

London Borough of Brent's Local Development Framework Development Policies and Site Specific Allocations Development Plan Documents Preferred Options Sustainability Appraisal Report Non-Technical Summary

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



June 2007

Prepared for London Borough of Brent
by
Collingwood Environmental Planning

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ABBREVIATIONS

AMR	Annual Monitoring Report
CEP	Collingwood Environmental Planning
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
LDF	Local Development Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SINC	Sites of Importance for Nature Conservation
SSSI	Site of Special Scientific Interest

How to comment on the Sustainability Appraisal Report

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

Public consultation on the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options and their Sustainability Appraisal Report runs from **18th June 2007** for six weeks.

All the comments must be received by 5pm on Monday **30th July 2007**.

Comments can be provided by:

Post: Policy and Research Team
The Planning Service
London Borough of Brent
Brent House
349 High Road
Wembley
Middlesex HA9 6BZ

Email: ldf@brent.gov.uk

Via the web: www.brent.gov.uk/planning.nsf

When you comment please include:

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

SUSTAINABILITY APPRAISAL REPORT NON-TECHNICAL SUMMARY

Background

Introduction

1. The Sustainability Appraisal of the London Borough of Brent's Development Policy Development Plan Document (DPD) Preferred Options and Site Specific Allocations DPD Preferred Options is detailed in a Sustainability Appraisal Report. A Non-Technical Summary of the Sustainability Appraisal Report has been prepared (i.e. this report), setting out an overview of the process and what changes it has brought about. The Non-Technical Summary also provides contact details and how to comment on the Sustainability Appraisal Report during the public consultation period on the Development Policy DPD Preferred Options and Site Specific Allocations DPD Preferred Options. For further details see the main Sustainability Appraisal Report, which divided into three parts:
 - Part A: Sustainability Context
 - Part B: Appraisal of Development Policies DPD Preferred Options
 - Part C: Appraisal of the Site Specific Allocations DPD Preferred Options
2. Whilst the language used in this Non-Technical Summary aims to be as straightforward as possible, the Sustainability Appraisal and the DPD processes are inherently complex and some use of technical terms is inevitable. Explanations of many of the terms used are included in the glossary in the back of the Development Policies DPD Preferred Options document.
3. The London Borough of Brent commissioned Collingwood Environmental Planning (CEP) in December 2004 to undertake the Sustainability Appraisal of the first three DPDs being prepared in Brent (the two DPDs included in this report, and the Core Strategy DPD, appraised previously¹). The Sustainability Appraisal of the draft Development Policies DPD and Site Specific Allocations DPD Preferred Options have been undertaken by CEP independently of the LB Brent, whilst working closely with them.

London Borough of Brent

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

¹ SA Report of the Draft Core Strategy DPD, Part B, October 2006, available from the LB Brent website: <http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/44465828647ed0b78025721b006013e3!OpenDocument>

other London boroughs. The location and boundaries of LB Brent are illustrated in Figure 1.

Figure 1: Location of London Borough of Brent



Source: London Borough of Brent

Brent's Local Development Framework

5. LB Brent commenced the preparation of its Local Development Framework (LDF) in September 2004. This will eventually replace the current Unitary Development Plan (UDP) which was adopted in January 2004. The LDF will comprise a suite of documents which taken together will provide the Council's vision, objectives, policies and proposals for meeting social, economic and environmental development aims. In replacing the UDP, the LDF for LB Brent will provide the framework and policies for the Borough in all aspects of land use and spatial planning.
6. Initially, the DPDs to be produced in LB Brent will include a:
 - Core Strategy²;
 - Development Policies; and
 - Site Specific Allocations.
7. In addition, a **proposals map** will also be produced to provide a spatial representation of the policies contained within the DPDs. If the **Annual Monitoring Report (AMR)** or other appropriate mechanism illustrates a need for a further DPD these will be produced.
8. The DPDs, together with the spatial development strategy prepared by the Mayor of London, form the statutory development plan within LB Brent.

² Note consultation on the Core Strategy DPD Preferred Options was completed on 11 December 2006

9. The objectives of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options are summarised below:

Development Policies DPD Objectives ³	Site Specific Allocations DPD Objectives
<p>Overarching objectives:</p> <ol style="list-style-type: none"> 1. Achieving sustainable development 2. Determining planning applications 3. Reflecting regional objectives <p>Development policy objectives:</p> <ol style="list-style-type: none"> 4. Promoting a quality environment 5. Meeting housing needs 6. Connecting places 7. Creating a strong local economy 8. Enabling community facilities 	<ol style="list-style-type: none"> 1. To support the role of the Spatial Strategy, set out in the Core Strategy DPD, with particular regard to growth areas at Wembley, Alperton, Church End, South Kilburn and Burnt Oak/Edgware Road by identifying potential development opportunities 2. To identify opportunities for particular uses or mixes of uses following a robust and credible assessment of suitability, availability and accessibility 3. To facilitate new and/or improved community based facilities and services to meet current and future demand by identifying appropriate sites 4. To demonstrate the advantages of assembly of land parcels to encourage a comprehensive approach to achieve the best disposition of land uses and the creation of high quality places 5. To identify and manage the potential impacts of development upon the natural and built environment, residents, workers, businesses and visitors 6. To establish broad principles of development and appropriate conditions that may be applied having regard for social, economic and environmental factors

What do we mean by Sustainable Development?

10. The term sustainable development encompasses the simple idea of ensuring a better quality of life for everyone, now and for generations to come. A widely-used international definition is *'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*⁴.
11. The UK Government and Devolved Administrations have clearly set out in the Shared Framework what sustainable development means for them and the approach they will take to pursue their goal. They offer the following interpretation:

³ Refer to Part B of this Report for full text and explanation of how these Objectives were defined.

⁴ From 'Our Common Future (The Brundtland Report)' – Report of the 1987 World Commission on Environment and Development.

