely that some net negative impacts will be inevitable hence the positive and negative effects predicted or policy H1 in particular.					
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-					

Summary of mitigation and enhancement

5.30 Table 22 represents the amalgamation of all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is

broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 22: Meeting Housing Needs – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
H1: Housing Provision	<p>No significant mitigation / enhancement identified. Note recommendations under SS2 within the Spatial Strategy section above.</p> <p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy and mitigate some of the potential negative effects. Policy SS10 will be important in terms of implementation of developer contributions, along with the SPD on Planning Obligations.</p>
H2: Sustainable Housing Provision	<p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy. In particular within the Core Strategy, this policy will be complemented the requirements in terms of infrastructure, sustainable design and construction, climatic change mitigation and adaptation environmental protection etc, including the policies in the Spatial Strategy (i.e. SS1, SS6, SS7, SS8, SS9 and SS10) and all the policies in the <i>Promoting a Quality Environment</i> chapter.</p> <p>The approach outlined in the supporting text (paragraph 7.0.13) is welcomed. Strong implementation of the principles set out throughout the Core Strategy and in development control policies (particularly the environment policies) will be required to realise the ambition set out in this paragraph.</p> <p>The potential negative impacts of high density development and high residential buildings will need to consider in greater detail in the forthcoming development control policies and subsequent guidance.</p> <p>As elsewhere in the Draft Core Strategy, this policy focuses on the effects of new development and to significantly improve the overall performance of the Borough's housing stock, in terms of energy efficiency and water conservation for example, retrofitting of measures to existing properties will be required too. 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.</p>
H3: A Balanced Housing Stock	<p>No significant mitigation / enhancement identified.</p>
H4: Affordable Housing Provision	<p>The earlier amendment of the policy to include a threshold capacity of 10 or more dwellings for the provision of affordable housing contributions (rather than 15) is welcomed. It is noted that the latest alteration to the London Plan (September 2006) does allow for boroughs to set a lower threshold than 10 where justifiable, which could be considered in the light of responses to the Preferred Options and the evolution of the London Plan and adjacent Boroughs' policies.</p>

Connecting Places

Summary of potential effects

- 5.31 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.
- 5.32 Table 23 summarises the appraisal of each policy to enable comparison of policies by objective and an overview of the effects of all the *Connecting Places* policies together (see Appendix 9 for further details).

5.33 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**.

5.34 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 ensure they 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.

5.35 Further details are included below 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.

Table 23: Connecting Places appraisal summary

Objective	Policy No.				Comments
	TRN1	TRN2	TRN3	TRN4	
Social					
S1. To reduce poverty and social exclusion	+	+	0	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Improving transport facilities for those without access to a car, and making access safer, easier and quicker to jobs and amenities for those using public transport, walking and cycling is likely to have a redistributive effect on equality of access in the Borough
S2. To improve the health of the population	+	+	+	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. See Objective S1. Promoting walking and cycling (all policies) are likely to have beneficial health effects from encouraging more active lifestyles.
S3. To improve the education and skills of the population	0	0	0	0	No significant effects are predicted.
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	No significant effects are predicted.
S5. To provide everybody with good quality surroundings	+	+	+	0	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Car traffic has a significant negative effect on communities, making walking unsafe and unpleasant, causing noise and air pollution and reducing visual amenity. Reducing these impacts can therefore have a positive impact on a local community and improve their satisfaction and ownership in the local area.
S6. To reduce crime and anti-social activity	+?	+?	+?	0	There is uncertainty regarding the significance of any positive effects, but increased pedestrian traffic can have a benefit on crime prevention through community awareness and passive surveillance. Therefore there could be a positive effect on crime and fear of crime.
S7. To encourage a sense of local community; identity and welfare	+	+	+	0	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Refer to Objective S5.
S8. To improve accessibility to key services especially for those most in need	+	+	+	+	Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Improved provision of public transport, walking and cycling facilities is likely to enhance access to key services, and improve affordability for those without access to a car.
Environmental					
EN1. To reduce the effect of traffic on the environment	++	++	++	++	These policies aim to help reduce the effect of traffic on the environment, encourage walking and cycling and increase the proportions of journeys using modes other than the car. Therefore these policies are predicted to have significant positive effects under this objective. Investing in infrastructure and links, that will have wider benefits beyond just meeting the demands of the additional growth proposed for the Borough, will make an overall positive contribution to improve transport and accessibility in the Borough. However, other aspects of the policies will just focus on reducing the overall impact the new development by

Objective	Policy No.				Comments
	TRN1	TRN2	TRN3	TRN4	
					reducing the net additional traffic it generates and despite the measures to reduce the impact of growth, the trend of increasing traffic is likely to continue.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	-?	0	No significant effects are predicted apart from policy TRN3, which could have an indirect negative impact on the water environment by inadvertently encouraging householders to create off-street parking on front gardens (due to parking constraint elsewhere) thereby increasing surface water run-off and reducing infiltration and groundwater recharge and exacerbating flooding. Localised protection of water quality will be required as part of developing any transport infrastructure.
EN3. To improve air quality	+	+	+	+	Reduced traffic volumes, and in particular modal shift from car to public transport, walking and cycling will lead to reduced air pollution from transport.
EN4. To conserve and enhance biodiversity	+?	+?	+?	+?	Potential long term positive effect on habitats and species if modal shift away from car transport and an overall reduction in traffic volumes are realised and therefore air quality improved. Infrastructure development (policy TRN1) could result in pressure for land take and therefore possible negative effects on biodiversity.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	+	+	+	Refer to Objectives S5 and EN4.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	+?	+?	+?	+?	There could be a potentially positive effect of these policies on historic buildings etc if traffic volumes and therefore air pollution were reduced. However, the significance is considered uncertain.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+	+	+	+	Reducing traffic volumes, encouraging more efficient means of transport and encouraging development in locations where accessibility to public transport and facilities is good are all likely to reduce energy use and greenhouse gas emissions. However, due to the likely effects of these policies in the context of total emissions in the Borough they have been scored to be of minor rather than major significance.
EN8. To minimise the production of waste and use of non-renewable materials	+?	+?	+?	+?	Although reducing vehicle traffic would have some positive effects on resource use and waste generation, the significance of these effects is uncertain and has not been assessed as sufficiently significant to score as a certain positive effect.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	No significant effects are predicted. Although infrastructure development (policy TRN1) could result in pressure for land take and therefore possible negative effects on land, but this effect is likely to be of minimal significance.
Economic					
EC1. To encourage sustainable economic growth	+	+	+	+	All the policies are likely to have an indirect positive effect as an efficient, equitable transport system is important to the long term viability of the local economy. No significant negative effects are predicted, although some businesses may perceive parking restraint (policy TRN3) as having negative effect on business development.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	+	+	+	+	Refer to Objective EC1.
EC3. To reduce disparities in economic performance and promote	+	+	+	+	The policies, if implemented fully, will create a stronger local economy with reliable and efficient transport and the location of key economic and social trip generating activities in accessible locations. These factors are likely to play an important role in promoting regeneration.

