

London Borough of Brent's Local Development Framework Development Policies and Site Specific Allocations Development Plan Documents Preferred Options Sustainability Appraisal Report Part B: Appraisal of the Development Policies Preferred Options

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



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Prepared for London Borough of Brent
by
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ABBREVIATIONS

AMR	Annual Monitoring Report	LDF	Local Development Framework
AQMA	Air Quality Management Area	LDS	Local Development Scheme
BAP	Biodiversity Action Plan	LEA	Local Education Authority
BEA	Borough Employment Area	LES	Local Employment Site
BIW	Businesses, Industry and Warehouses	LGA	Local Government Association
BREEAM	BRE (Building Research Establishment) Environmental Assessment Method	LNR	Local Nature Reserve
CEP	Collingwood Environmental Planning	LPA	Local Planning Authority
CF	Community Facilities	LIP	Local Implementation Plan
CMS	Convention on Migratory Species	MOL	Metropolitan Open Land
CO	Carbon Monoxide	NDC	New Deal for Communities
CO ₂	Carbon Dioxide	NO	Nitric Oxide
CP	Core Policy	NO ₂	Nitrogen dioxide
CST	Culture Sport and Tourism	NVQ	National Vocational Qualifications
db	Decibels	ODPM	Office of the Deputy Prime Minister
DC	Development Control	OS	Open Space
DCLG	Department for Communities and Local Government	ONS	Office of National Statistics
DCMS	Department for Culture Media and Sport	PCT	Primary Care Trust
Defra	Department for Environment Food and Rural Affairs	PM ₁₀	Particles measuring less than 10 microns
DETR	Department for Transport, Local Government and the Regions	PPG	Planning Policy Guidance
DfT	Department for Transport	PPS	Planning Policy Statement
DP	Development Policy	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
EEA	Energy Action Area	SCI	Statement of Community Involvement
EEC	European Economic Community	SD	Sustainable development
EC	European Commission	SD	Sustainable design
EIA	Environmental Impact Assessment	SEA	Strategic Employment Area
ENV	Environment	SEA	Strategic Environmental Assessment
EU	European Union	SFRA	Strategic Flood Risk Assessment
GPD	Gross Domestic Product	SINC	Sites of Importance for Nature Conservation
GIS	Geographical Information System	SOA	Super Output Areas
GLA	Greater London Authority	SO ₂	Sulphur dioxide
GOL	Government Office for London	SPD	Supplementary Planning Document
GP	General Practitioner	SPG	Supplementary Planning Guidance
GQA	General Quality Assessment	SRDF	Sub Regional Development Framework
H	Housing	SSSI	Site of Special Scientific Interest
HA	Housing Association	SUDS	Sustainable Urban Drainage
Ha	Hectare	TC	Town Centre
IEA	Industrial Employment Area	TPO	Tree Preservation Order
IMD	Index of Multiple Deprivation	TRN	Transport
I & O	Issues and Options	UD	Urban Design
LA 21	Local Agenda 21	UDP	Unitary Development Plan
LBB	London Borough of Brent	UNFCCC	United Nations Framework Convention on Climate Change
LB Brent	London Borough of Brent	VAT	Value Added Tax
LBPB	London Bus Priority Network	WFD	Water Framework Directive
LCN+	London Cycle Network Plus	WLWDA	West London Waste Disposal Authority (known as WestWaste)
LDD	Local Development Document	ZED	Zero Energy Development

PART B: APPRAISAL OF THE DEVELOPMENT POLICIES PREFERRED OPTIONS

5. DEVELOPMENT POLICIES ISSUES AND OPTIONS

Introduction

- 5.1 Sections 5 to 7 of the SA Report (Part B) present the findings of the SA of the Development Policies DPD Preferred Options and in particular Stage B of the SA process – *Developing and Refining Options* (see Section 2 of Part A of the SA Report which describes the Stages in the SA process). Sections 5 to 7 of the SA report broadly cover the different tasks which make up Stage B of the SA process, namely:
- **Section 5:** testing the DPD objectives against the SA objectives (task B1) and developing the DPD options (task B2);
 - **Section 6:** predicting and evaluating the effects of the DPD (tasks B3 and B4), mitigating the adverse effects and maximising the beneficial effects (task B5); and
 - **Section 7:** proposed measures to monitor the significant effects of the DPD implementation. This section supplements the full implementation and monitoring details for all Brent's DPDs, included in Section 4 of Part A (task B6).
- 5.2 See Sections 1 to 3 (Part A) of the SA Report for details of the findings of the tasks broadly under Stage A of the SA process, as well as background on the LB Brent LDF and the SA process.

Compatibility of the DPD and sustainability objectives

Purpose of testing the compatibility of the objectives

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

Objectives of the DPD

- 5.4 The Core Strategy DPD Preferred Options had a specific set of key objectives, which were tested for compatibility with the sustainability objectives during the sustainability appraisal of the Core Strategy. These objectives also provide the overall framework for all the DPDs (i.e. the Core Strategy, Development Policies and Site Specific Allocations). This section applies the same methodology of assessing the compatibility of objectives specifically to the objectives of the Development Policies DPD Preferred Options.

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- 5.5 Given the close relationship between the Development Policies DPD and the Core Strategy DPD, the Development Policies seek to “build on and reflect” the Core Strategy, objectives are not explicitly expressed in the Development Policies DPD Preferred Options. As a result and specifically for the purposes of the SA compatibility testing, the team undertaking the SA interpreted the text in the Development Policies DPD Preferred Options to form specific objectives for the document.
- 5.6 In the SA commentary¹ it was suggested that the Development Policies DPD Preferred Options might be strengthened by the inclusion of explicit objectives. Some example objectives were also suggested:
- *To provide a framework and criteria for guiding the achievement of sustainable development in the Borough.*
 - *To provide the detailed interpretation of the spatial planning strategy set out in the Core Strategy.*
 - *To set out detailed policies for the determination of planning applications for development in the Borough.*
- 5.7 Reflecting on these comments, some changes were made by LB Brent to the earlier draft of the Development Policies DPD Preferred Options, and the inclusion of additional text which clarifies the purposes and aims of the Development Policies is welcomed. However, the Development Policies DPD Preferred Options as currently presented does not include an explicit set of overarching objectives.
- 5.8 It is recommend for the submission version of the Development Policies, that further consideration is given to including a set of DPD objectives as this would strengthen it by clarifying what it, and the policy contained within it, are aiming to achieve. An alternative could be the inclusion of a direct reference to the Core Strategy objectives, if these are to be considered the overall objectives for the Development Policies as well, and possibly repeating these objectives within the introduction.
- 5.9 However, for the purpose of this appraisal, it is required that the SA “tests the DPD objectives against the sustainability objectives”. Following careful consideration of the current Development Policies DPD Preferred Options and the text within its’ introduction and policy chapters, the following are intended to summarise the objectives of the DPD:

¹ *Initial Sustainability Appraisal Commentary on the draft Development Policies Preferred Options*, prepared for LB Brent by CEP, 1st May 2007.

Overarching objectives:

1. **Achieving sustainable development:** to provide a framework and detailed criteria which guide the achievement of sustainable development in the Borough and deliver against the objectives of the Core Strategy.
2. **Determining planning applications:** to provide detailed policies and criteria to determine planning applications for development in the Borough, interpreting the spatial planning strategy set out in the Core Strategy.
3. **Reflecting regional objectives:** to provide a policy framework which reflects regional objectives at a local level, as set out in the London Plan.

Development Control objectives

4. **Promoting a quality environment:** to ensure planning applications in the Borough adhere to detailed criteria relating to urban design, sustainability principals, the protection of the environment, open space and biodiversity.
5. **Meeting housing needs:** to ensure that planning applications relating to housing in the Borough meet supply obligations while providing sustainable housing in construction, layout, setting and mix of tenure, which meets the needs of the people of Brent, both now and in future.
6. **Connecting places:** to ensure that planning applications in the Borough take proper account of the impacts they can have upon and improvements they can bring to transport and movement. Particular attention will be paid to enhancing public transport, walking and cycling, and reducing the need to travel.
7. **Creating a strong local economy:** to encourage planning applications which lead to the development of a local economy which meets local needs, adds value locally, and provides the services and facilities (shopping, culture, leisure and tourism) which the Borough requires for a sustainable economy.
8. **Enabling community facilities:** to ensure that planning applications protect and provide sufficient facilities to support and enhance vibrant, lively and safe communities in the Borough.

Compatibility of the sustainability and DPD objectives

- 5.10 The results of testing the proposed DPD objectives against the sustainability objectives are described below and shown in Table 10. Note that further details of the Sustainability objectives are included in Table 8 in Section 3 of the SA Report (Part A).
- 5.11 The DPD objectives (as drawn up by the sustainability appraisal team) are almost universally compatible with the sustainability objectives. This reflects the nature of the Development Policies DPD Preferred Options, which generally provide detailed criteria and guidance for applying the strategic and spatial policies in the Core Strategy. The objectives of the Development Policies are therefore relatively benign

or positive in sustainability terms, as they seek to provide control and conditions for the level of growth set out in the Core Strategy and to meet regional objectives.

