

London Borough of Brent's Draft Core Strategy Preferred Options

Sustainability Appraisal Report Appendices to Part B

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



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by

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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		

APPENDICES

APPENDIX 8

CORE STRATEGY ISSUES AND OPTIONS

Strategic Planning Objectives and Priorities

Question 1. What do you think are the priorities in considering the future development of the Borough?

Potential options / priorities: (not necessary mutually exclusive)

- A. Sustainable development (e.g. more energy efficient buildings)
- B. Protections of the natural environment
- C. Conservation of existing suburban character
- D. Regeneration of run-down areas (e.g. town centres)
- E. Building new homes
- F. Protecting Employment Areas such as Park Royal

Social	A	B	C	D	E	F	Commentary
S1 Prosperity and Social Incl.	+	o	o	++	+	+	These are very strategic priorities and their effects will be largely depending on their detailed implementation. Therefore only an indication of their performance can be provided here and there is a high level of uncertainty over the significant of the effects. It may also be possible, for example, to reverse some of these effects by incorporating certain measures / requirements during implementing.
S2 Health	o	o	o	++	?	o	
S3 Education and Skills	o	o	o	+	o	o	
S4 Housing	o	o	o	++	+	o	
S5 Quality of surroundings	o	+	+	++	o	o	
S6 Crime Prevention & Community Safety	o	o	o	+	+	o	
S7 Community Identity	o	o	o	++	o	o	
S8 Accessibility	o	o	o	++	+	o	
Environmental							<p>Sustainability strengths: Each of these priorities has its own potential contribution to make to sustainability. The dimension of sustainability which would potentially benefit or be adversely affected the most tends to vary from priority to priority. For example, regeneration could have very positive effects against social and economic objectives, but could have negative environmental consequences (such as additional traffic).</p> <p>Sustainability weaknesses: Some priorities have the potential for negative effects, for example protecting the natural environment could restrict economic growth and employment and building new homes could have environment consequences in terms of the generation of traffic, water resources and waste generation. These effects could be partly mitigated through the location of development and requirements for sustainable construction etc.</p> <p>Recommendations: Elements of many of these priorities could be incorporated into an overall strategy and opportunities should be sought to realise the potential offered for "win-win-win" solutions.</p>
EN1 Traffic	+	o	o	-	--	-	
EN2 Water Quality & Resources	++	+	o	o	--	-	
EN3 Air Quality	++	+	o	-	-	-	
EN4 Biodiversity	+	++	o	o	o	o	
EN5 Landscape & Townscape	++	++	o	+	+	o	
EN6 Historic Env. & Cultural Assets	o	o	o	o	o	o	
EN7 Climate Change	++	+	o	-	-	o	
EN8 Waste Management	++	o	o	-	--	o	
EN9 Land and Soil	o	++	o	+	-	o	
Economic							
EC1 Growth	o	-	o	++	+	++	
EC2 Employment	o	-	o	++	+	++	
EC3 Regeneration	o	o	o	++	+	++	
EC4 Investment	o	o	o	++	+	++	
EC5 Efficient Movement	++	o	o	+	-	+	

Key: Major positive: ++ Minor positive: + Neutral: o Minor negative: - Major negative: -- Uncertain: ?

Strategic Planning Objectives and Priorities: The Scale and Pace of Regeneration in the Borough

Question 2. Do you think the Council should support regenerative development, with associated growth in housing development, or should the Council restrict such growth?

Potential options / priorities:

A. Encourage residential led development and manage the environmental consequences and resulting pressure on facilities but reap the benefits regenerative development

B. Limit the opportunities for mixed, residential led development that in turn reduces potential impacts on the Borough, but does not bring forward the regenerative benefits of significant new investment

Sustainability strengths and weaknesses:

As stated in the Issues and Options Papers, there are clear choices to be made in the scale and pace of regenerative development wanted in the Borough i.e. whether to embrace growth or to take a more cautious approach.

Currently residential development is providing the catalyst to deliver mixed use and regenerative development and the resulting benefits this provides (e.g. affordable housing, employment, services, infrastructure etc). Without this residential led development these wider social and economic benefits may not be realised, however this has to be balanced against the environmental consequences of this scale and type of development. There are also issues around the timing of the provision of improvements to services, such as health and education, and infrastructure which may lag behind the residential development and put unacceptable pressures on the current services and infrastructure.

Other potentially negative consequences of major regeneration, e.g. traffic, air pollution, flood risk, resource use etc, are discussed in more detail under other issues but are also relevant here.

Recommendations:

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.

Strategic Planning Objectives and Priorities: Location of Major Regeneration Areas

Question 3. Are there areas in the Borough where regeneration and larger scale development should be encouraged?

Question 4. Are there areas in the Borough that are in decline that need early intervention to arrest it?

Potential options / priorities:

- A. Continue to expand regeneration development around Wembley Stadium area
- B. Encourage regeneration and larger scale development in other areas in Borough
- C. Focus regeneration other areas in the Borough that are in decline that need early intervention to arrest it

Sustainability strengths and weaknesses / Recommendations:

The Brent Regeneration Strategy 2001-2021 sets the direction of the Council's regeneration work over the next 20 years with the aim of making sure problems of deprivation are tackled effectively and to stop areas falling into decline. To achieve this vision, the strategy focuses on six key priorities which includes the use of landmark developments of regional or national significance, which also ensure local benefits, and focussing on particular neighbourhoods but also priorities across the whole borough. The strategy is supported by a series of two-year Action Plans. It is suggested that one of the challenges for the DPDs is to translate the spatial implications of the Strategy and Actions 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.

Strategic Planning Objectives and Priorities: Priority Land Uses or Themes

Question 5. Are there any land use priorities that should be stressed within the LDF? Are there any particular themes or objectives that should be emphasised or given priority within the LDF?

Potential options / priorities:

- A. Make housing a priority land use
- B. Make affordable housing a priority land use
- C. Make employment generating a priority land use
- D. Make mixed use a priority land use (more jobs, housing and environmental benefits - 'triple win')

Social	A	B	C	D	Commentary
S1 Prosperity and Social Incl.	+	++	+	+	<p>Sustainability strengths: Provision of affordable housing has wider social and economic benefits. One of the key strengths of mixed use development over the other priorities is the potential to reduce the need for travel. Employment uses will provide major benefits on economic objectives, with the other land use priorities also providing some economic benefits. Affordable housing in particular has social benefits.</p> <p>Sustainability weaknesses: All forms of additional built development have the potential to generate additional traffic, air pollution, waste etc, however the significance will depend on the location of housing and employment in relation to one another, whether employment opportunities are taken up by local residents therefore potentially reducing longer journeys, accessibility to public transport, the adoption of sustainable construction techniques and installation of fittings to minimise use of energy, water etc. A focus on housing development in particular has the potential to generate traffic and increase water use.</p> <p>Potential effects on more site specific issues such as biodiversity and the historic environment will depend on site specific characteristics and the implementation of other protection policies.</p> <p>Recommendations: 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.</p>
S2 Health	?	+	0	0	
S3 Education and Skills	0	+	0	0	
S4 Housing	+	++	-	+	
S5 Quality of surroundings	0	0	0	+	
S6 Crime Prevention & Community Safety	+	+	0	0	
S7 Community Identity	0	+	0	+	
S8 Accessibility	+	++	+	+	
Environmental					
EN1 Traffic	--	-	-	-	
EN2 Water Quality & Resources	--	-	-	-	
EN3 Air Quality	--	-	-	-	
EN4 Biodiversity	?	?	?	?	
EN5 Landscape & Townscape	+	+	+	+	
EN6 Historic Env. & Cultural Assets	?	?	?	?	
EN7 Climate Change	-	-	-	-	
EN8 Waste Management	-	-	-	-	
EN9 Land and Soil	?	?	?	?	
Economic					
EC1 Growth	++	0	++	+	
EC2 Employment	-	+	++	+	
EC3 Regeneration	+	++	++	+	
EC4 Investment	+	+	++	+	
EC5 Efficient Movement	-	+	?	++	
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ?</p>					

Strategic Planning Objectives and Priorities: Spatial Expressions of Priorities

Question 6. Are there any land use priorities that lead to a particular spatial arrangement around the Borough?

Potential options / priorities:

- A. Concentrate development in major town centres
- B. Concentrate development on major public transport interchanges
- C. Support a greater spread of development

Social	Option A	Option B	Option C	Commentary
S1 Prosperity and Social Incl.	+	+	o	<p>It is unlikely that any one of these 'options' will be implemented in isolation to the exclusion of the others as elements of each are likely to provide the most sustainable policy position for the Borough to reflect different local circumstances.</p> <p>Note that town centre locations and major public transport interchanges may be one and the same and therefore the benefits of each may be combined in certain locations (it is assumed for the purposes of this initial appraisal that the two do not coincide).</p> <p>Sustainability strengths: All three priorities provide potential strengths, not least the concentration of development on major public transport interchanges. The issues of traffic and accessibility are key for the Borough, like the rest of London to varying degrees. Encouraging the use of public transport and improving accessibility, with associated indirect benefits on health and social inclusion, is therefore welcomed.</p> <p>With respect to environmental objectives, the aim of reducing traffic also has the potential to reduce pollution.</p> <p>The concentration of development has the potential to have positive effects on the economic objectives. The efficient movement objective could benefit as concentrating development could reduce the use of the car which should have a beneficial effect on congestion. In addition, reducing congestion and development of public transport could have benefits effects on the growth and regeneration objectives.</p> <p>Sustainability weaknesses: The greater spread of development has the potential weakness of increasing traffic and air pollution. Facilities and services are also likely to be less assessable to those without access to a car and on lower incomes.</p> <p>The quality of surrounds may be reduced by increasing the density of development leading to noise nuisance etc, this could be a particular issue if development is concentrated and uses mixed causing nuisance thresholds to be passed. Similarly crime / fear of crime could be exacerbated, however development may be an opportunity to address it through appropriate design etc.</p> <p>Recommendations: 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.</p>
S2 Health	+	+	o	
S3 Education and Skills	o	o	o	
S4 Housing	+	+	+	
S5 Quality of surroundings	?	?	-	
S6 Crime Prevention & Community Safety	?	?	?	
S7 Community Identity	+	+	o	
S8 Accessibility	+	++	--	
Environmental				
EN1 Traffic	-	++	--	
EN2 Water Quality & Resources	-	-	-	
EN3 Air Quality	-	+	--	
EN4 Biodiversity	?	?	?o	
EN5 Landscape & Townscape	+	o	o	
EN6 Historic Env. & Cultural Assets	?	?	?	
EN7 Climate Change	-	o	-	
EN8 Waste Management	-	-	-	
EN9 Land and Soil	+	+	-	
Economic				
EC1 Growth	++	++	+	
EC2 Employment	++	++	+	
EC3 Regeneration	++	++	+	
EC4 Investment	++	++	+	
EC5 Efficient Movement	+	++	-	
<p>Key: Major positive: ++ Minor positive: + Neutral: o Minor negative: - Major negative: -- Uncertain:?</p>				

APPENDIX 9

APPRAISAL OF CORE STRATEGY PREFERRED OPTIONS

Appraisal of Core Strategy Preferred Options

The policies appraised below are those included in Draft Core Strategy provided by LB Brent on 27th September 2006 (Version 15), with minor changes to policies emailed 13th October 2006.

Note that some of the comments recorded in the column of the appraisal matrices are in abbreviated form. For further information on how scores are assigned against specific Sustainability Objectives please refer to the Significance Criteria in Appendix 7.

The Appraisal of each policy is recorded in the matrices on the following pages (note that the text of the policy from the Preferred Option is included at the top of the matrices for ease of reference).

Appraisal of the Spatial Strategy Policies

The policies in the Spatial Strategy are:

- CP SS1: Key Principles for Development
- CP SS2: Population and Housing Growth
- CP SS3: Focus of Growth
- CP SS4: Commercial Regeneration
- CP SS5: Wembley as a Focus for Growth
- CP SS6: Infrastructure to Support Development
- CP SS7: Sustainable Communities
- CP SS8: Meeting Local Community Needs
- CP SS9: Protecting the Built and Natural Environment
- CP SS10: Implementation

A matrix is included for each of these policies with a score provided against each of the sustainability criteria, not just the objectives.

Policy CP SS1: Key Principles for Development

The key principles which underpin the spatial strategy for Brent are:

- Focusing higher density development in five key growth areas, especially in the main growth area of Wembley.
- Change will be considered on a local area basis, thus facilitating comprehensive planning and provision of infrastructure to ensure that growth is sustainable. A design-led approach to development will be taken.
- Alongside growth will be the improvement of transport nodes, mainly stations and bus/rail interchanges, improvement of travel corridors around, improvement of walking and cycling and linking growth areas, with particular emphasis on the improvement of bus services.
- Controlling development in other areas, for example in maintaining the character of quality suburbs and protecting open space. Any development outside the growth areas will be at significantly lower densities than in the growth areas.
- Promoting improvements in town centres and local centres, strategic industrial areas and on housing estates in need of regeneration.
- Development in the key growth areas will be required to be mixed-use and also have a mix of housing size and tenures.
- All development should be sustainable through, for example, measures which mitigate or adapt to climate change.
- High quality design resulting in a significant improvement in the quality of the public realm.
- Ensuring that dwelling size and quality of neighbourhoods encourage people to stay in Brent over the long term.

Policy CP SS1: Key Principles for Development

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: Growth area focus should promote regeneration in the most deprived areas. Public realm improvements and emphasis on housing estates in need of regeneration likely to lead to long term improvements in relation to poverty and social exclusion. Emphasis on public transport likely to improve affordability of access to services for those most in need. Mitigation / Enhancement: None
	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: Positive effects depend on delivery of infrastructure and on relationship to other policies. Improved public realm, transport (especially public transport) and access / movement can all have positive health impacts. Mitigation / Enhancement: Policy CP SS9 includes specific reference to delivering enhancement / provision of open space, although greater provision of and access to open space and private outside space is not included in SS1 which could improve effects on health.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: Provision of 'infrastructure' should lead to better access to educational facilities or at least provide for additional pressure from level of population increase proposed. Improved public transport could also lead to better access to existing educational facilities. Provision of facilities cannot guarantee improved qualifications, skills etc. Mitigation / Enhancement: Reference to 'provision of infrastructure' in second bullet point is taken to include education facilities. More detailed policies in the Core Strategy on provision of infrastructure include SS6, SS7, SS10, H2 and CF1. The (forthcoming) development control policies should also include more detailed policies on the provision of infrastructure.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to	Will it increase access to good quality and affordable housing?	+	Effects: Principles set context for delivery of homes and regeneration of housing estates which should have positive effects. There is a focus on improving urban design and
	Will it encourage mixed use and range of housing tenure?	++	

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
live in a decent home	Will it reduce the number of unfit homes?	++	public realm quality and on affordable housing, mixed housing tenure and size, all of which should benefit those in greatest housing need in the borough. Effect on homelessness is unclear as not known if the provision of affordable housing will be accessible to those currently homeless. Mitigation / Enhancement: More detailed policies in the Core Strategy on provision of housing include policies H1, H2, H3 and H4. The (forthcoming) development control policies should also include more detailed policies on the provision of affordable housing. 'Building for life' not included here, but included in policy H2. The DPD has the potential to have beneficial affects on the quality of the existing housing stock, particularly public housing, through promoting regeneration and improvement of existing housing estates, as with South Kilburn.
	Will it reduce homelessness?	?	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	Effects: Emphasis on public realm quality and regeneration should improve amenity and sense of place. Noise levels will partly depend on changes arising from reducing traffic and transport improvements. Where emphasis on public transport reduces volume of traffic and development is design to minimise effects, noise levels and concerns are likely to fall, however it is also possible that improved corridors and connections between growth areas may lead to increased vehicle movements – in which case the opposite may be true. Increasing the density of development in the growth areas and mixed use development will also risk increased noise nuisance. Mitigation / Enhancement: The detailed delivery of this policy will be provided by other policies in the Core Strategy and subsequent DPDs and SPDs. Impacts on noise will depend on the success of managing traffic and mitigating the effects of higher density and mixed use developments. This is partly dealt with by policy SS7, the urban design policies in the Core Strategy (UD1 and UD2) and the sustainable housing policy H2. The (forthcoming) development control policies which should include a policy on controlling noise and vibration.
	Will it improve residential amenity and sense of place?	++	
	Will it reduce actual noise levels?	+/-	
	Will it reduce noise concerns?	+/-	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	Effects: Regeneration and improvements to design and the public realm are likely to reduce crime and fear of crime and have the potential to spread these benefits to beyond just new development. Mitigation / Enhancement: The policy does not include explicit mention of crime and safety, although it is recognised this is covered within improving design and the public realm and will be implemented via other policies in the Core Strategy.
	Will it reduce the fear of crime?	+	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+/?	Effects: Effects on sense of local community; identity and welfare are difficult to predict from the principles in this policy. However, townscape and public realm improvements are likely to increase sense of pride and implicitly likely to improve feelings of value within society and connections / communications between groups. Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to community include policies SS8 and CF1. The (forthcoming) development control policies should also include more detailed policies on the encouraging a sense of community and identity to deliver this objective.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	+/?	
	Will it improve ethnic relations?	+/?	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	+/?	
	Will it encourage people to respect and value their contribution to society?	+	
8. To improve accessibility to key services especially for those most in	Will it improve accessibility to key local services?	+	Effects: Focus on improved transport corridors and interchanges and emphasis on public transport should improve accessibility of key services. The second principle refers to provision of infrastructure to
	Will it improve the level of investment in key community services?	0	
	Will it make access more affordable?	+	

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
need	Will it make access easier for those without access to a car?	+	ensure growth is sustainable. Improved public transport and focus on growth areas is likely to increase affordability of access. Mitigation / Enhancement: Policies SS6, SS8 and SS10, deal with provision of infrastructure, community needs and implementation respectively. H2 and CF1 are also relevant in this regard. The timing of the provision of new services to meet the needs of existing and new communities needs to be in place as soon as developments are complete and the number of residents increases. Policy SS6 includes a requirement that infrastructure requirements will be met 'by time of occupation'. The (forthcoming) development control policies should also include more detailed policies on the provision of infrastructure.
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+/-	Effects: Improvements to transport nodes and the emphasis on public transport, walking and cycling should minimise traffic growth and the effect of traffic, however given the level of growth proposed and the uncertainty in people shifting from car to other means the overall effect could be an increase in traffic volume. Equally improved corridors and connection between growth areas may encourage more travel, offsetting positive effect of public transport improvements. Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to reducing traffic include the Connecting Places policies TRN1, TRN2, TRN3 and TRN4. Other relevant policies seeking to protect the environment from pollution etc includes policy ENV2. The (forthcoming) development control policies should also include more detailed policies on delivering on the commitment to reduce the need to travel, the Brent <i>Local Implementation Plan</i> and <i>Air Quality Action Plan</i> will also be key in delivering improvements.
	Will it increase the proportion of journeys using modes other than the car?	++	
	Will it encourage walking or cycling?	?	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	?	Effects: Effects on water quality uncertain given the strategic nature of the principles. These effects will be largely determined by the implementation of more detailed policies and guidance (e.g. SD2 and related (forthcoming) development control policies). Adaptation to climate change, high quality design and sustainable construction techniques should improve efficiency of water use, however development generally will increase net water consumption and sewage generation of the Borough. Mitigation / Enhancement: SS7 includes a specific mention of minimising water use. There is no mention of improving water quality in SS1 but pollution prevention is included in ENV2. More detailed policies in the Core Strategy relevant to water conservation include ENV1, ENV2, SD2 and H2. The (forthcoming) development control policies should also include more detailed policies on delivering improved water quality and water conservation. The existing SPG / proposed SPD on sustainable design and construction and proposal for developers to prepare a Sustainability and Climate Mitigation and Adaptation Strategy (see policy SD2) will support this.
	Will it reduce water consumption?	-/+	
11. To improve air quality	Will it improve air quality?	+	Effects: Positive scores dependent largely on transport modal changes / reduction proposed under these principles – as
	Will it help achieve the objectives of the Air Quality Management Plan?	+	

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
	Will it reduce emissions of key pollutants?	+	discussed under Objective 9 above. However, given the level of proposed growth there is likely to be an overall increase in traffic and emission and therefore this objective is scored negatively elsewhere (e.g. SS2) Mitigation / Enhancement: There is no mention of improving air quality in SS1. SS7 includes a specific mention of taking account of environmental constraints on development such as air quality. There is no mention of improving water quality in SS1 but pollution prevention is included in ENV2. More detailed policies in the Core Strategy relevant to air quality include ENV2 and SD2. The (forthcoming) development control policies should also include more detailed policies on delivering improved air quality, although the Brent <i>Local Implementation Plan</i> and <i>Air Quality Action Plan</i> will be key in delivering improvements.
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	?	Effects: Direct effects unclear given the strategic nature of the principles in this policy. Reference to high quality design and improving the public realm could include benefits for biodiversity, such as open space improvements, street trees, green roofs etc. Mitigation / Enhancement: See comments on Objective 2 vis-à-vis open space which could also have biodiversity benefits. Linked to details of implementation as set out in other policies (especially CP OS1 and CP OS2).
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	?	
	Will it maintain and enhance sites designated for their nature conservation interest?	?	
	Will it encourage protection of and increase number of trees?	+/?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+/?	Effects: Policy explicitly mentions protection of open space. Key focus is on improved public realm, which is likely to improve sense of place, townscape etc. No explicit mention of views and/or local distinctiveness. It is recognised that Brent as a borough does not have any strategic views, however some local views may be important. Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to enhancing landscape / townscape include SS9, UD1, UD2, SD2, ENV2, OS1, OS2 and H2. The (forthcoming) development control policies should also include more detailed policies.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	?	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	?	Effects: Direct effects unclear given the strategic nature of the principles in this policy. The Growth Areas are generally located outside the Conservation Areas in Brent, apart from South Kilburn. Impact on Statutory and Locally Listed Buildings and Sites of Archaeological Importance / Archaeological Priority Areas not known as strategy level. No specific mention in the policy of the protecting and enhancing the historic and cultural assets of these areas. The level of growth proposed has the potential to have negative effects on these assets, however through a 'design-led approach' and 'high quality design', these consideration should be incorporated. Mitigation / Enhancement: SS7 includes a specific mention of protecting cultural and historic assets. The (forthcoming) development control policies should also include more detailed policies on conserving and enhancing the historic and cultural environment, including protection of specific sites / areas, such as Conservation Areas, Statutory and Locally List Buildings and Sites of Archaeological Importance / Archaeological Priority Areas.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	Effects: Where transport modal shift is achieved and the number of car journeys reduced, transport emissions are likely to fall.

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
change and reduce vulnerability to climate change	Will it lead to an increased proportion of energy needs being met from renewable sources?	+	Sustainable construction methods and emphasis on climate change mitigation also likely to reduce energy consumption in the long term. Adaptation to climate change should ensure flood risk management, energy use etc is accounted for. Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to climate change mitigation and adaptation include SS7, SD1, SD2, EN1, ENV2, TRN2 and H2. The (forthcoming) development control policies should also include more detailed policies, including setting out local target to reduce CO2 emissions. The existing SPG / proposed SPD on sustainable design and construction and proposal for developers to prepare a Sustainability and Climate Mitigation and Adaptation Strategy (see policy SD2) will support this.
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	+	
	Will it reduce the risk of damage to property from storm events?	+	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+/-	Effects: Material and resource use and household waste are unlikely to be reduced due to 'growth' leading to increased construction / development and number of households over the plan period. However, the use of sustainable methods and design in construction should minimise increase in waste in the construction industry and households. Mitigation / Enhancement: SS7 includes a specific links to the policies to be included in the (forthcoming) development control policies which should also include more detailed policies on sustainable demolition and construction and operational waste management. Policy W1 deals with Sustainable Waste Management. The existing SPG / proposed SPD on sustainable design and construction (see policy SD2) will support this.
	Will it reduce household waste?	+/-	
	Will it increase waste recovery and recycling?	+/?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	+/?	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: Focus on growth areas is intended to enable higher densities and concentrated use, thus development is likely to be focussed on previously developed / brownfield land minimising pressure on development on any greenfield sites. Explicit mention is included on protecting open space which should ensure further losses are avoided. Mitigation / Enhancement: No explicit requirement that development should be only on or mostly on previously developed / brownfield land, which could be added to SS1. Focussing development on previously developed / brownfield land is included in policies SS7 and H1. Policy ENV2 includes the Councils desire to seek the remediation and re-use of contaminated land.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+/?	
	Will it ensure land is remediated as appropriate?	?	
	Will it minimise the loss of soils to development?	+/?	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	?	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+?	Effects: Regeneration, improved transport and focus on development are all likely to lead to economic growth. Emphasis on mixed use development may encourage start-ups, however there is no explicit mention of the need for a range of business uses (though this is covered in the BIW policies). The principles are likely to generally enhance the Borough as a business location. See overall comments below on 'mixed use' development. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (i.e. BIW1-3) and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	
	Will it enhance the image of the area as a business location?	++	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: Growth / development are likely to lead to greater employment opportunities. However, the relevance of opportunities to local skills and needs will determine whether these opportunities are available and rewarding to local people in the long term.
	Will it provide job opportunities for those most in need of employment?	?	
	Will it help to reduce long hours worked?	0	

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
	Will it help to improve earnings?	0	Mitigation / Enhancement: The scope of the spatial strategy limits its direct affect on improving learning and skills and more satisfying employment. The creation of 'sustainable communities' (policy SS7) will seek to help achieve this objective.
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: The principles seek to promote regeneration through focussing on the growth areas and other specific locations, including housing estates in need of regeneration. Some of the growth areas are in the most deprived parts of the Borough and this should help reduce disparity. Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to promoting regeneration include SS2, SS3, SS4, SS5, H2, H3, H4 and CF1. The (forthcoming) development control policies should also include more detailed policies to promote regeneration. Some existing and forthcoming SPDs also promote regeneration in certain parts of the Borough.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+/?	Effects: Aim of regeneration and growth areas is increased investment and economic development. However, it is unclear from this policy if development will be suitable for indigenous businesses (however refer to BIW policies). Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to inward development include BIW1, BIW2 and BIW3. The (forthcoming) development control policies and the Site Specific Allocations should promote inward investment.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	+	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	Effects: Accessibility is a key element of the principles, and is likely to be significantly improved. However there is the possibility that improved accessibility within the borough may also encourage cross-commuting and thus increase travel flows within the borough as well as increase community both into and out of the Borough. Mitigation / Enhancement: It will be very hard to mitigate for the above. However, supporting employment opportunities suitable for local people and providing opportunities for start up businesses for example through the local economy policies in the Core Strategy and in the (forthcoming) development control policies should help mitigate this effect. More detailed policies in the Core Strategy relevant to movement include the Connecting Places policies TRN1, TRN2, TRN3 and TRN4. The Brent <i>Local Implementation Plan</i> will also be key in delivering improvements to transport.
	Will it improve accessibility to work by public transport; walking and cycling?	++	
	Will it reduce journey times between key employment areas and key transport interchanges?	++	
	Will it facilitate efficiency in freight distribution?	?	