Objective	Policy No.				Comments
	TRN1	TRN2	TRN3	TRN4	
regeneration					
EC4. To encourage and accommodate both indigenous and inward investment	+	+	+/-	+	Refer to Objectives EC1 and EC3.
EC5. To encourage efficient patterns of movement in support of economic growth	++	++	++	++/-	<p>Policies TRN1- TRN3 have the key aim of providing better public transport, walking and cycling infrastructure. TRN2 places strong emphasis on locating trip generating activities in those areas most accessible. These policies are therefore predicted to have a major positive effect on encouraging efficient movement.</p> <p>Improved connectivity could have the negative effect of facilitating additional commuting outside the Borough.</p>
Overall comments on Connecting Places chapter:					
<p>This chapter generally performs well against the sustainability objectives and the effects are likely to be mostly positive, with a very limited number of negative effects predicted. 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.</p> <p>Note that the policies may achieve an increase in the proportion of journeys using modes other than the car, but given the level of growth proposed total traffic volumes may well increase overall (which has also been the historic trend). The positive effects of the policies should be viewed in this light and the benefits may be more than offset by the increase imposed by additional population and economic activity.</p>					
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+</p>					

Summary of mitigation and enhancement

5.36 Table 24 represents the amalgamation of all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 24: Connecting Places – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
TRN1: Prioritising Investment	No significant mitigation / enhancement identified. The implementation of other Core Strategy policies (e.g. SS6, SS8 and SS10) and the forthcoming development control policies will support / enhance this policy.
TRN2: Reducing the Need to Travel	No significant mitigation / enhancement identified. The implementation of other Core Strategy policies (e.g. SS1, SS3, SS5, SS7, SD1 and ENV1) and the forthcoming development control policies will support / enhance this policy.
TRN3: Parking and Traffic Restraint	No significant mitigation / enhancement identified. The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy. In developing the development control policies, consideration should be given to the Local Implementation Plan (LIP) and what spatial planning policies could do to further support its implementation as well as the issues of paving front gardens for parking.
TRN4: Transport Links in London	Given the existing problems with congestion and the predicted increases in traffic volume in the Borough it is recommended that the last sentence of the policy is deleted – “Bus and cycle facilities will be implemented only where the interests of all road users are safeguarded”. Whilst it is acknowledged that the interests of all road users should be considered, the need for a step change in transport towards more sustainable modes should not be restricted by the requirement to ‘safeguard’ particular interests as wider benefits may dictate that they should be curtailed. The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.

A Strong Local Economy and Meeting the Needs of the Community

Summary of potential effects

- 5.37 Table 25 summarises the appraisal of each policy to enable comparison of policies by objective and an overview of the effects of all the *Strong Local Economy* and *Meeting the Needs of the Community* policies together. Note that policy TC5 *Network of Town Centres* has not been appraised separately within these sections or in Appendix 9 as it purely sets out which Town Centres in the Borough have been categorised into which type of centre in the hierarchy. The role of the different centres is considered under the other Town Centre policies and it was not considered appropriate given its strategic focus for the SA to appraise individual centres.
- 5.38 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.
- 5.39 These impacts are reflected in the 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 other policies.
- 5.40 The culture, leisure and tourism policy is generally positive from a sustainability perspective. Efforts to promote business and cultural / leisure facilities related to local communities is particularly welcomed. 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.
- 5.41 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.

5.42 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 given predicted climatic changes.

5.43 Further details are included below 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.

5.44 The *Enabling Community Facilities* 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.

5.45 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.

5.46 Further details are included below on the mitigation and enhancement proposed for the *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.

Table 25: A Strong Local Economy and Meeting the Needs of the Community appraisal summary