- 5.12 For example, *Meeting housing needs* (DPD objective 5) which was also an objective in the Core Strategy DPD Preferred Options, was identified as being potentially in conflict with some environmental and social sustainability objectives in the SA of the Core Strategy. This was due to the Core Strategy objective being primarily about meeting high new housing provision targets, dictated by the London Plan, which in turn implied increased population and construction, with their associated environmental and social impact. However in the context of the Development Policies, the aim of the *Meeting housing needs* objective is to ensure that in meeting the housing growth obligations set out in the Core Strategy, the design, construction, layout and mix of sizes / tenures needed in the Borough for example are achieved. Thus, no potential conflict is predicted with any sustainability objectives.
- 5.13 This is also the case for some other DPD objectives, which at the more strategic level might have been expected to potentially be incompatible with certain sustainability objectives, however at the level of the Development Policies the objectives are either expected to be neutral or compatible with the sustainability objectives.
- 5.14 The only potential incompatibility noted by this assessment, is between DPD objective 7: *Creating a strong local economy*, and sustainability objectives EN1, EN3 and EN7, which cover traffic, air quality and climate change. This potential conflict is due to the increase in traffic likely to accompany increased economic activity and possible new leisure / tourism facilities. Some potential conflict is inevitable as delivering against this objective of the DPD will involve a trade-off between different aspects of sustainability. In the case of *Creating a strong local economy*, meeting the economic development aspirations of the Borough requires a potential trade-off between economic growth and expansion of certain facilities and certain environmental objectives, although increased economic activity can also provide the opportunity and mechanism to enhance aspects the environment.
- 5.15 The priority for the DPD is to maximise the benefits and mitigate the negative effects, and other DPD objectives seek to do this, such as DPD objective 6: *Connecting places*, which pays particular attention to public transport improvements and minimising the traffic impact of development (hence has been assessed as being positively compatible with sustainability objective *EN1: reducing the impact of traffic on the environment*).

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Table 10: Compatibility of the DPD and sustainability objectives

DPD Objectives	Sustainability Objectives																					
	Social								Environment									Economic				
	S1. Prosperity & Social Inclusion	S2. Health	S3. Education & Skills	S4. Housing	S5. Quality of Surroundings	S6. Crime Prevention & Community Safety	S7. Community Identity	S8. Accessibility	EN1. Traffic	EN2. Water Quality & Resources	EN3. Air Quality	EN4. Biodiversity	EN5. Landscape	EN6. Historic Environment & Cultural Assets	EN7. Climate Change	EN8. Waste Management	EN9. Land & Soil	EC1. Growth	EC2. Employment	EC3. Regeneration	EC4. Investment	EC5. Efficient Movement
Key:																						
Positive compatible:	+																					
Neutral:	0																					
Possible conflict:	-																					
1. Achieving sustainable development	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
2. Determining planning applications	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
3. Reflecting regional objectives²	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
4. Promoting a quality environment	+	+	0	0	+	+	+	0	0	+	+	+	+	+	+	+	+	0	+	+	+	0
5. Meeting housing needs	+	+	0	+	+	+	+	+	0	+	0	0	+	0	0	0	0	+	0	+	0	0
6. Connecting places	+	+	0	0	0	0	0	+	+	0	0	0	0	0	+	0	0	+	0	+	0	+
7. Creating a strong local economy	+	0	0	0	0	0	+	+	-	0	-	0	0	0	-	0	0	+	+	+	+	0
8. Enabling community facilities	+	+	+	0	0	+	+	+	+	0	0	0	+	0	0	0	0	0	+	+	0	0

² This objective is tested for compatibility based on the inclusion within the draft Development Policies of criteria which reflect requirements or expectations set out in the draft Further Alterations to the London Plan. For example DP UD policies require developments to “have regard to” a specific policy on inclusive design included in the London Plan. The London Plan also sets targets and guidelines for Boroughs on issues such as energy efficiency, renewables generation and parking standards.

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

Developing the issues and options

- 5.16 The consideration of issues and options in the development of the Development Policies DPD is described in this section.
- 5.17 In Autumn 2005, LB Brent produced a series of Issues and Options papers under the title '*A New Plan for a Better Brent – Your Views. Issues and Options Papers*'³. These papers sought to help the council make an informed choice as to how suitable land could best be developed, and for which purposes, and how the environment could best be protected through the LDF (which includes, initially, the Core Strategy DPD, the Site Specific Allocations DPD and the Development Policies DPD). These papers covered a broad range of topics to be considered within the LDF:
- strategic planning objectives and priorities;
 - townscape;
 - environmental protection;
 - planning for more and better housing;
 - transport, employment;
 - town centres and shopping;
 - leisure and tourism;
 - open space and biodiversity;
 - community facilities;
 - waste; and
 - site specific allocations.
- 5.18 These Issues and Options papers were available for public consultation through LB Brent's website, and LB Brent attended all of Brent's Area Consultative Forums throughout September 2005. Comments received went towards developing and have helped inform the preferred options for the Development Policies DPD.
- 5.19 In September 2005, work had not yet commenced on the Development Policies DPD and was still at an early phase in relation to the Core Strategy DPD, and thus the 'options' included in the papers were mainly presented as questions to elicit consultees' priorities for different measures, rather than as clearly discrete alternatives. Therefore, the SA at this stage (late 2005) was limited to providing an initial commentary on the sustainability issues raised by the Issues and Options papers and the key challenges and the sustainability strengths and weaknesses.
- 5.20 The SA commentary on the Issues and Options papers only considered alternatives and options where it was relevant to do so (e.g. where there were sufficiently distinct and realistic options to appraise and where there are likely to be significant sustainability effects). In certain policy areas, options may have been foreclosed by

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

higher level decisions, for example by policies in the London Plan, that limit the Borough's scope in considering certain levels of alternatives and options.

- 5.21 The SA commentary on the Issues and Options papers focused on the Strategic Planning Objectives and Priorities in more detail than the other LDF issues included in the Issues and Options papers. Where possible, options / priorities under the Strategic Planning Objectives and Priorities were compared against each of the sustainability objectives, with results presented in matrices⁴.
- 5.22 For all the issues, including the Strategic Planning Objectives and Priorities, a brief summary was produced on the key sustainability issues they raised (note that many of the Issues and Options papers already include discussion on the sustainability implications of the LDF issues). The SA commentary, including the comparison of the options, was provided to LB Brent to inform the subsequent development of the Preferred Options for the Core Strategy, and subsequently the Development Policies.
- 5.23 As well as reflecting this earlier *Issues and Options* SA commentary, the alternatives presented in the Development Policies DPD Preferred Options also “reflects on, and builds upon, the Core Strategy Preferred Options”⁵, which have been developed and refined following from the Issues and Options papers consultation (in part through the Draft Core Strategy Preferred Options sustainability appraisal).
- 5.24 A summary of the recommendations under each of the Strategic Planning Objectives and Priorities is provided below⁶.

Strategic Planning Objectives and Priorities: Summary of recommendations

Priorities in considering the future development of the Borough:

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

The scale and pace of regeneration in the Borough:

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

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

⁴ These are included in the 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>

⁵ Taken from introduction to the Draft Development Policies DPD, dated 01/06/07.

⁶ This summary table was also included in the SA report of the Draft Core Strategy DPD, October 2006.

but promoted elsewhere.

Location of major regeneration areas:

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

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

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

Priority land uses or themes:

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

Spatial expressions of priorities:

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

Refining the Preferred Options

- 5.25 In April 2007 an early draft of the Development Policies Preferred Options was produced by LB Brent, which included the preferred policies as well as alternative policy options, together with explanatory text describing why the preferred options was included rather than the proposed alternatives. These preferred options and alternative options drew on the Issues and Options papers and took into account the responses received upon them, including the feedback given through the 2005 SA commentary.
- 5.26 A detailed SA commentary on the early draft Development Policies Preferred Options was prepared on this early draft Development Policies Preferred Options (May 2007). This is included, together with LB Brent responses to the specific comments made, in Appendix 8. This document provided commentary on the alternatives proposed, and

made a number of recommendations with respect to alternatives. These recommendations included providing some further clarification on the alternatives considered and rejected in some policy areas, or for some specific policies. Specific commentary and recommendations were included against individual alternatives or sets of alternatives.

- 5.27 Following these recommendations, and specific comments on policy alternatives, LB Brent produced a revised draft Development Policies Preferred Options on 1st June 2007, in which the majority of the recommended changes had been made, and alternatives refined.
- 5.28 The tables below (Table 11 to Table 15) summarise the alternatives options considered in the Development Policies DPD Preferred Options and the justification for not selecting them provided by LB Brent. A commentary from the perspective of the SA is then provided on each of the Preferred Options' policies, the alternative options considered and reasons given why they were not selected. To fully understand the context to these comments it is necessary to read them alongside the policies in the Preferred Options.

Table 11: Promoting a quality environment - alternative options not selected, reasons and SA comments