Key: Major positive: Minor positive: **+** Neutral: 0 Minor negative: Major negative: Uncertain: **?** Mixed: **+/-**

Overall Summary

Effects:

By the nature of the policy, which sets out principles which underpin the spatial strategy, it is relatively strategic and therefore its impacts will be dependant on detailed implementation through other policies in the Core Strategy as well as in subsequent DPDs (e.g. development control policies) and SPDs.

Generally the Key Principles for Development score positively against the sustainability criteria. The emphasis on prioritising public transport, walking and cycling and improving transport nodes is particularly positive and could help the achievement of broader sustainability goals (environmental, social, as well as economic). The focus on regeneration and improving town centres etc is also very positive in terms of achieving social equity and improving quality of life for the most deprived residents. Focussed growth in a limited number of well connected and serviced areas is also positive from a sustainability perspective.

Environment, as well as social and economic, benefits should be derived from the emphasis on, for example, high quality design, a design –led approach and mitigating and adapting to climate change.

The focus on mixed use development and affordable homes could be seen by some developers as having a negative impact on the viability of some sites. However, with flexibility and uses tailored to specific locations this is not considered to outweigh the benefits, which include: sustaining a critical mass of uses and activities; reducing car dependency through allowing people to be near to a range of shops, amenities and jobs; ensuring a wider range of participation in urban life and avoid polarisation of social groups by mixing of different housing types and tenures; creating jobs for local communities; increasing workforce productivity by providing nearby leisure and retail opportunities etc.

Policy CP SS1: Key Principles for Development			
Objective	Criteria	Score	Comments
<p>Mitigation / Enhancement:</p> <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 comments above to where the forthcoming development control policies will need to focus to ensure the positive effects are enhanced and the negative effects are minimised (see comments on individual objectives).</p> <p>More specific comments 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 as proposed because development is always likely to be a compromise between the different dimensions of sustainability and delivering sustainable development is an aspirational concept.</p>			

Policy CP SS2: Population and Housing Growth			
<p>The Borough will plan for a population growth of up to 28,000 people by 2017. The development of over 10,146 (including 1000 non self-contained) additional homes will be sought between 2007 and 2017. The Borough will aim to achieve the London Plan target that 50% of new homes should be affordable.</p>			
<p>Note: This policy sets out targets for population and housing - the potential effects of population growth are acknowledged within the supporting text, and the magnitude / nature of these effects will be dictated by the detailed implementation and controls / standards placed upon them – which is set out in policies throughout the Core Strategy and will be included in the forthcoming development control policies. However, this policy has been appraised based on the sustainability implications of these growth. In essence this policy is appraised ‘stand-alone’, but with awareness of the broader issues tackled by the supporting text and detailed policies throughout the Core Strategy, as growth on the proposed scale will impose sustainability pressures as well as delivering benefits.</p>			

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	<p>Effects:</p> <p>The key focus of the supporting text, even if it is not included in the policy, is to use growth / regeneration to tackle social exclusion and regenerate currently deprived areas.</p> <p>Increased service provision implied in supporting text may improve affordability, however this will depend on the type of provision, location, etc.</p> <p>Mitigation / Enhancement:</p> <p>Many of the other more detailed policies in the Core Strategy are relevant to reducing poverty, promoting regeneration etc including SS3, SS4, SS5, SS6, SS7, SS8, H1, H2, H3, H4 and CF1.</p> <p>The (forthcoming) development control policies and the Site Specific Allocations should also promote this.</p>
	Will it improve affordability of essential services?	+?	
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	<p>Effects:</p> <p>Facilities and infrastructure are to be provided as part of growth and regeneration, however positive effects are dependent on provision of more than just meeting the increase demand implied by growth on the scale expected due to current deficit of facilities and health issues in areas of deprivation, for example.</p> <p>Mitigation / Enhancement:</p> <p>Implementation details are / should be covered in other policies in the Core Strategy (i.e. SS7, OS1 and CF1) and/or (forthcoming) development control policies.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	?	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	?	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p>Effects:</p> <p>Supporting text explicitly seeks to address the need to meet increasing demands on education. However the scale of new demand is likely to be very significant over the plan period, and the timing, location and nature of provision will affect access. Provision of facilities will not in itself necessarily improve qualifications and skills.</p>
	Will it improve access to high quality educational facilities?	+?	
	Will it help fill key skill gaps?	+?	

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
			Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (i.e. SS7 and CF1) and/or (forthcoming) development control policies.
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	++	Effects: This policy aims to deliver more homes, including achieving 50% affordable housing. However there is some risk that regeneration could increase property values more generally (across borough, and in specific locations) which may exacerbate affordability problems. Successful delivery of mix of housing sizes to cater for families / larger households will be critical. Policy does not specifically cater for existing unfit homes, however the regeneration focus may provide some indirect benefits (or direct where council housing is renovated e.g. as part of the South Kilburn regeneration). Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (i.e. H3 and H4) and/or (forthcoming) development control policies.
	Will it encourage mixed use and range of housing tenure?	++	
	Will it reduce the number of unfit homes?	+?	
	Will it reduce homelessness?	+?	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: Regeneration and development are likely to improve the quality of and satisfaction with the built environment, including the public realm. Increased population, higher densities, mixed use development and construction activity will all potentially create noise pollution and ongoing risk of increased noise nuisance. Mitigation / Enhancement: The detailed delivery of this policy will be provided by other policies in the Core Strategy and subsequent DPDs and SPDs. Impacts on noise will depend on the success of managing traffic and mitigating the effects of higher density and mixed use developments. This is partly dealt with by the urban design policies in the Core Strategy (UD1 and UD2) and the housing policy H2. The (forthcoming) development control policies which should include a policy on controlling noise and vibration.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	-	
	Will it reduce noise concerns?	-	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: Crime and fear of crime reduction depends on design and long-term improvements in quality of life and reductions in disparities and exclusion. The increase in population and growth per se will not directly affect actual or fear of crime. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (i.e. H2 which specifically refers to 'designing out crime') and/or (forthcoming) development control policies.
	Will it reduce the fear of crime?	0	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: Very much dependent on the nature of communities and development which actually occurs. Influx of new population may create, rather than ease tensions, if not managed sensitively. Mitigation / Enhancement: It is important to focus on the creation of communities – looking beyond the physical construction of homes and facilities and including local people in decision making and planning. Opportunities for involving the local community in the delivery of growth in the Borough should be incorporated into the implementation of the Core Strategy. Implementation details are / should be covered in other policies in the Core Strategy including SS6, SS7, SS8, H2 and CF1 and/or (forthcoming) development control policies.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+	
8. To improve accessibility to key services especially for those most in	Will it improve accessibility to key local services?	+/-	Effects: Transport infrastructure and provision improvements should increase ease of access to key local services, however population increase on the scale proposed will increase demand pressures on existing services. See also Objective
	Will it improve the level of investment in key community services?	+	
	Will it make access more affordable?	+?	

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
need	Will it make access easier for those without access to a car?	+	1 above. Mitigation / Enhancement: It is very important that facilities are provided to at least cater for, if not exceed expected increased demand for services and amenities and are provided in time for the population growth. Implementation details are / should be covered in other policies in the Core Strategy including SS6, SS7, SS8, SS10, H2 and CF1 and/or (forthcoming) development control policies.
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	-/-	Effects: In spite of public transport improvements and location of services close to population centres, the level of population growth / development expected is likely to overall increase the levels of traffic in the borough. Construction traffic required to bring about development on scale proposed could have significant temporary impacts at specific locations. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7 and TRN2) and/or (forthcoming) development control policies.
	Will it increase the proportion of journeys using modes other than the car?	+/-	
	Will it encourage walking or cycling?	0	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0/-	Effects: The scale of population growth expected will inevitably increase pressure on water resources regardless of efforts to minimise that increase through conservation. Detailed controls should protect the water environment from pollution – regeneration proposals may provide opportunities to enhance riparian / canal side areas. Mitigation / Enhancement: Implementation details, vis-à-vis water conservation and pollution prevention, are / should be covered in other policies in the Core Strategy (e.g. SS1, SS2, SS7, ENV1, ENV2, SD2 and H2) and/or (forthcoming) development control policies. Development control policies should emphasise the opportunity for regeneration proposals to provide opportunities to enhance riparian / canal side areas.
	Will it reduce water consumption?	-	
11. To improve air quality	Will it improve air quality?	-/-	Effects: Increased population, increased traffic volumes and construction in the borough are all likely to impact negatively on air quality both in the short and long term, even where efforts are made to minimise this impact through promoting public transport etc. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7 and TRN2) and/or (forthcoming) development control policies. These promote growth near transport nodes and seek to reduce the need to travel etc, but there is still likely to be a significant increase in traffic and emissions. The Brent <i>Local Implementation Plan</i> and <i>Air Quality Action Plan</i> will be key in delivering improvements.
	Will it help achieve the objectives of the Air Quality Management Plan?	-/-	
	Will it reduce emissions of key pollutants?	-/-	
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	+/-?	Effects: Effects uncertain as the location of development, and any enhancement measures that could be delivered via development, are not covered by this policy. There is the potential for some positive effects realised through development proposals e.g. habitat creation, tree planting. However the level of growth also has the potential to cause negative effects on biodiversity, including direct loss of sites / features, habitat fragmentation, disturbance etc. Given the focus on brownfield sites, this could in particular result in
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0/-?	
	Will it maintain and enhance sites designated for their nature conservation interest?	-?	

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
	Will it encourage protection of and increase number of trees?	-/+?	loss / damage to species and habitats that have colonised these areas. The supporting text to the policy states that valued parts of the Borough should be "protected from over-development or unnecessary change". It is therefore assumed that key sites would be avoided. Mitigation / Enhancement: Protection and enhancement of biodiversity should be covered in other policies in the Core Strategy, particularly OS1 and OS2) and (forthcoming) development control policies. The Local Biodiversity Act Plan and Mayors Biodiversity Strategy provides further details on implementation and priorities.
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	-?	Effects: Effects uncertain as the location and design of development, and any enhancement measures that could be delivered via development, are not covered by this policy. There is the potential for some positive effects to be realised through development proposals e.g. landscape and public realm enhancement, open space creation, tree planting etc. However the level of growth also has the potential to cause negative effects on landscape and townscape depending on its location, design etc. Although the borough has no strategic views, development on scale proposed may have impact on local skylines / views etc. The supporting text to the policy states that growth will be used for regeneration and renewal, so it should deliver improvements to the public realm etc. Mitigation / Enhancement: One of the key aims of the spatial strategy as a whole is to use regeneration and growth as a catalyst for enhanced public realm and townscape etc. Protection and enhancement of landscape/townscape are covered in other policies in the Core Strategy (e.g. SS9, ENV2, UD1, OS1 and OS2) and the (forthcoming) development control policies will need to adequately address the enhancement of ecological and landscape/townscape quality. It will be important to consider the impact, as part of implementation of the policy, on skylines and views and this should also be covered in the development control policy.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+/-?	
	Will it maintain and strengthen local distinctiveness and sense of place?	+/-?	
	Will it minimise visual intrusion and protect views?	-?	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	+/-?	Effects: Supporting text refers to need to preserve valued local areas / sites. No explicit reference to conservation areas, cultural and historic values. Scale of growth / development proposed has the potential to negatively effect the historic environment, but the focus on the growth area (see policy SS3) means the areas of greatest interest are mainly avoided. Impact on specific buildings and sites is uncertain given the strategic nature of this policy. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS9, UD1 and ENV2) and/or (forthcoming) development control policies.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	--	Effects: Welcome reference in supporting text to the environmental implications of increased population. Increased construction, population and associated consumption activities and traffic are all likely to increase the Boroughs overall consumption of energy and emissions of greenhouse gases, regardless of mitigation implied by other policies. Proportion of energy generated from renewables could be increased by requiring on-site generation as part of major developments (although this is not explicitly included in the
	Will it lead to an increased proportion of energy needs being met from renewable sources?	+?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
	Will it reduce the risk of damage to property from storm events?	?	relevant Core Strategy policies i.e. SS7 and SD2 – it should be included in a development control policy). Given the level of development and even with incorporation of sustainable drainage systems etc, it is likely that there will be a net increase in run-off etc and therefore an increase in flood risk. Mitigation / Enhancement: The only effective way to mitigate such impacts would be to limit growth, but this is not possible given the London Plan context. Implementation details are / should be covered in other policies in the Core Strategy (e.g. UD1, SD1, SD2, ENV1, ENV 2 and TRN1-4) and/or (forthcoming) development control policies. These will partly mitigate the effects, by for example promoting public transport, building in resilience to increased flood risk and storminess under climate change, requiring Flood Risk Assessments to provide better information on the risk associated with individual sites and suitable mitigation e.g. SUDS. The existing SPG / proposed SPD on sustainable design and construction and proposal for developers to prepare a Sustainability and Climate Mitigation and Adaptation Strategy (see policy SD2) will support this.
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	--	Effects: Increased construction, population and associated consumption activities are all likely to increase the Boroughs overall use of resources and generation of waste, regardless of mitigation implied by other policies. Waste recovery / recycling may increase but as a result of increased waste generation. New development could incorporate improved waste recycling facilities, particularly flats etc. Growth on the scale proposed is likely to generate significant construction and demolition waste. Mitigation / Enhancement: The only effective way to mitigate such impacts would be to limit growth, but this is not possible given the London Plan context. Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS7, UD1, UD2, SD2, ENV2 and W1) and/or (forthcoming) development control policies. These will partly mitigate the effects, by for example promoting waste minimisation and use of sustainable materials. The existing SPG / proposed SPD on sustainable design and construction and proposal for developers to prepare a Sustainability and Climate Mitigation and Adaptation Strategy (see policy SD2) will support this.
	Will it reduce household waste?	--	
	Will it increase waste recovery and recycling?	+?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	--	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+/-?	Effects: Supporting text identifies need to protect open space / and develop in areas “where it can be more readily accommodated” and focus of the overall strategy is to be on redevelopment of previously developed / brownfield land. However mixed score as development on scale required could increase pressure on greenfield sites, although the London Housing Capacity Study indicates level of growth proposed can be accommodated (but not higher levels). Impact on soils and remediation not mentioned – but this is covered elsewhere in the strategy. Mitigation / Enhancement: No explicit mention that development should be only on or mostly on previously developed / brownfield land. This could be added to the supporting text. Reference to previously developed / brownfield land is included in SS7 and H1 – however consideration should be given to the need to incorporate this requirement elsewhere in the policies and forthcoming policies.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	
	Will it ensure land is remediated as appropriate?	+?	
	Will it minimise the loss of soils to development?	?	
	Will it maintain and enhance soil quality?	?	
	Will it reduce the risk of subsidence?	-?	

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
			Policy ENV2 includes the Councils desire to seek the remediation and re-use of contaminated land. The potential for increased risk of subsidence under climate change could be dealt with by the (forthcoming) development control policies to support SD2 and an updated SPD on sustainable construction and design.
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: Core aim of the policy / overall strategy is to use growth / housing development to promote regeneration with proposed population increase of up to 28,000 people. Likely to lead to cascading of economic benefits. However positive scores will depend on detail of implementation. Mitigation / Enhancement: Policy is concerned with level of growth in terms of population / housing, other policies in the Core Strategy deal with commercial regeneration and the local economy (e.g. SS4, BIW1-3 and TC1-TC5).
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	
	Will it enhance the image of the area as a business location?	++	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: See above under objective 18. Mitigation / Enhancement: At present no explicit mention of the need for opportunities arising from regeneration (jobs, economic renewal) to be primarily relevant to local people – although this is implied through supporting text.
	Will it provide job opportunities for those most in need of employment?	?	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	+	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Key aim of policy (see above under objective 18 and 19). Spatial dimension of where growth is focused is dealt with under policy SS3 (i.e. partly in the areas requiring regeneration). Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS3, SS4, SS5 and SS7) and/or (forthcoming) development control policies.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	Effects: The supporting does not make distinction between indigenous business and those outside the borough, although development would provide opportunities for local construction companies and builders. Inward investment is likely to be promoted by the scale of growth and stimulate land / property available for business development. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS3, SS4, SS5, SS7, BIW1-3 and TC1-TC5) and/or (forthcoming) development control policies..
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	+	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	Effects: Positive effect on commuting due to plans to locate development of housing close to employment and services. However, increased population in Borough likely to lead to increase in commuting from / to Brent and resulting congestion. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS3, SS6, SS7, SS8, UD1, SD2, ENV1, ENV 2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it reduce journey times between key employment areas and key transport interchanges?	0	
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: ■ Uncertain: ? Mixed: +/-			
Overall Summary			
Effects: This policy (and supporting text) generally scores very positively against social and economic criteria, but has potentially significantly negative environmental impacts. This is due to the implications of construction, population increase and the associate consumption of materials, travel needs, waste, water and energy requirements / creation this implies. This is likely to be the case regardless of mitigation through other policies, although the scale of the effects could be reduced. It is welcomed that this factor is recognised in the supporting text.			

Policy CP SS2: Population and Housing Growth			
Objective	Criteria	Score	Comments
<p>The level of provision of additional homes is dictated by the London Plan and therefore the opportunity to avoid some negative effects, particularly some of the environmental effects, are not open to the Borough. Therefore the only option available is to try to mitigate these negative effects as far as possible.</p> <p>Positive scores on social objectives are dependant on regeneration impacts being suitable and accessible to local people.</p> <p>Mitigation / Enhancement:</p> <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 above to the supporting text to, in particular, enhance the positive effects (see comments on individual objectives).</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>			

Policy CP SS3: Focus for Growth
<p>The focus for population growth, and therefore significant new housing development, in the Borough will be the Wembley Opportunity Area and the regeneration areas of South Kilburn, Church End, Alperton and Burnt Oak/Colindale. These will be directly linked to infrastructure improvements.</p>
<p>Note: The scores for this policy relate to its specific focus on 'areas for growth'. In terms of the overall impacts of growth refer to SS2, above</p>

Policy CP SS3: Focus for Growth			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	<p>Effects:</p> <p>Focusing growth on a limited number of areas, including those in need of regeneration, and linking developing with infrastructure improvements is predicted to have a positive effect on reducing poverty and social exclusion.</p> <p>Mitigation / Enhancement:</p> <p>Care must be taken to ensure that the needs of local people are accounted for and not excluded from the benefits of new development.</p> <p>Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.</p>
	Will it improve affordability of essential services?	+	
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	<p>Effects:</p> <p>Focussing growth in a relatively small number of accessible locations is predicted to have a positive effect on health inequalities. Health will also be improved through alleviation of deprivation through regeneration, provision of affordable housing, employment etc and increasing exercise and healthier lifestyles.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p>Effects:</p> <p>No significant effects identified.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 1. Infrastructure improvements will need to be phased to meet the increase in population in these locations and more than meet increased demand associated with population growth.</p>
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to	Will it increase access to good quality and affordable housing?	++	<p>Effects:</p> <p>One of the keys aims of the policy (in combination with rest of Core Strategy) is to provide decent homes.</p> <p>Generally the effects of the policy are positive against this</p>
	Will it encourage mixed use and range of housing tenure?	+	

Policy CP SS3: Focus for Growth			
Objective	Criteria	Score	Comments
live in a decent home	Will it reduce the number of unfit homes?	+	objective. This is mainly due to the aim to deliver new homes for the Borough, including a high proportion of affordable homes and mix of tenure, sizes etc to meet Brent's needs. Mitigation / Enhancement: See Objective 1. Policy H4 sets out the requirements for affordable homes which will benefit the regeneration of the growth areas.
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: Generally the effects of policy are 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. 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. Mitigation / Enhancement: See Objective 1. Additional Core Strategy policies of relevance will include SS9 and H2.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	-	
	Will it reduce noise concerns?	-	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	Effects: Long-term regeneration reducing disparities and exclusion is likely to improve currently deprived areas and should impact positively on crime and fear of crime. Mitigation / Enhancement: See Objective 1.
	Will it reduce the fear of crime?	+	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	Effects: Improvements to deprived areas likely to enhance pride and through this sense of community engagement. It is hard to predict the effect of focussed growth on communication. Mitigation / Enhancement: See Objective 1.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	0	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	Effects: The policy aims to focus development in accessible locations, as well as be linked to infrastructure improvements, and is therefore likely to improve accessibility to facilities. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	+	
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	+	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	--	Effects: The policy is predicted to have some positive and some negative effects, of major significance against the criteria to reduce traffic volumes. These effects are predicted
	Will it increase the proportion of journeys using modes other than the car?	+	

Policy CP SS3: Focus for Growth			
Objective	Criteria	Score	Comments
	Will it encourage walking or cycling?	+	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. The positive effects result from the proposed focused growth on well connected centres, which will help promotion of public transport, walking and cycling facilities and services within communities thus reducing the need to travel. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2, H2 and TRN1-4) and/or (forthcoming) development control policies. Overall level of traffic will also depend on the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	-?	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. In addition to water consumption, development at specific locations could potentially lead to additional run off and pollution risk. There is some uncertainty over the significance of the potentially effects on water quality given the strategic nature of the Spatial Strategy. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2 and H2) and/or (forthcoming) development control policies.
	Will it reduce water consumption?	-	
11. To improve air quality	Will it improve air quality?	-	Effects: Development at specific locations likely to lead to environmental pressures – see Objective 9. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	
	Will it reduce emissions of key pollutants?	0	
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	?	Effects: Effects on biodiversity are uncertain. Although the growth could improve 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. Focussing development at specific locations could ease pressure on habitats elsewhere. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV2, OS1, OS2 and H2) and/or (forthcoming) development control policies. There is no explicit mention of trees or woodland in any policy.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	?	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	Effects: In growth areas main aim is redevelopment / enhancement and therefore could have a significant positive effects on landscape / townscape quality 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. 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. Mitigation / Enhancement: See Objective 12.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	+/-	
	Will it decrease litter in urban areas and open spaces?	0	
14. To conserve and where appropriate enhance the	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?	?	Effects: Overall the policy is predicted to have limited significant effects against this objective. However there is some uncertainty as the impact on the historic environment is

Policy CP SS3: Focus for Growth			
Objective	Criteria	Score	Comments
historic environment and cultural assets	Will it protect listed buildings?	?	likely to be determined by more detailed policies and their implementation. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS9, UD1 and ENV2) and/or (forthcoming) development control policies.
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	-	Effects: There is the potential for negative effects against this objective, particularly in terms of greenhouse gas emissions and flood risk. The negative effects predicted 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). 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 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. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	Effects: Focussed development / growth may offer opportunities to enhance / provide dedicated facilities for waste recovery and recycling. However, negative effects are likely due to the level of proposed development in the growth areas and the resulting consumption of natural resources and generation of waste, both during construction and occupation. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2, W1 and H2) and/or (forthcoming) development control policies.
	Will it reduce household waste?	-	
	Will it increase waste recovery and recycling?	+?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	-	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: Focussing development at growth areas will be largely / entirely on previously and should ease pressure on open / greenspace elsewhere. Impact on soils and remediation in local contexts is unclear at this strategic level. Mitigation / Enhancement: See Objective 16.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	
	Will it ensure land is remediated as appropriate?	?	
	Will it minimise the loss of soils to development?	?	
	Will it maintain and enhance soil quality?	?	
	Will it reduce the risk of subsidence?	?	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: Focussed growth / development has aim of providing for development in locations most suitable and in need. This is likely to improve / enhance economic conditions. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS2, SS5, SS7, TNR1-4, BIW1-3 and TC1-5) and/or (forthcoming) development control policies. Although focussed growth is a positive approach, it is also important that pockets of deprivation / need for support across the Borough are not overlooked.
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	

Policy CP SS3: Focus for Growth			
Objective	Criteria	Score	Comments
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: See Objective 18. Improvements to earnings will depend on the nature of employment created. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?	?	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	?	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Regeneration is a key aim of the policy and therefore it is predicted to have a major positive effect in relation to this objective. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	Effects: Generally the policy is predicted to have positive effects against these criteria. Significant investment will be required in the Borough, both in terms of construction of housing and other development, but also infrastructure and services. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	+	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	Effects: Focussed growth and location of growth near / in areas of good public transport accessibility should encourage the use of public transport and support walking and cycling. There is potential that growth areas generate commuting traffic – with people coming to them for work, or commuting from them, as population increases are focussed in specific areas. Mitigation / Enhancement: See Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it reduce journey times between key employment areas and key transport interchanges?	+	
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-			
<p>Overall Summary</p> <p>Effects: Focussing growth in areas of good accessibility and in need of regeneration is beneficial in terms of sustainability and the policy generally scores positively as a result. However potential negative environmental effects due to the scale of growth noted under SS2 may concentrate negative impacts in the areas of focussed growth / development – noise, air and water pollution etc may be exacerbated at the local level, for example. The need for development to be directly linked to improvements in infrastructure, as required by the policy, is a key condition on further development. If adequate infrastructure is not provided in time for the increase in population the policy would have more significant negative effects.</p> <p>It is also important that development at local level, particularly in areas currently relatively deprived, does not lead to new housing / opportunities unsuitable for existing residents – which may in long term increase current disparities rather than ease them.</p> <p>Mitigation / Enhancement: 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>			