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

12. Sustainable development is also central to the reformed planning system: *‘Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.’*⁵

Sustainability Appraisal

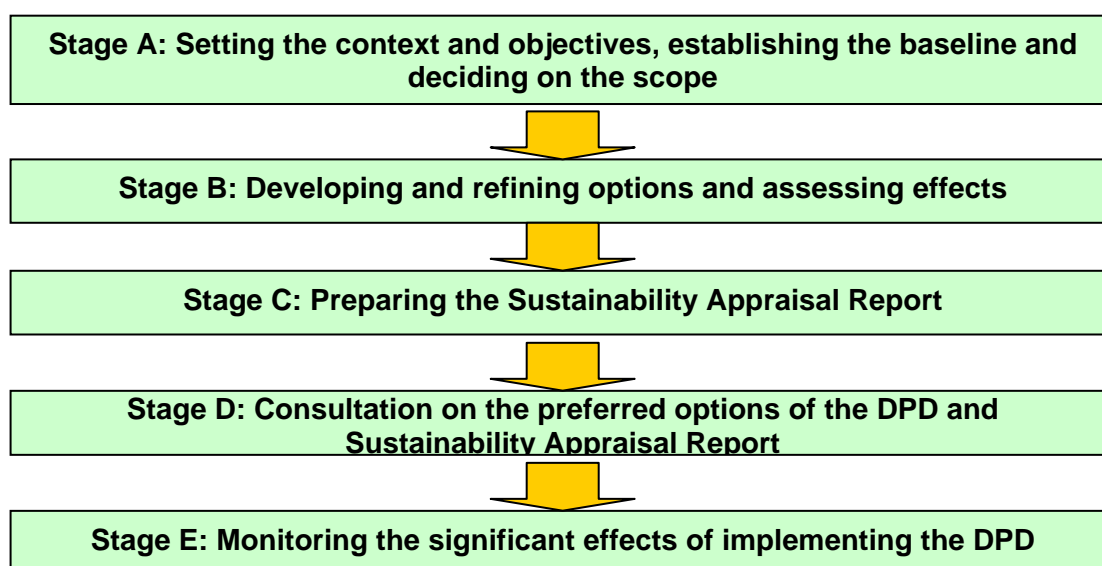
13. The purpose of Sustainability Appraisal is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of the DPDs. The Sustainability Appraisal considers each DPD’s implications, from a social, economic and environmental perspective,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

The appraisal methodology

15. The approach adopted to undertake the Sustainability Appraisal was based on the process set out in Government guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (November 2005)⁶. The Government guidance advocates a five stage process to undertaking Sustainability Appraisal, with each stage divided into a number of tasks (see Figure 2). The Sustainability Appraisal Report is one of the key outputs of Stage D of the process: consultation on the preferred options of the DPD and Sustainability Appraisal Report

⁵ Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

⁶ Office of the Deputy Prime Minister (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*. Note that Office of the Deputy Prime Minister (ODPM) has become part of the Department for Communities and Local Government (DCLG).

Figure 2: Key Stages in the Sustainability Appraisal Process

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

The Sustainability Appraisal Report

18. The Sustainability Appraisal Report is one of the key outputs from the Sustainability Appraisal process and is made available at the same time as the public consultation on the Preferred Options. The report is made up of four main parts, including:
- **A Non-Technical Summary** (i.e. this report); which sets out in relatively simple language and in a précis form, an overview of the Sustainability Appraisal process and its key findings and recommendations.
 - **Part A: Sustainability Context**; which provides background information relevant to the appraisal, such as baseline data and the policy context for the DPD. This part also sets out the methodology and other issues, including proposals for monitoring against sustainability objectives.
 - **Part B: Appraisal of the Development Policies DPD Preferred Options**; which presents the findings of the appraisal of alternatives and preferred options, as

well as an appraisal of compatibility of the objectives of the DPD against the Sustainability Objectives.

- **Part C: Appraisal of the Site Allocations DPD Preferred Options;** which presents the findings of the appraisal of alternatives and preferred options, as well as an appraisal of compatibility of the objectives of the DPD against the Sustainability Objectives.
- **Appendices** (to Part A, Part B and Part C); which provide detailed information and supporting documents relevant to each part of the report.

Sustainability Context

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

Relationship to other plans, programmes and objectives

20. The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship with these other documents and their requirements are explored to enable the LB Brent to take advantage of any potential synergies and to deal with any inconsistencies and constraints.
21. The Sustainability Appraisal of the Core Strategy DPD Preferred Options (October 2006) considered plans and programmes at all levels (i.e. international, national, regional / London and local / borough plans and programmes). However, for the Sustainability Appraisal of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options it was decided it would be most relevant to focus on the regional / London and local / borough plans and programmes, as the higher level plans and programmes would have already been largely incorporated into lower level documents. However, newer international and national plans and programmes were included as they may not have been reflected in some lower level documents, as well as Planning Policy Guidance (PPG) and Planning Policy Statements (PPS).
22. The preparatory work for the DPDs had already considered a number of planning policies and guidance documents. In order to meet the Sustainability Appraisal's requirements it was necessary to consider a broader range of policies and documents, particularly those with environmental protection and / or sustainability objectives.
23. In general no major inconsistencies between policies were identified, although several plans were the source of policies, conditions, etc that provided the context within which the DPDs have to be framed. Plans and programmes of particular relevance include the London Plan (and its alterations), as the spatial strategy for

London, the Sustainable Development Framework for London and the various Mayoral strategies, as well as the various LB Brent plans, strategies and guidance, including the Community Plan and the Core Strategy DPD Preferred Options itself.

24. The objectives contained within these plans and programmes will provide the direction for spatial planning within LB Brent. Many of the objectives of these plans and programmes are related to the sustainability objectives. These sustainability objectives will provide a framework within which the policies formulated within the DPD should produce the desired outcomes of these plans in a sustainable manner.

Baseline characteristics

25. The collection and assessment of information and data about the current and likely future state of the LB Brent area was used within the Sustainability Appraisal to help identify sustainability problems and predict the DPD's effects. Baseline topics and subtopics, covering the economic, social and environmental dimensions of sustainability, focused on the key issues facing LB Brent and the potentially significant effects each DPD could have. Where available, key trends and targets were identified, along with any difficulties and limitations in the data.
26. Much data already existed for LB Brent and the sources used included the Annual Monitoring Reports, 2004-2005 and 2005-2006, data held and collated by the Borough for monitoring purposes, other plans and programmes and established data sources, such as the Office of National Statistics.
27. The data is organised in the Sustainability Appraisal Report under the 22 sustainability objectives (see section below) and is presented in a number of formats including a description of the key data and trends illustrated by maps and graphs and tables including historic data, targets where applicable and comparisons with neighbouring authorities and London and / or the UK as a whole (see Part A of the main Sustainability Appraisal Report).