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
DP UD1 – UD10	The alternative would be to return to a single design policy	<p>Considered far too blunt and crude to properly address the range of urban design objectives required to significantly improve existing poor urban quality within many areas of Brent - particularly in view of the projected levels of future growth.</p> <p>The preferred UD Development Policies 1-10 are adapted from the existing UDP policies which have been well supported at appeals over the past 7 years.</p>	<p>Our previous SA commentary noted that returning to a single design policy would appear not to be the only reasonable alternative to these policies.</p> <p>Further justification that the alternatives preferred are the most appropriate is included in LB Brent response to the SA commentary (see Appendix 8) which states that: “The policies (UD1-UD10) also flow from the Core Strategy i.e. policies SS1, SS9, UD1 and UD2. This suite of policies provides the detail of how the core policies principles will be applied”.</p> <p>This is accepted, and is considered reasonable from the perspective of the SA.</p>
DP UD11 Design-led Intensive and Mixed-use Design DP UD12 High Buildings	An alternative to promoting intensive and mixed-use design and allowing high buildings would be to not permit or promote this type of development.	This would result in a less sustainable pattern of development and would be contrary to the London Plan.	<p>This is supported from a sustainability perspective.</p> <p>For DP UD12 – High Buildings, other alternatives can be imagined, for example such development could be limited to fewer areas, or allowed across the borough, or to further restrict the height of buildings.</p> <p>However, the preferred policy included in the DPD is reasonable, and other alternatives encompassing these are discussed in para 2.1.61 of the Preferred Options and the reasons for rejecting them provided.</p>
DP UD13 Priority Enhancement Areas	The alternative would be to dispense with design area policies, and rely on the individual design consideration policies.	<p>This would not then be in conformity with the London Plan, and the particular objective of improving townscape within these areas would not be given adequate attention.</p> <p>Preferred policy is also adapted from existing UDP policies which have been well supported at appeals over the past 7 years.</p>	The requirement to be in conformity with the London Plan restricts the reasonable alternatives for this policy, and this is accepted by the SA.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP UD14 Building Services Equipment</p> <p>DP UD15 Telecommunications</p> <p>DP UD16 Building-Mounted and Freestanding Advertisements</p>	<p>The alternative to these policies, which are primarily concerned about impacts on residential amenity or sensitive uses, is not to have them and rely instead on the individual urban design considerations.</p>	<p>There are specific impacts from the type of development covered by the policies that will not be adequately addressed by the more general design policies. These policies address specific concerns expressed by the local community.</p>	<p>It is accepted that these policies provide an important controlling role in relation to these particular concerns.</p> <p>The reasons for these policies being preferred are supported from a sustainability perspective.</p>
<p>DP UD17 Locally Listed Buildings</p> <p>DP UD18 Conversation Areas</p> <p>DP UD19 Areas of Distinctive Residential Character</p> <p>DP UD20 Views and Landmarks</p>	<p>No alternatives proposed.</p>	<p>These policies provide the detailed criteria for assessing development proposals, ensuring that they meet the objective, set out in the Core Strategy, of "protecting and enhancing...the built heritage and environment of the Borough". They expand upon policies CP SS1 and CP SS9. They focus on locally-relevant heritage assets which do not enjoy the level of protection afforded the preservation of statutory Listed Buildings and Conservation Areas. These policies are also necessary to ensure conformity with the London Plan.</p> <p>Consequently there are no alternative options.</p>	<p>The foreclosure of policy alternatives by the Core Strategy, and requirement for conformity with the London Plan is accepted, and the preferred options supported from a sustainability perspective.</p>
<p>DP SD1 Climate Change Mitigation and Adaptation</p>	<ol style="list-style-type: none"> Continue to seek only Brent's currently required EcoHomes / BREEAM 'Very Good' equivalent of Code Level 3 across the Borough in future, relying on changes to the Building Regulations to deliver the required ZED standards by 2016. Apply higher standards across the Borough as a whole, rather than just within the Wembley EAA and Housing Growth Areas. 	<ol style="list-style-type: none"> This would fail to meet the objectives of the Wembley Energy Action Area, as well as failing to deliver the much needed improvements in sustainable design quality within the Growth areas, sought in the Core Strategy. It would also fail to capitalise on the higher values generated by this growth, recently proposed Government Stamp Duty exemptions for ZEDs, and the economies of scale possible in larger developments. Focusing higher requirements in the areas where most development opportunities exist means that solutions can take advantage of economies of scale and in accordance with the draft PPS on Planning and Climate change which envisages 	<p>These alternatives are considered reasonable and the reasons for not preferring them are accepted. The inclusion of additional option reflecting the earlier SA commentary is welcomed.</p> <p>Further justification for the preferred option, through reference to the London Plan requirements could also be included.</p> <p>The preferred option, with a differential approach to the Wembley EEA and the growth areas is also supported from a sustainability perspective.</p> <p>LB Brent could consider in the future the possibility of phasing requirements, so that the</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
		"locally specific opportunities for requiring higher levels of building performance".	requirement of a minimum level 3 in all areas could be expected to rise to minimum level 4 by 2010, for example.
DP SD2 Sustainable Householder Developments	<ol style="list-style-type: none"> Continue to focus only on major development - and rely on encouragement of voluntary measures in smaller-scale and household proposals. Require all development, of whatever scale, to meet the highest standards. 	<ol style="list-style-type: none"> Would lead to an outcome falling far short of the range of contributions needed to deliver ZED homes by 2016 - along with the need to use the opportunity provided by householder applications, to progressively upgrade existing homes towards higher standards. Considered to be too great a burden for minor applications particularly in terms of the resources needed to ensure implementation. 	<p>These alternatives are considered reasonable and the reasons for not preferring them are accepted. The inclusion of additional option reflecting the earlier SA commentary is welcomed.</p> <p>The preferred policy is supported from a sustainability perspective.</p> <p>LB Brent could consider in the future the possibility of requiring phasing to higher standards, for example from 2010.</p>
<p>DP SD3 Energy – Demand, Renewables and Efficiency</p> <p>DP SD4 Sustainable Water – Demand and Efficiency</p> <p>DP SD5 Resource Efficiency – sustainable materials and de/construction</p> <p>DP SD6 Poor Air Quality Effects – Adaptation</p> <p>DP SD7 Operational Waste Management</p>	<ol style="list-style-type: none"> An alternative to these policies would be to continue the current UDP approach of a single policy for all these issues. Where policy is applied to 'major development', an option is to apply the requirements to all planning applications. An option for DP SD3 is to seek a phased increase over time in the proportion of on-site renewable energy generation. 	<ol style="list-style-type: none"> Would not properly reflect their significance for climate change, nor has it provided the required level of certainty for developers about the Council's expectations. The lack of UDP targets in particular, has made it more difficult to negotiate for instance, on renewables. These expectations should not be left for future inclusion in SPDs, due to the much longer timescale for updating and/or producing these, and the policy vacuum that would result in the meantime. Will be impractical in terms of the resources necessary to implement it when set against the benefits that will be achieved. Would be very difficult to implement, monitor and enforce. 	<p>The inclusion of additional reasonable options following earlier SA commentary is welcomed. While the proposed alternative 3, to DP UD3 would be a positive option from a sustainability perspective, the reasons for not preferring all these options are supported.</p> <p>However in spite of difficulty in implementation and monitoring, the phasing of renewable energy generation requirement could provide a strong signal to developers and a degree of 'aspiration' in relation to energy generation and efficiency, and we would suggest further consideration could be given to this alternative for submission version of the Development Policies.</p>
DP ENV1: Air Quality	Only require planning applications in Air Quality Management Areas to undertake an Air Quality	This would mean that some of the significant developments outside of the AQMA do not properly assess the impacts on air quality, and therefore would	The inclusion of an additional reasonable option following earlier SA commentary is welcomed. The reasons for the inclusion of the preferred

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
	Assessment. Therefore planning applications which do not fall into the AQMA will not require any air quality assessment.	not contribute towards meeting the National Air Quality Standards.	alternative is supported from sustainability perspective.
DP ENV2: Noise & Vibration	To not require noise mitigation measures in new developments and assume that building standards would require adequate noise insulation.	This would not take into account the cumulative impact of noise pollution on an area or direct noise generating development away from sensitive areas.	The inclusion of an additional reasonable option following earlier SA commentary is welcomed. The reasons for rejection of this alternative are supported from a sustainability perspective.
DP ENV3: Pollution and Amenity	To not allow any development which has the potential to pollute regardless of whether it is able to be mitigated.	This may preclude some essential infrastructure and services, the impacts of which can largely be mitigated, therefore it is not considered a feasible approach.	The inclusion of an additional reasonable option following earlier SA commentary is welcomed. The reasons for not selecting this alternative are supported from a sustainability perspective.
DP ENV4: Contaminated Land	To not allow any development on contaminated land.	This would not fulfil the national objective of directing development to brownfield land and would not assist in the remediation of potentially contaminated land.	The reasons for the preferred policy option are supported from a sustainability perspective. Further justification for limitation to the options possible could be included through reference to Government policy on development on brownfield land and the London Plan requirements.
DP ENV5: Water	To require SUDS as part of all developments.	This would be a positive step in terms of sustainability, however at this point in time, this requirement is considered to be too onerous, therefore only the consideration of the inclusion of SUDS is expected.	While including SUDS in all developments would be the strongest alternative from a sustainability perspective the justification for including the preferred alternative is accepted. A possible additional alternative could be to consider a phased approach to SUDS, such that from a certain date all developments will be required to include SUDS.
DP ENV7: Flooding	To not allow any non permeable hard surfacing in any developments, regardless of the scale of development.	Would be very difficult to actually achieve without removing all permitted development rights in the Borough, and without very strong evidence indicating that this is necessary it is not considered an appropriate policy approach at this time.	The nature of this policy limits the development of reasonable alternatives. The alternative proposed would strengthen the policy from a sustainability perspective, however the reasons for not including this option are accepted.
DP ENV8: Energy and Renewable Energy Generation	To restrict any other form of energy generation other than renewable energy	At this point in time, technology is still being developed in terms of renewable energy generation, and it is not prudent to restrict conventional energy generation until	An additional alternative could be to include text in the preferred policy which indicates that this policy, and its requirements, may be