Policy CP SS4: Commercial Regeneration

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

Policy CP SS4: Commercial Regeneration

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: The aim of the policy is to promote and protect certain strategic industrial /business locations, encourage redevelopment, investment and employment generation. Therefore this policy should have a positive effect on reducing poverty and social exclusion within the Borough. However, opportunities will need to be which are suitable and accessible to local people. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS5, SS6, SS7, TNR2, and BIW1-3) and/or (forthcoming) development control policies.
	Will it improve affordability of essential services?	0	
2. To improve the health of the population	Will it improve access to high quality health facilities?	0	Effects: Limited positive effect on health, although health will be improved through alleviation of deprivation through regeneration, employment etc. Significance uncertain. Mitigation / Enhancement: See Objective 1.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	+?	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	Effects: See Objective 1. Explicit mention in supporting text of use of S106 agreements to provide training for local people to improve job prospects is very positive. Mitigation / Enhancement: See Objective 1.
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	+	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?	0	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	0	Effects: Increased business activity, development and construction will all potentially create noise pollution and ongoing risk of increased noise nuisance. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UD1, UD2 and ENV2) and/or (forthcoming) development control policies and SPDs.
	Will it improve residential amenity and sense of place?	0	
	Will it reduce actual noise levels?	-	
	Will it reduce noise concerns?	-	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce the fear of crime?	0	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: See Objective 1. Where social exclusion is reduced and opportunities provided for local people, a sense of pride and engagement in the local area more likely to develop. Mitigation / Enhancement: See Objective 1
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	

Policy CP SS4: Commercial Regeneration			
Objective	Criteria	Score	Comments
	Will it encourage people to respect and value their contribution to society?	0	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	Effects: Investment in infrastructure is proposed which may facilitate better access to services. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	0	
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	-	Effects: The development of new employment / business is likely to increase net travel / number of journeys, even where effort is made to improve public transport provision. The development of distribution businesses may be particularly detrimental to reducing the effects of traffic, as these are likely to rely on van / lorry transport. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UD1, UD2, ENV1, ENV2 and TRN2) and/or (forthcoming) development control policies. Overall level of traffic will also depend on the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.
	Will it increase the proportion of journeys using modes other than the car?	+/-	
	Will it encourage walking or cycling?	+	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	?	Effects: Will depend largely on the nature of business which is developed. As with objective 9 above, the business and industrial development proposed will lead to a net increase in water consumption in the Borough. In addition to water consumption, development at specific locations could potentially lead to additional run off and pollution risk. There is some uncertainty over the significance of the potentially effects on water quality given the strategic nature of the Spatial Strategy. Redevelopment of contaminated sites could also provide an opportunity to remediate sites and reduce the pollution risk. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1 and ENV2) and/or (forthcoming) development control policies.
	Will it reduce water consumption?	-	
11. To improve air quality	Will it improve air quality?	-	Effects: Development at specific locations likely to lead to environmental pressures – see Objective 9. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	
	Will it reduce emissions of key pollutants?	-	
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	Effects: Limited positive effects predicted. Regeneration of business / industrial sites could lead to improvement to their local environment, however significance uncertain. Mitigation / Enhancement: See Objective 1.
	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	

Policy CP SS4: Commercial Regeneration			
Objective	Criteria	Score	Comments
	Will it minimise visual intrusion and protect views?	?	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	?	Effects: N/a Mitigation / Enhancement: Overall the policy is 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. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS9, UD1 and ENV2) and/or (forthcoming) development control policies.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	-	Effects: Increased commercial activity is likely to increase energy consumption and greenhouse gas emissions. For example, air conditioning use is likely to rise with new development, and transport based emissions will rise where distribution industry expands. In addition, extra run-off could increase flood risk. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	Effects: As with SS2 and SS3 expanded commercial activity will increase overall the consumption of materials and resources, regardless of mitigation action / controls. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2 and W1) and/or (forthcoming) development control policies.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling?	?	
	Will it reduce hazardous waste?	?	
	Will it reduce waste in the construction industry?	-	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: Development will be largely / entirely on previously and should ease pressure on open / greenspace elsewhere. Mitigation / Enhancement: See Objective 16.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure land is remediated as appropriate?	?	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	++	Effects: The aim of the policy is to promote and protect certain strategic industrial /business locations, encourage redevelopment, investment and employment generation. Therefore this policy should have a major positive effect on promoting economic growth in the Borough. However, opportunities will need to be which are suitable and accessible to local people. Mitigation / Enhancement: Some mention could be made of the need for long-term investments which ensure employment opportunities are durable. Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS5, SS6, SS7, TNR2, and BIW1-3) and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	++	
	Will it improve the resilience of business and the local economy?	+?	
	Will it promote growth in key sectors?	+	
	Will it promote growth in key clusters?	+	
	Will it enhance the image of the area as a business location?	++	

Policy CP SS4: Commercial Regeneration			
Objective	Criteria	Score	Comments
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	++	Effects: See Objective 18. It is difficult to predict impact on hours worked or earnings and therefore this remains uncertain. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to reduce long hours worked?	?	
	Will it help to improve earnings?	+?	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Reduce disparities in economic performance and promote regeneration is one of the key aims of the policy and therefore a major positive effect is predicted under this objective. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+/-?	Effects: Impact on indigenous business is unclear, although promotion of strategic business locations likely to provide business investment opportunities. New business from outside Borough could increase competition pressure and/or increase premises costs for local, indigenous businesses, but overall a major positive effect is predicted from the policy on investment and making land available to business development – by protecting land for employment, loss to residential will be avoided. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	++	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+	Effects: Supporting text explicitly refers to aim of seeking local benefits and reducing excessive commuting to central London. Locations for growth were selected to be accessible / located on or near public transport. Mitigation / Enhancement: Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?	++	
	Will it reduce journey times between key employment areas and key transport interchanges?	+	
	Will it facilitate efficiency in freight distribution?	+/-	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-			
Overall Summary			
Effects: Overall this policy scores very positively, particularly against economic objectives. The emphasis given in the supporting text to supporting local needs and use of S106 agreements to provide training for local people is welcomed from a sustainability perspective. There are some negative scores against environmental objectives, which relate primarily to the generation of traffic (either through general increase in business activity, or the proposed encouragement of distribution business) and the reliance on road transport.			
Mitigation / Enhancement: 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. 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. The phasing of infrastructure improvements will be important to avoid negative effects, which is included in SS6.			

Policy CP SS5: Wembley as a Focus for Growth

Wembley being the main focus for growth, will be developed as a new sustainable community where the stadium will be complemented by regeneration of the area as a regional sport, entertainment and leisure destination including new shops, hotels and community facilities as well as 5,000 new homes and on its role as an Olympic venue in 2012. This will be supported by new infrastructure such as schools, health facilities and transport provision, including appropriate parking facilities. Regeneration should provide a range of activities complementary to one another as well as to the Stadium such as retailing or leisure.

Policy CP SS5: Wembley as a Focus for Growth

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: Focused growth at Wembley with the necessary infrastructure should promote regeneration and should have a positive effect on reducing poverty and social exclusion. However, opportunities will need to be which are suitable and accessible to local people. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS4, SS6, SS7, SS8, H1-4, TNR1-4, BIW1-3 and TC1-5, CT1 and CF1) and/or (forthcoming) development control policies.
	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: Increasing pedestrian access should have health benefits. The development of new / expansion of community centre around Wembley may increase focus on sports / sporting activities and may have indirect effect on healthy lifestyles. Mitigation / Enhancement: See objective 1.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+?	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: Provision of new infrastructure including schools and community facilities should have a positive effect on education. Mitigation / Enhancement: See objective 1.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+	Effects: 5,000 new homes are proposed for the In Wembley area (half of all proposed in the whole Borough), many of which will be affordable homes (see policy H4) and a mixture of tenure, size etc (see policy H3). Therefore this policy is predicted to have a positive effect on providing decent homes to those that need them most. Mitigation / Enhancement: See objective 1.
	Will it encourage mixed use and range of housing tenure?	+	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: In Wembley area, focus of growth likely to improve perceptions and sense of ownership of the area. Specific development at Wembley (i.e. housing close to stadium) may generate particular noise / nuisance issues – such as those associate with live music / sporting events. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UD1, UD2, ENV2, OS1, H2 and TNR2) and/or (forthcoming) development control policies. Noise impacts and managing traffic within the Wembley growth area in particular will need to be considered within the forthcoming development control polices – as well as the future Area Action Plan for Wembley.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	-	
	Will it reduce noise concerns?	-	
6. To reduce crime and	Will it reduce actual levels of crime?	0?	Effects: Regeneration and use of design may have a beneficial

Policy CP SS5: Wembley as a Focus for Growth			
Objective	Criteria	Score	Comments
anti-social activity	Will it reduce the fear of crime?	0?	effect on crime / fear of crime. However, development as a regional centre may result in an increase in crime associated with major events. Effect uncertain. Mitigation / Enhancement: See Objective 5. The urban design policies will be particularly important in this regard to ensure crime considerations are fully integrated.
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: The regeneration of Wembley is designed to be a source of local pride and once completed should have a positive effect under this objective. Mitigation / Enhancement: See Objective 5.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	0	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	Effects: The redevelopment of the Wembley area is proposed to include a range of new infrastructure – both community facilities and transport provision and is therefore predicted to have a positive effect on accessibility of services. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	+	
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	+	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	-	Effects: No explicit mention of public transport / non-car means of access within the policy, however Wembley is relatively well connected (with improvements to the stations already undertaken / ongoing) and the policy will be implemented along with others that require promotion of public transport, walking and cycling. The supporting text does refer to the expansion of physical links to the east. The scale of growth proposed, and development of Wembley as a site of regional importance, is nevertheless likely to generate traffic coming into the Borough. This may be particularly acute during events and conferences. Reference to provision of parking facilities, which may promote / facilitate access by car, considered potentially negative. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS6, SS7, SS9, UD1, UD2, SD1, SD2, ENV1, ENV2, H2 and TNR2) and/or (forthcoming) development control policies. See overall comments below re reference to appropriate parking facilities.
	Will it increase the proportion of journeys using modes other than the car?	+/-	
	Will it encourage walking or cycling?	?	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	-?	Effects: As with objective 9 above, the increased number of dwellings and rising population and other development will lead to a net increase in water consumption – even if reduced consumption per-capita is realised. In addition to water consumption, development at specific locations could potentially lead to additional run off and pollution risk. There is some uncertainty over the significance of the potentially effects on water quality given the strategic nature of the Spatial Strategy. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2 and H2) and/or (forthcoming) development control policies.
	Will it reduce water consumption?	-	
11. To improve air quality	Will it improve air quality?	-	Effects: Development in an area which is well connected to existing public transport is a positive factor in improving air quality.
	Will it help achieve the objectives of the Air Quality Management Plan?	-	

Policy CP SS5: Wembley as a Focus for Growth			
Objective	Criteria	Score	Comments
	Will it reduce emissions of key pollutants?	-	However development of a regional centre at Wembley may lead to traffic increase (especially coming into the Borough from outside) which may lead to an increase in air pollution in the long-term. Mitigation / Enhancement: See Objective 9.
12. 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	Effects: No significant effects identified. However, for individual sites, the nature conservation value of previously development sites should be considered. Mitigation / Enhancement: Consideration could be given through the development control policies and other guidance including Development Frameworks to how biodiversity enhancement should be incorporated into the Wembley growth area.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	?	Effects: A key aim of the policy is to create a new sustainable community in the Wembley area and a regional destination. Due to the scale of regeneration / redevelopment, there is a period of considerable disturbance during construction. Care should be taken that Wembley focus should not be at detriment to other areas in the Borough. Litter may be generated, particularly as a result of large scale events. Mitigation / Enhancement: See Objective 5.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	-?	
	Will it decrease litter in urban areas and open spaces?	-?	
14. 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?	?	Effects: Overall the policy is 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. It is important that conservation areas and listed buildings in the Wembley area are not negatively effected by development plans. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS9, UD1 and ENV2) and/or (forthcoming) development control policies.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	-	Effects: As with SS2 – SS4, development on the scale proposed is likely to increase energy consumption and greenhouse gas emissions regardless of mitigation. No mention of renewable energy in this policy context. Concentrated development in Wembley area may lead to some exacerbation of flood risks, especially in the long-term when current flood risk zones may be expanded. Welsh Harp and River Brent are both flood risk areas. Mitigation / Enhancement: See Objective 5.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	-	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	Effects: Focussed development / growth may offer opportunities to enhance / provide dedicated facilities for waste recovery and recycling. However, negative effects are likely due to the level of proposed development in Wembley and the resulting consumption of natural resources and generation of waste, both during construction and occupation. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2, W1 and H2) and/or (forthcoming) development control policies.
	Will it reduce household waste?	-	
	Will it increase waste recovery and recycling?	+?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	-	
17. To conserve and enhance	Will it minimise development on greenfield sites?	+	Effects: Focussing development in Wembley will be largely / entirely

Policy CP SS5: Wembley as a Focus for Growth			
Objective	Criteria	Score	Comments
land quality and soil resources	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	on previously and should ease pressure on open / greenspace elsewhere. Impact on soils and remediation in local contexts is unclear at this strategic level. Mitigation / Enhancement: See Objective 16.
	Will it ensure land is remediated as appropriate?	?	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: As in policies SS3 and SS4, the central aim of this policy is to promote regeneration. This is likely to lead to economic and growth opportunities. Developing Wembley as a regional centre is likely to enhance the area's image as a business location. Improvements to earnings will depend on the nature of employment created. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS4, SS6, SS7, SS8, TNR1-4, BIW1-3 and TC1-5) and/or (forthcoming) development control policies. Although focussed growth is a positive approach, it is also important that pockets of deprivation / need for support across the Borough are not overlooked.
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	+	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	++	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: See Objective 18. Economic regeneration is likely to lead to job creation. Potential uncertainty over the scale to which such opportunities will be suitable and accessible to those most in need. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?	+?	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	+?	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Regeneration is a key aim of the policy and therefore it is predicted to have a major positive effect in relation to this objective. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	Effects: Generally the policy is predicted to have positive effects against these criteria. Significant investment will be required in the Borough, both in terms of construction of housing and other development, but also infrastructure and services. Unclear if it will explicitly encourage indigenous business, however general economic benefit and provision of employment land / development is likely to create opportunities for local business. Development on the scale proposed will necessitate inward investment, particularly in construction. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	++	
	Will it make land and property available for business development?	+	
22. To encourage efficient patterns of movement in support of economic	Will it reduce commuting?	+/-	Effects: Emphasis on transport linkages, and location of Wembley in accessible location is positive. However development of a regional centre for sport, entertainment and leisure will generate commuting for work (unless all jobs are taken locally), events and conferences.
	Will it improve accessibility to work by public transport; walking and cycling?	+/-	
	Will it reduce journey times between key employment areas and key transport interchanges?	+	

Policy CP SS5: Wembley as a Focus for Growth			
Objective	Criteria	Score	Comments
growth	Will it facilitate efficiency in freight distribution?	0	Focussed growth and location of growth near / in areas of good public transport accessibility should encourage the use of public transport and support walking and cycling. There is potential that Wembley generate commuting traffic – with people coming there for work, or commuting from them, as population increases are focussed in specific areas. Mitigation / Enhancement: See Objective 9.
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: --- Uncertain: ? Mixed: -/+			
Overall Summary			
<p>Effects: Generally scores positively, with welcome reference to the provision of new infrastructure. Some negative effects as identified in relation to the local environment, disturbance etc. There may be particular flood risk issues in the Wembley regeneration area. Increased development, including housing and commercial development may increase the risk of flooding effecting people and property, especially in the long-term.</p> <p>There may be specific sustainability concerns related to the development of a regional centre. As an entertainment / sports facility this is to be encouraged, however developing Wembley as a regional shopping centre may lead to increased competition for other local retailers. There are benefits however of promoting Wembley over, for example, Brent Cross as it will be more accessible by public transport, walking and cycling. The explicit reference to including “appropriate parking facilities” in the policy is not consistent with discouraging car transport.</p> <p>Mitigation / Enhancement: Focussing growth in Wembley is generally a positive approach from a sustainability perspective. However it is very important that the possible localised negative environmental 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>			

Policy CP SS6: Infrastructure to Support Development

The likely level of additional housing and its location will be assessed and the Council will plan accordingly for the provision of supporting infrastructure, identifying sites for new facilities where appropriate. Before granting planning permission for large-scale residential development, the Council will have to be satisfied that the infrastructural requirements arising from the scheme will be met by time of occupation. Contributions will be sought from development giving rise to the need for new infrastructure.

Policy CP SS6: Infrastructure to Support Development

Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and	Will it reduce poverty and social exclusion in those areas most affected?	++	Effects: Policy requires the provision of supporting infrastructure

Policy CP SS6: Infrastructure to Support Development			
Objective	Criteria	Score	Comments
social exclusion	Will it improve affordability of essential services?	+	with any additional housing. Significant positive score is dependent on the success / nature of facilities / infrastructure provided. To serve the needs of those most excluded infrastructure and amenities must be accessible and affordable. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	Effects: Policy requires the provision of supporting infrastructure with any additional housing. Significant positive score is dependent on the success / nature of facilities / infrastructure provided. To serve the needs of those most excluded infrastructure and amenities must be accessible and affordable. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: See Objective 2. Mitigation / Enhancement: See Objective 1.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?	0	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	Effects: Where facilities, amenities and recreation / leisure opportunities are available locally and of good quality, community satisfaction, identity and 'ownership' likely to increase and therefore the policy are likely to have a positive effect. Some amenities, such as outdoor recreation facilities may produce localised noise impacts. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UD1, SD2, ENV2, OS1 and OS2) and/or (forthcoming) development control policies.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	?	
	Will it reduce noise concerns?	?	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0/+	Effects: Long-term regeneration, including the provision of infrastructure, reducing disparities and exclusion is likely to improve currently deprived areas and should create a sense of community and vibrancy and impact positively on crime and fear of crime. Also, increase pedestrian movement around new community infrastructure and facilities should increase passive surveillance and feeling of safety in neighbourhoods. Mitigation / Enhancement: See Objective 5.
	Will it reduce the fear of crime?	0/+	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	Effects: Creating communities should be the long-term goal of this policy. Increase provision of community facilities is likely to improve community cohesion and provide an opportunity to increase engagement. Mitigation / Enhancement:
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	

Policy CP SS6: Infrastructure to Support Development			
Objective	Criteria	Score	Comments
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	See Objective 5.
	Will it encourage people to respect and value their contribution to society?	0	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	++	Effects: Main aim of policy is to provide the necessary infrastructure to support development and therefore is predicted to have a major positive benefit. However the ease and affordability of access will depend on the nature and type of infrastructure provided. See also Objective 1 above. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	++	
	Will it make access more affordable?	+/?	
	Will it make access easier for those without access to a car?	+	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+?	Effects: Positive effects are predicted to occur where local facilities and infrastructure reduce the need to travel to access them. The infrastructure provided will also include provision of public transport, walking and cycling facilities and services. Reducing the impact of traffic. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS7, SS8, UD1, SD2, ENV1, ENV2, H2 and TRN1-4) and/or (forthcoming) development control policies. Overall level of traffic will also depend on the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking or cycling?	+	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?	0	
11. To improve air quality	Will it improve air quality?	+/-?	Effects: Relates to Objective 9. Where traffic is reduced air pollution should be reduced – as traffic is the main driver of air pollution. However effects uncertain. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	+/-?	
	Will it reduce emissions of key pollutants?	+/-?	
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	0	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+?	Effects: Providing local amenities and infrastructure could result on improvements to townscape and landscape, improving sense of place, distinctiveness etc, however the effects are uncertain. Mitigation / Enhancement: See Objective 5.
	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	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	

Policy CP SS6: Infrastructure to Support Development			
Objective	Criteria	Score	Comments
14. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it protect listed buildings?	0	
	Will it help preserve, enhance and record archaeological features and their settings?	0	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+/-	Effects: See Objective 9. Potential effects uncertain under this objective. Any positive effects will depend on the impact on traffic volumes, as transport is a major consumer of energy, and the type of infrastructure provided e.g. embedded renewable energy generation. Flood risk dependant on design, type, location etc of infrastructure. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	?	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	Effects: Negative effects are likely as the provision of additional infrastructure is likely to result in an overall increase in use of resources and generation of waste, both during construction and operation. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV2, W1 and H2) and/or (forthcoming) development control policies.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling?	?	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	-	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: Infrastructure is likely to be developed on previously developed land. Provision of local facilities and services may, in long term, reduce the pressure on greenfield sites. Mitigation / Enhancement: See Objective 16.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure land is remediated as appropriate?	0	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: See Objective 1. Providing the necessary infrastructure is an important element of regenerating the Borough, which in turn should assist promote economic growth, employment creation etc and is therefore likely to provide positive effects. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: See Objective 18. Some infrastructure may generate employment opportunities directly, others may facilitate the delivery of employment from the uses it supports. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	0	

Policy CP SS6: Infrastructure to Support Development			
Objective	Criteria	Score	Comments
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	Effects: Reduce disparities in economic performance and promote regeneration is one of the key aims of the policy and therefore a positive effect is predicted under this objective. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	Effects: Development of new infrastructure on scale appropriate to the levels of housing development proposed will require inward investment in the Borough. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	0	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+	Effects: Refer also to Objective 9. The infrastructure may facilitate movement, but this will mainly be designed to meet the increased demand from new development rather than address existing congestion problems etc. Mitigation / Enhancement: See Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it reduce journey times between key employment areas and key transport interchanges?	0	
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: + Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+			
<p>Overall Summary</p> <p>Effects: Generally a very positive policy. Comments below seek to improve an already largely positive approach – and should be read in that context.</p> <p>Phasing of infrastructure improvements will be key to realising many of the benefits of this policy and therefore the inclusion of “by time of occupation” is welcomed. Affordability, and access for local residents, is also very important. Creation of new facilities which are not accessible to local people (either too expensive or not meeting specific local needs) may exacerbate local disparities and lead to community resentment / indifference. Also facilities / infrastructure which simply encourages trips from elsewhere within, or even outside, the Borough may have negative local impacts rather than positive ones.</p> <p>Mitigation / Enhancement: 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>			

Policy CP SS7: Sustainable Communities

Planning policies will contribute towards achieving sustainable development by:

- optimising the use of previously developed land and vacant or underused buildings
- requiring a high quality of design to facilitate higher density development
- ensuring that development occurs in locations that are accessible by public transport, walking and cycling
- ensuring that development takes account of the capacity of existing or planned infrastructure, including public transport, utilities and community infrastructure, such as schools, health, community facilities, open space and leisure.
- taking account of to the physical and environmental constraints on the development of land, including, for example, flood risk and drainage capacity and air quality and noise pollution.
- ensuring that no significant harmful impacts occur to the environment, to peoples health or to cultural and historic assets or that such impacts are acceptably mitigated
- minimising the use of energy and water, minimising waste
- ensuring an appropriate mix of dwellings that meet Brent's and London's needs
- taking into account the impacts on natural resources and promoting the use of more sustainable materials
- ensuring that development incorporates green networks as an integrated part of the wider open space network
- recognising the value and need to enhance the waterways and waterbodies in the borough and promoting the principles of the Blue Ribbon Network

Policy CP SS7: Sustainable Communities

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: This policy is predicted to have positive / major positive effect on reducing poverty and social exclusion. The policy aims to ensure that development occurs in locations that are currently, or are planned to be, accessible by public transport, walking and cycling and that development takes account of the capacity of existing or planned infrastructure, (including public transport, utilities and community infrastructure, such as schools, health, community facilities, open space and leisure). Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS6, SS7, UDI, UD2, SD2 and H2) and/or (forthcoming) development control policies.
	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: The policy requires that development takes account of the capacity of existing facilities, including health, open space and leisure. Development in locations accessible by walking and cycling likely to encourage healthier lifestyles. Mitigation / Enhancement: See Objective 1.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: See Objective 1. The policy requires that development takes account of the capacity of existing facilities, thus should ensure that there is sufficient access to education facilities. Mitigation / Enhancement: See Objective 1.
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	++	Effects: The requirements of the policy should provide for high quality design and the delivery of buildings which incorporate the key requirements of sustainable construction. Features such as energy and water efficiency will improve the long-term affordability of occupying these
	Will it encourage mixed use and range of housing tenure?	+	
	Will it reduce the number of unfit homes?	0	