Key sustainability problems and issues

28. Many of the key sustainability problems and issues facing LB Brent have previously been identified within existing reports, strategies and plans. However, further problems and issues have emerged through the Sustainability Appraisal process, which has also sought to identify the evidence to support the selection of key issues from the baseline data. Some of the key sustainability problems and issues facing LB Brent's community include (see Table 1 and Part A of the main Sustainability Appraisal Report for further details):
 - high levels of unemployment and low incomes;
 - relatively low levels of higher education attainment;
 - deprivation, exclusion and inequalities;

- high incidence and fear of crime;
 - poor condition of the housing stock and overcrowding;
 - relatively high property prices;
 - the lack of green space, trees and wildlife habitats;
 - the poor quality of the townscape and public realm;
 - poor air quality; and
 - poor energy efficiency, which combined with low incomes results in fuel poverty.
29. However, whilst LB Brent does face some key sustainability problems, it also offers some key opportunities including:
- very good public transport links, especially with Central London;
 - broad cultural diversity, it is the second most ethnically diverse local authority in the country and over 120 languages are spoken in the Borough; and
 - several major regeneration areas, including Wembley where the recently redeveloped National Stadium will be the catalyst to regeneration in the area and South Kilburn where LB Brent has obtained significant Government funding.

Table 1: Summary of key sustainability problems

Social
1. Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London.
2. Disparity in social and economic conditions both between wards within Brent and with other areas.
3. Health inequalities and limited access to health facilities.
4. Low educational attainment and projected shortfall of school places.
5. Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards.
6. High incidence of crime and fear of crime.
7. Inadequate provision of and access to essential services and amenities.
Environmental
8. Mixed quality of the built environment and the need for improved architectural design quality.
9. Pressure on biodiversity and habitats and lack of green space, particularly in southern wards.
10. Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner.
11. Contaminated land and soils present a potentially significant restriction / cost in developing brownfield / derelict sites.
12. Water quality and pollution are key issues for the watercourses running through Brent

and availability of water resources is an issue generally in London and the South East.
13. Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent.
14. Quality of and access to open spaces and parks, including open air sport grounds.
15. The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment.
16. The need to reduce energy use and carbon dioxide emissions, increase energy efficiency and switch to renewable energy sources
17. Poor air quality along major roads and in the south of Brent, with much of southern Brent designated an Air Quality Management Area.
18. Noise nuisance, both from domestic and industrial sources as well as from noise and vibration from major road routes in the Borough.
Economic
19. Unemployment and insufficient job opportunities for local people.
20. Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership.
21. The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space.
22. The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal.
23. The need to support development in existing centres and ensure the health of town-centres.

The sustainability appraisal framework

30. The establishment of sustainability objectives and criteria is central to the Sustainability Appraisal process and provides a method for sustainability effects to be described, assessed and compared. The sustainability objectives used for the Sustainability Appraisal of the DPDs were based on those already developed and agreed following consultation for the appraisal of the adopted LB Brent UDP, although they were modified slightly to reflect the particular needs and issues identified in the DPDs.
31. There were 22 objectives used in total, organised under the three dimensions of sustainability: social; environmental; and economic (see Table 2). They covered a broad range of topics such as:
- to reduce poverty and social exclusion;
 - to minimise the production of waste and use of non-renewable materials; and
 - to offer everybody the opportunity for rewarding and satisfying employment.
32. Each objective was broken down into a number of sub-objectives or criteria for the purposes of the appraisal where more detailed analysis was appropriate (see Part A

of the main Sustainability Appraisal Report) and indicators identified to monitor the objective.

Table 2: Sustainability objectives

Social
Prosperity and Social Inclusion
S1. To reduce poverty and social exclusion
Health
S2. To improve the health of the population
Education and Skills
S3. To improve the education and skills of the population
Housing
S4. To provide everybody with the opportunity to live in a decent home
Quality of surroundings
S5. To provide everybody with good quality surroundings
Crime Prevention and Community Safety
S6. To reduce crime and anti-social activity
Community Identity
S7. To encourage a sense of community; identity and welfare
Accessibility
S8. To improve accessibility to key services especially for those most in need
Environmental
Traffic
EN1. To reduce the effect of traffic on the environment
Water Quality and Resources
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply
Biodiversity
EN4. To conserve and enhance biodiversity
Landscape and Townscape
EN5. To maintain and enhance the character and quality of landscapes and townscapes
Historic Environment and Cultural Assets
EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets
Climate Change
EN7. To reduce contributions to climate change and reduce vulnerability to the effects of climate change
Waste Management
EN8. To minimise the production of waste and use of non-renewable materials
Land and Soil
EN9. To conserve and enhance land quality and soil resources
Economic
Growth
EC1. To encourage sustainable economic growth
Employment
EC2. To offer everybody the opportunity for rewarding and satisfying employment
Regeneration
EC3. To reduce disparities in economic performance and promote sustainable regeneration
Investment
EC4. To encourage and accommodate both indigenous and inward investment
Efficient Movement
EC5. To encourage efficient patterns of movement in support of economic growth

Appraisal of the Development Policies DPD Preferred Options

33. The Sustainability Appraisal of the Development Policies DPD Preferred Options is summarised below and described in more detail in Part B of the main Sustainability Appraisal Report.

Appraisal of alternatives at issues and options stage

34. Issues and Options were considered and consulted upon as part of developing the LB Brent Local Development Framework in Autumn 2005. A key requirement of the Sustainability Appraisal is to consider reasonable alternatives as part of the appraisal process and an initial Sustainability Appraisal commentary on the key challenges and the sustainability strengths and weaknesses of the evolving issues and options was produced in October 2005. This provided an input to all three of the evolving DPDs (i.e. the Core Strategy, Development Policies and Site Specific Allocations) on the potential sustainability implications of the issues and options presented in the consultation document: '*A New Plan for a Better Brent – Your Views. Issues and Options Papers*'. The Issues and Options Papers included the following topics:

- Strategic Planning Objectives and Priorities
- A Better Townscape - By Design
- Environmental Protection
- Planning for More and Better Housing
- Transport
- Employment
- Town Centres and Shopping
- Leisure and Tourism
- Open Space and Biodiversity
- Community Facilities
- Waste
- Site Specific Allocations

Appraisal of evolving draft Preferred Options

35. As well as reflecting this earlier Issues and Options Sustainability Appraisal commentary, the alternatives presented in evolving draft Development Policy DPD Preferred Options also "*reflects on, and builds upon, the Core Strategy Preferred Options*"⁷, which have been developed and refined following from the Issues and Options papers consultation (in part also through the Core Strategy DPD Preferred Options Sustainability Appraisal).
36. An early draft of the Development Policy DPD Preferred Options was produced by LB Brent in April 2007, which included the preferred policies as well as alternative policy options. A detailed Sustainability Appraisal commentary was prepared on this early draft Development Policies Preferred Options (May 2007). Following these recommendations, and specific comments on policy alternatives, LB Brent produced

⁷ Taken from introduction to the Draft Development Policies DPD, dated 01/06/07.

a revised draft Development Policies Preferred Options on 1st June 2007, in which recommended changes had been made, and alternatives refined.