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
		this is more developed and secure.	reconsidered during the plan period, to allow for flexibility of approach in the light of possible technology and best-practice changes in what is a very fact moving and evolving field of technology and expertise. However, the justification for not adopting the alternative proposed is considered reasonable, and is understood taking into account the need for a pragmatic approach to development in the Borough.
<p>DP OS1: Open Space and Outdoor Recreation</p> <p>DP OS 2: Metropolitan Open Land (MOL)</p>	No alternatives proposed.	These policies are consistent with the London Plan and its number 1 objective: To accommodate London's growth within its boundaries without encroaching on open spaces. If these policies did not seek to protect Brent's important open spaces then this would be inconsistent with the regional guidance.	The reasons for these policies' preferred options are supported from a sustainability perspective. Further comment explaining the direct link between these policies and those in the Core Strategy could also be included to strengthen the justification for the preferred options.
<p>DC OS3 Green Chains and the Blue Ribbon Network</p> <p>DP OS4 Sites of Special Scientific Interest (SSSI)</p> <p>DP OS5 Local Nature Reserves, Sites of Important Nature Conservation and Wildlife Corridors</p>	No alternatives proposed.	<p>There are no clear alternatives to the protection of these important sites for biodiversity. PPS9 Biodiversity and Geological Conservation states that clear distinctions should be made between the hierarchy of international, national, regional and local sites. Brent does not have any international sites, and its national site is the SSSI within the Welsh Harp. The local nature reserves and local sites have been distinguished from this nationally important site and is therefore in accordance with national guidance.</p> <p>The current UDP for Borough II and Local sites, protects the site itself but not when it is affected by adjacent sites. This approach is not considered to sufficiently enhance biodiversity or raise awareness in other areas. For development adjacent to these areas it is not considered unduly restrictive.</p>	The reasons for these policies' preferred options are supported from a sustainability perspective. Further comment explaining the direct link between these policies and those in the Core Strategy could also be included to strengthen the justification for the preferred options.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP OS6 Species Protection</p> <p>DP OS7 Wildlife Corridors</p> <p>DP OS8 Provision and Enhancement of Open Space and Nature Conservation</p>	No alternatives proposed	<p>These policies all follow directly from Core Strategy policies CP OS1- Protection and Enhancement of Open Space and Biodiversity and CP OS2 Promotion of Biodiversity and Nature Conservation .</p> <p>Alternative options not selected for the protection and enhancement of open space and biodiversity have already been appraised in the Core Strategy document.</p>	The reasons for these policies' preferred options are supported from a sustainability perspective.
DP OS9 Children's Play Facilities	<ol style="list-style-type: none"> No requirement for provision and maintenance of, or contributions towards, children's play facilities Require all developments to make contributions towards children's play facilities 	<ol style="list-style-type: none"> The requirement for children's play facilities is in conformity with PPG17, PPS3 and the Further Alterations to the London Plan. This could lead to the creation of a large number of small play areas, which do not meet local need by being located in areas of deficiency and which would be difficult to ensure the long term maintenance of. 	<p>The provision of appropriate, accessible and sufficient play space / facilities for children is a very important aspect of a local community, and in the healthy development of children and young people.</p> <p>The preferred policy is thus supported from a sustainability perspective, and the reasons for not including the proposed alternatives are accepted.</p>

Table 12: Meeting housing needs - alternative options not selected, reasons and SA comments

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
DP H1 Resisting Loss of Housing	Uncontrolled loss of existing housing stock, including affordable	Would be unsustainable as it would further exacerbate the existing demand/ supply gap. Such housing loss would also be contrary to the London Plan strategy.	<p>The preferred alternative is supported from a sustainability perspective, and the justification for not including the proposed option is accepted.</p> <p>Requirement for conformity with the London Plan limits the reasonable alternatives possible.</p>
DP H2 Housing on Brownfield Sites	<ol style="list-style-type: none"> Prioritising new housing development on 'greenfield' sites Set a target lower than 95% on brownfield Set a target higher than 95% on 	<ol style="list-style-type: none"> Would be highly unsustainable. Setting a target significantly lower than 95% would effectively require substantial use of greenfield sites to achieve the Plan's housing target. Setting a higher target would not generate the necessary prudential implementation margin. 	<p>The justification for not including these alternatives is accepted.</p> <p>The need for prudence in implementation (justification for rejecting option 3) is considered reasonable, and it is accepted that some flexibility will be required to meet the onerous</p>

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Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
	brownfield		housing development targets set out in the Core Strategy. The inclusion of additional reasonable options following the earlier SA commentary is welcomed.
DP H3 Sub-Division of Houses; Flat Conversions	<ol style="list-style-type: none"> 1. Higher conversion floorspace threshold 2. Lower conversion floorspace threshold 3. Reduction in the locational criteria 	<ol style="list-style-type: none"> 1. Difficult to justify given the long standing 110sq.m minimum. 2. A threshold lower than 110 sq.m would result in the potential loss of small houses providing accommodation suitable for single family households. 3. Could generate detrimental congestion and traffic flow problems. 	The reasons for not taking these alternatives forward are accepted. The sub-division of houses can assist in the provision of appropriate new dwellings, and the policy does provide protection for existing “single family” households, which if unprotected would have been a significant concern from a sustainability perspective given the identified shortage of family sized accommodation, and high levels of overcrowding in the Borough.
DP H4 Change of Use	<ol style="list-style-type: none"> 1. Not permitting appropriate change of use and the residential use of upper floors 2. Uncontrolled change of use 	<ol style="list-style-type: none"> 1. Would unnecessarily restrain housing supply. 2. Could endanger the stock of commercial buildings which would otherwise have a viable continued non-residential use. 	The reasons for not taking these alternatives forward are accepted.
DP H5 Scale and Density of New Housing	<ol style="list-style-type: none"> 1. Not employ measurable criteria to assess the suitability of a site to sustainably accommodate new housing 2. Employing a lower density range 3. Employing a higher density range 	<ol style="list-style-type: none"> 1. Would be ineffective 2. Would be contrary to the London Plan. 3. Could be unsustainable. 	The preferred alternative is supported from a sustainability perspective, particularly requiring assessment based on access to public transport (PTAL), town centres and to be not to the detriment of adjacent amenities. The reasons for not taking these proposed alternatives forward are accepted.
DP H6 New Housing: External Design, Layout and Amenity Space	<ol style="list-style-type: none"> 1. Lower environmental and amenity requirements 2. Higher environmental and amenity requirements 3. Not requiring external amenity space and children’s play facilities 4. More stringent amenity requirements 	<ol style="list-style-type: none"> 1. Would not provide the requisite level of sustainability. 2. May be unduly prescriptive. 3. Would impose additional stress on existing public provision. 4. Could be unduly prescriptive. 	The preferred policy alternative is considered very positive from a sustainability perspective, and does seem to provide an appropriate balance of control and flexibility. By making cross-references to a large number of other policies the alternatives possible are to a certain extent limited. The reasons for not taking forward these proposed alternatives are supported from a

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
			sustainability perspective, however further explanation of why options 2 and 4 are considered to be “unduly prescriptive” would strengthen this justification.
DP H7 New Housing Development: Internal Layout and Amenity	<ol style="list-style-type: none"> 1. Not to include this specific policy. 2. More stringent requirements. 	<ol style="list-style-type: none"> 1. Could lead to unsatisfactory housing provision and possible detrimental overdevelopment. 2. Could be unduly prescriptive. 	<p>The preferred option is supported from a sustainability perspective, as the internal layout of housing together with flexibility of design can play an important role in wellbeing, as well as the ongoing usefulness of housing – a contribution to sustainability by meeting long-term needs without requiring major modifications.</p> <p>Further explanation of why option 2 is considered to be “unduly prescriptive” would strengthen this justification.</p>
DP H8 Very Large Housing Schemes (Including Major Estate Regeneration Areas)	<ol style="list-style-type: none"> 1. Not having a specific policy for very large housing schemes, including comprehensive estate regeneration programmes 2. A lower threshold or more stringent requirements 	<ol style="list-style-type: none"> 1. Could lead to unsustainable development. 2. Could be unduly prescriptive. 	<p>The need for policy to control proposals for very large housing schemes is supported from a sustainability perspective, as such schemes may have specific and significant potential sustainability effects.</p> <p>The reasons for not taking the proposed alternatives forward are accepted, however some further explanation of why option 2 is considered “unduly prescriptive” might strengthen this justification.</p>
DP H9 Dwelling Mix (Self-contained Housing)	<ol style="list-style-type: none"> 1. Not requiring an appropriate dwelling mix or retaining the current UDP definition of a family unit as only comprising two bedrooms. 2. Higher requirements 	<ol style="list-style-type: none"> 1. Would lead to a housing provision that would not meet the Borough’s household needs. 2. Could be unduly prescriptive. 	<p>The need for a balanced stock of housing is a key issue for the borough, and the inclusion of targets for and protection of family accommodation is welcomed – the preferred policy alternative is thus supported from a sustainability perspective.</p> <p>The reasons for not taking the proposed alternatives forward are accepted, however some further explanation of why option 2 is considered “unduly prescriptive” might strengthen this justification.</p>
DP H10 Sheltered Housing (Self-contained)	<ol style="list-style-type: none"> 1. Not providing an enabling policy. 2. Imposing no restriction on the 	<ol style="list-style-type: none"> 1. Would ignore a specific housing need. 2. Would exacerbate the current shortage of family accommodation. 	<p>The preferred policy is supported from a sustainability perspective, and the need to enable new sheltered housing is recognised.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
Accommodation	<p>loss of existing family housing.</p> <p>3. More detailed requirements</p>	<p>3. Could be unduly prescriptive.</p>	<p>Protection of existing family housing is particularly welcomed and thus the justification for not taking option 2 forward is strongly supported.</p> <p>Although the preferred option is considered to be a practical balance of control and facilitation, some further explanation of why more detailed requirements would be considered unduly prescriptive might strengthen this justification.</p>
DP H11 New Non Self-contained Accommodation	<p>1. Not having a policy</p> <p>2. Imposing no restriction on the loss of existing self contained housing</p> <p>3. Not restricting child occupancy</p> <p>4. More detailed requirements</p>	<p>1. Would fail to provide for a particular housing need.</p> <p>2. Would exacerbate the current shortage</p> <p>3. Would result in children being unsatisfactorily housed</p> <p>4. Could be unduly prescriptive.</p>	<p>The need for this policy is supported and the preferred alternative considered reasonable from a sustainability perspective.</p> <p>The reasons for not taking forward the proposed alternatives are supported.</p>
DP H12 Housing Providing Care	<p>1. Not having a policy</p> <p>2. Imposing no restriction on the loss of existing family housing</p> <p>3. More detailed requirements</p>	<p>1. Would fail to provide for a particular housing need.</p> <p>2. Would exacerbate the current shortage</p> <p>3. Could be unduly prescriptive.</p>	<p>The need for this policy is supported and the preferred alternative considered reasonable from a sustainability perspective.</p> <p>The reasons for not taking forward the proposed alternatives are also accepted.</p>
DP H13 Sites for Nomadic Peoples	<p>Not providing a specific policy to enable this specialised accommodation need</p>	<p>Would be contrary to Government strategy and London Plan requirements. Furthermore, the absence of an enabling policy to accommodate recognised ethnic minorities, who have been subject to historical discrimination and prejudice, could represent indirect discrimination contrary to Human Rights and Anti-Discrimination legislation.</p>	<p>Need to be in accordance with Government and London Plan requirements is recognised.</p> <p>The Proposed policy is also supported from a sustainability perspective in providing for this specific need while seeking to mitigate as much as possible for any potential negative environmental or social effects.</p>
DP H14 Requirement for Affordable Housing	<p>1. Retaining the current UDP threshold of 15 units</p> <p>2. Reducing the threshold below 10 units</p> <p>3. Not considering the affordable housing viability factors</p> <p>4. Continuing the current UDP policy specified expectation of affordable housing provision</p>	<p>1. Would not generate the required additional affordable housing and would also not be in conformity with the emerging Revised London Plan.</p> <p>2. Could be contrary to Government guidance and might not be viable on many sites.</p> <p>3. Would be contrary to Government strategy and London Plan requirements.</p> <p>4. Would be essentially incompatible with the</p>	<p>The shortage of affordable housing is a key sustainability issue for Brent, and thus this preferred policy is supported from a sustainability perspective, and the reduction of the threshold for provision of affordable housing in developments providing 10 units or more from 15 or more in the UDP is particularly welcomed.</p> <p>The reasons given for not taking forward the proposed alternatives are accepted as being reasonable.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
	within the 30%-50% range	proposed 'viability' dependent principle.	
DP H15 Type of Affordable Housing	<ol style="list-style-type: none"> Not specifically distinguishing between Social Rental and Intermediate Housing requirements and specifying a 70%:30% ratio Not providing for exceptions Imposing more stringent requirements. 	<ol style="list-style-type: none"> Would fail to properly address Brent's priority housing needs and would be contrary to London Plan requirements. Would render the sought affordable housing non viable or unsuitable for specific providers needs. Could be unduly prescriptive. 	The reasons for not taking forward the proposed alternatives are supported. The preferred policy is considered to be very positive from a sustainability perspective in seeking to address a critical sustainability issue in the Borough. Some further explanation of why more stringent requirements (option 3) would be considered unduly prescriptive might strengthen this justification - such as it is felt that a reasonable balance between meeting this housing need while balancing other needs and policy aims is required, and more stringent requirements would not enable this.
DP H16 Off-site Affordable Housing – 'Provision in Lieu'	<ol style="list-style-type: none"> Not providing this type of on-site affordable housing policy exceptions Permitting more exemptions 	<ol style="list-style-type: none"> Would be contrary to Government guidance and London Plan requirements. could lead to an under provision of affordable housing given the shortage of suitable sites 	The reasons for not taking forward these proposed alternatives are accepted. The preferred option is supported from a sustainability perspective, by providing for an appropriate balance between meeting the specific need for affordable housing, while enabling a reasonable degree of flexibility in implementation.