Objective	Policy No.									Comments
	BIW1	BIW2	BIW3	TC1	TC2	TC3	TC4	CT1	CF1	
Social										
S1. To reduce poverty and social exclusion	+	+	+	+	+	0	+	+	++	<p>Generally the effects of these policies are positive against this objective. No significant negative effects are predicted.</p> <p>Protecting and providing employment opportunities (BIW policies) and regenerating and improving the quality and access to town centres (TC1 and possibly TC2 and TC4) are predicted to have indirect positive effects on reducing poverty and social exclusion.</p> <p>The policies to promote leisure and tourism for the local community (policy CT1) and in particular meeting community needs for a range of facilities (policy CF1), e.g. the arts, learning, health, social care and general wellbeing, is expected to have a major positive effect on reducing poverty and social exclusion.</p>
S2. To improve the health of the population	0	+	0	0	0	0	0	+	++	<p>Most policies are unlikely to have a significant effect on health (although reduced poverty and social exclusion, improved employment opportunities etc will have some indirect positive effects on health).</p> <p>However, the policy to promote leisure and tourism (policy CT1) is predicted to have positive effects on health and the policy on meeting community needs for a range of facilities (policy CF1) is predicted to have a major positive effect on health due to increased healthcare provision it will deliver.</p>
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	+	++	<p>See Objective S2. Policy CF1 is predicted to have a major positive effect on education and learning due to the increased provision of facilities it will deliver.</p>
S4. To provide everybody with the opportunity to live in a decent home	-?	0	0	0	0	0	0	0	0	<p>For most of the policies it is predicted they will have no significant effects. Policy BIW1 is predicted to have a possible negative effect as by protecting employment land uses this may in some cases restrict the availability of land for affordable / other housing development.</p>
S5. To provide everybody with good quality surroundings	0	+	+	+/-	+	+	+	++	+	<p>Generally the effects of these policies are positive against this objective. Potential positive effects of BIW2-3 as they require environmental and neighbourhood impacts to be considered and BIW2 may allow re-use of employment land where this would provide significant environmental gains. Both potentially positive and negative effects predicted for TC1 as the focus on Wembley could reduce local distinctiveness and sense of place and cause noise / nuisance to residents whilst also delivering regeneration benefits.</p> <p>Tapping into existing diversity and pride and creating new, accessible spaces for culture, art and leisure facilities is likely to have a major positive effect on neighbourhoods and sense of place (policy CT1).</p>
S6. To reduce crime and anti-social activity	+	+	+	0	+	+	+	+	+	<p>Some indirect positive effects predicted, but the significance of the effects uncertain for some policies. Although crime is not explicit focus of these policies it is likely that improved access to leisure and community facilities (policies CT1 and CF1) and better quality town centres will have a beneficial impact on crime / fear of crime. Policies BIW1-</p>

Objective	Policy No.									Comments
	BIW1	BIW2	BIW3	TC1	TC2	TC3	TC4	CT1	CF1	
										3 could have positive effect through enhancing the local economy and therefore employment opportunities.
S7. To encourage a sense of local community; identity and welfare	0	0	0	+	+	+	0	++	++	No negative effects predicted. Enhanced town centres (policies TC1-TC3) will have positive effects on sense of local community and identity. Policies CT1 and CF1 are predicted to have a major positive effect in this regard as they focus on promoting local communities and their diversity, culture and identity.
S8. To improve accessibility to key services especially for those most in need	0	0	0	+	+	+	+	+	++	No negative effects predicted. The Town Centre policies (TC1-TC4) are predicted to have positive effects on the accessibility of key services. Culture, leisure, sports and art facilities are an essential part of local service provision. Locating facilities in accessible places in accordance with the sequential approach is likely to increase ease and affordability of access, and improve access for those without a car. Policy CT1 is therefore predicted to have a positive effect. The main aim of policy CF1 is to improve provision and access to local services and community facilities and is therefore predicted to have a major positive effect on accessibility to key services.
Environmental										
EN1. To reduce the effect of traffic on the environment	-	+/-	+	+/-	+/-	+/-	0	+/-	+	Generally the effects are predicted to be both positive and negative. This is because whilst the policies include provisions to reducing traffic, or maximising access by non-car means, they are also likely to attract additional trips. In the case of the town centres, improving a network of centres is likely to also have a positive effect by reducing the need to travel further afield for the shopping. The protection of employment land and premises (policy BIW1) is predicted to have a negative effect on traffic as many are in inaccessible locations for public transport.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0/-?	0/-?	0/-?	0/-?	0	0	0	0	0	Additional business and industrial use, as well as the development of Wembley town centre, could increase water consumption and pollution. The other policies are predicted to have a minimal effect.
EN3. To improve air quality	0/-	+	0/+	+/-	+/-	+/-	0	+/-	0/+	Due to nature of businesses in the Borough, the major pressure on air quality is likely to be from transport and trip generation. BIW2 seeks explicitly to reduce the need to travel by car and minimising the environmental impact of operations and movement. Mixed effects predicted for Town Centre policies as the general thrust of policies is to encourage development in accessible locations. However retail expansion / provision of new retail uses, particularly in major centres is likely to generate increased traffic and therefore air pollution. Although policy CT1 requires development to be in accordance with the sequential approach, creation of significant new tourism and leisure facilities in Brent may generate traffic. This may be particularly the case with facilities such as conference centres.

Objective	Policy No.									Comments
	BIW1	BIW2	BIW3	TC1	TC2	TC3	TC4	CT1	CF1	
										Whereas the location of facilities close to populations may reduce trips.
EN4. To conserve and enhance biodiversity	0	0	0	0	0	0	0	0	0	No significant effects are predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	0	+	+	+	+	0	+	+	0	Positive effects possible from business and industrial development (policies BIW2 and BIW3), but not certain. Improvements to town centres (policies TC1 and TC2) and leisure and tourism activities (policy CT1) are predicted to improve townscape / public realm quality at specific locations.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	0	0	+	0	Generally no significant effects are predicted apart from policy CT1 which focus on culture and tourism and is likely to benefit cultural assets.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	-	+	+	+/-	+/-	+/-	0	+/-	0/+	See Objective EN1. Policy BIW1 is predicted to have a negative effect as increased industrial and business activity will increase energy use.
EN8. To minimise the production of waste and use of non-renewable materials	-	+	+	-	-	-	0	0/-	0	Negative effects predicted from Town Centre policies as increased retail activity in the Borough is likely to lead to increased resource use and waste generation, especially packaging waste. Increased industrial and business activity (Policy BIW1) likely to also generate waste and increase resource use.
EN9. To conserve and enhance land quality and soil resources	+	+	+	+	+	+/-?	+	+	0	Positive effects predicted. Protecting existing employment land (BIW policies) and focussed town centre growth (TC policies) likely to ease pressure on greenfield sites.
Economic										
EC1. To encourage sustainable economic growth	++	++	++	+	+	+	+	++	+	Major positive effects predicted for policies BIW1, BIW2, BIW3 and CT1. All policies likely to have a positive impact.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	++	+	+	+	+	+	+	+	+	Positive effects expected for all policies. The ability of those most in need, and those in most deprived areas to take advantage of new opportunities will depend on jobs being suitable and/or appropriate training made available. Many of the jobs being created (leisure, retail etc) are likely to be low-skill, low wage jobs with limited security (often temporary and/or par-time)
EC3. To reduce disparities in economic performance and promote regeneration	+	+	++	+	++	+	++	++	++	Major positive effects predicted. The community facilities policy (CF1) and local town centres policies (TC2 and TC4) are predicted to have a particularly significant effect on regenerative.