37. During the refinement of the Preferred Options, the Sustainability Appraisal process led to a number of changes being made to earlier drafts of the Development Policies and therefore measures to improve the sustainability performance of the policies were already incorporated in many cases.
38. Appraisal of the potential effects of the final version of the Development Policies DPD Preferred Options was undertaken in early June 2007. The policies were 'scored' using a five point scale to indicate the likely potential significant effects under each of the sustainability objectives (i.e. major positive effects, minor positive effects, neutral effects, minor negative effects and major negative effects, with additional categories for where the likely effects are uncertain or mixed). In some cases, where the policies addressed specific aspects of the same issue, policies were grouped and appraised together. Proposed mitigation and enhancement measures as to how policies could be improved were identified and recommendations made on how the policies and supporting text should be changed. The comments and scores were recorded in a series of matrices (see example blank matrix below).

Figure 3: Example appraisal matrix

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

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

Summary of the overall likely significant effects of the DPD Preferred Options

40. The detailed appraisal focused on, and was structured around, the chapters in the DPD Preferred Options, namely:
- Promoting a Quality Environment.
 - Meeting Housing Needs.
 - Connecting Places.
 - A Strong Local Economy.
 - Enabling Community Facilities.
41. These chapters each included a number of policies (see 42).
42. The policies in the Development Policies DPD Preferred Options generally flow from and provide additional detail on the Core Strategy DPD Preferred Options which has already been appraised. The Development Policies in general provide the detailed implementation guidelines, conditions and criteria to ensure the acceptable delivery of the strategic framework and spatial plan set out in the Core Strategy, rather than promoting growth or development per se. As a result, the Development Policies DPD Preferred Options generally performed very well against the sustainability objectives and the majority of significant potential effects identified were positive.
43. There were, however, some uncertain and potentially negative effects identified under certain objectives, particularly under the environmental dimension of sustainability. However, these tended to be limited to certain criteria and, where possible the appraisal identified measures to either manage or reduce many of these potentially negative effects. In addition, mitigation measures were often already provided for either by other policies within the Development Policies DPD Preferred Options or the Core Strategy DPD Preferred Options.
44. The potential effects identified under each chapter and the policies it contains are summarised below. These are explored in more detail in Part B of the main Sustainability Appraisal Report.

Table 3: Policies included in the Development Policies DPD Preferred Options

Development Policies	
<p>Promoting a Quality Environment</p> <p><i>A Better Townscape – By Design</i></p> <p>DP UD1 Urban Design Appraisals DP UD2 Townscape: Local Context and Character DP UD3 Urban Structure: Space and Movement DP UD4 Inclusive Design: Access for All DP UD5 Urban Clarity and Safety DP UD6 Tree Protection and Promotion DP UD7 Public Realm: Landscape Design and Biodiversity DP UD8 Public Realm: Streetscape DP UD9 Public Realm: Lighting and Light Pollution DP UD10 Architectural Quality DP UD11 Design-led Intensive and Mixed-use Design DP UD12 High Buildings DP UD13 Priority Enhancement Areas DP UD14 Building Services Equipment DP UD15 Telecommunications DP UD16 Building-Mounted and Freestanding Advertisements DP UD17 Locally Listed Buildings DP UD18 Conservation Areas DP UD19 Areas of Distinctive Residential Character DP UD20 Views and Landmarks</p> <p><i>Towards a Sustainable Brent, 2020</i></p> <p>DP SD1 Climate Change Mitigation and Adaptation DP SD2 Sustainable Small-Scale and Householder Developments DP SD3 Energy – Demand, Renewables and Efficiency DP SD4 Sustainable Water – Demand and Efficiency DP SD5 Resource Efficiency – sustainable materials and de/construction DP SD6 Addressing Poor Air Quality Effects DP SD7 Operational Waste Management</p> <p><i>Environmental Protection</i></p> <p>DP ENV1 Air Quality DP ENV2 Noise and Vibration DP ENV3 Pollution and Amenity DP ENV4 Contaminated Land DP ENV5 Water DP ENV6 Flooding DP ENV7 Energy and Renewable Energy Generation</p> <p><i>Enhancing Open Space and Biodiversity</i></p> <p>DP OS1 Open Space and Outdoor Recreation DP OS2 Metropolitan Open Land (MOL) DC OS3 Green Chains and the Blue Ribbon Network DP OS4 Sites of Special Scientific Interest (SSSI) DP OS5 Local Nature Reserves and Sites of Important Nature Conservation DP OS6 Species Protection DP OS7 Wildlife Corridors DP OS8 Provision and Enhancement of Open Space and Nature Conservation DP OS9 Children's Play Facilities</p> <hr/> <p>Connecting Places</p> <p>DP TRN1 Transport Assessment</p> <p><i>Sustainable Modes of Transport</i></p> <p>DP TRN2 Public Transport Integration DP TRN3 Bus Improvements / Connections DP TRN4 Cycling and Walking Environments DP TRN5 Highway Design and Forming an Access to a Road DP TRN6 Freight DP TRN7 Parking and Servicing: Residential and Non-Residential Developments DP TRN8 Off-Street Parking DP TRN9 Parking in Town Centres Appendix TNR1: Parking Standards</p>	<p>Meeting Housing Needs</p> <p><i>Housing Provision</i></p> <p>DP H1 Resisting Loss of Housing DP H2 Housing on Brownfield Sites DP H3 Sub-Division of Houses; Flat Conversions DP H4 Change of Use</p> <p><i>Sustainable Housing Development</i></p> <p>DP H5 Scale of New Housing: the Locational Approach DP H6 New Housing: External Design, Layout and Amenity Space DP H7 New Housing Development: Internal Layout and Amenity DP H8 Very Large Housing Schemes (Including Major Estate Regeneration Areas)</p> <p><i>A Balanced Housing Stock</i></p> <p>DP H9 Dwelling Mix (Self-contained Housing) DP H10 Sheltered Housing (Self-contained Accommodation) DP H11 Non Self-contained Accommodation DP H12 Housing Providing Care DP H13 Sites for Nomadic Peoples</p> <p><i>Affordable Housing Provision</i></p> <p>DP H14 Requirement for Affordable Housing DP H15 Type of Affordable Housing DP H16 Off-site Affordable Housing – 'Provision in Lieu'</p> <hr/> <p>A Strong Local Economy</p> <p><i>Business, Industry and Warehousing</i></p> <p>DP BIW1 Regeneration of Local Employment Areas DP BIW2 Facilities for Employees DP BIW3 Work-live development DP BIW4 Home-working DP BIW5 Park Royal</p> <p><i>Town Centres and Shopping</i></p> <p>DP TC1 Brent Retail Need Allocations DP TC2 Neighbourhood Centres DP TC3 Other Shopping Parades and Units DP TC4 Car-Boot / Other Recycling Sales</p> <p><i>Diversity of Town Centres</i></p> <p>DP TC5 Non-Retail Uses DP TC6 Managing A3, A4 and A5 Uses DP TC7 Food and Drink (Café) Quarters DP TC8 Amusement Centres and Mini-cab Offices DP TC9 Offices and Residential Above Shops DP TC 10 Existing and New Markets</p> <p><i>The Shopping Environment</i></p> <p>DP TC11 Design and Infrastructure</p> <p><i>Town Centre Management and Specific Centres</i></p> <p>DP TC12 Town Centre Initiatives DP TC13 Neasden – Regeneration Opportunities DP TC14 Brent's Distinctive Multi-cultural centres DP TC15 Willesden Arts Quarter</p> <p><i>Culture, Sport and Tourism Uses</i></p> <p>DP CST1 Promoting Culture, Sport and Tourism uses DP CST2 Protection of Brent's Cultural Assets DP CST3 Archaeological Sites and Monuments</p> <hr/> <p>Enabling Community Facilities</p> <p>DP CF1 New Community Facilities and Extensions to Existing DP CF2 Protection of Existing Community Facilities DP CF3 Developer Provision and Contributions Towards Community Facilities</p>