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

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
DP TRN1 Transport Assessment	<ol style="list-style-type: none"> To not request Transport Assessments and accompanying Travel Plans for developments likely to cause significant impacts. the requirement for Transport Assessments and Travel plans could be limited to only major developments 	<ol style="list-style-type: none"> Would be detrimental to the environment, transport systems and safety if appropriate mitigation is not secured, whilst national planning guidance and London Plan policy request DPD policies to require such information. Core policy CP TRN1 also request contributions sought from development to promote more sustainable modes whilst supporting regeneration and growth. This would not be the preferred approach in terms 	Transport Assessments are important as they help understand the environmental, economic and social impacts of congestions, vehicle noise and traffic generated pollution which can be very significant. This policy is therefore supported from a sustainability perspective, and the reasons for not taking forward the proposed alternatives are accepted.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP TRN2 Public Transport Integration</p> <p>DP TRN3 Bus Improvements / Connections</p>	<p>No alternatives proposed.</p>	<p>of sustainability.</p> <p>Policies DP TRN2 and DP TRN3 follow directly from Core Strategy policies CP TRN2 Reducing the Need to Travel and CP TRN4 Transport Links in London. Alternative options not selected have already been appraised in the Core Strategy document.</p>	<p>The foreclosure of policy alternatives by the Core Strategy is accepted, and the preferred options are supported from a sustainability perspective.</p>
<p>DP TRN4 Cycling and Walking Environments</p>	<p>No alternatives proposed</p>	<p>As above.</p>	
<p>DP TRN5 Highway Design and Forming an Access to a Road</p>	<p>Be less restrictive and exclude new accesses onto the North Circular Road and London Distributor Roads.</p>	<p>This would be detrimental to public safety and could hinder the circulation of traffic and therefore this approach should be dismissed.</p>	<p>The nature of this policy limits the development of specific alternatives. The reasons for not taking the proposed alternative forward are accepted.</p>
<p>DP TRN6 Freight</p>	<p>To not promote the maximisation of rail and water modes but ensure that all development which requires freight facilities to locate in areas which minimise disturbance and are close to major transport routes.</p>	<p>Would contradict the London Plans' sustainable transport policy and guidance in PPG13 in the protection, and development of, rail and water modes.</p>	<p>The need to be in conformity with the London Plan and Government guidance is recognised. Rail and water modes of freight transport are considered preferable from a sustainability perspective and thus policy to promote these is supported. A possible additional option could be to restrict freight generating development only to sites which offer access to rail and water based transport. This would be the strongest option from a sustainability perspective, though it is recognised that it may be unacceptable in terms of restricting the realisation of economic objectives.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP TRN7 Parking: Residential and Non-Residential Developments</p> <p>DP TRN8 Restrictions of Off Street Parking</p> <p>DP TRN9 Parking in Town Centres</p>	<p>No alternatives proposed.</p>	<p>Policies DP TRN7 to DP TRN9 follow directly from Core Strategy policy CP TRN3 Parking & Traffic Restraint. Alternative options not selected have already been appraised in the Core Strategy document.</p>	<p>The foreclosure of policy alternatives by the Core Strategy is accepted, and the preferred options are supported from a sustainability perspective.</p>
<p>Parking Standards</p>	<p>No alternatives proposed.</p>	<p>None included.</p>	<p>As noted in the appraisal (see Section 6) it may strengthen the parking standards to consider possible changes to the standards over time to reflect changing priorities, and the possibility that more restrictive parking policy, along with other transport demand management measures, may be required and more acceptable as perceptions and attitudes change to environmental issues, and particularly climate change.</p> <p>The development of an alternative to this effect could be considered prior to the completion of the submission version of the Development Policies.</p>

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

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP BIW1 Regeneration of Local Employment Areas</p>	<p>The Council could allow the redevelopment of Local Employment Areas for residential development without asking for a demonstration of demand nor requiring the provision of new workspace that is fit for modern operational standards.</p>	<p>The effect of this approach would be the widespread loss of opportunities to develop small workspaces for which the Council is satisfied there is demand. This would result in a loss of local employment opportunities and limit business development.</p>	<p>This alternative essentially represents the opposite to the preferred policy. The justification for not taking forward this alternative is accepted, and the preferred option is supported from a sustainability perspective.</p> <p>The justification for not continuing the 'business as usual' (i.e. the current UDP policy) could also</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
DP BIW2 Facilities for Employees	To not permit such facilities within Strategic and Borough Employment Areas.	The effect of this would be for users to travel into town centres from industrial estates to access these services. This would be less sustainable and may exacerbate road congestion within industrial estates and town centres. Facilities that are located within the estates can be accessed by foot.	<p>be presented.</p> <p>This alternative essentially represents the opposite to the draft preferred policy. The justification for not taking forward this alternative is accepted, and the preferred option is supported from a sustainability perspective.</p> <p>The justification for not continuing the 'business as usual' (i.e. the current UDP policy) could also be presented. Additional alternatives could be include:</p> <ul style="list-style-type: none"> - Exceptions for larger scale facilities (200sqm+) - Planning obligations to provide child care facilities for proposals at a smaller scale than proposed in preferred policy – such as at least 3000sqm or employing 100 staff, or even lower.
DP BIW3 Work-live development	To allow permitted development rights for changing the work-live unit into a residential dwelling	Would result in the loss of the working element of the developments, defeating the object of work-live.	<p>The preferred policy alternative is supported from a sustainability perspective, and the reasons for not taking forward the proposed alternative are accepted.</p> <p>Other alternatives appear limited in the context of this policy and the proposed option is therefore considered sufficient.</p>
DP BIW4 Working at home	An alternative approach would be to not manage home working.	This could lead to dwelling house being used as business premises that may have a detrimental impact on surrounding residential properties by virtue of traffic impact and noise pollution.	The proposed alternative is essentially the opposite of the draft preferred policy. However the preferred option is supported from a sustainability perspective and the development of other alternatives appears limited by the specific focus of this policy.
DP BIW5 Park Royal	An alternative approach would be to not recognise the Park Royal Opportunity Area Planning Framework	This would mean that policy direction would be given from the saved UDP policies, the Core Strategy and Site Specific Allocations document only. The Opportunity Area Planning Framework is a useful planning document that provides further detail and establishes cross borough working in the interests of maintaining the status of the area.	This policy simply sets out the Council's recognition of the Park Royal Opportunity Area Planning Framework. The reasons given for taking forward this policy approach is supported.
DP TC1 Brent	No alternatives proposed	This policy is a quantification of the Retail Need and	The foreclosure of policy alternatives by the Core