Objective	Policy No.									Comments
	BIW1	BIW2	BIW3	TC1	TC2	TC3	TC4	CT1	CF1	
EC4. To encourage and accommodate both indigenous and inward investment	++	+	+	++	+	+	+	++	0/+	One of aims of these policies is to encourage investment in the Borough. Development at Wembley is bringing in inward investment, however to realise this major effect it will need to support indigenous businesses.
EC5. To encourage efficient patterns of movement in support of economic growth	+/-	+	+	+/-	+?	+?	+	++/-	0/+	Generally the policies are predicted to have positive effects. However some may have positive and negative effects (policies BIW1, TC1 and CT1) as these policies may encourage increased trip generation / commuting in spite of efforts to reduce travel need and develop in accessible locations.
Overall effects of Strong Local Economy and Meeting the Needs of the Community										
<p>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.</p> <p>These impacts are reflected in 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 (policy TC1) it is predicted that a negative (or positive and negative) effect will occur in spite of mitigation text within policies.</p>										
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-</p>										

Summary of mitigation and enhancement

5.47 Table 26 represents the amalgamation of all the outstanding mitigation and enhancement comments and recommendations arising from the appraisal. This is broadly the same text that appears in the mitigation and enhancement comments sections of each individual appraisal matrix in Appendix 9.

Table 26: A Strong Local Economy / Community Facilities – summary of mitigation and enhancement

Policy	Proposed mitigation and enhancement and SA comments
BIW1: Protection of Employment Land and Premises	<p>Note the comments above on policy SS4 in the Spatial Strategy - although it is recognised that storage and distribution is predicted to be a growth industry nationally, and for the Borough, and protecting industrial land restricts opportunities for high value uses particularly residential development, we would caution against it being encouraged as a focal industry for Brent. Distribution is likely to create disproportionately less employment relative to the land take of buildings, as well as generate traffic and associated noise and pollution. They may increase local GVA, but lead to limited benefit for local residents.</p> <p>The possible negative environmental impacts of development for business and industry are addressed explicitly through other policies in the Core Strategy (including SS1, SS9, SD2, ENV1 and ENV2) and will need to be dealt with in more detail in the forthcoming development control policies.</p> <p>The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.</p>
BIW2: Principles of Business, Industrial and Warehousing Development	<p>In the penultimate bullet water conservation could be added to energy efficiency and minimising waste generation.</p> <p>The implementation of other Core Strategy policies (e.g. SS1, SS4, SS6, SS7, SS9, SD1, SD2 and ENV1), the forthcoming development control policies and other DPDs / SPDs / Area Action Plans will support / enhance this policy.</p>
BIW3: Reuse of Employment Land and Premises	<p>The last bullet point refers to Council's "wider regeneration objectives", these could be referred to or referenced in the supporting text.</p> <p>There is no mention of the role that markets and other localise / indigenous / culturally related economic initiatives can have in the wider employment context – consider this for the forthcoming development control policies.</p> <p>The implementation of other Core Strategy policies, the forthcoming development control policies and other DPDs / SPDs / Area Action Plans will support / enhance this policy.</p>
TC1: Principal Retail Location TC1: Other Preferred Locations TC3: Exceptional Locations TC4: Town Centre Opportunity Sites	<p>No significant mitigation / enhancement identified.</p> <p>There may be some danger that a strong focus on a major retail centre at Wembley could damage the viability of local centres and retailers, thus undermining regeneration efforts elsewhere. It is vital that development at Wembley is complementary and not conflicting with existing local services.</p> <p>Major retail development is likely to attract external investment to the Borough, but equally much of the economic benefit accruing will leave the Borough, as retailers of a scale suitable for a major location are likely to be national, or multinational companies. The regenerative and local benefits may thus be limited to some low-skill employment – and the positive economic (multiplier) effects for the Borough smaller than hoped.</p> <p>The implementation of other Core Strategy policies, the forthcoming development control policies and other DPDs / SPDs / Area Action Plans will support / enhance these policies.</p>
CT1: Promoting Leisure and Tourism	<p>No significant mitigation / enhancement identified.</p> <p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance these policies.</p>
CG1: Meeting	No significant mitigation / enhancement identified.

Policy	Proposed mitigation and enhancement and SA comments
the Needs of the Community	The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance these policies.

Cumulative effects of the Draft Core Strategy

- 5.48 There are different types of cumulative effects, but what we are principally concerned with here is the total effects of multiple actions on a single 'receptor', which could be certain group within the population or people living in a particular locality, the water environment or flora and fauna for example. Many impacts arising from the Draft Core Strategy are likely to be cumulative (e.g. emissions of air pollutants and greenhouse gases). From the summary of the appraisal in the section above, many effects which have already can be identified are cumulative in character. This is partly emphasised where several polices are predicted to impact upon the same sustainability objective.
- 5.49 Table 27 identifies some of the most significant cumulative effects, both positive and negative, which are predicted to occur due to the effects of a number of policies on a particular issue or receptor. This is not an exhaustive list as predicting the interactions and additive effect of policies is complex and uncertain, however these cumulative effects are considered some of the most significant.