Policy CP SS7: Sustainable Communities			
Objective	Criteria	Score	Comments
	Will it reduce homelessness?	0	homes. It also requires that the homes are appropriate mix to meet Brent and London's needs. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS6, SS7, SS9, UDI, UD2, SD1, SD2, ENV1, ENV2, OS1 and H2) and/or (forthcoming) development control policies. The policy only deals with new development and therefore other mechanisms, largely outside the scope of the LDF, will be required to address the efficiency / quality of the existing housing stock.
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: Overall aim is to generate functioning, well-served local communities. Design standards and sufficiency of amenities are likely to enhance satisfaction and sense of ownership. Higher densities, which the policy seeks to facilitate, can lead to noise nuisance which is included as a constraint under the policy. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UDI, UD2, SD2, ENV2, OS1, OS2 and H2) and/or (forthcoming) development control policies.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	+	
	Will it reduce noise concerns?	+	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: The need to incorporate considerations of crime within designs / and reach certain standards should be included in the development control policies.
	Will it reduce the fear of crime?	0	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: See Objective 5. Mitigation / Enhancement: See Objective 5. Involvement of local people in decisions will be important to develop community identity and foster a sense of pride in an area.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	++	Effects: By accounting for existing capacity and ensuring development in areas of good public / walking / cycling access there should be a major positive effect on accessibility of services. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	++	
	Will it make access more affordable?	+	
	Will it make access easier for those without access to a car?	++	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: The policy requires that development occurs in locations that are accessible by public transport, walking and cycling. Existing air quality and noise are also included as a constraint on development. This policy is predicted to have a positive effect on reducing the effects of traffic on the environment. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS6, SS7, SS9, UDI, UD2, SD1, SD2, ENV1, ENV2, H2 and TRN1-4) and/or (forthcoming) development control policies. Overall level of traffic will also depend on the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking or cycling?	+	

Policy CP SS7: Sustainable Communities			
Objective	Criteria	Score	Comments
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+	<p>Effects: The policy includes the requirement to ensure no significant harmful impacts to the environment and recognises the value and need to enhance the waterways and waterbodies in the Borough and promote the London Plan's Blue Ribbon Network. Explicit reference to minimising water use is not included.</p> <p>Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2 and H2) and/or (forthcoming) development control policies.</p>
	Will it reduce water consumption?	+	
11. To improve air quality	Will it improve air quality?	+	<p>Effects: See Objective 9.</p> <p>Mitigation / Enhancement: See Objective 9.</p>
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	+	
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	+	<p>Effects: The policy includes a requirement to prevent impacts to the environment and ensuring that development incorporates green networks as an integrated part of the wider open space network. Supporting text refers to need to protect biodiversity. The policy is therefore likely to have a positive effect on biodiversity.</p> <p>Mitigation / Enhancement: See Objective 5. Some species (especially birds) rely on habitats created on derelict and previously developed land. Whilst the reuse of such land in principle is recognised in policy as a more sustainable approach than using greenfield sites, the value of each site needs to be assessed.</p>
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	+?	
	Will it maintain and enhance sites designated for their nature conservation interest?	+?	
	Will it encourage protection of and increase number of trees?	+?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+	<p>Effects: See Objective 12. The policy aims to provide high quality design, and development which takes account of existing open space capacity.</p> <p>Mitigation / Enhancement: See Objective 5.</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?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	+	<p>Effects: The policy includes a requirement to ensure that no significant harmful impacts occur to cultural and historic assets. Overall the policy is predicted to have significant positive 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.</p> <p>Mitigation / Enhancement: See Objective 5.</p>
	Will it protect listed buildings?	+?	
	Will it help preserve, enhance and record archaeological features and their settings?	+?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	<p>Effects: The policy requires that development takes place in locations accessible by public transport, walking and cycling which is likely to reduce transport related energy use. It also requires that use of energy generally is minimised and drainage and flood risk are taken into account. Supporting text refers to need to address climate change. The policy is therefore likely to have positive effects on reducing greenhouse gas emissions from new development, although this represents a reduction of the overall additional amount from new buildings but there is likely to still be an increase overall.</p> <p>Mitigation / Enhancement: See Objective 9. The policy only deals with new development and therefore other mechanisms, largely outside the scope of the LDF, will be required to address the efficiency / quality of the existing housing stock.</p>
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	+	
	Will it reduce the risk of damage to property from storm events?	0	

Policy CP SS7: Sustainable Communities			
Objective	Criteria	Score	Comments
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+	<p>Effects: The policy includes specific reference to minimising waste and use of 'right / sustainable materials'.</p> <p>As above, this is more about minimising additional consumption from new development rather than reducing consumption overall (which could still increase over the plan period). However, the policy itself is likely to have positive effects (others that promote the growth have been identified as having a negative effect , e.g. policy SS3)</p> <p>Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV2, W1 and H2) and/or (forthcoming) development control policies.</p>
	Will it reduce household waste?	+	
	Will it increase waste recovery and recycling?	?	
	Will it reduce hazardous waste?	?	
	Will it reduce waste in the construction industry?	+	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	++	<p>Effects: One of the aims of the policy is optimise the use of previously developed land. This is likely to ease pressure on greenfield sites and have a major positive effect on conserving and enhancing land quality.</p> <p>Mitigation / Enhancement: See Objective 16.</p>
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	++	
	Will it ensure land is remediated as appropriate?	0	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	<p>Effects: The focus of the policy is contributing to delivering 'sustainable communities', concentrating mainly on the social and environment aspects rather than economic. However, development following the principles set out in the policy should lead to attractive, efficient and regenerated communities which in turn will make them be perceived as desirable and attractive places to live and work.</p> <p>Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS4, SS5, SS7, BIW1-BIW3, ENV2 and TRN1-4) and/or (forthcoming) development control policies.</p>
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	0	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	<p>Effects: The aim of the policy is to help facilitate the objective of achieving sustainable communities by setting out the requirements for development / regeneration in terms of the type of development, infrastructure requirements, physical / environmental constraints etc. The policy is therefore predicted to have a major positive effect under this objective.</p> <p>Mitigation / Enhancement: See Objective 18.</p>
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	<p>Effects: See objective 18.</p> <p>Mitigation / Enhancement: See objective 18.</p>
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	0	
22. To encourage efficient patterns of	Will it reduce commuting?	+	<p>Effects: The policy includes the requirement for development to be accessible by public transport, walking and cycling and for it</p>
	Will it improve accessibility to work by public transport; walking and cycling?	+	

Policy CP SS7: Sustainable Communities			
Objective	Criteria	Score	Comments
movement in support of economic growth	Will it reduce journey times between key employment areas and key transport interchanges?	+	to take account of existing and planned infrastructure, including public transport, utilities and community infrastructure. Therefore the policy should help facilitate movement and reduce journey times. Mitigation / Enhancement: See Objective 9.
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+			
Overall Summary			
<p>Effects: Overall this policy scores very positively and will have positive effects across many of the objectives as it encompasses many aspects of promoting sustainable communities.</p> <p>Mitigation / Enhancement: 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>			

Policy CP SS8: Meeting Local Community Needs
<p>The needs of both existing and new communities, such as for community facilities, shops, leisure facilities, etc., should be met by development. The Council will carry out appraisals of the key growth areas to ascertain local community needs. Such needs will be met either directly or cumulatively by securing contributions from individual schemes. This could include improvements to the public realm, community facilities, schools, health facilities, new sports provision, public open space, training, child care facilities, public transport provision, etc.</p>

Policy CP SS8: Meeting Local Community Needs			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	<p>Effects: The policy requires the provision of community facilities, shop leisure facilities and will secure contributions for improvements to improvements as listed in the policy. This will promote regeneration and therefore the policy is therefore predicted to be very positive in reducing poverty and social exclusion. Supporting text refers to need to enhance quality of life for all of Brent's diverse communities. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS6, SS7, SS10, UD1, SD2, and and/or (forthcoming) development control policies.</p>
	Will it improve affordability of essential services?	+	
2. To improve the health of the population	Will it improve access to high quality health facilities?	++	<p>Effects: Main aim is to provide services and amenities which meet local community needs. This is could include health facilities as necessary and therefore the policy is predicted to have a positive / major positive on improving health. Provision of open space / leisure facilities likely to encourage healthy lifestyles Mitigation / Enhancement: See Objective 1 – also relevant is policy OS1 regarding the protection and enhancement of open space.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education	Will it improve qualifications and skills of the population?	+	<p>Effects: See Objective 2. By ensuring sufficient facilities are</p>

Policy CP SS8: Meeting Local Community Needs			
Objective	Criteria	Score	Comments
and skills of the population	Will it improve access to high quality educational facilities?	++	available, including schools and training, the policy is predicted to have a positive / major positive on improving education and skills. Mitigation / Enhancement: See Objective 1.
	Will it help fill key skill gaps?	+	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?	0	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	Effects: Improvements 'across the board' suggested by this policy approach will have a very positive effect on communities and residential amenity. Some facilities (such as outdoor sports, schools etc) could generate localised noise impacts, but effects are uncertain Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, UD1, SD2, ENV2, OS1 and OS2) and/or (forthcoming) development control policies.
	Will it improve residential amenity and sense of place?	++	
	Will it reduce actual noise levels?	?	
	Will it reduce noise concerns?	?	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	Effects: Where sense of community improves, crime levels may fall. Increasing volume of pedestrians can be a factor in discouraging crime and anti-social behaviour. Significance of positive effects uncertain. Mitigation / Enhancement: See Objective 5.
	Will it reduce the fear of crime?	+?	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	Effects: See Objective 5. Mitigation / Enhancement: See Objective 5.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	+?	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	+?	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	++	Effects: Main aim of the policy is to ensure the needs, including relevant facilities, infrastructure and services, of both new and existing communities are met. The policy is predicted to have a major positive effect on accessibility to key services. Mitigation / Enhancement: See objective 1.
	Will it improve the level of investment in key community services?	++	
	Will it make access more affordable?	++	
	Will it make access easier for those without access to a car?	++	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: Positive effects are predicted to occur as the policy requires improvements to public transport provision. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS6, SS7, SS10, SD1, SD2, ENV1, ENV2, H2 and TRN1-4) and/or (forthcoming) development control policies. Overall level of traffic will also depend on the success of other initiatives, strategies (e.g. the Air Quality Action Plan and Local Implementation Plan) etc in the future to reduce traffic.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking or cycling?	+	

Policy CP SS8: Meeting Local Community Needs			
Objective	Criteria	Score	Comments
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?	0	
11. To improve air quality	Will it improve air quality?	+	Effects: See Objective 9. Where travel is reduced, this will have a positive impact on air quality and pollution. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	+	
	Will it reduce emissions of key pollutants?	+	
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	0	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+	Effects: Policy includes improvement of public realm and public open space where necessary, and identification of specific local needs. The policy is predicted to have a positive / major positive effect on the enhancement and quality of landscapes and townscapes. Mitigation / Enhancement: See Objective 5.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	++	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	?	Effects: Effects on the historic environment uncertain. Mitigation / Enhancement: See Objective 5.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	?	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	Effects: See Objective 9. Potential effects partly uncertain under this objective. Any positive effects will depend on the impact on traffic volumes, as transport is a major consumer of energy, and the type of facilities provided. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	?	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	0	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-?	Effects: Development of significant new local facilities will necessitate some increased material use. Significance uncertain. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, SS9, SD2, ENV2, W1 and H2) and/or (forthcoming) development control policies.
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling?	0	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	0	

Policy CP SS8: Meeting Local Community Needs			
Objective	Criteria	Score	Comments
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	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	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: See Objective 1. Improvements in local services, reflecting community needs, is likely to enhance areas as places to live and work. Providing the necessary infrastructure is an important element of regenerating the Borough, which in turn should assist promote economic growth, employment creation etc and is therefore likely to provide positive effects. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	+	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	Effects: See Objective 18. Some infrastructure may generate employment opportunities directly, others may facilitate the delivery of employment from the uses it supports. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?	+	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	0	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Reduce disparities in economic performance and promote regeneration is one of the key aims of the policy and therefore a major positive effect is predicted under this objective. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	Effects: See Objectives 18 and 19. Development of new facilities to meet community needs will require inward investment in the Borough. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	0	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+	Effects: Refer also to Objective 9. The infrastructure may facilitate movement, but this will mainly be designed to meet the increased demand from new development rather than address existing congestion problems etc. Mitigation / Enhancement: See Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?	+	
	Will it reduce journey times between key employment areas and key transport interchanges?	0	
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: Minor positive: + Neutral: 0 Minor negative: Major negative: Uncertain: ? Mixed: -/+			
Overall Summary			
Effects: A very positive policy, as it focuses on identifying (through appraisals) and then meeting local community needs. A tailored and specific approach to developing services and amenities is most likely to ensure development is appropriate in scale and type, an actually serves the requirements of the communities in question.			
Mitigation / Enhancement: There is a strong link / similarity between this policy and policy SS6: Infrastructure to support development. No significant mitigation / enhancement identified. Detailed implementation of policy will be through many of the other Core Policies and the forthcoming development control policies.			

Policy CP SS9: Protecting the Built and Natural Environment

The quality and character of the borough's built and natural environment will be protected and enhanced, and new or improved open space and nature conservation value will be provided to meet existing deficiencies and, in particular, the needs of a growing population. Development will not generally be permitted on the borough's open spaces. The character of high quality neighbourhoods will be protected from inappropriate development. New development will pay due regard to the design and scale of existing quality neighbourhoods.

Policy CP SS9: Protecting the Built and Natural Environment

Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	0	Effects: The quality of and access to open spaces and the built environment could improve wellbeing, although the policy is not expected to have a significant positive effect. Mitigation / Enhancement: None
	Will it improve affordability of essential services?	0	
2. To improve the health of the population	Will it improve access to high quality health facilities?	0	Effects: Where open space is protected and enhanced, physical activity is likely to be promoted, with health benefits associated. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS7, ENV2, OS1 and OS2) and/or (forthcoming) development control policies.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	+	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve access to high quality educational facilities?	0	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?	0	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	Effects: A factor in the quality of surroundings will be the availability of open space, areas of nature conservation value and the existing built environment. The policy also requires that design and scale of existing quality neighbourhoods, is considered. The policy is therefore predicted to have positive effect on quality of surroundings. Mitigation / Enhancement: See Objective 2.
	Will it improve residential amenity and sense of place?	+	
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?	0	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce the fear of crime?	0	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: See Objective 5. Mitigation / Enhancement: See Objective 2.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	0	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	0	
	Will it encourage people to respect and value their contribution to society?	0	
8. To improve accessibility to	Will it improve accessibility to key local services?	0	Effects: No significant effects identified.

Policy CP SS9: Protecting the Built and Natural Environment			
Objective	Criteria	Score	Comments
key services especially for those most in need	Will it improve the level of investment in key community services?	0	Mitigation / Enhancement: None
	Will it make access more affordable?	0	
	Will it make access easier for those without access to a car?	0	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+?	Effects: Where open space is more easily accessible, trip generation to access open space further afield may be reduced. Therefore there could be a minor benefit to air quality. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS7, SS8, UD1, SD2, ENV1, ENV2, H2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it increase the proportion of journeys using modes other than the car?	0	
	Will it encourage walking or cycling?	+	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?	0	
11. To improve air quality	Will it improve air quality?	+?	Effects: See Objective 9. Also, open space may provide important areas of planting, which can improve air quality. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	0	
	Will it reduce emissions of key pollutants?	0	
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	++	Effects: Key aim of policy is to protect and enhance areas of nature conservation value and therefore it is expected to have a positive effect on conserving and enhancing habitats. Mitigation / Enhancement: See Objective 2.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	+	
	Will it maintain and enhance sites designated for their nature conservation interest?	++	
	Will it encourage protection of and increase number of trees?	+?	
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	++	Effects: See Objective 12. One of the main aims of policy is to enhance and protect the built and natural environment. The policy is therefore predicted to have a major positive effect on quality of landscape and townscapes. Mitigation / Enhancement: See Objective 2.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	++	Effects: The policy aims to protect the character of the Borough, including conservation areas, and therefore is expected to have a major positive effect. The effects on listed buildings and archaeological are uncertain but expected to be positive. Mitigation / Enhancement: See Objective 2.
	Will it protect listed buildings?	+?	
	Will it help preserve, enhance and record archaeological features and their settings?	+?	
15. To reduce contributions to climate change and reduce vulnerability to	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+?	Effects: See Objective 9. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	

Policy CP SS9: Protecting the Built and Natural Environment			
Objective	Criteria	Score	Comments
climate change	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	0	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling?	0	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	0	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	++	Effects: Presumption against development on open spaces is likely to protect greenfield sites and focus development on previously developed land. Mitigation / Enhancement: See Objective 2.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure land is remediated as appropriate?	0	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	Effects: Improved / enhanced open spaces and character is likely to create areas in which are attractive to live and work in. However, potentially positive effects not considered sufficiently significant on encouraging sustainable economic growth. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS5, SS6, SS7, SS8, UD1, SD2, ENV1, ENV2 and TRN1-4) and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it provide job opportunities for those most in need of employment?	0	
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	0	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	Effects: Open space and the built and natural environment are an important aspect of regeneration. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	Effects: See Objective 18. Presumption against development on open spaces may limit some availability of business development land. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	-	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	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	
	Will it facilitate efficiency in freight distribution?	0	

Policy CP SS9: Protecting the Built and Natural Environment			
Objective	Criteria	Score	Comments
Key: Major positive: Minor positive: Neutral: 0 Minor negative: Major negative: Uncertain: ? Mixed:			
Overall Summary			
<p>Effects: A very positive policy on protecting open space and biodiversity from development and enhancing the quality of the local environment. The policy has no major negative effects. Whilst including 'presumption against' development on open space in the policy would offer stronger protection (rather than in the supporting text), it is understood that However it is very important that the possible localised negative environmental 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. in limited circumstances development related to the open space, e.g. changing facilities, be may be permitted.</p> <p>Mitigation / Enhancement: 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>			

Policy CP SS10: Implementation
<p>The Council will, when appropriate, use its Compulsory Purchase Powers to assemble sites. Where new development is likely to result in significant impacts upon the local area, S106 obligations will be sought to mitigate against these impacts, as detailed in the Supplementary Planning Document (SPD) on Planning Obligations.* This will include standard charges together with the allocation of sites and the preparation of SPD and Area Action Plans to help achieve its strategic planning aims.</p>

Policy CP SS10: Implementation			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	<p>Effects: Compulsory Purchase Powers / S106 obligations are intended to be used to ensure that developers provide facilities / development to meet the Councils planning aims. This is likely to lead to improvements in areas currently deprived, especially where new development and associated obligations are in or proximate to these areas. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS6, SS8 and CF1) and/or (forthcoming) development control policies.</p>
	Will it improve affordability of essential services?	0	
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	<p>Effects: Positive effect on health facilities, where the development of such facilities is required by planning obligations. Mitigation / Enhancement: See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?	0	
	Will it reduce health inequalities?	+	
	Will it reduce death rates?	0	
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+?	<p>Effects: Positive effect on health facilities, where the development of such facilities is required by planning obligations. Mitigation / Enhancement: See Objective 1.</p>
	Will it improve access to high quality educational facilities?	+	
	Will it help fill key skill gaps?	0	
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+	<p>Effects: Supporting text refers explicitly to meeting regenerative needs and housing growth. Using obligations to meet planning aims is likely to include affordability aspirations. Mitigation / Enhancement: See Objective 1.</p>
	Will it encourage mixed use and range of housing tenure?	+	
	Will it reduce the number of unfit homes?	0	
	Will it reduce homelessness?	0	
5. To provide everybody with good	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	<p>Effects: Main aim of the policy is to ensure that development meets spatial planning aims – of which improving residential</p>

Policy CP SS10: Implementation			
Objective	Criteria	Score	Comments
quality surroundings	Will it improve residential amenity and sense of place?	+	amenity and neighbourhoods is a key aspect. Mitigation / Enhancement: See Objective 1.
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?	0	
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce the fear of crime?	0	
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	Effects: See Objective 5. Also supporting text refers explicitly to the need for close consultation with local communities. This is likely to encourage the involvement of people in decision making, and their engagement with the planning process. Mitigation / Enhancement: See Objective 1.
	Will it foster a sense of pride in area?	+	
	Will it increase the ability of people to influence decisions?	+	
	Will it improve ethnic relations?	0	
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?	+	
	Will it encourage people to respect and value their contribution to society?	+	
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	++	Effects: Main aim of the policy is to ensure that community needs are met – through obligations where necessary. Affordability of access to the facilities are not referred to here but will clearly be important in the actual access to the new facilities. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?	+	
	Will it make access more affordable?	?	
	Will it make access easier for those without access to a car?	+	
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: Where facilities and amenities are provided through obligations in close proximity to residential areas / within residential developments, the need to travel by car should be minimised, and therefore the policy will have a positive effect. However, as such minimisation may be of additional journeys (made by new residents / population increase) the overall impact on Borough traffic volumes may be limited. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS6, SS7, SS8, SD2, ENV1, ENV2, H2, TRN2).and/or (forthcoming) development control policies.
	Will it increase the proportion of journeys using modes other than the car?	+	
	Will it encourage walking or cycling?	+	
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?	0	
11. To improve air quality	Will it improve air quality?	+?	Effects: See Objective 9. Effects will depend largely on the impact on traffic and travel. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?	+?	
	Will it reduce emissions of key pollutants?	+?	
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?	0	
	Will it maintain and enhance sites designated for their nature conservation interest?	0	
	Will it encourage protection of and increase number of trees?	0	

Policy CP SS10: Implementation			
Objective	Criteria	Score	Comments
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	Effects: See Objective 5. Mitigation / Enhancement: See Objective 5.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?	+	
	Will it maintain and strengthen local distinctiveness and sense of place?	+	
	Will it minimise visual intrusion and protect views?	0	
	Will it decrease litter in urban areas and open spaces?	0	
14. 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?	?	Effects: See Objective 5. Effects uncertain. Conserving and enhancing the historic environment is not specifically mentioned within the policy. Mitigation / Enhancement: See Objective 5.
	Will it protect listed buildings?	?	
	Will it help preserve, enhance and record archaeological features and their settings?	0	
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+?	Effects: See Objective 9 and 11. Minimal effects predicted. Mitigation / Enhancement: See Objective 9 and 11.
	Will it lead to an increased proportion of energy needs being met from renewable sources?	0	
	Will it reduce emissions of ozone depleting substances?	0	
	Will it minimise the risk of flooding from rivers and watercourses to people and property?	0	
	Will it reduce the risk of damage to property from storm events?	0	
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce household waste?	0	
	Will it increase waste recovery and recycling?	0	
	Will it reduce hazardous waste?	0	
	Will it reduce waste in the construction industry?	0	
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+?	Effects: By ensuring developments provide for local needs, the policy is likely to encourage focussed service / facilities provision, which should ease pressure to develop elsewhere. Mitigation / Enhancement: See Objective 5.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	
	Will it ensure land is remediated as appropriate?	+	
	Will it minimise the loss of soils to development?	0	
	Will it maintain and enhance soil quality?	0	
	Will it reduce the risk of subsidence?	0	
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	0	Effects: By creating well served communities with sufficient amenities and facilities the area is likely to become more attractive to businesses as a location. Mitigation / Enhancement: Implementation details are / should be covered in other policies in the Core Strategy (e.g. SS1, SS3, SS4, SS5, SS7, TRN1-4, BIW1-3 and TC1-5).and/or (forthcoming) development control policies.
	Will it improve business development and enhance productivity?	0	
	Will it improve the resilience of business and the local economy?	0	
	Will it promote growth in key sectors?	0	
	Will it promote growth in key clusters?	0	
	Will it enhance the image of the area as a business location?	+	
19. To offer everybody the	Will it reduce short and long-term local unemployment?	+?	Effects: General support for regeneration is likely to have positive

Policy CP SS10: Implementation			
Objective	Criteria	Score	Comments
opportunity for rewarding and satisfying employment	Will it provide job opportunities for those most in need of employment?	+?	long term effect on employment and possibly earnings. Mitigation / Enhancement: See Objective 18.
	Will it help to reduce long hours worked?	0	
	Will it help to improve earnings?	0	
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Regenerations is a key aim of the policy. Therefore it are predicted to have major positive effect in relation to this objective. Mitigation / Enhancement: Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0	Effects: See Objective 18. Development of new facilities etc will require some increased inward investment. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?	+	
	Will it make land and property available for business development?	0	
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+?	Effects: See Objective 9. Mitigation / Enhancement: See Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?	+?	
	Will it reduce journey times between key employment areas and key transport interchanges?	+?	
	Will it facilitate efficiency in freight distribution?	0	
Key: Major positive: Minor positive: Neutral: 0 Minor negative: Major negative: Uncertain: ? Mixed:			
Overall Summary			
<p>Effects: Overall a positive policy with no negative effects, although some effects are uncertain given the policies strategic nature. This is mainly due to the fact that these effects will depend very much on implementation, and the specific obligations required on a case by case basis.</p> <p>Mitigation / Enhancement: 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>			

Appraisal of the other policies

The other policies in the Core Strategy are:

Maintaining a Quality Environment

- CS UD1: Spatial Design Strategy
- CS UD2: Design Delivery Protocol
- CS SD1: Climate Adaptation Infrastructure
- CS 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

Meeting Housing Needs

- CP H1: Housing Provision
- CP H2: Sustainable Housing Development
- CP H3: A Balanced Housing Stock
- CP H4: Affordable Housing Provision

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

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
- CS TC1: Principal Retail Location
- CS TC1: Other Preferred Locations
- CS TC3: Exceptional Locations
- CS TC4: Town Centre Opportunity Sites
- CS TC5: Network of Town Centres
- CS CT1: Promoting Leisure and Tourism

Enabling Community Facilities

- CS CF1: Meeting the Needs of the Community

A matrix is included for each of these policies, or collections of policies as indicated by the brackets, with a score provided against each of the sustainability objectives.

Maintaining a Quality Environment

Policy CP UD1: Spatial Design Strategy

A high quality of urban design is expected in development proposals throughout the Borough. Particular regard will be had to the design of schemes within the Borough's 'Growth Areas', in 'Areas of Low Townscape or Public Realm Quality', as well as Brent's 'Transport Corridors & Gateways'.