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
Retail Need Allocations		hierarchical allocation preference in policies CP TC1-2 in the Core Strategy (and will subsequently be moved into that document in the submission version). The rationale for not selecting alternative options have already been given in the Core Strategy.	Strategy is accepted.
DP TC2 Neighbourhood Centres	Allowing unrestricted changes to non-retail	Could quickly lead to neighbourhood centres with little or no retail provision or to the more rapid loss of essential services.	Other alternatives could be mentioned, such as requiring a lower percentage (i.e. no more than 20%) or allowing a higher percentage of a centre to be in non retail uses. However, the preferred option is supported from a sustainability perspective as providing an appropriate balance between protecting retail uses, while enabling some flexibility. The reasons for not taking forward the proposed alternative are also accepted.
DP TC3 Other Shopping Parades and Units DP TC4 Car-Boot / Other Recycling Sales	To have no protection for these retail uses and essential services outside town centre boundaries.	This could lead to a loss in these uses as a result of high level in change of use to residential developments. Such loss would subsequently increase the need to travel for local residents to go to the next nearest local shops to meet their daily needs. This is considered an unsustainable option.	For policy DP TC3 this alternative and the reasons for not taking it forward are supported. The preferred option does provide a good balance between the need to protect retail uses, while allowing a degree of flexibility in development. There does not appear to be a meaningful alternative to policy DP TC4. A possible alternatives could include further restrictions on Car-Boot Sales, but this is not considered a sustainable option.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP TC5 Non-Retail Uses</p> <p>DP TC6 Managing A3, A4 and A5 Uses</p> <p>DP TC7 Food and Drink (Café) Quarters</p> <p>DP TC8 Amusement Centres and Mini-cab Offices</p>	<p>To allow non- retail uses to occur in town centre locations regardless of the frontage designations.</p>	<p>This option was not chosen because of its likely adverse impact on the vitality of centre and it also departed from PPS 6 requirements (see paragraphs 2.16 and 2.17) and the London Plan Policy 3D.1.</p>	<p>The foreclosure of policy alternatives by the London Plan and national planning guidance is accepted.</p> <p>The preferred policy options presented for these uses are supported from a sustainability perspective, and are likely to offer protection and promotion to the vitality of existing centres.</p>
<p>DP TC9 Offices and Residential Above Shops</p>	<p>To protect residential above ground floor against commercial uses in Major town centres.</p> <p>This means a consistent approach would apply to every town centre that only residential uses above shop would be acceptable.</p>	<p>This approach would offer no flexibility and would not be beneficial to the vitality of the borough Major centres.</p>	<p>The reasons for not taking forward the proposed alternative are accepted.</p> <p>The preferred alternative does appear to provide an appropriate balance of protection for residential uses, while offering some flexibility to encourage appropriate economic development.</p> <p>It is thus supported from a sustainability perspective.</p>
<p>DP TC 10 Existing and New Markets</p>	<p>No alternative proposed.</p>	<p>No explanatory text included.</p>	<p>This policy is new, in that no such policy was included in the UDP.</p> <p>While the preferred alternative is supported from a sustainability perspective, we would recommend that at least one policy option be considered prior to the finalised submission version of the Development Policies.</p>
<p>DP TC11 Design and Infrastructure</p>	<ol style="list-style-type: none"> 1. To rely upon policies within the Urban Design Chapter. 2. Move this policy to UD chapter 	<ol style="list-style-type: none"> 1. The design-related issues here are specific to town centres, and would not be easily addressed using generic design policies. 2. Is more easily picked up by both applicants & officers (thus likely to be more effective) here, and would, in any case, not fit well into the design themes by which the Urban design Chapter is organised. 	<p>The nature of this policy limits the development of clear alternatives.</p> <p>The reasons given for not taking forward the alternatives proposed are accepted.</p> <p>The need to control the design and layout of development in or adjoining town centres is recognised and the preferred option included in the draft Development Policies is supported from a sustainability perspective.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
<p>DP TC12 Town Centre Management Initiatives</p> <p>DP TC13 Neasden – Development Opportunities</p> <p>DP TC 14 Brent’s Distinctive Multi-cultural centres</p> <p>DP TC15 Willesden Arts Quarter</p>	<p>To have no specific town-centre policies</p>	<p>This approach was not selected as it is not in line with the London Plan Policies 3D.1 and 3D.4 which require development plan documents to include policies to support town centre management, promote and enhance culture through designating cultural quarters in centres.</p>	<p>The need to be in accordance with the London Plan is accepted as restricting the development of reasonable alternatives.</p> <p>In addition the preferred options presented are considered very positive from a sustainability perspective, in promoting local identity and encouraging development based on the regeneration of culturally rich and unique areas.</p>
<p>DP CST1 Culture Leisure and Tourism uses</p>	<p>A separate policy on hotels and visitor accommodation.</p>	<p>It was considered that the effects of hotel development could adequately be assessed under the same policy for all culture, sport and tourism uses. The policy also conforms with the Core Strategy</p>	<p>The reasons given for not taking forward the proposed alternative are accepted, as is the restriction on alternatives due to the need for conformity with the Core Strategy.</p> <p>Other alternatives can be imagined however, such as placing stronger requirements / restrictions on developments. For example such developments could be allowed <i>only</i> where they serve a community function, or where there is <i>no</i> additional traffic generated. Such alternatives may be too restrictive, however we would suggest that they could be considered prior to the drafting of the final submission version of the Development Policies.</p>
<p>DP CST2 Protection of Brent’s Cultural Assets</p>	<p>To <i>not</i> protect existing cultural assets, and focus entirely on developing new Culture, Sport and Tourism uses.</p>	<p>In terms of existing resources, Brent already has a number of assets, and it is these that are recognised such as its diverse communities, and art and entertainment facilities that should be acknowledged and protected. By allowing the loss of sports facilities would not be in accordance with national guidance as outlined in PPG17 Open Space, Sport and Recreation.</p>	<p>This is considered a reasonable alternative, and the reasons for not taking it forward are accepted. The need to protect existing cultural assets is considered very important from a sustainability perspective, and thus the preferred policy is supported.</p>
<p>DP CST3 Archaeological Sites and</p>	<p>1. The policy could prevent any development or excavation from occurring within these areas</p>	<p>1. It is recognised that this is neither desirable nor practical, and redevelopment of sites is necessary to meet housing needs and other priority land</p>	<p>The reasons for not taking forward these alternatives are accepted, and the proposed preferred policy is supported.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
Monuments	2. No protection of sites or monuments	uses. 2. Without any protection, some of Brent's valuable history will be lost or go undocumented.	

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

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
DP CF1 New Community Facilities and Extensions to Existing	While community facilities are wide ranging, these could be further subdivided into topics with individual policy assessments of each.	It was considered that there are potential impacts common to all community facilities and these should be included within a single all encompassing policy. This policy also conforms with the core strategy policy which encourages community facilities to be located within accessible areas. This policy also assures that a proper assessment is made of all potential effects this may have on the wider environment.	The preferred policy is supported from a sustainability perspective. The provision of appropriate, accessible community facilities is very important to support the well-being and vibrancy of communities and neighbourhoods. The criteria outlined for the supply of facilities do provide a good balance between the need to encourage such facilities while protecting against loss of other uses, environmental and other potential negative impacts. The reasons for not taking forward the proposed alternative are supported.
DP CF2 Protection of Existing Community Facilities	1. To not allow any exceptions to the loss of facilities, even in exceptional circumstances. 2. Keep UDP policy which refers to the reduction of the facility size if the facility is too large to meet current needs.	1. It is considered that the policy intent still protects all community facilities, and some allowance should be made for exceptional circumstances. 2. This is no longer considered needed, as it is more favourable to be rebuild facilities to suit current and future needs.	The preferred option is supported from a sustainability perspective, as the protection of existing community facilities is considered very important for the well-being of communities, however the need for some flexibility is recognised. The reasons for not taking forward the proposed alternatives are accepted.
DP CF3 Developer Provision and Contributions Towards Community Facilities	1. As an alternative, another community use could be a priority (over education) or they could be treated all equally. 2. Keep current UDP policy which requires education contributions and community facilities to be secured within very large scale or	1. This would not reflect the current situation and needs in the borough. Special mention is made for education contributions in preferred alternative, given Brent's critical need for additional school places. 2. This has been considered to be successful in the past, and the policy intent therefore has remained the same.	The SA baseline study (see Part A) identified the shortfall of school places in the borough as a current problem, which is likely to be exacerbated by population increase over the plan period. The focus on education related contributions "in particular" is welcomed therefore, and the proposed preferred alternative supported from a sustainability perspective.

Policies	Alternative options not selected	Reasons why not selected (as included in Draft Development Policies)	SA comments
	mixed use schemes.		The proposed alternatives are considered reasonable, and the reasons for not taking them forward accepted.

6. APPRAISAL OF THE DEVELOPMENT POLICIES PREFERRED OPTIONS

Introduction to the appraisal of the Development Policies DPD Preferred Options

- 6.1 The methodology adopted for the Sustainability Appraisal (SA) of the draft Development Policies DPD Preferred Options is described in Section 2 of this SA Report (Part A). The findings of the appraisal of the version of the Preferred Options which was issued for public consultation is presented in this section.
- 6.2 During the refinement of the Preferred Options, the SA 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. These changes were particularly made in response to a detailed SA commentary on an earlier draft of the Development Policies (May 2007), this is included, together with LB Brent responses to the specific comments made, in Appendix 8. Following these recommendations, and specific comments on policy alternatives, LB Brent produced a revised draft Development Policies DPD Preferred Options on 1st June 2007.
- 6.3 Consequently, what is presented here is a description of the residual effects and proposed mitigation and enhancement measures relevant to the latest version of the Preferred Options and any outstanding SA recommendations. The version of the draft Development Policies DPD Preferred Options appraised in this section was dated, and made available to CEP on 1st June 2007.
- 6.4 A detailed appraisal was undertaken of collections of policies, reflecting their groupings into chapters and sub-chapters within the Preferred Options document. Following internal discussions of possible appraisal approaches, it was decided to consider the policies in groups rather than individually for three reasons:
- Firstly, the policies in the Development Policies DPD Preferred Options are strongly linked to the Core Strategy DPD Preferred Options previously appraised, which means that many strategic and sustainability issues potentially raised by the Development Policies have already been considered in depth in the earlier appraisal.
 - Secondly, many of the Development Policies concern the detailed implementation of aspects of policy as set out in the Core Strategy DPD Preferred Options, and they are thus in most cases more focussed and specific in terms of content. It was thus decided that completion of individual matrices for each policy would represent a disproportionate level of detail.