Table 27: Key cumulative effects of the Draft Core Strategy

Cumulative Effects	Receptor	Causes / Comments
Positive Effects		
Provision and increase accessibility to services and facilities	Communities in deprived areas, particularly those without a car	Throughout the Draft Core Strategy there is an emphasis on providing amenities and services in accessible locations and improve non-car infrastructure. This is likely to have a positive cumulative impact on deprived communities.
Crime and fear of crime reduction	General population, especially at-risk groups (youth, deprived, elderly etc)	Policies which seek to promote regeneration, improve public realm, encourage walking, provide community facilities and training opportunities are likely to have a beneficial effect on crime and fear of crime. Passive surveillance, pedestrian traffic and the feeling of pride / sense of identity can be contributing factors.
Townscape and public realm	General population especially in areas of low townscape / public realm quality	Many policies seek to improve the public realm directly or indirectly. While this is addressed explicitly in policies such as SS9 and SD2, the cumulative effect across the Draft Core Strategy is also likely to be positive.
Enhanced image of	Business Local	Sustainability objective EC1 (Economic Growth) scores positively against almost all policies. Although (as noted in appraisal, and overall effects below) there are

Cumulative Effects	Receptor	Causes / Comments
Brent and employment opportunities	population (including working age population)	negative effects associated with increased economic activity, the likely impact of policies to improve public realm, enhance non-car transport infrastructure and connectivity, and improve facilities for residents are likely to act cumulatively in the long term.
Negative Effects		
Reduced affordability of house prices	Existing Brent residents, especially those economically and socially deprived	<p>Although the Draft Core Strategy explicitly seeks to provide affordable housing (policy H4), there is a risk that the cumulative effects of regeneration and flagship projects (such as Wembley), improved public realm, improved transport links and more business activity may lead to an increase average house prices in the Borough (over and above underlying price rises).</p> <p>This highlights the importance of delivering on the affordable home target and ensuring the housing delivered is suitable and affordable to those in greatest need.</p>
Increased pressure on open space, biodiversity and habitats	<p>Flora and fauna</p> <p>Local people using open space</p>	<p>There is considerable pressure on existing land resources within LB Brent. Pressure from the proposed level of growth and the demand for land from business and industry, housing, retail and leisure is likely to combine to put significant additional pressure on existing open space (historically a large area of open space has been lost in the Borough). Greenfield sites have a more attractive development potential than brownfield sites.</p> <p>The Draft Core Strategy emphasises throughout the requirement to develop previously developed land, however the cumulative impact from competing demands is likely increase the pressure to release open space for development.</p>
Increased noise and nuisance	General population, especially those living close to main roads and in the Growth Areas such as Wembley	<p>Increased activity associated with the construction (short – medium term / temporary) and habitation (long term / permanent) of new homes (10,146 new homes with an additional population increase of 25,000-28,000 over period to 2017), increased housing density (in town centres), development of a regional centre at Wembley and expansion of certain business activities are likely to have cumulative impact on those living (and working) in these locations and will potential reduce their quality of live / wellbeing due to disturbance from neighbourhood noise and nuisance.</p> <p>The Draft Core Strategy includes various policies which aim to ensure these effects are avoided or mitigated. The forthcoming development control policies, as well as relevant development briefs, SPDs, Area Action Plans etc., will need to provide further guidance / policy.</p>
Increased traffic and congestion	Air and general population, especially those living close to main roads and in the Growth Areas such as Wembley	<p>Similar / in combination effect with increased noise and nuisance described above. Several aspects of the Draft Core Strategy are likely to lead to increased traffic and congestion, with knock-on effects on air quality, health, climate change etc.</p> <p>There is policy and supporting text through out the Draft Core Strategy which seeks to minimise traffic and trip generation, and ensure access to essential services and jobs is made easier by modes other than the car. However in conflict with this is the cumulative effect of the development proposed. Constructing new homes, with an influx of population, increased economic activity (such as freight storage and distribution), tourism and leisure / Wembley may cumulatively generate significant transport pressures. Management and minimisation efforts may be outweighed by this.</p>
Increased greenhouse gas emissions	Global environment	<p>There are many sources of greenhouse gas emissions which will potentially increase as a result of the Draft Core Strategy – additional transport / vehicle emissions, construction of new homes and other development, habitation of additional homes etc. Cumulatively these are likely to present a challenge for the Borough which will be seeking to reduce overall emissions to meet London / Government targets. Several policies seek to reduce the potential increase from new development (e.g. SS1 and SD2). Additionally policy SD1, which proposes developing a Climate Adaptation and Carbon Management Programme with partners, will help tackle emissions more generally.</p>

Cumulative Effects	Receptor	Causes / Comments
		See more details below on the overall effects of the Draft Core Strategy.
Resource use and waste generation	Land, air, water (within and outside borough)	As above for greenhouse gas emissions, these activities will also consume resources, generate waste, use energy and water during both the construction and operational phases.

Potential overall effects of the Draft Core Strategy

- 5.50 This section provides a brief summary of the most significant potential effects from the findings of the appraisal.
- 5.51 Overall the Draft Core Strategy is predominantly predicted to have positive effects. The summary appraisal matrices show that the Draft Core Strategy is predicted to have particularly positive effects against the social and economic objectives within the sustainability framework. The situation is more mixed in relation to the environmental objectives.
- 5.52 Overall positive social effects are predicted to include improvements to: poverty and social exclusion; the location, access and provision of community facilities and services; affordable housing, and improvements to public transport infrastructure benefiting accessibility.
- 5.53 Overall positive environmental effects are predicted to include improvements to: the public realm and townscape; standards of design and construction; and where successful, management and reduction of travel. As expected, the Environment and Open Space policies have strong positive effects predicted across all the environmental objectives.
- 5.54 Positive economic impacts are expected both directly from the protection and enhancement of employment land, but also indirectly from the improved image and environmental quality of the Borough, the profile of developments such as Wembley, and the increased population (and therefore potential workforce and consumers) and improved housing provision. Improved transport infrastructure which aims to reduce car use and congestion and increases access to jobs and services by public transport, walking and cycling should have considerable long-term economic benefits. To realise these benefits policies to manage and minimise road transport will need to be strongly implemented.
- 5.55 However there are also some overall negative effects predicted from the Draft Core Strategy. Some of these are noted under the cumulative effects discussion above, however presenting these as overall effects we focus on three key areas: resource use (materials, waste, water and energy), traffic generation and land use.