Development proposals in these areas will be expected to:

- a. Significantly enhance the character of the local townscape and public realm within Areas of Medium-high Townscape Quality – regard should be had, however, to existing building lines and the overall scale of the area, unless there are good planning or urban design reasons for deviating from these;
- b. Make efficient use of sites with high levels of public transport accessibility, reflected in a sustainable intensity and mix of development –however, higher densities will depend on quality of design, and will only be permitted if the design is of an exemplary or exceptional standard;
- c. In Areas of Low Townscape or Public Realm Quality, to have an independence of form and design, creating where appropriate, new compositions and points of interest –making a positive design statement, including a creative use of space and materials; and
- d. Be consistent with any approved Development Framework for the Growth Area, and
- e. Make an on-site, or in-lieu, contribution towards implementation of key design or infrastructural measures in the Framework, commensurate with the scale of the proposed development.

The Council will produce, in collaboration with its partners, Development Frameworks for Growth Areas, Areas of Low Townscape or Public Realm Quality, and the Transport Corridors & Gateways.

A key consideration in assessing schemes will be the ability of applicants and their project team to commit to Brent's Design Protocol (See Policy CS UD2 below) for delivering the required quality as set out above and in other policies below, to ensure the design standards of approved schemes are implemented.

Policy CP UD2: Design Delivery Protocol

The Council will establish a Design Delivery Protocol. Significant development proposals within the Borough's Growth Areas, Areas of Low Townscape Quality, as well as Brent's Transport Corridors and Gateways, will be required to adhere to this Protocol.

Conditions incorporating its principles and procedures will form part of any planning consent. Significant developments are those on sites of 0.3 hectare or more; 1,000 sqm floorspace or more, 10 or more residential units, sites likely to have a significant impact on the public realm, major new regeneration projects, and sites affecting the setting of listed buildings.

Key elements of the Design Protocol methodology will include:

- a. A pre-application matrix showing how due account is taken of contextual issues & officer advice;
- b. The submission with applications of a comprehensive Design Statement (based upon a format and contents set out in SPG4 and any revisions) clearly setting out the scheme in its context, the design rationale / principles, a schedule of specific design measures integral to the scheme, and the main specifications / their selection criteria,
- c. The use of reputable and/or appropriately skilled architects or designers from a Council or CABE Approved Listing of those who have produced quality work; or from the RIBA Client Service's recommendation based on the Council's quality criteria;
- d. Agreement to facilitate subjecting the scheme to a Design Review Panel;
- e. Conditions based on the Design Statement, and requiring submission prior to commencement, of detailed specifications for Council approval, demonstrating that approved design quality standards will be met; and
- f. Ensuring an appropriate procurement strategy is put in place for cascading design quality requirements through the project and construction teams; and
- g. Submission of an Independent Post-construction Quality Report, as a basis for enforcement action to be taken in the event of non-compliance with approved design standards.

Note: Policies UD1 and UD2 are appraised together as they form a coherent policy position. UD1 sets out the strategy for achieving spatial design expectations, and UD2 outlines the establishment and details of a Design Delivery Protocol – which will ensure that the spatial design expectations of UD1 are adhered to between the granting of permission and completion of a development project. In essence therefore Policy UD2 seeks to ensure the realisation of UD1 – thus the sustainability implications / effects of UD1 are those which are relevant in the context of this sustainability appraisal.

CP UD1: Spatial Design Strategy / CP UD2: Design Delivery Protocol			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	<p>Effects: Quality of built the environment and design standards / quality can be an important aspect in relieving deprivation and exclusion. However impact on the most affected will depend on details of implementation, and also the enhancement of existing buildings / housing in deprived areas, as well as the standards applied to new development proposals.</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy, along with details / guidance on the Protocol.</p>
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	<p>Effects: Well designed areas, pleasant to live in and safe to move about in likely to encourage more active lifestyles, walking and cycling which should have positive effects on health. Policy UD1 makes particular reference to design within areas of low Public Realm Quality.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+	<p>Effects: Quality of design is the main aim of the policies and should contribute to delivering good quality housing. Ensuring that design is 'exemplary' in high density developments.</p> <p>Mitigation / Enhancement: See Objective 1. Care should be taken that high quality design is not used as justification by developers to limit affordability. Housing policies (H1-H4) should mitigate for this.</p>
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	<p>Effects: High quality design especially in growth areas and areas of current low townscape / public realm quality – should improve satisfaction and residential amenity. Requirement of exemplary design standards for higher density developments should ease potential noise/nuisance issues associated with high density, although this may remain as issue.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	+	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	<p>Effects: Although not explicitly mentioned design can play an important role in reducing both actual crime and fear of crime. Creating communities which encourage pedestrian movement, can be attractive and increase passive surveillance and ease some of the possible causes of anti-social behaviour.</p> <p>Mitigation / Enhancement: See Objective 1. Development control policies should include specific requirements to incorporate Security by Design principles.</p>
	Will it reduce the fear of crime?		
7. To encourage a sense of local community;	Will it encourage engagement in community activities?	+	<p>Effects: See objective 5. Supporting text refers explicitly to creating an environment Brent 'can be proud of'.</p>
	Will it foster a sense of pride in area?		

CP UD1: Spatial Design Strategy / CP UD2: Design Delivery Protocol			
Objective	Criteria	Score	Comments
identity and welfare	Will it increase the ability of people to influence decisions? Will it improve ethnic relations? Will it encourage communications between different communities in order to improve understanding of different needs and concerns? Will it encourage people to respect and value their contribution to society?		Communities which are well designed with integrated infrastructure are more likely to encourage participation in community activities and thus in long-term lead potentially to greater social cohesion and stronger social networks. Mitigation / Enhancement: See Objective 1.
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services? Will it improve the level of investment in key community services? Will it make access more affordable? Will it make access easier for those without access to a car?	+	Effects: Design can play a role in ensuring access to local services. Requirement also to be consistent with any approved proposed Development Frameworks – effects in practice will depend on content of these Frameworks. UD1 explicitly refers to need to make efficient use of sites with high levels of public transport accessibility which should have a positive effect on access to key services. Mitigation / Enhancement: See Objective 1 – Core Strategy policies of particular relevance include SS1, SS6, SS7, SS8 and H2. The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes? Will it increase the proportion of journeys using modes other than the car? Will it encourage walking or cycling?	+	Effects: Efficient use of sites with high public transport accessibility should play an important role in reducing car reliance and therefore reduce negative environmental effects. Also well designed areas / neighbourhoods can encourage walking and cycling. Mitigation / Enhancement: See Objective 1 – Core Strategy policies of particular relevance include ENV1, ENV2 and TRN2. The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water? Will it reduce water consumption?	+	Effects: Good quality, appropriate spatial design is likely to be an important contributing factor to minimising the impact on the water environment, including drainage, flood resilience, water re-use. Mitigation / Enhancement: See Objective 1 – Core Strategy policies of particular relevance include SD2, ENV1 and ENV2. The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
11. To improve air quality	Will it improve air quality? Will it help achieve the objectives of the Air Quality Management Plan? Will it reduce emissions of key pollutants?	+	Effects: Air quality likely to be improved where traffic intensity reduced by efficient use of public transport and reducing the need to travel. Mitigation / Enhancement: See Objective 9.
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency? Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it encourage protection of and increase number of trees?	++	Effects: High quality design especially in growth areas and areas of current low townscape / public realm quality – should provide opportunities to enhance and improve access to biodiversity. Mitigation / Enhancement: See Objective 1. Habitats and nature conservation are not specifically mentioned in policy, although it is covered explicitly elsewhere in Core Strategy (i.e. OS1 and OS2). The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
13. To maintain and enhance the quality of	Will it improve the landscape and ecological quality and character of open spaces?	++	Effects: Main aim of policies is encouraging highest standards of spatial design. High quality design especially in growth

CP UD1: Spatial Design Strategy / CP UD2: Design Delivery Protocol			
Objective	Criteria	Score	Comments
landscapes and townscapes	Will it enhance the quality of priority areas for townscape and public realm enhancements?		areas and areas of current low townscape / public realm quality – should provide opportunities to enhance and improve them. Explicit mention of local distinctiveness and respect for existing building lines and scales in policy UD1. Mitigation / Enhancement: See Objective 1. The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
	Will it maintain and strengthen local distinctiveness and sense of place?		
	Will it minimise visual intrusion and protect views?		
	Will it decrease litter in urban areas and open spaces?		
14. 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?	+	Effects: See Objective 13. UD1 does not explicitly mention historic environment / cultural assets, however introductory text (paragraphs 6.0.1 – 6.0.6) and UD2 does include reference to conservation areas / listed buildings. Mitigation / Enhancement: See Objective 13.
	Will it protect listed buildings?		
	Will it help preserve, enhance and record archaeological features and their settings?		
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	Effects: See Objective 11. Design can play an important role in reducing energy consumption and adaptation to climate change more generally. In the context of spatial design key factors include the orientation of buildings (solar heating / cooling), and the accessibility by means other than the car – walking and cycling in particular. Mitigation / Enhancement: See Objective 10.
	Will it lead to an increased proportion of energy needs being met from renewable sources?		
	Will it reduce emissions of ozone depleting substances?		
	Will it minimise the risk of flooding from rivers and watercourses to people and property?		
	Will it reduce the risk of damage to property from storm events?		
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+	Effects: Spatial design can play an important role in efficient resource / materials use, and in the management of waste – both that created by the construction process, and by the occupation of both residential and commercial properties. UD2 refers to 'appropriate procurement strategy' being in place to 'cascade design quality requirements through the project and construction teams'. Mitigation / Enhancement: See Objective 10.
	Will it reduce household waste?		
	Will it increase waste recovery and recycling?		
	Will it reduce hazardous waste?		
	Will it reduce waste in the construction industry?		
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?		
	Will it ensure land is remediated as appropriate?		
	Will it minimise the loss of soils to development?		
	Will it maintain and enhance soil quality?		
	Will it reduce the risk of subsidence?		
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: By creating attractive, well designed and spatially efficient (in terms of layout etc) areas, the attractiveness to businesses is likely to be enhanced, and existing businesses are likely to remain in the area. Mitigation / Enhancement: See Objective 1. The proposed Development Frameworks will also provide a mechanism to set out more detailed mitigation and enhancement.
	Will it improve business development and enhance productivity?		
	Will it improve the resilience of business and the local economy?		
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the	Will it reduce short and long-term local unemployment?	0	Effects: Dependent on the impacts related to business development

CP UD1: Spatial Design Strategy / CP UD2: Design Delivery Protocol			
Objective	Criteria	Score	Comments
opportunity for rewarding and satisfying employment	Will it provide job opportunities for those most in need of employment?		/ stability. Mitigation / Enhancement: See Objective 18.
	Will it help to reduce long hours worked?		
	Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	Effects: Main aim of the policies is to ensure highest spatial design standards in Brent – a key factor in the broader regeneration process. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	Effects: See objective 18. Mitigation / Enhancement: See objective 18.
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: ■ Uncertain: ? Mixed: -/+			
<p>Overall Summary</p> <p>Effects: Overall these policies score positively and will have positive effects across many of the objectives as they promote high quality design and aim to improve areas of poor townscape and public realm, integrate public transports and infrastructure for example. UD2 provides the mechanism to ensure that the standards of design are delivered through the use of a Design Delivery Protocol for significant developments. There are no predicted negative effects.</p> <p>The review of schemes after construction (UD2 supporting text) is considered a very positive factor in ensuring that developments adhere to the design and conditions agreed – thus helping to ensure that the design aspirations of the Core Strategy are actually met.</p> <p>Mitigation / Enhancement: 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.</p> <p>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.</p> <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>			

CP SD1: Climate Adaptation Infrastructure

An 'holistic' approach will be adopted towards developing Brent's Climate Adaptation infrastructure. The Council will produce in collaboration with its partners, a 'Climate Adaptation & Carbon Management' Programme during the Plan-period.

This will take a Boroughwide view of embedded energy generation requirements to ensure security of supplies, particularly for key services, and the need to co-ordinate the incremental provision of these, along with a 'sustainable urban drainage' and 'sustainable waste management' infrastructure from ongoing development activity in Brent (See CS ENV1).

A key development and regeneration consideration will be the ability of design proposals to enable future connectivity between related sustainable infrastructure systems within the Borough.

CP SD1: Climate Adaptation Infrastructure			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+?	<p>Effects: Indirectly, ensuring developments are 'climate-proofed' and through the encouragement of renewable energy generation / embedded energy can contribute to reducing aspects of poverty such as fuel poverty.</p> <p>Mitigation / Enhancement: More detailed policies in the Core Strategy relevant to energy include policies SD2, ENV1 and H2. The (forthcoming) development control policies should also include more detailed policies to benefit fuel poverty to help deliver this objective.</p>
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	+?	<p>Effects: A holistic approach to adaptation infrastructure should include benefits for health.</p> <p>Mitigation / Enhancement: Health implications of climate change should be considered in programme</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+?	<p>Effects: An important aspect in ensuing ongoing quality and liveability of homes will be ensuring that their construction accounts for the need to adapt to and mitigate for climate change.</p> <p>Mitigation / Enhancement: The policy aims to take a thorough wide view which is particularly positive, however in terms of improving the energy efficiency and generation the greatest influence of the DPD will be over new development. Therefore separate mechanisms will be required to deliver improvement in the existing building stock. The proposed programme to be developed with partners will help achieve this.</p>
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?		
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		

CP SD1: Climate Adaptation Infrastructure			
Objective	Criteria	Score	Comments
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	0	Effects: Policy does not explicitly refer to traffic / travel, therefore no significant effects identified. Mitigation / Enhancement: These aspects of responding to / mitigating for climate change are covered by policy ENV1 as well as TRN2, SS1 and SS7.
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+	Effects: Although not mentioned in policy, implicit in climate adaptation will be smarter use of water. Policy explicitly refers to sustainable urban drainage. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+?	Effects: More efficient homes and buildings, embedded energy generation and a 'holistic' approach to Climate Adaptation Infrastructure may lead to air quality improvements – though this depends on how this is implemented in practice. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV1, ENV2, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it help achieve the objectives of the Air Quality Management Plan?		
	Will it reduce emissions of key pollutants?		
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it enhance the quality of priority areas for townscape and public realm enhancements?		
	Will it maintain and strengthen local distinctiveness and sense of place?		
	Will it minimise visual intrusion and protect views?		
	Will it decrease litter in urban areas and open spaces?		
14. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it protect listed buildings?		
	Will it help preserve, enhance and record archaeological features and their settings?		
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	++	Effects: Key aim of policy (particularly when taken with SD2) and is predicted to have a major positive effect on reducing vulnerability to climate change. Mitigation / Enhancement: See Objective 11. As the policy is concerned with reducing emissions etc, the title could more accurately refer to mitigation as well as adaptation.
	Will it lead to an increased proportion of energy needs being met from renewable sources?		
	Will it reduce emissions of ozone depleting substances?		

CP SD1: Climate Adaptation Infrastructure			
Objective	Criteria	Score	Comments
	Will it minimise the risk of flooding from rivers and watercourses to people and property?		
	Will it reduce the risk of damage to property from storm events?		
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+?	<p>Effects: Policy explicitly refers to sustainable waste management infrastructure, and implementation of the programme has the potential to have positive effects on waste management.</p> <p>Mitigation / Enhancement: As part of the programme, consideration should be given to the effects of higher temperatures, which are predicted under climate change, and the necessary response in terms of infrastructure and managing waste. The policy may not reduce production of waste per se as specified in the objective, but how it is managed.</p>
	Will it reduce household waste?		
	Will it increase waste recovery and recycling?		
	Will it reduce hazardous waste?		
	Will it reduce waste in the construction industry?		
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0/+	<p>Effects: Increased subsidence is one predicted climate change impact (due to increased soil shrinkage / ground swell). Although not explicitly mentioned in policy or supporting text it is assumed that this would be addressed through the adaptation strategy. Subsidence is given detailed attention in the GLA Climate Change Checklist for Development referred to in supporting text.</p> <p>Future connectively may need safeguarding land to allow provision of future infrastructure and due to impacts e.g. flood risk management.</p> <p>Mitigation / Enhancement: As part of the programme, consideration should be given to the need to safeguard land due to the effects of climate change.</p>
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?		
	Will it ensure land is remediated as appropriate?		
	Will it minimise the loss of soils to development?		
	Will it maintain and enhance soil quality?		
	Will it reduce the risk of subsidence?		
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	<p>Effects: Increased infrastructure resilience to climate change is an important part of economic resilience – in particular minimising the potential disruptive impacts of climate change events (such as storms, drought, heat etc.) and also reducing reliance on increasingly costly energy supplies.</p> <p>Mitigation / Enhancement: As part of the programme, consideration should be given to how business should respond to the effects of climate change.</p>
	Will it improve business development and enhance productivity?		
	Will it improve the resilience of business and the local economy?		
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it provide job opportunities for those most in need of employment?		
	Will it help to reduce long hours worked?		
	Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	<p>Effects: An integrated adaptation programme should help protect land and businesses from the impact of climate change. Use of climate proofing and sustainable drainage techniques, for example, should help ensure the viability of future sites and premises in light of predicted climate change impacts.</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it encourage inward investment?		
	Will it make land and property available for business development?		

CP SD1: Climate Adaptation Infrastructure			
Objective	Criteria	Score	Comments
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: + Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+			
Overall Summary			
<p>Effects: A positive policy from a sustainability perspective, with no negative effects predicted. An integrated approach to providing infrastructure to adapt to climate change will improve the resilience of the Borough to future impacts. The policy specifically mentions the need to consider embedded energy generation, sustainable urban drainage and waste management within development.</p> <p>However, in practice the actual effects of the policy over the plan period will depend largely on the detailed proposals set out in the proposed Climate Adaptation and Carbon Management Programme and its subsequent implementation. Clearly many of the adaptation and mitigation required will be beyond the scope of the Core Strategy DPD, as well as other DPDs and SPDs, and the Borough will need to work in partnership with many other organisations.</p> <p>Mitigation / Enhancement: 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>			

CP SD2: Sustainable Design and Construction

All development is expected to contribute towards achieving sustainable development, including climate change mitigation and adaptation. Particular regard to climate adaptation measures (See CS ENV1) will be expected of proposals in, and adjacent to, flood-risk areas (as defined by the Environment. Agency) and in the Borough's Growth Areas.

A 'Sustainability & Climate Mitigation and Adaptation' Strategy is required for new development, extensions and refurbishment proposals. This should demonstrate that all the following matters (relevant to the nature and scale of the proposal) have been adequately addressed at the design stage:

- Energy Efficiency & Renewables, (DC Policy SD3);
- Water Management & Sustainable Drainage (DC Policy ENV5-ENV6);
- Sustainable Materials (DC Policy SD5);
- Landscape & Biodiversity (DC Policy SD6);
- Sustainable Demolition & Construction (DC Policy SD7);
- Operational Waste Management (DC Policy SD8);
- Pollution Control (DC Policies ENV1, ENV2 & ENV4).

The strategy should include an appraisal of the proposal using the Brent / London Checklist, and / or an alternative, recognised methodology. Major schemes are expected to achieve 'Excellent' on these assessments. Other schemes will be expected to achieve a minimum (equivalent) rating of 'Very Good'.

Note: this policy refers throughout to development control policies for specific implementation standards / proposals. At the time of the appraisal of the Core Strategy Preferred Options a final drafts of these development control policies are not been available so appraisal below is based on the specific text in SD2 alone.

CP SD2: Sustainable Design and Construction			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	<p>Effects: Developments built to 'excellent' standards are likely to contribute to reducing poverty and social exclusion, particularly by alleviating fuel poverty. The impact of this on those most in need may be limited as this will apply mainly to major new developments, although many of these will need to be affordable under policy H4.</p> <p>Mitigation / Enhancement: This policy refers to extensions and refurbishment proposals which are positive, however the retrofitting of existing properties will be required to improve the performance of the Borough's housing stock generally – although this is likely to be outside the scope of the DPD. The implementation of other Core Strategy policies (e.g. SS1, SS7, ENV1, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	+?	<p>Effects: Health benefits could be derived from better quality buildings, due to improvement such as energy efficiency, ventilation, consideration of the construction materials used / internal pollution and the replacement of unfit homes.</p> <p>Mitigation / Enhancement: Reference to improving health should be considered as an objective of sustainable construction and included in the forthcoming development control policies.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+	<p>Effects: See Objective 1 and 2. Highest standards of sustainable construction as set out in existing guidance is likely to increase the quality of construction and materials used.</p> <p>Mitigation / Enhancement: The Borough will need to work with developers so that higher design / sustainability standards and climate proofing are not used to justify reduced provision of affordable housing due to any additional costs, of sustainable construction.</p>
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	<p>Effects: Improving "Landscape and Biodiversity" which are included in the policy are likely to have some benefits for the improving the quality of surroundings</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. OS1 and OS2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	<p>Effects: N/a</p> <p>Mitigation / Enhancement: The need to consider crime as part of design and meeting Secured by Design Standard should be included in the development control policies.</p>
	Will it reduce the fear of crime?		

CP SD2: Sustainable Design and Construction			
Objective	Criteria	Score	Comments
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: See Objectives 1 and 4. Mitigation / Enhancement: The need to engage with local people and stakeholders as part of developing major schemes and regeneration proposals could be referred to in the supporting text.
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: The Sustainability and Climate Mitigation and Adaptation Strategy should incorporate reducing the need to travel, the location of public transport etc and therefore should have a beneficial effect by reducing the effects of traffic. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+	Effects: Policy refers to DC policies ENV5 and ENV6 covering Water Management and Sustainable Drainage. Both should reduce water consumption and improve water quality associated with new developments. Mitigation / Enhancement: This policy refers to extensions and refurbishment proposals which are positive, however the retrofitting of existing properties will be required to improve the performance of the Borough's housing stock generally – although this is likely to be outside the scope of the DPD. The implementation of other Core Strategy policies (e.g. SS1, SS7, ENV1, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+	Effects: Policy refers to Pollution Control (DC policies ENV1, 2 and 4), and Energy Efficiency and Renewables (DC policy SD3). These should ensure that air quality is protected and pollution minimised. Mitigation / Enhancement: N/a
	Will it help achieve the objectives of the Air Quality Management Plan?		
	Will it reduce emissions of key pollutants?		
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	+	Effects: Policy refers to Landscape and Biodiversity (DC policy SD6) and therefore positive effects on biodiversity are likely. Improvements could include tree planting, landscaping schemes, green roofs etc. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS9, OS1 and OS2) and the forthcoming development control policies will support / enhance this policy.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of	Will it improve the landscape and ecological quality and character of open spaces?	+	Effects: As above (Objective 12) Mitigation / Enhancement:

CP SD2: Sustainable Design and Construction			
Objective	Criteria	Score	Comments
landscapes and townscapes	Will it enhance the quality of priority areas for townscape and public realm enhancements?		As above (Objective 12)
	Will it maintain and strengthen local distinctiveness and sense of place?		
	Will it minimise visual intrusion and protect views?		
	Will it decrease litter in urban areas and open spaces?		
14. 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?	+?	Effects: As above (Objective 12) Mitigation / Enhancement: As above (Objective 12)
	Will it protect listed buildings?		
	Will it help preserve, enhance and record archaeological features and their settings?		
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	++	Effects: The Sustainability and Climate Mitigation and Adaptation Strategy should help deliver positive effects. Energy efficiency and renewables (DC SD3) and sustainable design and construction aspirations of the policy have central aim of reducing energy consumption and emissions of greenhouse gases. Magnitude of effects will depend to a large extent on development control policies referred to in policy text. Supporting text (6.2.3, 6.2.4 and 6.2.5) refers to renewables targets and specific renewable installations as described in the Mayors Energy Strategy. Mitigation / Enhancement: See comments below under overall summary. The implementation of other Core Strategy policies (e.g. SS1, SS7, ENV1 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it lead to an increased proportion of energy needs being met from renewable sources?		
	Will it reduce emissions of ozone depleting substances?		
	Will it minimise the risk of flooding from rivers and watercourses to people and property?		
	Will it reduce the risk of damage to property from storm events?		
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+	Effects: Policy explicitly refers to Sustainable Materials, Sustainable Demolition and Construction, Operational Waste Management and Pollution Control. Although the detail of these will be set out in development control policies they should all contribute to minimising waste and non-renewable resource use of new development. Mitigation / Enhancement: Effect on overall borough waste production and resource use will depend on the enforcement of standards and aspirations across all schemes. The implementation of other Core Strategy policies (e.g. SS1, SS7, ENV1, H2 and W1) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce household waste?		
	Will it increase waste recovery and recycling?		
	Will it reduce hazardous waste?		
	Will it reduce waste in the construction industry?		
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: Appraisal against existing climate change / sustainability checklists should mitigate against soil damage and subsidence risks. Mitigation / Enhancement: The implementation of the forthcoming development control policies will support / enhance this policy.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?		
	Will it ensure land is remediated as appropriate?		
	Will it minimise the loss of soils to development?		
	Will it maintain and enhance soil quality?		
	Will it reduce the risk of subsidence?		
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: Climate change resilience is a factor in ensuring a stable economy in light of predicted climate impacts. Resilience of infrastructure and buildings will be important in maintaining a working local economy.
	Will it improve business development and enhance productivity?		