- Thirdly, the number of policies included in the Development Policies is considerably larger than is the case with the Core Strategy DPD Preferred Options policies (94 policies in total, compared to 37 within the Core Strategy), reflecting their more specific implementation focus.
- 6.5 Additionally, in some cases a number of policies have been appraised together. This has only been done where consecutive policies cover different aspects of a broader issue, such as Public Realm (policies DP UD7, 8 and 9), or Affordable Housing (DP H14, 15 and 16). Table 16, presents a full list of the policies in the Development Policies DPD Preferred Options, structured as they appear in the DPD. Where policies have been appraised together this has been indicated in the list by shading.
- 6.6 Each of the sustainability objectives and criteria were considered (see the appraisal framework as set out in Section 3 of Part A), although scoring has been assigned at the objective level only.
- 6.7 The results are presented in a series of matrices, below (also see Figure 28 for an example of a blank appraisal matrix), these matrices include:
- a score against each objective, which represents a score based on consideration of each of the criteria;
 - a commentary on the likely positive and negative effects of the policies under each objective;
 - a description of potential enhancement and mitigation measures under each objective; and

Figure 28: Example appraisal matrix

Policy Number and Title			
Objective	Score	Score	Comments
Social			
1. To reduce poverty and social exclusion			Effects: Mitigation / Enhancement:
2. To improve the health of the population			Effects: Mitigation / Enhancement:
etc			
etc			
etc			
Key:			
Major positive: ■ Minor positive: + Neutral: o Minor negative: - Major negative: ■ Uncertain?: -/+			
Overall Summary			
Effects:			
Mitigation / Enhancement:			

Table 16: Policies included in the Draft Development Policies Preferred Options

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

Note: consecutive policies shaded [grey] have been appraised together.

- an overall summary commentary on the potential effects of the policies and potential enhancement and mitigation measures, including recommendations on improving or clarifying the policy or supporting text from a sustainability perspective, mitigating the potential negative effects and enhancing the potential positive effects of the policy.
- 6.8 By scoring groups of policies together the process of drawing summary conclusions and makes cross-policy comparisons, the assessment of policy compatibility and of cumulative impacts is eased, compared to completing a single matrix for each policy.
- 6.9 The draft Development Policies have been subdivided in this Section to follow the Chapters of the Development Policies DPD Preferred Options:
- Promoting a Quality Environment
 - Meeting Housing Needs
 - Connecting Places
 - A Strong Local Economy and Enabling Community Facilities
- 6.10 Each of the Chapters in the Draft Development Policies Preferred Options are presented in turn, along with a separate table summarising the potential mitigation and enhancement measures and SA recommendations.

Detailed appraisal of the significant social, environmental and economic effects of the Development Policies DPD Preferred Options

- 6.11 The following sections provide a description of findings of the appraisal of the significant social, environmental and economic effects of the Development Policies DPD Preferred Options. The version that was appraised was dated 1st June 2007. No significant changes to the text or policies were expected to be made between this version and the version produced for public consultation starting on the 18th June 2007.

Promoting a Quality Environment

- 6.12 Within the Development Policies DPD Preferred Options, the *Promoting a Quality Environment* chapter is made up of four distinct policy groupings, reflecting the policy structure of the Core Strategy DPD Preferred Options. To be consistent with the appraisal of the Core Strategy, the *Promoting a Quality Environment* chapter has been appraised as a whole, with common conclusions, mitigation and enhancement and overall summary of effects produced. However, the appraisal has been subdivided by policy grouping, with separate matrices for each policy topic:
- A better townscape: by design – DP UD policies 1 to 20 (included in two matrices);

- Towards a sustainable Brent, 2020 – DP SD policies 1 to 7;
- Environmental protection – DP ENV policies 1 to 7; and
- Enhancing open space and biodiversity – DP OS policies 1 to 9.

6.13 These matrices are presented below.

Summary of potential effects

6.14 The *Promoting a quality environment* chapter generally performs very well against the sustainability objectives, and no significant negative effects are predicted. Reflecting the focus of the Development Policies on relatively specific aspects of policy, the predominant effect is predicted to be ‘minor positive’, although some ‘major positive’ and ‘mixed’ effects are also predicted.

6.15 Table 17 to Table 21 present the appraisal of each set of policies within the *Promoting a quality environment* chapter. As discussed above, in the majority of cases each policy was appraised separately, however they are presented collectively in the following matrices as this allows easy comparison of policies by objective and ease of summarising effects across a whole chapter or sub-chapter.

A Better Townscape – By Design

6.16 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.

- 6.17 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, 2020

- 6.18 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.
- 6.19 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

- 6.20 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.

6.21 No significant negative effects are expected from the section on *Environmental Protection*.

Enhancing Open Space and Biodiversity

6.22 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**.

6.23 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.

6.24 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.

6.25 Mitigation and enhancement suggestions for the *Promoting a quality environment* policies are included in Table 22. Reflecting the nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Table 17: Promoting a Quality Environment – A Better Townscape – By Design (DP UD policies 1 – 12) appraisal matrix

Objective	Policy No.											Comments on predicted effects
	UD 1	UD 2	UD 3	UD 4	UD 5	UD 6	UD 7/8/9	UD 10	UD 11	UD 12		
Social												
S1. To reduce poverty and social exclusion	+	0	0	0	+	0	0	0	0	0	0	UD1 – see notes at end. UD5 - Urban clarity and safety can play an important role in reducing social exclusion by making urban environments more accessible and less threatening to vulnerable groups particularly the elderly and young.
S2. To improve the health of the population	+	0	+	0	+	+	0	0	0	0	0	UD3 - aims to ensure urban spaces which encourage foot and cycle movement and connections to greenspace UD5 - by creating safer and 'clearer' urban spaces likely to encourage walking, moving and more active lifestyles. UD6 positive health impacts of trees include improved air quality, providing more comfortable and attractive outdoor spaces and attractive environments.
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	0	0	0	0	No significant effects are predicted.
S4. To provide everybody with the opportunity to live in a decent home	+	+	0	+	0	0	0	0	0	0	0	Improved urban design should have a positive effect generally on the quality of housing. UD2 – by ensuring the quality of existing spaces and improvement in areas of poor character. UD4 – seeks to ensure buildings and homes adaptable to the needs of everyone in the long term.
S5. To provide everybody with good quality surroundings	++	++	+	+	+	+	++	+	+	+	+	Central aim of UD 1, UD 2 and UD7, 8 and 9 is improving quality of townscape and urban design. All policies seek to improve or ensure some specific aspect of urban design, thereby contributing to the quality of surroundings.
S6. To reduce crime and anti-social activity	+	0	+	0	++	0	+	0	0	0	0	UD5 supporting text and policy includes information on the positive role of design in reducing crime. UD3 – by ensuring urban spaces encourage movement on foot and by bike, and structured to be function and attractive, safety should be improved. UD7/8/9 – by improving public realm, use levels and attitudes to public and other open spaces is likely to improve.
S7. To encourage a sense of local community; identity and	+	+	+	0	++	0	+	0	0	0	0	UD5 – seeks explicitly to produce safer, more inclusive urban spaces. This in turn is likely to improve community relations and communication – and in the long term

Objective	Policy No.											Comments on predicted effects
	UD 1	UD 2	UD 3	UD 4	UD 5	UD 6	UD 7/8/9	UD 10	UD 11	UD 12		
welfare												identity and welfare. UD2, 3 and 7/8/9 – all seek to address aspects of urban design, movement and the quality of the public realm in a positive manner – which are likely in the long term to create beneficial outcomes in terms of communities.
S8. To improve accessibility to key services especially for those most in need	+	0	+	+	+	0	0	0	0	0	0	UD3 – providing urban spaces which are easier to move around and between, particularly on foot, by bike and public transport, will improve access for all, and particularly those without access to cars. UD4 – specifically requires development to provide access for all. Minor positive score given as accessibility also depends on other aspects – such as location near residential areas, and access by public transport etc. UD5 – seeks to make new developments easier and safer to use and access.
Environmental												
EN1. To reduce the effect of traffic on the environment	0	0	+	0	0	+	0	0	+	0	0	UD3 – seeks explicitly to ensure developments encourage walking, cycling and public transport use. UD6 – trees can absorb air pollutants and reduce noise and visual impact of roads and traffic. UD11 – mixed use developments and higher densities can reduce the need to travel, where residents also work or access shopping and other amenities in close proximity.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	+	0	0	0	0	0	UD7 – as recommended in the SA commentary, it would be beneficial to include text such that planting schemes explicitly consider minimising water use.
EN3. To improve air quality	0	0	+	0	0	+	0	0	0	0	0	UD3 – by encouraging walking and cycling, especially for shorter journeys. UD6 – trees absorb air pollutants, thereby having a beneficial effect on air quality.
EN4. To conserve and enhance biodiversity	0	+	0	0	0	++	++	0	0	0	0	UD2 – explicitly refers to need to design proposals to ensure no harm to the character of natural features, green chains and metropolitan open land. UD6 – trees, particularly mature examples, represent an important habitat for a large number of insects and other animals, and in turn support bird species. UD7 – key aim is to ensure landscape and biodiversity are protected and promoted in development.
EN5. To maintain and enhance the quality of landscapes and townscapes	++	++	++	0	+	+	++	++	0	+	0	Main aim of UD1/2/3/7/8/9/10 is to improve townscape, public realm and landscape. UD5 – safe and useable public urban spaces are more likely to be used and maintained in the long term, as well as to have the respect of local residents – thus community neglect, littering etc likely to be reduced. UD6 – trees are an important aspect of urban environments, and can greatly improve public spaces, providing colour, a sense of space, shade etc.