- 5.56 Increased population, construction and business activity will use resources and generate waste. A rise in population and associated demand for goods, services transport and utilities (e.g. water, sewerage and energy) will increase use of natural resources, energy and water. Travel generation from an increase in population of 28,000 (as identified by Policy SS2) over the plan period may offset some of the efforts made in the policies and supporting text which seek to manage the growth and where possible reduce the need to travel.
- 5.57 As discussed under the cumulative effects, the Draft Core Strategy has ambitious aims in terms of regeneration, housing development, revitalisation of town centres and the protection and enhancement of the Borough as a business location. These factors will all put pressure on the use of land, including on existing open spaces which will need to be resisted.
- 5.58 It is not possible to estimate accurately the overall resource use of fully implementing the Draft Core Strategy and the policies it contains. Much will depend on the manner of implementation over the period 2007 – 2017 including external influences beyond the control of the Core Strategy or the Borough. However, there are some overall effects that we can predict. An increase in population of up to 28,000 over a ten year period is significant as it represents an increase in the Borough's population of almost 10%. Equally the amount of housing provision proposed (10,146 new homes) represents an increase of approximately 10% on the current stock of 105,000 homes. An estimate of the possible effects, divided into construction and operation, (on Carbon Dioxide emissions, waste production, aggregate use and water use) of these home-building targets is presented below, however it should be emphasised that these are just very approximate estimates:

Effects on resource use and emissions of proposed level of growth in LB Brent

A study by CPRE⁴ estimated the building of one new home⁵ as being responsible for:

- Emissions of climate changing greenhouse gas emissions equivalent to 35 tonnes of CO₂.
- The Production of 11.25 tonnes of solid waste.
- Consumption of 60 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled).

In addition the occupation of each additional house will:

- Generate emissions to the equivalent of 4.05 tonnes of CO₂ gas per year through burning fossil fuels (this does not include fossil fuel consumption in transporting the occupants to and from their home in their day to day lives).
- Produce 1.25 tonnes of solid wastes a year.
- Consume 180,000 litres of water per year while producing a roughly equivalent quantity of sewage effluent.

⁴ CPRE (2005), *Building on Barker - How we can continue to improve housing for everyone without damaging the environment and sprawling over the countryside*

⁵ These figures are based on a typical 90 square metre new home meeting current Building Regulations and occupied by three people.

Construction:

Based on these figures an estimated overall impact of the housing figures proposed by the Draft Core Strategy for construction would be (obviously making various assumptions on size of unit etc):

- Approximate emissions equivalent to 355,110 tonnes of CO₂. Assuming that the housing figures are delivered evenly over the plan period (10 years from 2007 to 2017), the annual equivalent CO₂ emissions will be 35,110 tonnes. CO₂ emissions from all sources totalled 1,514,000 tonnes in Brent (2003)⁶, so additional emissions from building new homes could account for a 2.3% annual increase in CO₂ emissions (approximately).
- The production of 114,143 tonnes of solid waste or 11,414 tonnes per year (no data for construction waste production in Brent). For comparison in 2004-5 the total municipal waste arisings in Brent were 131,000 tonnes, so the extra waste produced by construction would constitute the equivalent to a 9% increase in municipal waste each year.
- The consumption of 60,876 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled) per year.

Occupation:

In occupation, assuming the homes are constructed evenly over the plan period, each year would see the occupation of an additional 1120 homes (approximately) and a population increase of approximately 1% of total population each year 2007-2017:

- Each household in Brent produced an average of 1121 kg of waste in 2003 and the total household waste produced in the Borough 117,000 tonnes⁷. The waste produced by the occupation of 1120 homes per year will produce an extra of 1255 tonnes of household waste (approximately) or a little more than 1% per year.
- Water (and approx equivalent sewage), approximately an additional 1% (165 litres per day per capita)⁸
- Road transport and CO₂ emissions: currently (2003) road transport produces approximately 275,000 tonnes of CO₂ per year, an increase of 1% in the population will increase emissions by 1%
- Domestic CO₂ emissions: 2.5 tonnes per capita, 661,000 tonnes extra per year⁹

What difference the SA has made

5.59 The Sustainability Appraisal process and the development of the LDF, including the Core Strategy, were initiated at the same time and the SA has inputted throughout the evolving Draft Core Strategy. The Preferred Options document 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 Draft Core Strategy will have positive effects, some either negative effects or opportunities for further enhancement were identified through the SA process. Generally these recommendations have been incorporated in the Preferred Options, however some remain outstanding and these are described in the Sustainability Appraisal Report.

⁶ Defra (2005) Local and Regional CO₂ Emission Estimates for 2003

⁷ West London Waste Authority and Constituent Boroughs (2005) Draft Joint Municipal Waste Management Strategy

⁸ SA Scoping Report of the London Plan (GLA, 2005)

⁹ Defra (2005) Local and Regional CO₂ Emission Estimates for 2003

- 5.60 Whilst the SA provided inputs throughout the development of the Draft Core Strategy, there were two points when the SA provided LB Brent with a detailed commentary of suggested amendments to the evolving document. This was in July and September 2005. LB Brent provided a detailed response to each of these which shows that the majority of amendments requested were made and where not, justifications were given. This illustrates the iterative nature of the two processes. These documents are available on request from LB Brent.

6. IMPLEMENTATION AND MONITORING OF THE CORE STRATEGY

Links to other tiers of plans and programmes and the project level

- 6.1 The Core Strategy is part of a broader hierarchy of plans, which will not be developed nor implemented in isolation. Links and relationships exist at the local (Borough) level but also at the regional (London) and national level.
- 6.2 The Core Strategy is a key DPD within the Brent LDF, which will replace the UDP as the statutory plan for Brent and will be made up of an evolving suite of DPDs and SPDs (known collectively as Local Development Documents – LDDs). The Core Strategy is the key DPD in that it sets the highest level strategic objectives and policies for the LDF. However ensuring these objectives are met will depend on the detailed implementation and site-specific expression set out in the Development Control Policies DPD, Proposals Map DPD, Site Specific Allocations DPD and Area Action Plan DPDs (such as those proposed for Wembley and Park Royal). In addition to provide further guidance or explanation, SPDs for specific issues linked to DPD policy, such as sustainable construction and South Kilburn Housing Regeneration, will be / have been prepared.
- 6.3 Once major sites and regeneration schemes identified within the Core Strategy and other DPDs come forward they may require an Environmental Impact Assessment undertaken.
- 6.4 The Core Strategy has been developed with reference to a large number of national and regional plans and strategies. At the highest level it reflects the broad agenda set out in Securing the Future - UK Government Sustainable Development Strategy, and for specific aspects it has been developed in line with national targets for issues such as housing, waste management, energy and transport. At the regional (London) level the Core Strategy is linked to policies, strategies and targets set out in GLA documents and the London Plan (alterations), which has for example set targets for housing development and affordable housing provision.
- 6.5 In addition, the Core Strategy is linked to and must be aware of a very large number of local (borough) plans and those developed by neighbouring boroughs, such as Local Implementation Plans (LIPs) which seek to deliver the London Transport Strategy within each borough, Waste Management Strategies, Biodiversity Action Plans and so on.