CP SD2: Sustainable Design and Construction			
Objective	Criteria	Score	Comments
	Will it improve the resilience of business and the local economy?		Reducing reliance on external fuel / energy supplies, which could become increasingly costly / unpredictable, can also enhance economic resilience. Mitigation / Enhancement: N/a
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it provide job opportunities for those most in need of employment?		
	Will it help to reduce long hours worked?		
	Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+?	Effects: High standards of construction and design likely to contribute to overall regeneration efforts. Building resilient properties and infrastructure will ensure that regeneration efforts are as resilient as possible to climate change impacts. Mitigation / Enhancement: N/a
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+?	Effects: See objective 18. Mitigation / Enhancement: N/a
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+?	Effects: Policy could have some effects to help reduce the need to travel etc and therefore reduce commuting. Mitigation / Enhancement: N/a
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: ■ Uncertain: ? Mixed: -/+			
Overall Summary			
Effects: A positive policy from a sustainability perspective, with no negative effects predicted. Thus mitigation / enhancement comments outlined below should be seen in this context.			
In practice the actual effects of the policy over the plan period will depend largely on the success of implementing the Sustainability and Climate Mitigation and Adaptation Strategy and the detailed Development Control policies referred to. The actual effects therefore of the implementation of policy SD2 will depend upon the detail contained in these DC policies and implementing these policies.			
Mitigation / Enhancement: 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.			
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.			
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:			
<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, 			

CP SD2: Sustainable Design and Construction			
Objective	Criteria	Score	Comments
	<ul style="list-style-type: none"> 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 support for local integrated recycling schemes, CHP schemes and other treatment options. encourage major developments to incorporate living roofs and walls where feasible reduce adverse noise impacts 		

CP ENV1: Climate Change
<p>The Council will expect development to take account of the potential impacts of climate change in any new development through mitigation measure such as:</p> <ul style="list-style-type: none"> promoting the renewable energy generation within developments and at a larger scale (see policy DC ENV 7); seeking to reduce 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); and seeking to reduce harmful emissions from new development and refurbishments (see policy CP SD2) . <p>and, through adaptation measures such as:</p> <ul style="list-style-type: none"> minimising flood risk (see policy DC ENV 6); climate proofing all policies and developments.
<p>Note: as with policy SD2, the specific implementation points set out in this policy refer to individual DC policies. Thus the specific effects will also depend on the details and implementation of these policies.</p>

CP ENV1: Climate Change			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected? Will it improve affordability of essential services?	+	<p>Effects: Construction to reflect climate change mitigation is likely to benefit fuel poverty by improving insulation and energy efficiency however as policy will focus is new development as opposed to improving existing stock to scale of positive impact will be limited. The impact on cost and affordability of homes could be a negative effect, but running costs should be reduced.</p> <p>Mitigation / Enhancement: Energy efficiency (a key factor in fuel poverty) is not mentioned in policy, although it is in supporting text (6.3.4). See comments below under overall comments.</p>
2. To improve the health of the population	Will it improve access to high quality health facilities? Will it encourage healthy lifestyles and provide opportunities for sport and recreation? Will it reduce health inequalities? Will it reduce death rates?	+	<p>Effects: Climate change is likely to have impacts on health and benefits could result by reducing fuel poverty (see above), pollution and managing flood risk etc.</p> <p>Mitigation / Enhancement: In the detailed development control policies, health implications of climate change should be considered.</p>
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population? Will it improve access to high quality educational facilities? Will it help fill key skill gaps?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing? Will it encourage mixed use and range of housing tenure? Will it reduce the number of unfit homes?	0/+	<p>Effects: See Objective 1.</p> <p>Mitigation / Enhancement: None</p>

CP ENV1: Climate Change			
Objective	Criteria	Score	Comments
5. To provide everybody with good quality surroundings	Will it reduce homelessness?	0/+	Effects: See Objective 1. Mitigation / Enhancement: None
	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?		
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?		
6. To reduce crime and anti-social activity	Will it reduce noise concerns?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce actual levels of crime?		
7. To encourage a sense of local community; identity and welfare	Will it reduce the fear of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage engagement in community activities?		
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
8. To improve accessibility to key services especially for those most in need	Will it encourage people to respect and value their contribution to society?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve accessibility to key local services?		
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
9. To reduce the effect of traffic on the environment	Will it make access easier for those without access to a car?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce traffic volumes?		
	Will it increase the proportion of journeys using modes other than the car?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it encourage walking or cycling?	+	Effects: Policy seeks to reduce the need to travel (refers to policy DC ENV1) through development. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it improve the quality of inland water?		
11. To improve air quality	Will it reduce water consumption?	0	Effects: The policy as written is likely to have minimal effects on water conserve and water quality. These could be covered under this policy. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD1, SD2, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy. See comments below under overall summary – additional adaptations to climate change could be covered by the policy to increase its scope.
	Will it improve air quality?		
	Will it help achieve the objectives of the Air Quality Management Plan?		
12. To conserve and enhance biodiversity	Will it reduce emissions of key pollutants?	+	Effects: Positive effects on air quality from reducing the need to travel and renewable energy related requirements. Policy also explicitly seeks to reduce 'harmful' emissions from new development and refurbishments. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD1, SD2, ENV2, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?		
12. 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	Effects: The policy as written is likely to have minimal effects on conserving and enhancing biodiversity. Although climate change could have an impact on biodiversity and therefore

CP ENV1: Climate Change			
Objective	Criteria	Score	Comments
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it encourage protection of and increase number of trees?		adaptation is need. Mitigation / Enhancement: Promoting adaptation to the impacts of climate change on biodiversity should be considered and therefore it is recommended that the biodiversity and climate change are considered in the forthcoming development control policies.
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces? Will it enhance the quality of priority areas for townscape and public realm enhancements? Will it maintain and strengthen local distinctiveness and sense of place? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?	0	Effects: Related to the biodiversity above, climate change impacts could also affect the landscape. Mitigation / Enhancement: It is recommended that the climate change impacts on landscape are considered in the forthcoming development control policies.
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	0	Effects: Climate change impacts could also affect the historic environment (e.g. through additional subsidence). Mitigation / Enhancement: It is recommended that the climate change impacts on the historic environment are considered in the forthcoming development control policies.
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?	+	Effects: Adapting to climatic changes is one of the main aims of the policy. Renewable energy generation is promoted, along with reducing the need to travel, particularly by car. However energy efficiency is only mentioned in supporting text, but is a factor which may also have a significant affect on climate change contributions. Mitigation / Enhancement: The positive effects of the policy be maximised by covering a more comprehensive set of types of mitigation and adaptation (see comments below under overall summary). Energy efficiency could be brought into main policy text, for example. The implementation of other Core Strategy policies (e.g. SS1, SS7, SD1, SD2, ENV2, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources? Will it reduce household waste? Will it increase waste recovery and recycling? Will it reduce hazardous waste? Will it reduce waste in the construction industry?	0	Effects: The policy as written is likely to have minimal effects on waste / resource use, however climate change could impact upon waste management. Mitigation / Enhancement: Whilst more related to waste management than minimising the production of waste which is the focus of the objective, consideration of the need for adaptation in waste management could be covered in the forthcoming development control policies and would enhance this policy.
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings? Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?	0	Effects: The policy as written is likely to have minimal effects on conserve and enhance land quality and soil resources. Mitigation / Enhancement: Climate proofing could include consideration of subsidence, however the specific details of climate proofing proposed are not specified so it is unclear if it would be covered. See overarching mitigation / enhancement comments below.

CP ENV1: Climate Change			
Objective	Criteria	Score	Comments
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: Adaptation to climate change will ensure local businesses / the local economy is more resilient to its potential impacts. Mitigation / Enhancement: As the scope for adaptation to climate change will be wider than the DPD, or the Borough as a whole, can address partnership working will be required. This will be facilitated by the Climate Adaptation and Carbon Management Programme (policy SD1).
	Will it improve business development and enhance productivity?		
	Will it improve the resilience of business and the local economy?		
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it provide job opportunities for those most in need of employment?		
	Will it help to reduce long hours worked?		
	Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	Effects: Reducing the need to travel and promoting sustainable construction as part of climate change adaptation and mitigation will have benefits for regeneration. Mitigation / Enhancement: None
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	Effects: Climate change could impact on investment, availability of land etc through increased flood risk, subsidence etc and therefore seeking to take account of these in development proposals should have a positive effect. Mitigation / Enhancement: The positive effects of the policy be maximised by covering a more comprehensive set of types of mitigation and adaptation (see comments below under overall summary).
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+	Effects: Policy refers to seeking to reduce the need to travel, especially journeys by private vehicles and therefore could have a positive effect on efficient movement. Mitigation / Enhancement: One way to ensure this would be through more local employment – thus reducing commuting and travel needs. The implementation of other Core Strategy policies (e.g. SS1, SS7, SD1, SD2, ENV2, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: ■ Major negative: ■ Uncertain?: ■ Mixed: +/-			
Overall Summary Effects: Ensuring new development takes account of the potential impacts of climate change and seeks to minimise exacerbating it in the future is a positive policy from a sustainability perspective, with no negative effects predicted. However, the policy could be made more robust by including a more comprehensive list of types of climate change mitigation and adaptation that should be taken into account (see below). Mitigation / Enhancement: 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: Mitigation: <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) 			

CP ENV1: Climate Change			
Objective	Criteria	Score	Comments
<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>			

CP ENV2: Protecting the Environment			
<p>The council will seek to protect and enhance the environment and amenity of the borough through:</p> <p>i) using its powers to prevent potentially polluting development arising from or affecting any land use (see policies DC ENV 1 -3 & 5);</p> <p>ii) encouraging development that enhances the quality of the natural and built environment;</p> <p>iii) seeking the remediation and re-use of contaminated land (policy DC ENV4) ; and</p> <p>iv) encouraging development that uses sustainable design and construction techniques (see CP SD2) and makes efficient use of resources .</p> <p>Development Control policies DC ENV 1-7 seek to achieve these aims. Developments will be expected to meet the requirements of these policies and to achieve best practice in terms of sustainability wherever possible.</p>			
<p>Note: Relationship to DC policies ENV 1 – 7 is fundamental to the implementation and therefore sustainability effects of this policy.</p>			

CP ENV2: Protecting the Environment			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	<p>Effects: Best practice in sustainable design and construction, reducing pollution and increased environmental amenity are likely to create specific developments / housing which better meet the needs of residents and could play a role in reducing social exclusion and deprivation.</p> <p>Mitigation / Enhancement: It is important that the beneficial effects of higher standards in design and construction etc impact on those most in need / most deprived, not just those able to take advantage / move to areas where new development is required to meet such standards. These standards therefore need to form part of regeneration schemes, affordable housing etc.</p>
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	<p>Effects: An enhanced environment, preventing pollution and remediation of contaminated land should all have a positive benefit on health.</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, OS1, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		

CP ENV2: Protecting the Environment			
Objective	Criteria	Score	Comments
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: Improved health could have indirect, but relatively minimal, positive benefits on education. Mitigation / Enhancement: None
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+?	Effects: See Objective 1. Mitigation / Enhancement: See Objective 1. Seeking opportunities to retrofit the existing housing stock, which may be beyond the scope of the DPD, would provide wider benefits.
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: See Objective 1. Supporting text refers to DC ENV 1-7 and specifically to mitigate significant impacts including noise and vibration. Mitigation / Enhancement: See Objective 1 and 2.
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	+	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+?	Effects: See Objective 1. An enhanced environment could also lead to an increased sense of pride in an area. Mitigation / Enhancement: See Objective 1 and 2.
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	0	Effects: Policy unlikely to have a direct effect on reducing traffic. Mitigation / Enhancement: Several other policies specifically seek to reduce the need to travel and promote public transport, walking and cycling e.g. SS1, SS7, ENV1, H2 and TRN2).
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+	Effects: Key aim of this policy is the prevention of pollution and enhancement of built and natural environment. Water quality is referred to in supporting text (which refers to DC policies ENV 1-7). Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+	Effects: Key aim of this policy is the prevention of pollution. Supporting text refers to DC policies ENV 1-7 including aim
	Will it help achieve the objectives of the Air Quality Management Plan?		

CP ENV2: Protecting the Environment			
Objective	Criteria	Score	Comments
	Will it reduce emissions of key pollutants?		to prevent and mitigate pollution impacts arising from development on air quality. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1, H2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency? Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it encourage protection of and increase number of trees?	+	Effects: Prevention of polluting activities, enhancement of natural (and built) environment and the remediation and reuse of contaminated land all specifically required by policy – are likely to have beneficial impacts on habitats and species. Mitigation / Enhancement: Consideration of the biodiversity value of brownfield sites and enhancing biodiversity through habitat creation as part of development projects should be promoted through the implementation of other Core Strategy policies (e.g. SS9, OS1, OS2 and H2) and the forthcoming development control policies to support / enhance this policy.
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces? Will it enhance the quality of priority areas for townscape and public realm enhancements? Will it maintain and strengthen local distinctiveness and sense of place? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?	+	Effects: Enhancement of quality of built and natural environment Developments that make use of sustainable design and construction techniques are likely to be an important factor in improving townscape, public realm and landscape quality. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS9, OS1, OS2 and H2) and the forthcoming development control policies will support / enhance this policy.
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	+	Effects: See Objective 13. Mitigation / Enhancement: See Objective 13.
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?	+	Effects: Climate change mitigation and adaptation benefits will be realised through use of sustainable design and construction techniques and efficient use of resources. Although there is no reference to energy use and efficiency in the policy. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1 and H2) and the forthcoming development control policies will support / enhance this policy.
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources? Will it reduce household waste? Will it increase waste recovery and recycling? Will it reduce hazardous waste? Will it reduce waste in the construction industry?	+	Effects: Policy should have a positive affect on the efficient use of resources and sustainable design and construction techniques. No explicit reference to waste generation and management in the policy. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, ENV1, SD2, W1 and H2) and the forthcoming development control policies will support / enhance this policy.
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?	+	Effects: Policy seeks to remediate and re-use contaminated land. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1 and SS7) and the forthcoming development control policies will support / enhance this policy.

CP ENV2: Protecting the Environment			
Objective	Criteria	Score	Comments
	Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?		
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people? Will it improve business development and enhance productivity? Will it improve the resilience of business and the local economy? Will it promote growth in key sectors? Will it promote growth in key clusters? Will it enhance the image of the area as a business location?	+	Effects: As with policies SD1 – SD2 and ENV 1 – ensuring that development is as resilient to change as possible, efficient and attractive – are all key factors in promoting the area as a business location, and ensuring that businesses, and workers remain in the area and it attracts investment. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1, OS1, OS2 and H2) and the forthcoming development control policies will support / enhance this policy.
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked? Will it help to improve earnings?	0/+?	Effects: See Objective 18. Could have indirect beneficial employment effects. Mitigation / Enhancement: None
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	Effects: A key outcome of successful implementation of higher environmental standards in design and construction will be improved buildings, space and places to live and work. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SD2, ENV1, OS1, OS2 and H2) and the forthcoming development control policies will support / enhance this policy.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business? Will it encourage inward investment? Will it make land and property available for business development?	+	Effects: See objective 18. Mitigation / Enhancement: See objective 18.
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting? Will it improve accessibility to work by public transport; walking and cycling? Will it reduce journey times between key employment areas and key transport interchanges?	0	Effects: Policy unlikely to have a direct effect on improving movement. Mitigation / Enhancement: Several other policies specifically seek to reduce the need to travel and promote public transport, walking and cycling e.g. SS1, SS7, ENV1, H2 and TRN2).
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: ■ Uncertain: ? Mixed: -/+			
Overall Summary			
Effects: A positive policy from a sustainability perspective, with no negative effects predicted. There are likely to be direct positive effects related to improving the environment, but also indirect effects of improving the environment on social and economic objectives. The nature of the specific effects and the realisation of these positive effects will be largely dependant on the details set out in the forthcoming development control policies (DC policies ENV 1-7) and their implementation.			
Mitigation / Enhancement: 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.			
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			

CP ENV2: Protecting the Environment			
Objective	Criteria	Score	Comments
sustainability perspective, The policy would be strengthened if this qualification was removed.			

CP OS1: Protection and Enhancement of Open Space and Biodiversity
All open space will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well being of Brent's residents, visitors and wildlife. Support will be given to the enhancement and management of open space for recreational and amenity use, and the improvement of sites for biodiversity and nature conservation. New or improved provision will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created.
CP OS2: Promotion of Biodiversity and Nature Conservation
Biodiversity of all plants, animals and species will be promoted, and priority given to habitats and species listed within the Regional or Local Biodiversity Action Plan. Existing habitats will be protected, including those designated to be of important nature conservation value, and enhancements will be sought in new developments. Public access, particularly the routes and paths that form the Metropolitan Walk Network, will be encouraged for a wider appreciation of nature and wildlife.
These policies have been appraised together.

CP OS1: Protection and Enhancement of Open Space and Biodiversity / CP OS2: Promotion of Biodiversity and Nature Conservation			
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: In terms of open space and opportunities for outdoor play and recreation – policies and supporting text seek to enhance existing, and provide new open spaces which are accessible by walking and cycling, particularly in areas where there is current deficiency. These are important factors in enhancing quality of life and wellbeing of local residents and are likely to alleviate some of the effects of poverty and social exclusion. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7 and H2) and the forthcoming development control policies will support / enhance this policy.
	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: Improved quality, greater provision, and easier access to open spaces and outdoor play areas are likely to encourage physical activity. Positive health benefits and opportunities for sport and recreation. The enhancement of the Metropolitan Walk Network in the borough could have health benefits. Mitigation / Enhancement: See Objective 1.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: No effects identified. Mitigation / Enhancement: Opportunities for environmental education could be incorporated into enhancement and provision of open space e.g. provision of signage. This could be incorporated in the development control policies.
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		

CP OS1: Protection and Enhancement of Open Space and Biodiversity / CP OS2: Promotion of Biodiversity and Nature Conservation			
Objective	Criteria	Score	Comments
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+ / ++	Effects: Open space and the natural environment are important factors in the amenity of residential areas and the creation of neighbourhoods which are good to live in. Positive effects are therefore likely to result from enhancement and creation of open space. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, UD2 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified Mitigation / Enhancement: The development control policies could include requirements to consider safety issues in the design of open space etc.
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+ ?	Effects: Enhancing the quality of open spaces and the natural and built environment could contribute to local pride and engagement – especially where new open spaces are created in areas of previous deficient, or where existing open spaces are enhanced. Mitigation / Enhancement: Where new areas of open space are created or existing areas enhanced, the local residents and businesses should be involved in the process.
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: By improving the quality of existing open spaces and providing new space in current areas of deficit, some trips currently made to access open space elsewhere are likely to be avoided, although in terms of traffic volume this is likely to be a very minor benefit The Metropolitan Walks Network and general enhancement of open spaces and corridors are likely to encourage walking, and cycling where facilities are provided. Mitigation / Enhancement: In planning new or enhanced areas of open space, consideration could be given to accessibility by public transport, walking and cycling. This could be dealt with in the forthcoming development control policies or subsequent guidance (e.g. in the form of SPDs).
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+	Effects: Open space plays an important role in the regulation of the water cycle. An increase in permeable surfaces (perhaps achieved through new provision in open space deficient areas) will benefit groundwater recharge and may reduce local flood risk. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV1 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+	Effects: Trees and other vegetation play an important role in mitigating poor air quality.
	Will it help achieve the objectives of the Air Quality Management Plan?		

CP OS1: Protection and Enhancement of Open Space and Biodiversity / CP OS2: Promotion of Biodiversity and Nature Conservation			
Objective	Criteria	Score	Comments
	Will it reduce emissions of key pollutants?		Mitigation / Enhancement: None
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	++	Effects: Key aim of policy OS2 is to conserve and enhance biodiversity. Mitigation / Enhancement: Trees could be explicitly mentioned as an important aspect of the biodiversity.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	++	Effects: Key aim of policy OS1 is to enhance / improve quality of open space. Open and green space is an important element of the public realm and local distinctiveness and sense of place. Mitigation / Enhancement: None
	Will it enhance the quality of priority areas for townscape and public realm enhancements?		
	Will it maintain and strengthen local distinctiveness and sense of place?		
	Will it minimise visual intrusion and protect views?		
	Will it decrease litter in urban areas and open spaces?		
14. 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?	+?	Effects: Enhancing open space may provide opportunities the historic environment and cultural assets. Mitigation / Enhancement: None
	Will it protect listed buildings?		
	Will it help preserve, enhance and record archaeological features and their settings?		
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	Effects: See Objectives 9 and 10. Trees and vegetation may provide a carbon sink function. Open space / semi natural habitats play an important role in flood risk management. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV1 and H2) and the forthcoming development control policies will support / enhance this policy.
	Will it lead to an increased proportion of energy needs being met from renewable sources?		
	Will it reduce emissions of ozone depleting substances?		
	Will it minimise the risk of flooding from rivers and watercourses to people and property?		
	Will it reduce the risk of damage to property from storm events?		
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce household waste?		
	Will it increase waste recovery and recycling?		
	Will it reduce hazardous waste?		
	Will it reduce waste in the construction industry?		
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	Effects: The policy seeks to protect open space from development and therefore development on greenfield sites should be largely avoided. Mitigation / Enhancement: None
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?		
	Will it ensure land is remediated as appropriate?		
	Will it minimise the loss of soils to development?		
	Will it maintain and enhance soil quality?		
	Will it reduce the risk of subsidence?		

CP OS1: Protection and Enhancement of Open Space and Biodiversity / CP OS2: Promotion of Biodiversity and Nature Conservation			
Objective	Criteria	Score	Comments
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	Effects: Indirectly, by creating open spaces and habitats, it will improve the quality of the environment and create communities in which people want to live and work. Businesses more likely to locate to an area with high quality of life and attractive surroundings. Mitigation / Enhancement: None
	Will it improve business development and enhance productivity?		
	Will it improve the resilience of business and the local economy?		
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it provide job opportunities for those most in need of employment?		
	Will it help to reduce long hours worked?		
	Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+?	Effects: Providing open space / habitat improvements could be incorporated into regeneration proposals. Mitigation / Enhancement: None
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+/-	Effects: See Objective 18. Creating new and protecting existing open space may conflict with making land available for industrial / business uses. Mitigation / Enhancement: None
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+?	Effects: Metropolitan Walk Network and enhanced open space generally may encourage more people to walk to work, where this is practicable. Mitigation / Enhancement: None
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+			
Overall Summary			
Effects:			
<p>A positive policy from a sustainability perspective, with no negative effects predicted. The effects of protecting open space from inappropriate development, creating new or improved open space in current areas of deficiency and additional pressure and protecting and creating habitats are likely to include direct positive effects on biodiversity and the quality of the public realm, which in turn could have many other benefits such as an enhancing the quality of life and wellbeing of the local residents, providing the conditions to attract economic development and employment uses and providing a carbon and pollution sink.</p>			
Mitigation / Enhancement:			
<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 control policies or subsequent guidance (e.g. in the form of SPDs).</p>			

CP W1: Sustainable Waste Management

Development and activities will be encouraged which support the minimisation of waste and the reuse of materials, and in particular abide with the delivery of the priorities of the waste hierarchy - which seeks first to promote the reduction of waste, followed by its re-use, then recycling and composting, followed by energy recovery, before finally accepting its disposal as a last resort.

Support will be for the provision of accessible and well-designed recycling facilities and recycling collection points. All new developments will need to make appropriate provision for recycling facilities and the collection of waste.





With respect to managing waste locally, the Council will have regard to the forecast waste arisings identified in the London Plan for the borough and the West London sub-region. Brent will work with the other boroughs that comprise the West London Waste Management authority to identify sites and to develop policies for the consideration of applications for waste management facilities.

CP W1: Sustainable Waste Management

Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	Effects: Well maintained, designed and sufficient recycling facilities may improve quality of surroundings by providing better facilities, reducing fly-tipping etc. Requirement for provision of recycling facilities and collection points in new developments may increase satisfaction and ownership in the local neighbourhood. Mitigation / Enhancement: None
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+?	Effects: See Objective 5. Mitigation / Enhancement: None
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		

CP W1: Sustainable Waste Management			
Objective	Criteria	Score	Comments
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	Effects: No significant effects identified (the “services” referred to under this objective are not taken to include waste management facilities) Mitigation / Enhancement: None
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	+?	Effects: Minimising and managing waste could have a positive effect on reducing the risk of water pollution. Mitigation / Enhancement: None
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+/-	Effects: Minimising waste is likely to have the positive effect by reducing emissions of specific air pollutants associated with certain waste management / disposal options. However, energy recovery could have potential local air quality impacts (although this source of energy could be replacing more polluting sources). Mitigation / Enhancement: The approach 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 –and the potential impacts of different types of facility and potential sites should be considered 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 to ensure local problems with emissions to air, as well as visual, light, smell, or noise pollution are avoided/mitigated. Depending on the scale of facility, EIA may be required at the site level.
	Will it help achieve the objectives of the Air Quality Management Plan?		
	Will it reduce emissions of key pollutants?		
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	-?	Effects: Potential negative visual effects of waste management facilities. Mitigation / Enhancement: Localised impacts of waste management facilities would need to be carefully planned and assessed to avoid local impacts on visual, light, smell, air-borne or noise pollution. See Objective 11.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?		
	Will it maintain and strengthen local distinctiveness and sense of place?		
	Will it minimise visual intrusion and protect views?		
	Will it decrease litter in urban areas and open spaces?		