Promoting a quality environment

45. The *Promoting a quality environment* chapter generally performs very well against the sustainability objectives, and no significant negative effects are predicted.

A Better Townscape – By Design

46. The key potentially significant positive effects of the policies in the section on *A Better Townscape – By Design* (DP UD policies) are:

- Enhanced quality of **public realm, townscape and landscapes**, together with protection and promotion of **environmental quality and biodiversity** in new development are predicted and these could also have beneficial effects on social factors, in particular aiding **reduction of crime and anti-social activity**, and **promoting local community identity and welfare**.
- Design and layout of development which provides safer and ‘clearer’ urban spaces can **increase physical activity** through walking and cycling, as well as having **positive effects on wellbeing**. These factors are likely to lead to beneficial effects on the **health of local people**, especially in the long-term.
- By offering a high level of **protection for listed buildings and conservation areas** (policies DP UD17 and DP UD18), the historic environment is expected to be protected and enhanced in the long-term.
- Taken together, the above effects are predicted to create, over the life of the plan and beyond, an urban environment and built fabric which **encourages communities in which people will choose to live and work**, which in turn will have long-term benefits for the economic health of the borough, by encouraging investment and ensuring a workforce and customer base for businesses considering locating within the area.

47. No negative effects are expected to arise from the section on *A Better Townscape – By Design*. This reflects the nature of these policies, which seek to set specific criteria to help implement the higher level policies set out in the Core Strategy DPD Preferred Options.

Towards a Sustainable Brent

48. The key potentially significant positive effects of the section on *Towards a Sustainable Brent, 2020* (DP SD policies) are:

- Through the use of sustainability checklists, and the encouragement of water saving and efficiency measures in design, greater **protection for water quality** and the **management and efficiency of water resource supply and use** is predicted from/within the new development constructed.

- Encouragement of renewable energy and energy efficiency measures, contributing towards **reduced contributions to climate change**, and the **strengthening of adaptive capacity** within the new development constructed.
 - In addition, energy efficiency measures, improved quality of materials used in construction and policy to help control internal air quality are expected to have positive social effects, such as **improved health** (due to better quality living environments), and **helping to reduce fuel poverty**.
 - Requirements on developments to consider resource efficiency, and complete sustainability checklists, are expected to **help reduce the production of waste**, and in particular construction waste from the new development.
49. One potentially uncertain negative effect relates to the possibility of air pollution arising from small scale, local energy generation. It is noted that the possibility of this effect is recognised as requiring control in policy DP ENV1: Air Quality.

Environmental Protection

50. The key potentially significant positive effects of the section on *Environmental Protection* (DP ENV policies) are:
- By providing control and criteria on the potentially environmentally damaging aspects of development, **protection for air and water quality**, and in the case of new developments, improved air and water quality is predicted.
 - The **enhancement of soil and land quality**, particularly in relation to the remediation of existing / historic sites of contaminated land, is predicted in order to facilitate development.
 - The **encouragement of mitigation and reduced vulnerability to climate change** within new development is predicted by encouraging renewable energy generation and planning with flooding, water and energy use and efficiency in mind.
 - The environmental benefits noted are also likely to have positive social and economic effects, especially in the long-term. In particular, **improving health and providing good quality surroundings** which are **resilient to climate change**, as well as encouraging **long-term economic viability** through helping to provide an attractive living and working environment.
51. No significant negative effects are expected from the section on *Environmental Protection*.

Enhancing Open Space and Biodiversity

52. The key potentially positive effects of the section on *Enhancing Open Space and Biodiversity* (DP OS policies) are:

- Because of the **protection of open space, green chains and the blue ribbon network** within the borough, and the requirements on the provision of additional open space with new development, **biodiversity and habitat should be enhanced** and existing sites are offered protection.
 - **Prevention of harm to protected areas**, such as Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves and Sites of Special Scientific Interest (SSSIs) is specifically controlled, and is likely to lead to positive effects, particularly in the medium to long-term.
 - By protecting and enhancing various aspects of open and green-space in the Borough these policies are also expected to have positive social effects. In particular, **beneficial health effects**, the provision of **good quality surroundings** and promoting **community identity and welfare**.
53. The effects in relation to economic objectives are potentially uncertain, given the complex trade-offs and interactions likely in implementation of the Open Space policies. While a good quality environment, with sufficient open space and healthy habitats and biodiversity will improve quality of life in the Borough and enhance its' image as a place to live and work, some could see environmental protection as having the effect of constraining certain types of growth. From a sustainability perspective, these trade-offs are important, and the social and environmental benefits are felt to more than outweigh any perceived constraints to economic growth.
54. It should also be noted that the policies in the *Promoting a quality environment* chapter, as elsewhere in the Development Policies DPD Preferred options, focus on the effects of new development, although extensions and refurbishments are also referred to within some policies. The retrofitting of energy efficiency and water conservation measures to existing properties would be required to significantly improve the overall performance of the Borough's housing stock. Although this is mainly outside the scope of the DPD, it is important to put the positive effects of the policies in this context and highlight the need for other mechanisms to address this wider issue.
55. Mitigation and enhancement suggestions for the *Promoting a quality environment* policies are included in Section 6 (Part B) of the Sustainability Appraisal Report. Reflecting the nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Meeting Housing Needs

56. The policies in the *Meeting Housing Needs* chapter generally perform very well against the sustainability objectives and the effects are likely to be mostly positive or very positive. There are also predicted to be a limited number of mixed effects under certain sustainability objectives, with some positive and some negative impacts possible, as well as some uncertainty over other effects.