Proposals for monitoring

- 6.6 Monitoring the significant sustainability effects of implementing the Core Strategy is a fundamental part of the SA process. It is important to monitor performance against

the sustainability objectives, which form the core of this appraisal, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken.

- 6.7 The SEA Directive requires the significant environmental effects of a plan or programme to be monitored and that the Environment Report (this report) should include a description of measures ‘envisaged’ for monitoring the implementation of the plan.
- Annex 1(i) of the SEA Directive requires the Environment Report to include “a description of the measures envisaged concerning monitoring in accordance with Article 10”.
 - Article 10 (1) states that “Member States shall monitor the significant environmental effects of the implementation of plans and programmes...”
- 6.8 In addition, The Planning and Compulsory Purchase Act 2004 requires the local authority to prepare an Annual Monitoring Report (AMR) which should set out the extent to which the policies and objectives of DPDs and SPDs making up the LDF are being achieved.
- 6.9 Brent has produced an AMR¹⁰ for the period 2004 – 2005, which sets out “a concise overview of development activity within Brent during 2004 – 2005” and an “outline [of] progress towards the new Local Development Framework (LDF)”. As the Core Strategy DPD is finalised and other elements of the LDF (e.g. Development Control Policy DPD, Site Specific Allocations DPD etc) are developed, the monitoring of these will be explicitly addressed through updates to the AMR.
- 6.10 ODPM (now DCLG) has published a good practice guide on monitoring LDFs¹¹, which proposes (though these are not a statutory requirement) three levels of indicators:
- **Contextual indicators** – which provide monitoring of the background against which the LDF operates.
 - **Output indicators** – which enable monitoring of specific policies included in the LDF.
 - **Significant effects indicators** – which provide monitoring of the important ‘effects’ of the LDF as identified by the Sustainability Appraisal.
- 6.11 This hierarchy of indicators provides a practical approach which enables SA monitoring to be incorporated within the wider AMR process required for the LDF. It is proposed that such an approach and indicator hierarchy be considered for monitoring purposes in relation to this SA and the Brent LDF.

¹⁰ *Enabling Development in Brent, Annual Monitoring Report 2004/05.*

¹¹ *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005.
<http://www.communities.gov.uk/index.asp?id=1143905>

- 6.12 Although the significant effects indicators proposed here are in relation to the effects of the Core Strategy DPD it is expected that this framework will be adapted and expanded to meet the monitoring needs of the SAs of other DPDs as these emerge.
- 6.13 Further information and description of these three levels of indicators is provided below, including discussion of the significant effects of the Core Strategy as identified by this SA, and proposed indicators for monitoring them.

Contextual and output indicators

- 6.14 Contextual indicators aim to provide the background information (i.e. set the context) against which the effects of implementation of the DPD can be measured (in the case of Brent's AMR, this is likely to consider effects of the LDF as a whole). The Government best practice guide on monitoring LDFs suggests that contextual indicators should draw on existing sources of information and be structured to build an environmental, social and economic baseline for the area. Chapter 2 of the existing Brent AMR contains a baseline for the Borough entitled "*Brent: Between Inner and Outer London*". While it may be necessary to adapt this in light of the emerging LDF, and increase the coverage of environmental indicators, it does cover the majority of key topics for contextual indicators as suggested by the Government guidance:

Key topics for contextual indicators:

<p>Demographic structure: population size, household types, ethnic composition, and social groups</p> <p>Socio-cultural issues: crime rates, unemployment level and deprivation</p> <p>Economy: economic activity rates, household income, house price level, productivity and employment</p> <p>Environment: key assets in the natural environment</p> <p>Housing and built environment: housing stock conditions and quality and assets of the built environment</p> <p>Transport and spatial connectivity: transport accessibility, regional hub, spatial inequality / uneven distribution of activities</p>

- 6.15 Output indicators seek to measure the outcomes of implementation of the plan policies themselves. They are thus directly related to specific policies contained within the DPD / LDF. The guidance on monitoring LDFs suggests that output indicators are subdivided into Core Output indicators and Local Output indicators. In addition the guidance sets out a set of Core Output indicators to be monitored, and these should be reflected within the AMR. These are set out in the box below.
- 6.16 Local Output indicators should be developed to reflect specific local conditions and issues, and the individual policies contained within the DPD / LDF. They can thus be more detailed and focussed than Core Output indicators and reflect more closely the specific monitoring needs of Brent.

LDF Core Output Indicators¹²:**Business Development**

- 1a Amount of land developed for employment by type.
- 1b Amount of land developed for employment, by type, which is in development and/or regeneration areas defined in the local development framework.
- 1c Percentage of 1a, by type, which is on previously developed land.
- 1d Employment land supply by type.
- 1e Losses of employment land in (i) development/regeneration areas and (ii) local authority area.
- 1f Amount of employment land lost to residential development.