CP W1: Sustainable Waste Management			
Objective	Criteria	Score	Comments
14. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it protect listed buildings?		
	Will it help preserve, enhance and record archaeological features and their settings?		
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	Effects: Minimising waste and reuse of material is likely to have a positive effect on emissions of greenhouse gases, for example reducing methane from landfilled waste. Whilst not a renewable source of energy, waste-to-energy has a role within the waste hierarchy and is considered a positive alternative to energy from fossil fuels. No significant effects identified on flood risk, beyond site specific issues that would have to be considered at a more detailed scale. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SD1 and ENV1) and the forthcoming development control policies will support / enhance this policy. These policies should consider the adaptations necessary in waste management to accommodate climatic change.
	Will it lead to an increased proportion of energy needs being met from renewable sources?		
	Will it reduce emissions of ozone depleting substances?		
	Will it minimise the risk of flooding from rivers and watercourses to people and property?		
	Will it reduce the risk of damage to property from storm events?		
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	++	Effects: One of the keys aims of the policy is to minimise the production of waste from new development, as well as promoting recycling, composting, energy recover. Mitigation / Enhancement: More significant positive effects would be realised by seeking opportunities to improve recycling and waste management facilities across the whole Borough and within its existing housing stock, whilst this is largely beyond the scope of the DPD and other mechanisms would be needed to implement it. More detailed policies will be set out in the proposed Joint Waste Development Plan document – with Ealing, Harrow, Hillingdon, Hounslow and Richmond.
	Will it reduce household waste?		
	Will it increase waste recovery and recycling?		
	Will it reduce hazardous waste?		
	Will it reduce waste in the construction industry?		
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?		
	Will it ensure land is remediated as appropriate?		
	Will it minimise the loss of soils to development?		
	Will it maintain and enhance soil quality?		
	Will it reduce the risk of subsidence?		
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+?	Effects: There could be potential positive effects on economic growth from new business opportunities in waste.. Mitigation / Enhancement: None
	Will it improve business development and enhance productivity?		
	Will it improve the resilience of business and the local economy?		
	Will it promote growth in key sectors?		
	Will it promote growth in key clusters?		
	Will it enhance the image of the area as a business location?		
19. To offer everybody the opportunity for rewarding and	Will it reduce short and long-term local unemployment?	+?	Effects: Refer to Objective 18. Mitigation / Enhancement: None
	Will it provide job opportunities for those most in need of employment?		

CP W1: Sustainable Waste Management			
Objective	Criteria	Score	Comments
satisfying employment	Will it help to reduce long hours worked? Will it help to improve earnings?		
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business? Will it encourage inward investment? Will it make land and property available for business development?	+?	Effects: See objective 18. Mitigation / Enhancement: None
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting? Will it improve accessibility to work by public transport; walking and cycling? Will it reduce journey times between key employment areas and key transport interchanges?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
Key: Major positive:  Minor positive: + Neutral: 0 Minor negative:  Major negative:  Uncertain: ? Mixed: 			
<p>Overall Summary</p> <p>Effects:</p> <p>A positive policy from a sustainability perspective, with limited negative effects predicted. There are likely to be direct positive effects related to reducing the consumption of materials and resources, facilitating recycling and reducing waste generation. Waste should be seen as a resource with disposal being considered only as the last option, and waste management facilities will be needed to ensure that waste is disposed of as near as possible to its place of production. Whilst positive from a resource utilisation perspective, generating energy from waste could have local negative effects on, for example, visual, light, smell, air-borne or noise pollution.</p> <p>Mitigation / Enhancement:</p> <p>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.</p> <p>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.</p>			

Meeting Housing Needs

CP H1: Housing Provision

The Plan seeks to increase the supply of housing to meet identified Borough needs by :

- a) Enabling the sustainable provision of an additional minimum of 9,146 self contained, and 1,000 non self contained, homes through new build, conversion, estate regeneration and change of use schemes on brownfield (previously developed land) sites between 2007 and 2017, in accordance with the London Plan Proposed Alterations (as informed by the London Housing Capacity Study 2004).
- b) Preventing any net loss of housing unless it is required to meet a regeneration objective or the provision of an essential community facility.

Attaining these additional housing targets will be dependent on the timely provision of any environmental, physical and social infrastructural enhancement required to prevent unacceptable overstress on existing provision and amenities. Developers will be expected to make a contribution of an appropriate scale to the provision of required environmental, physical and social infrastructure .

The Council will regularly monitor the provision of new housing consents and completions in the Brent Annual Monitoring Report

CP H2: Sustainable Housing Development

The Plan seeks to ensure to ensure that all new housing is located, designed and constructed to lifetime home standards so as to :

- a) Provide the number and types of homes most appropriate to the site's location and character, in accordance with the London Plan Density Matrix, in order to make the most efficient use of the site
- b) Complement and / or enhance the local environment / townscape. Particular consideration will be given to the suitability of the locality to satisfactorily accommodate high residential buildings
- c) Promote travel efficiency so as to reduce the length of journeys between home, work, educational, shopping and leisure opportunities
- d) Minimise the use of non renewable resources and generation of waste
- e) Maximise energy and water conservation
- f) Provide a liveable safe and attractive environment for both new and existing occupiers by 'designing out crime' , providing a reasonable level of amenities and employing high quality materials and landscaping

CP H3: A Balanced Housing Stock

The Plan seeks to maintain and provide a balanced housing stock by protecting existing accommodation that meets known needs and ensuring that new housing appropriately contributes towards the wide range of Borough household needs including :

- a) An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms)
- b) Housing designed and constructed to meet 'lifetime homes standards'; 10% of ground floor units and those with lift access should be designed and constructed to wheelchair accessible/adaptable standards.
- c) Non-self contained accommodation to meet identified needs
- d) Care and support accommodation for those unable to live independently

CP H4: Affordable Housing Provision

The Plan seeks to increase the Borough's stock of affordable housing by:

- a) Protecting existing affordable housing unless it is required to meet a regeneration objective or provide an essential community facility
- b) Ensuring that new housing in suitable schemes on sites with a capacity of fifteen or more dwellings makes the maximum reasonable on-site contribution towards the Borough's target of 50% affordable new housing provision.

Note: These policies are appraised together as they represent different elements in the achievement of the overarching policy goal of meeting housing needs in the borough. Each policy is 'scored' individually, but comments cover all the policies to provide a cross-policy analysis.

Policy H1 has a closely linked to policy CP SS2.

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision						
Objective	Criteria	Score				Comments
		H1	H2	H3	H4	
Social						
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	+	+ / ++	+ / ++	<p>Effects:</p> <p>The effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>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.</p> <p>Mitigation / Enhancement:</p> <p>The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7, SS8, SS10 and CF1) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it improve affordability of essential services?					
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	+	0	+	<p>Effects:</p> <p>Generally the effects of the policies are positive against this objective. No significant negative effects are predicted.</p> <p>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.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?					
	Will it reduce health inequalities?					
	Will it reduce death rates?					
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	0	<p>Effects:</p> <p>No significant effects are predicted. However, policy H2 does aim to improve travel efficiency, including to educational facilities.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 1.</p>
	Will it improve access to high quality educational facilities?					
	Will it help fill key skill gaps?					
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	++	+	++	++	<p>Effects:</p> <p>Generally very positive, as the housing policies seek to work towards meeting the Borough's housing needs, in terms of affordability, tenure, size etc. No significant negative effects are predicted.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 1. The policy has already been amended to change the threshold from 15 or more dwellings to 10 or more dwellings which is supported. The revision to the London Plan provides the option, where justifiable, to include a lower threshold which should be considered through the Preferred Option consultation.</p>
	Will it encourage mixed use and range of housing tenure?					
	Will it reduce the number of unfit homes?					
	Will it reduce homelessness?					
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	++	+	+	<p>Effects:</p> <p>All the housing policies are predicted to have positive effects as the main aim of policies is to enhance the provision and</p>

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision						
Objective	Criteria	Score				Comments
	Will it improve residential amenity and sense of place? Will it reduce actual noise levels? Will it reduce noise concerns?					quality of the housing stock, and associated local environments, townscape and public realm. No significant negative effects are predicted. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS7, SS9, ENV2, OS1 and OS2) and the forthcoming development control policies will support / enhance this policy. Higher densities can lead to localised effects on noise pollution, nuisance etc and these should be dealt with in more detail in the development control policies.
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime? Will it reduce the fear of crime?	0	+	0	0	Effects: 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. Mitigation / Enhancement: See Objective 5 and overall mitigation / enhancement comment, below.
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities? Will it foster a sense of pride in area? Will it increase the ability of people to influence decisions? Will it improve ethnic relations? Will it encourage communications between different communities in order to improve understanding of different needs and concerns? Will it encourage people to respect and value their contribution to society?	0	+	+	0	Effects: 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 5. Mitigation / Enhancement: See objective 5 – Core Strategy policies UD1 and UD2 will be particularly relevant. Policy H2 / H3 could refer to the need to engage local communities in the provision of housing and associated amenities / facilities. The masterplanning approach adopted in South Kilburn may offer a good example – where example units were build for trial by local residents and comments / feedback and suggestions considered in the final selection of design / layouts.
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services? Will it improve the level of investment in key community services? Will it make access more affordable? Will it make access easier for those without access to a car?	+?	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 1.
Environmental						
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes? Will it increase the proportion of journeys using modes other than the car?	-	+	0	0	Effects: Provision of housing on the scale proposed by H1 will result in an increase in

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision						
Objective	Criteria	Score			Comments	
	Will it encourage walking or cycling?					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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD1, SD2, ENV1, ENV2, and TRN2) and the forthcoming development control policies will support / enhance this policy.
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	-	+	0	0	Effects: 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). Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD1, SD2, ENV1 and ENV2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?					
11. To improve air quality	Will it improve air quality?	-	+	0	0	Effects: See Objective 9. 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. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?					
	Will it reduce emissions of key pollutants?					
12. 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	Effects: 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. Mitigation / Enhancement: See Objective 5. Consideration will need to be given to the conservation value of previously development land – this should be reflected in forthcoming development control policies.
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?					
	Will it maintain and enhance sites designated for their nature conservation interest?					
	Will it encourage protection of and increase number of trees?					
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+	++	+	0	Effects: 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
	Will it enhance the quality of priority areas for townscape and public realm enhancements?					
	Will it maintain and strengthen local distinctiveness and sense of place?					
	Will it minimise visual intrusion and protect views?					

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision						
Objective	Criteria	Score				Comments
	Will it decrease litter in urban areas and open spaces?					schemes etc. Mitigation / Enhancement: See Objective 5. Consideration will need to be given to the suitability of tall residential buildings and high density development – the forthcoming development control policies, and guidance within SPD, Development Frameworks etc, should provide more detail on the design principles and conditions to be placed on this type of development.
14. 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	0	Effects: 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. Mitigation / Enhancement: See objective 5.
	Will it protect listed buildings?					
	Will it help preserve, enhance and record archaeological features and their settings?					
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	-/+	+	0	0	Effects: See Objective 9. New homes are to be designed to a high standard, minimise energy efficiency etc and therefore reduce the potential negative effects of additional homes. Mitigation / Enhancement: See objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?					
	Will it reduce emissions of ozone depleting substances?					
	Will it minimise the risk of flooding from rivers and watercourses to people and property?					
	Will it reduce the risk of damage to property from storm events?					
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	+	0	0	Effects: See Objective 9. The level of housing proposed (policy H1) will consume resources and generate waste, although policy H2 seeks to ensure these negative effects are minimised. Mitigation / Enhancement: See objective 9.
	Will it reduce household waste?					
	Will it increase waste recovery and recycling?					
	Will it reduce hazardous waste?					
	Will it reduce waste in the construction industry?					
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	++	+	0	0	Effects: 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. Mitigation / Enhancement: See objective 10.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?					
	Will it ensure land is remediated as appropriate?					
	Will it minimise the loss of soils to development?					
	Will it maintain and enhance soil quality?					
	Will it reduce the risk of subsidence?					
Economic						
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	+	+	+	Effects: 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
	Will it improve business development and enhance productivity?					
	Will it improve the resilience of business and the local economy?					
	Will it promote growth in key sectors?					

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision						
Objective	Criteria	Score				Comments
	Will it promote growth in key clusters? Will it enhance the image of the area as a business location?					economy. Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked? Will it help to improve earnings?	+/-	0	0	0	Effects: See Objective 19. 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. Mitigation / Enhancement: See Objective 18.
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	+	++	++	Effects: 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. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business? Will it encourage inward investment? Will it make land and property available for business development?	+	+	+	+	Effects: Development of housing on the scale proposed will require inward investment. However minor positive effects given for all policies for reason given under Objective 18 above and because of potential conflicts with the demand for land for business development.. Mitigation / Enhancement: See Objective 18.
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting? Will it improve accessibility to work by public transport; walking and cycling? Will it reduce journey times between key employment areas and key transport interchanges?	+/-	+	+	0	Effects: 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. Mitigation / Enhancement: See Objective 18.
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: ■ Major negative: ■ Uncertain: ? Mixed: ■						
Overall Summary						
Effects: 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.						
Mitigation / Enhancement:						
H1: Housing Provision						

CP H1: Housing Provision / CP H2: Sustainable Housing Development / CP H3: A Balanced Housing Stock / CP H4: Affordable Housing Provision

Objective	Criteria	Score	Comments
			<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> <p>H2: Sustainable Housing Provision</p> <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 Promoting a Quality Environment 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> <p>H3: A Balanced Housing Stock</p> <p>No significant mitigation / enhancement identified.</p> <p>H4: Affordable Housing Provision</p> <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

CP TRN1: Prioritising Investment

Investment in transport infrastructure will be prioritised so that it meets the needs of the growth and regeneration areas identified above. Contributions will be sought from development to promote public transport, walking and cycling.

CP TRN2: Reducing the Need to Travel

A pattern of development that reduces the need to travel, especially by car, will be achieved by:

- (a) Locating major trip generating activity in areas most accessible to public transport, in particular at the main transport interchanges /town centres;
- (b) Improving public transport, walking and cycling infrastructure;
- (c) Encouraging developments with a mix of uses in locations where public transport access is good, particularly town centres;
- (d) Increasing residential densities, particularly in, or close to, town centres;

CP TRN3: Parking and Traffic Restraint

Off-street parking standards, will set maximum levels of off-street parking that can be provided in new developments, with least parking provided in areas of good public transport accessibility.

CP TRN4: Transport Links in London

The implementation of the London Bus Priority Network and the London Cycle Network will be a priority, including requiring provision as part of the development of appropriate sites. Bus and cycle facilities will be implemented only where the interests of all road users are safeguarded.

Note: These policies are appraised together as their implementation is part of a coherent policy approach to transport in the context of the Core Strategy.

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London

Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
Social						
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	+	0	+	Effects: 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. Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.
	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: Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. See Objective 1. Promoting walking and
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?					
	Will it reduce health inequalities?					

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London						
Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
	Will it reduce death rates?					cycling (all policies) are likely to have beneficial health effects from encouraging more active lifestyles. Mitigation / Enhancement: See Objective 1.
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve access to high quality educational facilities?					
	Will it help fill key skill gaps?					
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?					
	Will it reduce the number of unfit homes?					
	Will it reduce homelessness?					
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	+	+	0	Effects: 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. Mitigation / Enhancement: See objective 1.
	Will it improve residential amenity and sense of place?					
	Will it reduce actual noise levels?					
	Will it reduce noise concerns?					
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	+?	+?	0	Effects: 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. Mitigation / Enhancement: See objective 1.
	Will it reduce the fear of crime?					
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	+	+	0	Effects: Generally the effects of the policies are positive against this objective. No significant negative effects are predicted. Refer to Objective 5. Mitigation / Enhancement: See objective 1.
	Will it foster a sense of pride in area?					
	Will it increase the ability of people to influence decisions?					
	Will it improve ethnic relations?					
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?					
	Will it encourage people to respect and value their contribution to society?					
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	+	+	+	Effects: 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.. Mitigation / Enhancement: See objective 1.
	Will it improve the level of investment in key community services?					
	Will it make access more affordable?					
	Will it make access easier for those without access to a car?					

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London						
Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
Environmental						
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	++	++	++	++	<p>Effects:</p> <p>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.</p> <p>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 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.</p> <p>Mitigation / Enhancement:</p> <p>The implementation of other Core Strategy policies (e.g. SS1, SS3, SS7, ENV1 and ENV2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it increase the proportion of journeys using modes other than the car?					
	Will it encourage walking or cycling?					
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	0	-?	0	<p>Effects:</p> <p>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.</p> <p>Localised protection of water quality will be required as part of developing any transport infrastructure.</p> <p>Mitigation / Enhancement:</p> <p>The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD1, SD2, ENV1, ENV2 and H2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it reduce water consumption?					
11. To improve air quality	Will it improve air quality?	+	+	+	+	<p>Effects:</p> <p>Reduced traffic volumes, and in particular modal shift from car to public transport, walking and cycling will lead to reduced air pollution from transport.</p> <p>Mitigation / Enhancement:</p> <p>See Objective 9. For full benefits of public transport over car transport to be realised it is important to encourage buses to run as near to capacity as possible – thus per-capita emissions and road-space usage are minimised.</p>
	Will it help achieve the objectives of the Air Quality Management Plan?					
	Will it reduce emissions of key pollutants?					
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?	+?	+?	+?	+?	<p>Effects:</p> <p>Potential long term positive effect on habitats and species if modal shift away</p>

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London						
Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?					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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD1, SD2, ENV1, ENV2, OS1 and OS2) and the forthcoming development control policies will support / enhance this policy.
	Will it maintain and enhance sites designated for their nature conservation interest?					
	Will it encourage protection of and increase number of trees?					
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+	+	+	+	Effects: See Objectives 5 and 12 Mitigation / Enhancement: See objective 12.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?					
	Will it maintain and strengthen local distinctiveness and sense of place?					
	Will it minimise visual intrusion and protect views?					
	Will it decrease litter in urban areas and open spaces?					
14. 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?	+	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 12.
	Will it protect listed buildings?					
	Will it help preserve, enhance and record archaeological features and their settings?					
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?					
	Will it reduce emissions of ozone depleting substances?					
	Will it minimise the risk of flooding from rivers and watercourses to people and property?					
	Will it reduce the risk of damage to property from storm events?					
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	+	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 10.
	Will it reduce household waste?					
	Will it increase waste recovery and recycling?					
	Will it reduce hazardous waste?					
	Will it reduce waste in the construction industry?					
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	0	0	0	0	Effects: 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. Mitigation / Enhancement: See Objective 10 – consider effects of infrastructure proposals within the Site Specific Allocations, where included, and /
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?					
	Will it ensure land is remediated as appropriate?					
	Will it minimise the loss of soils to development?					

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London						
Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
	Will it maintain and enhance soil quality?					or case by case.
	Will it reduce the risk of subsidence?					
Economic						
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	+	+	+	+	Effects: 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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS4, SS5, SS7, H1, BIW1-3 and TC1-5) and the forthcoming development control policies will support / enhance this policy.
	Will it improve business development and enhance productivity?					
	Will it improve the resilience of business and the local economy?					
	Will it promote growth in key sectors?					
	Will it promote growth in key clusters?					
	Will it enhance the image of the area as a business location?					
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	+	+	+	+	Effects: See Objective 18 – though the protection and provision of employment is likely to be most strongly linked to TRN1 and TRN2. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?					
	Will it help to reduce long hours worked?					
	Will it help to improve earnings?					
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	+	+	+/-	+	Effects: See objectives 18 and 20. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?					
	Will it make land and property available for business development?					
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	++	++	++	++	Effects: 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. Improved connectivity could have the negative effect of facilitating additional commuting outside the Borough. Mitigation / Enhancement: See Objective 18.
	Will it improve accessibility to work by public transport; walking and cycling?				-/	
	Will it reduce journey times between key employment areas and key transport interchanges?					
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: ■ Major negative: ■ Uncertain?: ■ Mixed: +/-						
Overall Summary						
Effects: 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.						

CP TRN1: Prioritising Investment / CP TRN2: Reducing the Need to Travel / CP TRN3: Parking and Traffic Restraint / CP TRN4: Transport Links in London						
Objective	Criteria	Score				Comments
		TRN1	TRN2	TRN3	TRN4	
<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>Mitigation / Enhancement:</p> <p>TRN1: Prioritising Investment</p> <p>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.</p> <p>TRN2: Reducing the Need to Travel</p> <p>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.</p> <p>TRN3: Parking and Traffic Restraint</p> <p>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.</p> <p>TRN4: Transport Links in London</p> <p>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.</p> <p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.</p>						

A Strong Local Economy

CP BIW1: Protection of Employment Land and Premises

Industrial Employment Areas (IEAs) are designated for the protection, establishment and expansion of industrial operations characterised by use classes B1c, B2 and B8, or Sui Generis uses that are closely related.

CP BIW2: Principles of Business, Industrial and Warehousing Development

Applications for business, industrial and warehousing development will be required to demonstrate that principles of modern usage will be achieved, in particular:

- the sequential approach (for office development)
- reducing the need to travel by car and promoting non-road travel to work
- the efficient use of land, including the possibility of intensification
- the relationship with adjoining sites and uses and the spaces between buildings and parcels of land
- premises that are fit for purpose, entailing high standards of design and build flexible workspace
- maximising energy efficiency and minimising waste generation (see policy CS SD2)
- minimising environmental impact of operations and movement, and detailing appropriate mitigation measures

CP BIW3: The Re-use of Employment Land and Premises

The Council may permit the redevelopment of employment land and premises, except within Industrial Employment Areas where this will be strongly opposed, where proposals:

- Entail a provision of modern workspace that is fit for purpose and may include managed affordable workspace for emerging business,
- Significant environmental improvements and sustainability gains to the environment by virtue of the design of workspace and operational standards,
- Meet the Council's wider regeneration objectives.

Note: These policies are appraised together as their implementation together is part of a coherent policy approach to employment land and business development.

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

Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
Social					
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	+	+	<p>Effects:</p> <p>Generally the effects of these policies are positive against this objective. No significant negative effects are predicted.</p> <p>Protecting and enhancing employment land and providing employment opportunities are predicted to have indirect positive effects on reducing poverty and social exclusion. Supporting text reference to training and skills requirements is welcomed.</p> <p>Mitigation / Enhancement:</p> <p>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 (and affordable) training made available.</p> <p>The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.</p>
	Will it improve affordability of essential services?				

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					
Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
2. To improve the health of the population	Will it improve access to high quality health facilities?	0	+?	0	<p>Effects: 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). The sequential approach (BIW2) may lead to more people working near to other services and facilities, improving ease of access to health facilities. Also, BIW2 seeks to promote non-road travel to work, which may be beneficial to health from walking and cycling / increased exercise.</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?				
	Will it reduce health inequalities?				
	Will it reduce death rates?				
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	<p>Effects: See Objective 2. Supporting / introductory text (9.1.14-9.1.20) discuss the importance of skills and education for the local workforce.</p> <p>Mitigation / Enhancement: See Objective 2.</p>
	Will it improve access to high quality educational facilities?				
	Will it help fill key skill gaps?				
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	-?	0	0	<p>Effects: 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> <p>Mitigation / Enhancement: See objective 2.</p>
	Will it encourage mixed use and range of housing tenure?				
	Will it reduce the number of unfit homes?				
	Will it reduce homelessness?				
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	0	+	+	<p>Effects: 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. Positive effects where vibrant local economies provide accessible jobs to local people, and lead to enhancement of local centres. Some industrial uses may have negative noise impacts, and distribution (B8) uses may generate freight / lorry traffic which will be a major cause of road noise.</p> <p>Mitigation / Enhancement: See Objective 2.</p>
	Will it improve residential amenity and sense of place?				
	Will it reduce actual noise levels?				
	Will it reduce noise concerns?				
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+?	+?	+?	<p>Effects: Some indirect positive effects predicted, but the significance of the effects uncertain for some policies. Policies BIW1-3 could have positive effect on crime / fear of crime through enhancing the local economy and therefore employment opportunities. Positive effects where employment levels rise, and where appropriate, accessible local economies develop within the borough.</p> <p>Mitigation / Enhancement: See Objective 2.</p>
	Will it reduce the fear of crime?				
7. To encourage a sense of local community;	Will it encourage engagement in community activities?	0	0	0	<p>Effects: See Objective 6.</p> <p>Mitigation / Enhancement:</p>
	Will it foster a sense of pride in area?				

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					
Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
identity and welfare	Will it increase the ability of people to influence decisions?				See Objective 2.
	Will it improve ethnic relations?				
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?				
	Will it encourage people to respect and value their contribution to society?				
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	0	0	0	Effects: See Objective 2. Mitigation / Enhancement: See Objective 2.
	Will it improve the level of investment in key community services?				
	Will it make access more affordable?				
	Will it make access easier for those without access to a car?				
Environmental					
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	-	+/-	+?	Effects: 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. 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. Supporting text recognises the potential traffic impacts of business activity (9.1.25). This is reflected in the sequential approach and explicit requirement to reduce need to travel (BIW2). Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7, SD1, SD2, ENV1, ENV2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it increase the proportion of journeys using modes other than the car?				
	Will it encourage walking or cycling?				
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0/- ?	0/- ?	0/+ ?	Effects: Additional business and industrial use, as well could increase water consumption and pollution. BIW3 refers to significant environmental improvements, in case of reuse of employment land, however no explicit reference is made in policies to water consumption and/or quality. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD1, SD2, ENV1 and ENV2) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce water consumption?				
11. To improve air quality	Will it improve air quality?	0/-	+	0/+	Effects: 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. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?				
	Will it reduce emissions of key pollutants?				

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					
Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
12. 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	Effects: No significant effects are predicted. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?				
	Will it maintain and enhance sites designated for their nature conservation interest?				
	Will it encourage protection of and increase number of trees?				
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	+	+	Effects: See Objective 5. Positive effects possible from business and industrial development are predicted to improve townscape / public realm quality at specific locations. Mitigation / Enhancement: See Objective 10.
	Will it enhance the quality of priority areas for townscape and public realm enhancements?				
	Will it maintain and strengthen local distinctiveness and sense of place?				
	Will it minimise visual intrusion and protect views?				
	Will it decrease litter in urban areas and open spaces?				
14. 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	0	0	Effects: No significant effects are predicted. Mitigation / Enhancement: None
	Will it protect listed buildings?				
	Will it help preserve, enhance and record archaeological features and their settings?				
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	-	+	+	Effects: See Objective 9. Increased industrial and business activity will increase energy use. BIW2 and BIW3 explicitly refer to minimising environmental impacts of employment land / business uses. Policy BIW1 is predicted to have a negative effect as increased industrial and business activity will increase energy use. Mitigation / Enhancement: See Objective 9.
	Will it lead to an increased proportion of energy needs being met from renewable sources?				
	Will it reduce emissions of ozone depleting substances?				
	Will it minimise the risk of flooding from rivers and watercourses to people and property?				
	Will it reduce the risk of damage to property from storm events?				
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	+	+	Effects: Increased industrial and business activity (Policy BIW1) likely to also generate waste and increase resource use. Mitigation / Enhancement: See Objective 10.
	Will it reduce household waste?				
	Will it increase waste recovery and recycling?				
	Will it reduce hazardous waste?				
	Will it reduce waste in the construction industry?				
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites?	+	+	+	Effects: Positive effects predicted. Protecting existing employment land is likely to ease pressure on greenfield sites. Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy.
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?				
	Will it ensure land is remediated as appropriate?				
	Will it minimise the loss of soils to development?				
	Will it maintain and enhance soil quality?				
	Will it reduce the risk of subsidence?				