57. The policies in the *Meeting Housing Needs* policies are principally seeking to allow the Borough to meet existing and predicted housing supply needs, while minimising potential negative environmental and social impacts. The appraisal reflected this in the effects predicted.
58. The key potentially positive effects of the Housing policies are:
- By providing strong protection for existing housing, especially affordable housing, and seeking to meet the Borough's particular needs for both affordable and family accommodation, by providing an appropriate mix of tenure and size, the Housing policies are predicted to help **provide everyone with the opportunity to live in a decent home**.
 - By helping provide decent homes for all, and ensuring sufficient supply of affordable homes, these policies are also expected to help in **reducing certain aspects of poverty and social exclusion**, and **helping improve health**. By imposing controls on the way in which new housing developments are realised, these policies are also likely to help to **create stronger communities and improve wellbeing / community welfare**.
 - By setting out requirements for new housing development to be assessed on its proximity to public transport and town centres, these policies are likely help **reduce the need to travel**, and thus minimise the impact of traffic on the environment.
 - A sufficient and appropriate supply of housing is also likely, particularly in the long-term, to **support the local economy** by making Brent an attractive place to live and work, and providing a stable socio-economic basis for local businesses.
59. The effects in relation to some policies are potentially uncertain, for example in relation to:
- The sub-division of housing and very large housing developments. The nature of such developments in bringing new population to specific areas, and to the Borough as a whole may have negative environmental effects, even where these are sought to be controlled by the policies themselves. Traffic generation may lead to **contributions to air pollution and carbon dioxide emissions**.
 - While remediation of contaminated land to enable housing development will bring environmental benefit, where a significant proportion of such sites are converted to housing, **some loss of biodiversity value** of the brownfield sites may occur. However, it is noted that the alternative, to locate new housing on green-field sites, would potentially result in considerably greater loss to biodiversity as well as other negative environmental impacts.
60. Mitigation and enhancement suggestions for *Meeting Housing Needs* policies are included in Section 6 (Part B) of the Sustainability Appraisal Report. Reflecting the

nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Connecting Places

61. This chapter generally performs very well against the sustainability objectives, with a large number of potentially positive effects predicted, with no significant negative effects predicted. Many of the potentially 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.
62. The key potentially positive sustainability effects arising from the *Connecting Places* chapter include:
- Requiring transport assessments which seek to ensure that new developments provide and support affordable and accessible public transport, as well as providing good and practical walking and cycling routes and infrastructure, is likely to have positive social effects, particularly by **improving accessibility**, but also **helping to reduce social exclusion, reducing crime (through passive surveillance) and improving health**. Social and community wellbeing and quality of life are also likely to be improved.
 - Where higher levels of public transport use, and walking and cycling are achieved and car trips reduced, environmental benefits are also possible, notably, **improved air quality, noise, and reduced greenhouse gas emissions**.
 - Reducing congestion, providing efficient and accessibly public transport and the improvements to the physical and social environment are potentially effects due to reducing the need to travel. This would have potentially positive economic effects, improving the **long-term viability of the local economy**. These factors are also likely to play an important role in **promoting regeneration**.
63. No potentially significant negative effects are predicted. As a result, there are no specific recommendations for mitigation and enhancement in relation to the policies in the *Connecting Places* chapter. However, some specific recommendations are included in relating to parking standards, which are included in Section 6 of Part B of the Sustainability Appraisal Report.

A Strong Local Economy

64. The overall potentially effects of the *Strong Local Economy* chapter and the policies it contains are more mixed than for the other chapters. The effects, in general, are still generally predicted to be positive, with very few significant negative effects expected. Where these occur, they relate to the environmental objectives, and are minor in potential significance.
65. The key potentially positive sustainability effects arising from the Strong Local Economy policies include:

- Emphasis on the protection of local employment areas, and the provision of an appropriate mix of flexible work-spaces, such as work-live and home-working, is likely to **protect local employment and provide additional employment opportunities** in the local area.
 - Encouraging the provision of facilities to enable all sections of the population to work (such as childcare), could also have a potentially positive effect on **poverty and social exclusion**.
 - Where local businesses are able to thrive and more people are able to work close to home, or in the Borough, **community identity, pride and wellbeing could potentially be improved**. Crime could also be reduced where centres become more vibrant, perhaps especially due to the **protection of existing retail space** in town centres.
66. The *Culture, Sport and Tourism* section is particularly predicted to have a strong positive effect on community identity and welfare, and the promotion of cultural assets.
- As noted above, the greatest local benefit is likely to come from the **promotion of relatively small scale, locally specific cultural, leisure and tourism facilities**.
 - Promoting and protecting local markets may also lead to the **regeneration of certain areas**, and could help in the **establishment of new retail businesses**.
 - By protecting local employment, and providing facilities for employees near to work, some **travel need could be reduced** to employment elsewhere, and during the working day.
 - This, in turn may have positive environmental effects, **reducing traffic related air-pollution, and reduced greenhouse gas emissions**.
 - Supporting local and new businesses could also bring about **economic development** benefit for the Borough.
67. Although limited, the potentially significant negative and mixed sustainability effects arising from the Strong Local Economy policies include:
- Car boot sales and markets may result in some specific localised social and environmental impacts. Although the policies (DP TC4 and DP TC10) seek to minimise local disruption, the holding of boot sales and markets have the potential to produce some **additional local traffic** leading to air and noise pollution, as well as potentially **increasing waste generation**. Clearly these impacts will be limited to the days and times during which these sales occur. However, particularly in the case of markets, there may be significant local social and economic benefit, and increase community vibrancy / identity.
 - The creation of new sport and tourism facilities, particularly if these are large in scale, has the potential to **generate additional travel need**, and increase journeys made within and to the Borough (particularly for large tourist

developments). However, this could be offset by efforts to ensure public transport accessibility, and by a reduction in journeys to access such facilities outside the borough.