Housing

- 2a Housing trajectory showing:
 - (i) net additional dwellings over the previous five year period or since the start of the relevant development plan document period, whichever is the longer;
 - (ii) net additional dwellings for the current year;
 - (iii) projected net additional dwellings up to the end of the relevant development plan document period or over a ten year period from its adoption, whichever is the longer;
 - (iv) the annual net additional dwelling requirement; and
 - (v) annual average number of net additional dwellings needed to meet overall housing requirements, having regard to previous years' performances.
- 2b Percentage of new and converted dwellings on previously developed land.
- 2c Percentage of new dwellings completed at:
 - (i) less than 30 dwellings per hectare;
 - (ii) between 30 and 50 dwellings per hectare; and
 - (iii) Above 50 dwellings per hectare.
- 2d Affordable housing completions

Transport

- 3a Percentage of completed non-residential development complying with carparking standards set out in the local development framework.
- 3b Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.

Local Services

- 4a Amount of completed retail, office and leisure development.
- 4b Percentage of completed retail, office and leisure development in town centres.
- 4c Percentage of eligible open spaces managed to green flag award standard.

Minerals (for minerals planning authority only)

- 5a Production of primary land won aggregates.
- 5b Production of secondary/recycled aggregates.

Waste (for waste planning authority only)

- 6a Capacity of new waste management facilities by type.
- 6b Amount of municipal waste arising, and managed by management type, and the percentage each management type represents of the waste managed.

¹² Based on Table 4.4 of *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005 – see note 2

Flood Protection And Water Quality

7. Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.

Biodiversity

8. Change in areas and populations of biodiversity importance, including:
- (i) change in priority habitats and species (by type); and
 - (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional or sub-regional significance.

Renewable Energy

9. Renewable energy capacity installed by type.

Significant effects indicators

6.17 The guidance on monitoring LDFs states that significant effects indicators should be linked to the SA objectives and indicators. The monitoring of significant effects is intended to enable a comparison between the predicted effects (as set out in the appraisal) and the actual effects seen during implementation of the policies (as set out in the DPD). Taken with the contextual and output indicators, sufficient numbers of significant effects indicators should be developed to ensure robust assessment of policy implementation.

6.18 Table 28 sets out potential indicators for the significant sustainability effects identified through the SA process (each significant effects relates to one or more of the sustainability objectives). Where possible, existing indicator sources are used. In addition, where we are aware that there is a lack of data or no existing indicator relevant to a particular significant effect this is noted.

Table 28: Significant sustainability effects associated with the Draft Core Strategy and potential indicators

Significant effects (most relevant sustainability objective code)	Potential indicators	Comments / gaps
Increased housing development (S1, S4, EN7)	Population and demographics (age structure etc.) Number / percentage increase in housing development / completions See Core Output indicators 2a – 2d Development in flood risk areas	Already monitored / available Likely gap - development in flood risk areas
Decreased affordability of housing (S1, S4)	Number / percentage of affordable home completions	Already monitored / available
	House prices Income to house price ratio	Already monitored / available Suggested source - Joseph Rowntree Foundation (www.jrf.org.uk)
Reduced social exclusion and inequalities deprivation, including access to services and amenities	See Core Output indicators 3a, 3b and 4a – 4c Index of Multiple Deprivation	Already monitored / available

Significant effects (most relevant sustainability objective code)	Potential indicators	Comments / gaps
(S1, S2, S3, S8)	% households experiencing fuel poverty Surveys of access / ease of access Net change of floorspace in D2 use % of people living within easy walking distance of local amenities (local shops, post office, etc.) No of GPs per 1000 population Qualifications of working age residents	
Improved townscape and public realm (S5, S7, EN5)	Area of townscape considered to be of low quality % vacant floorspace in primary shop frontages % residents who are satisfied with their neighbourhoods as a place to live	Already monitored / available
Reduced crime and fear of crime (S6)	Fear of crime Actual levels of crime	Already monitored / available
Improved standards of design and construction in development (EN2, EN3, EN7)	Number of developments meeting EcoHomes 'good' or 'very good' standards	Already monitored / available
Increased pressure on open space, biodiversity and habitats (S5, EN4, EN5)	See Core Output indicator 8 % development on previously developed land Area of outdoor sports land for community use Loss of Greenfield land % population living within 200m of open space Meeting Brent BAP targets	Already monitored / available
Increased noise and nuisance (S5)	Population density Noise complaints Road / ambient noise mapping	Already monitored / available
Increased resource use, waste generation and CO ₂ emissions (EN1, EN2, EN3, EN7)	See Core Output indicators 6a and 6b Domestic energy efficiency CO ₂ emissions from all sources % energy from renewable sources Number of developments meeting EcoHomes 'good' or 'very good' standards Waste collection, composition and disposal routes / %s Domestic water consumption	Most already monitored / available Likely gap - domestic energy efficiency and CO ₂ emissions and % energy from renewable sources – possible source Brent Energy Network Likely gap - domestic water consumption
Improved public transport infrastructure (S8, EN1, EN3, EN7, EC5)	Transport modal split Access to public transport PTAL score for new development	Already monitored / available
Increased walking and cycling	As above	Already monitored / available

Significant effects (most relevant sustainability objective code)	Potential indicators	Comments / gaps
(S2, S8, EN1, EN3, EN7, EC5)		
Increased traffic (S2, S8, EN1, EN3, EN7, EC5)	Traffic levels per annum Peak / off peak traffic flows and speed	Already monitored / available
Reduced air quality (S2, EN1, EN3, EN7)	Days when air quality is moderate or higher Air quality monitoring results (based on results from the 5 monitoring stations in LB Brent)	Already monitored / available
Reduced loss of employment land (EC1, EC2, EC3, EC4)	See Core Output indicators 1a – 1f	Already monitored / available
Reduced unemployment (S1, EC1, EC2, EC3)	Change in claimant count unemployment rate Long-term unemployment (percentage of unemployed who have been out of work for over one year) % People in Work-less Households	Already monitored / available
Increased investment in regeneration areas (EC1, EC2, EC3, EC4)	Percentage change in the total number of VAT registered businesses in the area	Already monitored / available
Enhanced perceptions / image of Brent (S5, S7, EC3, EC4)	Surveys of perceptions	Possible gap – suggested source: Mori polls Brent may need to commission new surveys

Next steps

6.19 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.

6.20 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 SAs of these DPDs will draw on the information and process included in this SA Report.