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

Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
Economic					
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?	++	++	++	Effects: Main aim of suite of policies is to promote economic growth. Major positive effects predicted all policies. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS4) and the forthcoming development control policies will support / enhance this policy.
	Will it improve business development and enhance productivity?				
	Will it improve the resilience of business and the local economy?				
	Will it promote growth in key sectors?				
	Will it promote growth in key clusters?				
	Will it enhance the image of the area as a business location?				
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?	++	+	+	Effects: 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. Mitigation / Enhancement: See Objective 18.
	Will it provide job opportunities for those most in need of employment?				
	Will it help to reduce long hours worked?				
	Will it help to improve earnings?				
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	+	++	Effects: Regeneration and disparities are a complex issue. Structured protection and support for employment land uses and business development can play an important role in this, and reference to this is welcomed. BIW3 explicitly refers to Council's regeneration objectives and supporting text explicitly focuses on regeneration of employment areas. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	++	+	+	Effects: See objective 18. One of aims of these policies is to encourage investment in the Borough, however to realise this major effect it will need to support indigenous businesses. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?				
	Will it make land and property available for business development?				
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	++	+	Effects: Generally the policies are predicted to have positive effects. However some may have positive and negative effects (policy BIW1) as these policies may encourage increased trip generation / commuting in spite of efforts to reduce travel need and develop in accessible locations. BIW2 actively seeks to reduce need to travel and encourage non-car modes. Mitigation / Enhancement: See Objective 18.
	Will it improve accessibility to work by public transport; walking and cycling?				
	Will it reduce journey times between key employment areas and key transport interchanges?				

Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain?: -/+ Mixed: +/-

Overall Summary

Effects:

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.

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.

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

Objective	Criteria	Score			Comments
		BIW1	BIW2	BIW3	
Mitigation / Enhancement:					
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>					

CP TC1: Principal Retail Location

Wembley Town centre is designated as the principal centre within the Borough. In order to establish Wembley as a civic focus for the Borough, the Council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development.

Major new retail or leisure development will only be permitted in other town centres or edge-of-centre locations, if it can be demonstrated that no sequentially preferred sites are available in Wembley, and the preferred location order set out in policies CS TC2 & TC3 is followed.

The Council will continue to work with its partners to produce a Design Framework (see policy CS UD1) for implementing a comprehensive environmental improvement programme in Wembley. Proposals are expected to significantly enhance the quality of shopping, leisure provision, and the townscape and public realm in Wembley in accordance with its Borough status.

CP TC2: Other Preferred Locations

Proposals for retailing and other town centre uses which attract a lot of people, will be determined in accordance with the following sequential approach.

Major & District Centres

Within the Major Town Centres and District Centres scheme for these uses should be consistent with the scale and function of the centre within which they are located.

Town centre proposals should reinforce, or help implement the Strategy for particular centres.

On the edge of Major Town Centres and District Centres, proposals for town centre uses, will be required to comply with the above and should be designed to integrate effectively in existing frontages. In addition they are required to demonstrate:

- (1) A Need for the development in the format proposed;
- (2) That no sequentially preferable site is available within the Major & District Centres boundaries (for major development) in Wembley) (CS TC1);
- (3) That there would be no unacceptable impact on the vitality and viability of other town or district centres; and
- (4) That the development would be accessible by a choice of transport means supporting the hierarchy in TRN2.

Local Centres

In local centres, proposals for small to medium scale retailing and town centre uses, will be permitted where they serve a local catchment area, meeting people's day to day needs.

Proposals for larger scale retailing or other facilities will be required to comply with criteria (1) (2) and (4) governing the consideration of edge-of-centre developments as set out above.

CP TC3: Exceptional Locations

Neighbourhood Centres

Large scale development will not be permitted to locate in Neighbourhood centres. Only very small-scale town centre uses will be permitted to locate in Neighbourhood centres.

Out-Of-Centre Locations

Out-of-centre proposals for the development or extension of retail and other town centre uses, will not be permitted unless:

- (a) There is a clearly demonstrated Need for the proposal, in the format proposed;
- (b) There is no sequentially preferable site available in Major, District or Local centres (CS TC2);
- (c) The proposal, by itself or cumulatively with other completed developments or commitments, would not have an unacceptable impact on the vitality & viability of Town, District or Local centres, nor compromise their ability to attract regenerative investment; and

(d) The development ensures a 'Good' level of public transport accessibility or significantly improves the choice of other transport means, including existing or provides new, suitable pedestrian & cycle access.

In addition, wherever possible, such developments should be combined with other existing out-of-centre developments. Conditions will be used to limit the floorspace, subdivision, goods range, mix of convenience and comparison offer, and keep ancillary nature of subsidiary elements of the schemes.

CP TC4: Town Centre Opportunity Sites

Within the boundaries of the Boroughs network of Town Centres sites suitable for town centre development have been identified. These opportunity sites are listed within the Site Specific Allocations and shown on the Proposals Map. Development at appropriate scale which assist the regeneration of the centres will be encouraged at the opportunity sites.

These do not preclude the assembly of other town centre sites in Wembley town centre, which may become available for regenerative amalgamation for major retail and/or leisure development, such as a Shopping Mall, if this is demonstrated to be consistent with Brent's strategic Objectives.

Note: These policies are appraised together as their implementation is part of a coherent policy approach to town centres and shopping in the Borough.

CP TC1: Principal Retail Location - Refer also to appraisal of SS5 – Wembley as a focus for growth

CP TC4: Town Centre Opportunity Sites - Policy depends on details set out in Site Specific Allocations]

CP TC5: Network of Town Centres - Not appraised as simply sets out town centre hierarchy.

CP TC5: Network of Town Centres

The Town Centres in the Borough form a network –based upon the following hierarchy.

Major Town Centres	District Centres	Local Centres
Wembley Kilburn	*Burnt Oak Harlesden *Cricklewood Willesden Green Ealing Road Wembley Park Kingsbury	*Colindale Preston Road *Kenton Queens Park Kensal Rise Sudbury Neasden

There are also 36 Neighbourhood Centres, defined in the Appendix & Proposals Map.

The Boundaries of all the town centres will be defined on the Proposals Map.

CP TC1: Principal Retail Location / CP TC2: Other Preferred Locations / CP TC3: Exceptional Locations / CP TC4: Town Centre Opportunity Sites

Objective	Criteria	Score				Comments
		TC1	TC2	TC3	TC4	
Social						
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	+	+?	0	+?	Effects: Generally the effects of these policies are positive against this objective. No significant negative effects are predicted. 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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS4, SS5, SS7 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it improve affordability of essential services?					
2. To improve the health of the population	Will it improve access to high quality health facilities?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?					
	Will it reduce health inequalities?					
	Will it reduce death rates?					
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it improve access to high quality educational facilities?					
	Will it help fill key skill gaps?					
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?					
	Will it reduce the number of unfit homes?					
	Will it reduce homelessness?					
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+/-	+	+	+	Effects: Policies generally seek to enhance town centres and ensure they remain viable in the long-term. Generally the effects of these policies are positive against this objective. Both
	Will it improve residential amenity and sense of place?					
	Will it reduce actual noise levels?					

CP TC1: Principal Retail Location / CP TC2: Other Preferred Locations / CP TC3: Exceptional Locations / CP TC4: Town Centre Opportunity Sites						
Objective	Criteria	Score				Comments
	Will it reduce noise concerns?					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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS4, SS5, SS7, SS9, UD1, UD2, ENV2, OS1 and OS2) and the forthcoming development control policies will support / enhance this policy.
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0	+?	+	+	Effects: 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 better quality town centres will have a beneficial impact on crime / fear of crime. Where local centres become more vibrant and successful, it is likely that crime will fall both due to direct prosperity, and also due to indirect factors such as increased pedestrian traffic (passive surveillance) and local pride. Mitigation / Enhancement: See Objective 5.
	Will it reduce the fear of crime?					
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	+	+	+	0	Effects: See objective 5. No negative effects predicted. Enhanced town centres will have positive effects on sense of local community and identity. Mitigation / Enhancement: See objective 5.
	Will it foster a sense of pride in area?					
	Will it increase the ability of people to influence decisions?					
	Will it improve ethnic relations?					
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?					
Will it encourage people to respect and value their contribution to society?						
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+?	+	+	+	Effects: No negative effects predicted. The policies are predicted to have positive effects on the accessibility of key services. Main aim of policies TC2-TC4 is to improve town centre / local centre service provision. Although developing Wembley as a major centre (TC1) will lead to increased investment / provision at the Borough level access will be easier to local / neighbourhood centres from many parts of the Borough. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?					
	Will it make access more affordable?					
	Will it make access easier for those without access to a car?					
Environmental						
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+/-	+/-	+/-	0	Effects: Generally the effects are predicted to be both positive and negative. This is because
	Will it increase the proportion of journeys using modes other than the car?					

CP TC1: Principal Retail Location / CP TC2: Other Preferred Locations / CP TC3: Exceptional Locations / CP TC4: Town Centre Opportunity Sites						
Objective	Criteria	Score				Comments
	Will it encourage walking or cycling?					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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS4, SS5, SS7 and TRN2) and the forthcoming development control policies will support / enhance this policy.
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water? Will it reduce water consumption?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
11. To improve air quality	Will it improve air quality? Will it help achieve the objectives of the Air Quality Management Plan? Will it reduce emissions of key pollutants?	+/-	+/-	+/-	0	Effects: See Objective 9. Both positive and negative effects are predicted for the policies as their general thrust 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. Mitigation / Enhancement: See Objective 9.
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency? Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it encourage protection of and increase number of trees?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces? Will it enhance the quality of priority areas for townscape and public realm enhancements? Will it maintain and strengthen local distinctiveness and sense of place? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?	+	+	0	+	Effects: Refer also to Objective 5. Improvements to town centres are predicted to improve townscape / public realm quality at specific locations. Emphasis on local and neighbourhood centres may in particular enhance townscapes and public realm. Mitigation / Enhancement: See Objective 5.
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	0	0	0	0	Effects: No significant effects identified. Mitigation / Enhancement: None
15. To reduce contributions to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?	+/-	+/-	+/-	0	Effects: See Objective 9. Mitigation / Enhancement:

CP TC1: Principal Retail Location / CP TC2: Other Preferred Locations / CP TC3: Exceptional Locations / CP TC4: Town Centre Opportunity Sites						
Objective	Criteria	Score				Comments
and reduce vulnerability to climate change	Will it lead to an increased proportion of energy needs being met from renewable sources?					See Objective 9.
	Will it reduce emissions of ozone depleting substances?					
	Will it minimise the risk of flooding from rivers and watercourses to people and property?					
	Will it reduce the risk of damage to property from storm events?					
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?	-	-	-	0	Effects: Negative effects predicted as increased retail activity in the Borough is likely to lead to increased resource use and waste generation, especially packaging waste. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV2, and W1) and the forthcoming development control policies will support / enhance this policy.
	Will it reduce household waste?					
	Will it increase waste recovery and recycling?					
	Will it reduce hazardous waste?					
17. To conserve and enhance land quality and soil resources	Will it lead to reduced waste in the construction industry?					Effects: Sequential approach to town centre developments, and the focussed development at existing centres is likely to ease pressure on greenfield sites. TC3 does suggest that some out-of-centre development will be permitted in the plan period – and these may impact upon green / open spaces. Mitigation / Enhancement: See Objective 5.
	Will it minimise development on greenfield sites?	+	+	+/- ?	+	
	Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings?					
	Will it ensure land is remediated as appropriate?					
	Will it minimise the loss of soils to development?					
	Will it maintain and enhance soil quality?					
Economic	Will it reduce the risk of subsidence?					Effects: All policies likely to have a positive impact. Main aim is to generate vibrant local economy. Development at Wembley may create a flag-ship regional centre, attracting new business interest in the Borough. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS4 and SS5) and the forthcoming development control policies will support / enhance this policy.
	18. To encourage sustainable economic growth	+	+	+	+	
	Will it encourage new business start-ups and opportunities for local people?					
	Will it improve business development and enhance productivity?					
	Will it improve the resilience of business and the local economy?					
	Will it promote growth in key sectors?					
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it promote growth in key clusters?					Effects: 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) Mitigation / Enhancement: See Objective 18.
	Will it enhance the image of the area as a business location?	+	+	+	+	
	Will it reduce short and long-term local unemployment?					
	Will it provide job opportunities for those most in need of employment?					
	Will it help to reduce long hours worked?					
	Will it help to improve earnings?					

CP TC1: Principal Retail Location / CP TC2: Other Preferred Locations / CP TC3: Exceptional Locations / CP TC4: Town Centre Opportunity Sites						
Objective	Criteria	Score				Comments
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	+	++	+	++	Effects: Main aim of the policies. Major positive effects predicted. The local town centres policies (TC2 and TC4) are predicted to have a particularly significant effect on regenerative. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	++	+	+	+	Effects: 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. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?					
	Will it make land and property available for business development?					
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	+/-	+?	+?	+	Effects: Generally the policies are predicted to have positive effects. However policy TC1 may have positive and negative effects as it may encourage increased trip generation / commuting in spite of efforts to reduce travel need and develop in accessible locations. The more local retail services are provided the less people are likely to travel to meet their shopping needs. Large scale retail centre(s) at locations accessible by a choice of transport means (TC2) may improve access by non-car means, however 'a choice of means' could also encourage car use. A major centre at Wembley is likely to generate trips within and from outside Brent, though it is recognised that some of this may be offset by reduced trips to other major centres outside the borough. Mitigation / Enhancement: See Objective 9.
	Will it improve accessibility to work by public transport; walking and cycling?					
	Will it reduce journey times between key employment areas and key transport interchanges?					
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain?: ? Mixed: +/-						
Overall Summary						
Effects: These policies score largely positively and there are no major negative effects.						
TC1: Principal Retail Location, has some positive and some negative effects predicted due to the resource use, traffic generation and the nature of employment potential associated with major retail developments.						
Mitigation / Enhancement: No significant mitigation / enhancement identified. 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. 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. The implementation of other Core Strategy policies, the forthcoming development control policies and other DPDs / SPDs / Area Action Plans will support / enhance these policies.						

CP CT1: Promoting Leisure and Tourism

Leisure and tourism activities, including arts, culture, sports and entertainment, will be promoted in locations easily accessible by walking, cycling, and public transport, and in accordance with the sequential approach (see policy CS TC2). Facilities will be promoted for the enjoyment of existing communities as well as those visiting the borough, enabling Brent to become a showcase for entertainment and cultural diversity, while balancing the environmental impacts of increased tourism. Contributions from relevant major and all significant applications will be sought towards the promotion of arts, culture and tourism throughout the Borough.

CP CT1: Promoting Leisure and Tourism

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: Generally the effects of these policies are positive against this objective. No significant negative effects are predicted. Promotion of leisure and tourism for the local community is expected to have a positive effect on reducing poverty and social exclusion. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7 and SS8) and the forthcoming development control policies will support / enhance this policy.
	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: Promoting leisure and tourism is predicted to have positive effects on health by increasing physical activity. Mitigation / Enhancement: See Objective 1.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	+	Effects: See Objective 2. Cultural awareness, entertainment and sports should have a positive effect on skills. Mitigation / Enhancement: See Objective 1.
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	++	Effects: Generally the effects of this policy are positive against this objective. 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). Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS8, OS1, OS2 and CF1) and the forthcoming development control policies will support / enhance this policy.
	Will it improve residential amenity and sense of place?	?	
	Will it reduce actual noise levels?		
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	Effects: See objective 5. Some indirect positive effects predicted, but the significance of the effects uncertain for some policies. Although crime is not explicit focus of this policy it is likely that improved access to leisure and community facilities and better quality town centres will have a beneficial impact on crime / fear of crime. Mitigation / Enhancement: See objective 5.
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	++	Effects: One of the main aims of policy. See objective 5 and 6. Policy is predicted to have a major positive effect on sense of local community and identity as they focus on promoting diversity, culture and identity. Mitigation / Enhancement:
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		

CP CT1: Promoting Leisure and Tourism			
Objective	Criteria	Score	Comments
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		See Objective 5.
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	Effects: 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. This policy is therefore predicted to have a positive effect. The main aim of policy Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+/-	Effects: 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. Although policy 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. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS3, SS4, SS5, SS7 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	+/-	Effects: 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. Whereas the location of facilities close to populations may reduce trips. See objective 9. Transport will impact upon air quality and pollution, thus these effects are interrelated. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?		
	Will it reduce emissions of key pollutants?		
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	+	Effects: Positive effects possible from leisure and tourism activities are predicted to improve townscape / public realm quality at specific locations. Impact on landscape and ecological quality may not be significant. However as under Objectives 5 and 6, cultural
	Will it enhance the quality of priority areas for townscape and public realm enhancements?		

CP CT1: Promoting Leisure and Tourism			
Objective	Criteria	Score	Comments
	Will it maintain and strengthen local distinctiveness and sense of place? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?		and leisure facilities improvements are likely to play an important role in local distinctiveness, pride and sense of place. Impact on views and litter are uncertain. Mitigation / Enhancement: See Objective 5.
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	+	Effects: The policy is likely to benefit cultural assets. Mitigation / Enhancement: See Objective 5.
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?	+/-	Effects: See Objective 9. Mitigation / Enhancement: See Objective 9.
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources? Will it reduce household waste? Will it increase waste recovery and recycling? Will it reduce hazardous waste? Will it reduce waste in the construction industry?	0/-	Effects: Some leisure, cultural, tourism activities may generate waste and increase resource use. However policy does refer to need to 'balance the environmental impacts of increased tourism'. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS7, SS9, SD2, ENV2 and W1) and the forthcoming development control policies will support / enhance this policy.
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings? Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?	+	Effects: Positive effects predicted. Sequential approach likely to ease pressure on greenfield sites. Mitigation / Enhancement: See Objective 16.
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people? Will it improve business development and enhance productivity? Will it improve the resilience of business and the local economy? Will it promote growth in key sectors? Will it promote growth in key clusters? Will it enhance the image of the area as a business location?	++	Effects: Major positive effects predicted. Culture and tourism can become an important economic sector. Focus on local cultural diversity likely to encourage new start ups and local initiatives. Mitigation / Enhancement: The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance this policy. Street markets could be considered, especially those with local / ethnic or cultural distinctiveness, in the development control policies.
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked?	+	Effects: Positive effects predicted. 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

CP CT1: Promoting Leisure and Tourism			
Objective	Criteria	Score	Comments
	Will it help to improve earnings?		wage jobs with limited security (often temporary and/or part-time). Both directly / short term in new leisure and tourism facilities, and indirectly / long term as local culture related businesses become more important / viable. Mitigation / Enhancement: See Objective 18.
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: Major positive effects predicted on regeneration. Main aim of policy. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	++	Effects: See objective 18. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	++/-	Effects: Policy may have positive and negative effects as it may encourage increased trip generation / commuting in spite of efforts to reduce travel need and develop in accessible locations. Sequential approach, and requirement for development in locations accessible by walking, cycling and public transport, positive. Mitigation / Enhancement: See Objective 18 and 9.
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-			
Overall Summary			
Effects:			
Overall a very positive policy. From a sustainability perspective, efforts to promote business and cultural / leisure facilities related to local communities is particularly positive.			
Some tourism / leisure facilities will have very different potential effects than others. Conference facilities may, for example encourage increased travel to the area by car with limited local economic benefit (although if local caterers, etc. are used this may be increased), whereas small local facilities may encourage more people to seek leisure in the borough and thus improve local distinctiveness / vibrancy and reduce transport and related environmental impacts. Recognition of this in supporting text is welcomed.			
Mitigation / Enhancement:			
No significant mitigation / enhancement identified. The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance these policies.			

Enabling Community Facilities

CF1: Meeting the Needs of the Community

The provision of accessible community facilities that meet the needs of present and future generations will be encouraged while maintaining existing amenity, enabling equal opportunities for the visual and performing arts, music and drama learning, health, social care and general well being. Existing facilities will be protected or appropriately replaced to allow for the future needs of the community. Relevant major and significant applications will be required to make contributions towards, or provision for, new or improved facilities to meet the needs of a growing population.

CF1: Meeting the Needs of the Community			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	<p>Effects: Meeting community needs for a range of facilities 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. The policy also notes the need to address current and future generations which is positive for the long-term provision of facilities.</p> <p>Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7, SS8 and H2) and the forthcoming development control policies will support / enhance this policy.</p>
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	++	<p>Effects: One of main aims of this policy is provision and protection of healthcare facilities and is therefore predicted to have a major positive effect on access to health facilities.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	++	<p>Effects: See Objective 1. The policy is predicted to have a major positive effect on education and learning due to the increased provision of facilities it will deliver.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	0	<p>Effects: No significant effects identified.</p> <p>Mitigation / Enhancement: None</p>
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	+	<p>Effects: Access and quality of community facilities is likely to play an important role in residential amenity, neighbourhood satisfaction, sense of place and vibrant working communities. Generally the effects of this policy are positive against this objective. 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.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?	0	
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	+	<p>Effects: Although crime is not the explicit focus of the policy, it is likely that improved access to community facilities will have a beneficial impact on crime / fear of crime. Some indirect positive effects predicted, but the significance of the effects uncertain for some policies.</p> <p>Mitigation / Enhancement: See Objective 1.</p>
	Will it reduce the fear of crime?		

CF1: Meeting the Needs of the Community			
Objective	Criteria	Score	Comments
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	++	Effects: See Objective 5. The policy is predicted to have a major positive effect on sense of local community and identity as it focuses on promoting local communities and their diversity, culture and identity. Mitigation / Enhancement: See Objective 1.
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	++	Effects: 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. 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. Mitigation / Enhancement: See Objective 1.
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: Where facilities are protected in accessible locations, and trips to access facilities elsewhere are prevented. Local service and facility provision close to centres of population should encourage walking and cycling and reduce car trips. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7, SS8, ENV1, ENV2 and TRN2) and the forthcoming development control policies will support / enhance this policy.
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it reduce water consumption?		
11. To improve air quality	Will it improve air quality?	0/+	Effects: See Objective 9. Mitigation / Enhancement: See Objective 9.
	Will it help achieve the objectives of the Air Quality Management Plan?		
	Will it reduce emissions of key pollutants?		
12. 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	Effects: No significant effects identified. Mitigation / Enhancement: None
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?		
	Will it maintain and enhance sites designated for their nature conservation interest?		
	Will it encourage protection of and increase number of trees?		
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
	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?		

CF1: Meeting the Needs of the Community			
Objective	Criteria	Score	Comments
	Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?		
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?	0/+	Effects: See Objective 9. Mitigation / Enhancement: See Objective 9.
16. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources? Will it reduce household waste? Will it increase waste recovery and recycling? Will it reduce hazardous waste? Will it reduce waste in the construction industry?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings? Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?	0	Effects: No significant effects identified. Mitigation / Enhancement: None
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people? Will it improve business development and enhance productivity? Will it improve the resilience of business and the local economy? Will it promote growth in key sectors? Will it promote growth in key clusters? Will it enhance the image of the area as a business location?	+	Effects: In the long term improving the health, education and general well being of the local population is likely to enhance the attractiveness of the area as a business location. Specifically improved skill / education levels should encourage local start-ups and other businesses to locate to the Borough. Mitigation / Enhancement: The implementation of other Core Strategy policies (e.g. SS1, SS6, SS7 and SS8) and the forthcoming development control policies will support / enhance this policy.
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked?	+	Effects: See Objective 18. 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 (social care, health etc) are likely to be low-skill, low

CF1: Meeting the Needs of the Community			
Objective	Criteria	Score	Comments
	Will it help to improve earnings?		wage jobs with limited security (often temporary and/or part-time). Some employment generation / protection in facilities themselves. Schools / health centres can generate significant employment. Mitigation / Enhancement: See Objective 18.
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: See Objective 1 and 18. Community facilities and the impact they have on the health and well being of local communities is a key aspect in long-term regeneration. Mitigation / Enhancement: See Objective 18.
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	0/+	Effects: See objective 18. Mitigation / Enhancement: See Objective 18.
	Will it encourage inward investment?		
	Will it make land and property available for business development?		
22. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	0/+	Effects: Potential for positive impact as facilities will be in accessible locations and reduce travel need, as they are to be located around transport nodes or in areas easily accessible by a choice of transport means. Mitigation / Enhancement: See Objective 18.
	Will it improve accessibility to work by public transport; walking and cycling?		
	Will it reduce journey times between key employment areas and key transport interchanges?		
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Major negative: - Uncertain?: Mixed: -/+			
Overall Summary			
Effects: Overall a very positive policy, particularly against social objectives as well as the economic objectives. The policy is predicted to have no negative effects. Good access to education, healthcare, social care, faith institutions and other community facilities and services, will help decrease social inequalities within and between different communities in the Borough and as a result promote regeneration and economic growth.			
Mitigation / Enhancement: No significant mitigation / enhancement identified. The implementation of other Core Strategy policies and the forthcoming development control policies will support / enhance these policies.			