68. Mitigation and enhancement suggestions for *A Strong Local Economy* policies are included in Section 6 (Part B) of the Sustainability Appraisal Report. Reflecting the nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Enabling Community Facilities

69. The *Enabling Community Facilities* chapter generally performs very well against the sustainability objectives and the potentially significant effects are predicted to be mostly very positive. Potentially positive sustainability effects arising from the Enabling Community Facilities policies include:

- **Protecting and enhancing community facilities** which are a fundamental support mechanism for those most deprived and excluded access.
- Improved community facilities in deprived neighbourhoods are likely to **improve community identity and welfare** and may bring other benefits such as **reducing crime and anti-social activity**.
- Improved provision and protection of **health and education facilities**. In particular the aim to develop a new City Academy by 2009 is mentioned in the supporting text.
- Where local facilities are protected and new facilities developed there may be **reduced trips generated** to access facilities elsewhere.
- **Improved skill and education levels** may encourage local start-ups and encourage other businesses to locate in the Borough.
- **Employment generation** potential from new education, health and other community facilities.

70. There are no significant potentially negative sustainability effects predicted to arise from the Enabling Community Facilities policies, beyond the localised environmental and amenity impacts of the provision of new facilities. Some minor policy clarifications and text changes are suggested in Section 6 (Part B) of the Sustainability Appraisal Report.

Appraisal of the Site Specific Allocations DPD Preferred Options

71. The Sustainability Appraisal of the Site Specific Allocations DPD Preferred Options is summarised below and described in more detail in Part C of the main Sustainability Appraisal Report.

Appraisal of alternatives

72. The section above under the appraisal of the Development Policies DPD Preferred Options explains the process undertaken at the Issues and Options stage, which also considers sites.
73. At the issues and options stage, up to three possible uses were proposed for each site allocation, e.g. housing, employment, mixed use (housing and employment), etc. and these were put to public consultation. Following public consultation, one of the possible uses or a combination of uses for each site allocation were developed by LB Brent and included in the evolving drafts of the Site Specific Allocations DPD Preferred Options.
74. The process of consideration of site allocations at the issues and options stage and leading up to the preferred options stage entailed the inclusion and exclusion of many sites. In some cases, allocations were excluded because alternative configurations (of size and shape) have been included. Other sites were excluded because:
- development had already started or had been completed;
 - the site was deemed unlikely to come forward for development; or
 - an issue related to the planning history of a site.
75. Additionally, other site allocations did not follow this process and were either carried forward from the adopted Unitary Development Plan (2004) or introduced after the issues and options stage as opportunities arose or proposals were made to LB Brent.
76. The sustainability effects of these sites were considered throughout the SA process, through the use of appraisal 'proformas' completed by LB Brent officers (see Appendix 3 in the main Sustainability Appraisal Report). This provided a template for LB Brent planning officers to consider key issues, opportunities and constraints of each site and potential sustainability strengths and weaknesses associated with them. In addition, meetings were held with LB Brent to discuss emerging sites and use options.

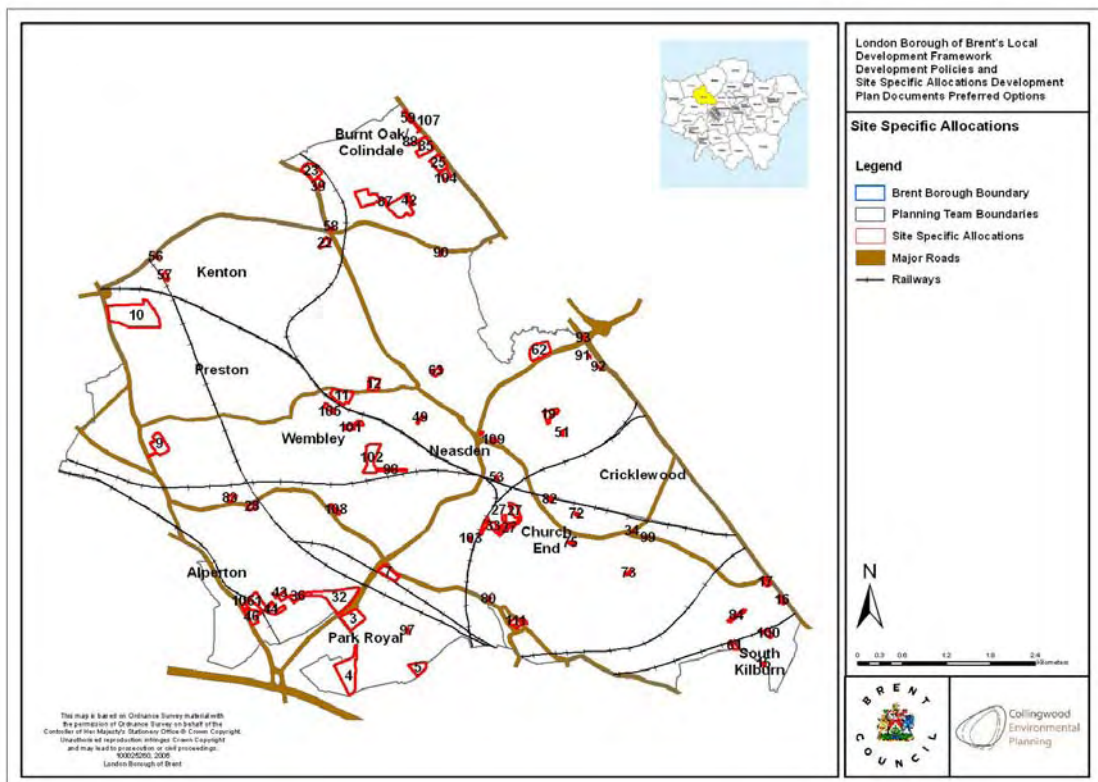
Appraisal of evolving Preferred Options

77. An appraisal was undertaken of each site allocation in the draft Preferred Options document. LB Brent planning officers were asked to fill in a proforma which covered key constraints and opportunities of each site. An appraisal was undertaken of each site allocation using the proformas and analysing constraint and opportunity maps

using a Geographical Information System (GIS). The appraisal criteria varied depending whether the preferred use of the site was housing, employment, community, transport or mixed use, but included:

- Sites located in the **most deprived areas** and/or areas designated for growth or employment uses or for **regeneration**;
- Sites that will result in **loss of open space**;
- Sites that are located in areas of **open space deficiency**;
- Accessibility of the site by **public transport**;
- Sites located in the proximity of sites important for **nature conservation**;
- Sites located in **flood risk areas**;
- Sites that could affect **listed buildings** or are within a **Conservation Area**; and
- Sites located in areas of **poor air quality** or **high noise levels**.

Figure 4: Sites includes in the Preferred Options



78. A location map of all the site allocations included in this DPD Preferred Options is included in Figure 4. Further details on these sites are included in the main

Sustainability Appraisal Report. Key results of the appraisal of each site allocation were:

- Most of the site allocations for **employment or community** use are located within or close to the **most deprived areas** in the Borough. The few sites not within or near the most deprived areas are justified by being near an area designated for growth or being the redevelopment of an existing site.
- The majority of the site allocations that include **employment use** are situated within areas designated for that use (strategic employment areas) or areas designated for growth.
- The majority of sites that include **residential development** are located within areas that are a **priority for regeneration** or growth. These areas also benefit from **good public transport**.
- Many sites are located in areas that are not close to or have not got easy access to **open spaces, parks or sports facilities**. The lack of green spaces and quality and access to existing open spaces are two of the key sustainability problems identified in Table 1. As part of the development of these sites contributions to new open, amenity and sports space should be sought.
- Several sites are located in areas where **accessibility by public transport** is an issue. Development of these sites should be accompanied by improvements to public transport and access by cycling and walking. Additionally, sites that are not very accessible may not be suitable for large densities of houses, i.e. a smaller number of homes may be more appropriate.
- Several sites are situated in the vicinity of areas designated for their **nature conservation importance**. Development of these sites should avoid any negative impacts on areas of nature conservation. Pressure on these areas is a key issue in LB Brent (see Table 1).
- The development of several sites could affect **listed buildings or conservation areas**, so it is important that development avoids any visual impacts or loss of character to these areas or buildings.
- Several site allocations are situated within **flood risk areas**, so proposals for development of these sites should be accompanied by a flood risk assessment as required by government guidance in Planning Policy Statement 25. There are several sites that are larger than 1 hectare, these sites will also require a surface water flood risk assessment even if they are not located in the flood plain.
- Many sites are located in areas of **poor air quality and high noise levels** and therefore these issues will need to be considered in the use and design of these sites.

Summary of the overall likely significant effects of the DPD

79. Appraisal of the potential effects of the final version of the Site Specific Allocations DPD Preferred Options was undertaken. The overall effects of all the sites included were 'scored' using a five point scale to indicate the likely potential significant effects under each of the sustainability objectives (i.e. major positive effects, minor positive effects, neutral effects, minor negative effects and major negative effects, with additional categories for where the likely effects are uncertain or mixed). Proposed mitigation and enhancement measures and recommendations as to how the DPD Preferred Options overall or the individual sites could be improved were identified. The comments and scores were recorded in a series of matrices (see example blank matrix in Figure 3).
80. The appraisal of the sites as a whole concluded that there was likely to be significant positive effects against several of the sustainability objectives, particularly on those related to reducing poverty and regeneration mainly because the great majority of the sites area located in areas of high deprivation or regeneration areas and also for the potential contribution that the sites could make to new affordable homes. The DPD Preferred Options is also predicted to have positive effects on the sustainability objectives related to health and living in decent homes due to the potential for providing new affordable homes, living in a decent home and being in employment are two important determinants of health and the development of the sites could provide an important contribution to this.
81. The DPD Preferred options also performs well against the objectives related to reducing the effects of traffic, improving accessibility and encouraging efficient patterns of movement as the sites are mostly located in town centres or growth areas relatively well served by public transport. The sites also perform well against the objective of conserving and enhancing land and soil as many of the sites are currently derelict, underused or contaminated and development should help address these issues. Finally, the DPD Preferred Options also performs well against the objectives of sustainable economic growth and encouraging investment in the Borough as it will provide new and improved sites for employment use.
82. Regarding potentially significant negative effects, these are mostly inherent to providing new development and are mostly related to resource use, waste and other environmental impacts such as noise, air quality and especially contributions to increasing the risk of flooding and the effects of climate change. Various mitigation and enhancement proposals were provided by the appraisal as the DPD Preferred Options evolved, many of which were included in the supporting text to the sites to provide conditions or requirements on their development or related to other policies which were already in place in the other DPD Preferred Options which would act to avoid or mitigate potential effects.

Implementation and monitoring

83. A key part of the Sustainability Appraisal process is establishing how the significant sustainability effects of implementing the DPD will be monitored. This will be linked to the Annual Monitoring Report required for the LDF. Some potential indicators, where they exist, have been proposed as a starting point for developing the monitoring programme for the DPD and the Sustainability Appraisal. These are being proposed as part of combined monitoring for all the Brent DPDs. The majority of the indicators proposed are from readily available data sources. It is envisaged that the monitoring would be on an annual basis, although updates of some indicators will not be available that frequently. See Section 4, 7 and 10 in the main Sustainability Appraisal Report for further details.

Difference the process has made

84. The Sustainability Appraisal process and the development of the LDF (incorporating the three DPDs) were initiated at the same time and the Sustainability Appraisal has inputted to the evolving DPDs throughout.
85. The Preferred Options versions of each DPD is therefore based on a spatial plan and strategic vision for the Borough underpinned by an assessment of the sustainability issues facing it. Whilst many of the development policies and site specific allocations within the DPDs will have positive effects, some either negative effects or opportunities for further enhancement were identified through the Sustainability Appraisal process. Generally these recommendations have been incorporated in the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options being consulted upon, however some remain outstanding and these are described in the main Sustainability Appraisal Report in more detail.

Next steps

86. The key next steps and outputs are as follows:
- Formal consultation on the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options and this Sustainability Appraisal Report.
 - Amendments to the DPD Preferred Options in light of consultations to produce the Submission version of each DPD.
 - Appraisal of any significant changes, leading to either revisions to the SA Report, or an addendum to the Sustainability Appraisal Report, if changes are minor.
 - Submission of each DPD to the Secretary of State for Independent Examination and the Examination in Public process.
 - Adoption of the final version of the Development Policies DPD and Site Specific Allocations DPD.

- Adoption Statement – prepared by LB Brent to notify the public that each DPD has been adopted. This will include information on the main issues raised during consultation on the DPD and Sustainability Appraisal and how these were taken into account in developing the DPD and other information required as part of the Sustainability Appraisal.
- Ongoing monitoring and review.