Objective	Policy No.											Comments on predicted effects
	UD 1	UD 2	UD 3	UD 4	UD 5	UD 6	UD 7/8/9	UD 10	UD 11	UD 12		
												UD12 – requires buildings to be of “outstanding” architectural and urban design quality and to fit in with existing surroundings.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	+	0	0	0	+	0	0	0	0	0	UD2 – Explicit reference is made to need to respect historic features in proposals. UD6 – Trees, particularly mature examples, can be of considerable historical significance – they will have been present as landmarks for 50+ years.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+	0	0	0	0	+	+	0	0	0	0	UD6 - Trees can help mitigate (e.g. through absorption of CO2) and adapt to (e.g. by providing shade) climate change. UD7 - Actively managing landscape and biodiversity such as through green-roofs, SUDS etc is likely to play an important role in adaptation to climate change, especially in the long-term.
EN8. To minimise the production of waste and use of non-renewable materials	+	0	0	0	0	0	0	0	0	0	0	No significant effects are predicted.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	+	+	0	0	0	0	UD6 – trees are particularly important for soil stability, and the prevention of erosion. UD7 - Actively managing landscape and biodiversity is likely to improve and protect soil and land quality.
Economic												
EC1. To encourage sustainable economic growth	+	+	+	+	+	0	+	+	+	0	0	UD11 – well designed and planned mixed-use development is likely to have direct economic benefits in the medium to long-term. Other policies – although these policies do not explicitly encourage economic growth, a better quality, more useable, user friendly and safe local public realm, buildings and spaces are likely in the long-term to encourage people to want to remain in Brent, as well as providing an attractive environment for people to live, work and establish businesses – and is likely to therefore have a positive economic impact.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	0	0	0	0	0	0	No significant effects predicted.
EC3. To reduce disparities in economic performance and promote regeneration	0/ +	0/ +	0/ +	0/ +	0/ +	0	0/ +	0/ +	+	0	0	See EC1.
EC4. To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	0	0	0	0	0	0	No significant effects predicted, however this objective does relate to EC1 and EC3.
EC5. To encourage efficient patterns of movement in	+	0	+	0	+	0	0	0	+	0	0	UD3 and UD5 – by improving the ability of people to move easily and safely within and between urban spaces and new development these policies are likely,

Objective	Policy No.										Comments on predicted effects	
	UD 1	UD 2	UD 3	UD 4	UD 5	UD 6	UD 7/8/9	UD 10	UD 11	UD 12		
support of economic growth												particularly in the medium and long-term, to support successful local economies. UD11 – mixed use development can, where appropriately managed offer considerable opportunities for minimising movement, and maximising efficiency, by providing amenities and residential space in close proximity.
Overall comments on Policies UD1 – UD12												
A positive set of policies, with no significant negative effects predicted. Positive effects are likely in relation to policies which seek to improve and protect public realm, townscape and local urban environmental quality. As these factors are vital in providing the built fabric in which communities live and thrive, these policies are also predicted to have positive effects on social objectives related to communities, reducing exclusion, reducing crime, and in the medium to long term enhancing the strength and vitality of the local economy.												
Policy specific comments												
UD1:												
<ul style="list-style-type: none"> - As the SA commentary on the draft Development Policies noted, the cumulative effects of a number of “smaller-scale proposals” can still be significant, and inclusion of text explaining what would be required in a “brief design statement” might strengthen this policy. - Has been scored based on assumption that policies referred to within text are implemented. 												
UD3:												
<ul style="list-style-type: none"> - Supporting text: it is recommend that a full reference is given to Government’s “places, streets and movement” publication. - A cross reference to TRN7 on parking standards might be a useful addition to the policy or supporting text. 												
UD5:												
<ul style="list-style-type: none"> - Supporting text: it is recommend a full reference to the Police “secured-by-design” report. 												
UD6:												
<ul style="list-style-type: none"> - The inclusion of a recommendation to promote tree planting in new development is welcome. 												
UD8:												
<ul style="list-style-type: none"> - Although it is noted that cross-over paving (front gardens paved to connect to roads) does not in itself require planning permission, we would re-iterate our previous comment that cross-overs increase urban run off, and that recent data (2004) from the London Assembly Environment Committee suggest that Brent has among the highest number of pavement cross-overs of the London Boroughs. Some recognition of this in supporting text could strengthen the policy. - As recommended in the previous SA commentary, reference could usefully be made to signage within the policy text as well as supporting text as it can greatly improve access and ease of movement. 												
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-												

Table 18: Promoting a Quality Environment – A Better Townscape – By Design (DP UD policies 13 – 20) appraisal matrix

Objective	Policy No.								Comments on predicted effects
	UD13	UD14	UD15	UD16	UD17	UD18	UD19	UD20	
Social									
S1. To reduce poverty and social exclusion	+	0	0	0	0	0	0	0	UD13 – Identifies areas of low townscape and public realm quality in need of improvement, in the long-term where Core Strategy policy UD1 is implemented effectively, this is likely to create environments which improve quality of life for people in these areas – often excluded and vulnerable.
S2. To improve the health of the population	0	0	0/+	0	0	0	0	0	UD15 – although policy will not actively promote health improvement, by ensuring telecoms equipment does not exceed exposure guidelines, does offer some health protection.
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	0	No significant effects predicted

Objective	Policy No.								Comments on predicted effects
	UD13	UD14	UD15	UD16	UD17	UD18	UD19	UD20	
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	0	0	+	0	UD19 – explicitly seeks to protect areas of distinctive residential character.
S5. To provide everybody with good quality surroundings	0	+	+	+	+	+	+	+	UD13 – seeks explicitly to improve areas of low townscape and public realm quality UD14 – by controlling unsightly and obtrusive building services equipment. UD15 – seeks to control visual intrusion from communications equipment. UD16 – by managing the visual impact of advertisements and encouraging public realm / landscaping enhancements adjacent to freestanding advertisement hoardings. UD17 – by protecting the special character of listed buildings, and ensuring any changes to them bring about benefits to the community. UD18 – provides protection and seeks to ensure enhancement of the character of conservation areas. UD19 – explicitly seeks to protect areas of distinctive residential character. UD20 – specifically seeks to protect views / local landmarks.
S6. To reduce crime and anti-social activity	+	0	0	0	0	0	0	0	UD13 – in the long-term through public realm improvements.
S7. To encourage a sense of local community; identity and welfare	+	0	0	0	0	+	+	0	UD13 – in the long-term through public realm improvements. UD18/19 – likely to protect aspects of community identity in conservation areas / areas of distinctive residential character.
S8. To improve accessibility to key services especially for those most in need	0	0	0	0	0	0	0	0	No significant effects predicted.
Environmental									
EN1. To reduce the effect of traffic on the environment	0	0	0	0	0	0	0	0	No significant effects predicted.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	0	0	0	0	0	0	0	0	No significant effects predicted.
EN4. To conserve and enhance biodiversity	0	0	0	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	+	+	+	+	+	+	+	All policies are expected to have positive effects: UD13 – seeks explicitly to improve areas of low townscape and public realm quality UD14 – by controlling unsightly and obtrusive building services equipment. UD15 – seeks to control visual intrusion from communications equipment.

Objective	Policy No.								Comments on predicted effects
	UD13	UD14	UD15	UD16	UD17	UD18	UD19	UD20	
									UD16 – by managing the visual impact of advertisements and encouraging public realm / landscaping enhancements adjacent to freestanding advertisement hoardings. UD17 – by protecting the special character of listed buildings, and ensuring any changes to them bring about benefits to the community. UD18/19 – provides protection and seeks to ensure enhancement of the character of conservation areas / areas of distinctive residential character. UD20 – specifically seeks to protect views / local landmarks.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	++	++	0	+	UD17 – seeks explicitly to protect and enhance listed buildings in Brent, and places strict controls on the demolition or alteration of these historic / cultural assets. UD18 – provides protection and seeks to ensure enhancement of the character of conservation areas. UD20 – by maintaining views and landmarks, likely in long-term to ensure the preservation of key heritage assets.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	0	0	0	0	0	0	0	No significant effects predicted.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0	0	0	0	No significant effects predicted.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	0	0	0	No significant effects predicted.
Economic									
EC1. To encourage sustainable economic growth	+	0	0	0	0	0	0	0	UD13 – seeks explicitly to improve areas of low townscape and public realm quality as well as gateways and key corridors – in the long term this is likely to make these areas more attractive for businesses, and encourage people to live and work in the area.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	0	0	0	No significant effects predicted.
EC3. To reduce disparities in economic performance and promote regeneration	+	0	0	0	0	0	0	0	UD13 – See EC1 – in the long-term through public realm improvements.
EC4. To encourage and accommodate both indigenous and inward investment	+	0	0	0	0	0	0	0	UD13 – See EC1
EC5. To encourage	0	0	0	0	0	0	0	0	No significant effects predicted.

Objective	Policy No.								Comments on predicted effects
	UD13	UD14	UD15	UD16	UD17	UD18	UD19	UD20	
efficient patterns of movement in support of economic growth									
Overall comments on Policies UD13 – UD20									
<p>As with UD1 – UD12, policies UD13 – UD20 are likely to have positive effects against those objectives to which they are relevant. There is limited impact expected on economic objectives, as a result of the relatively specific and focussed nature of these policies.</p> <p>There are major positive scores predicted for policies UD17 and UD18 against objective EN6 – as these policies explicitly seek to protect and enhance aspects of Brent's historical built heritage / environment.</p> <p>The other sustainability objectives which are likely to have the most significant positive effects are S5 and EN5 both concerned with the quality of townscape, landscape and 'surroundings'. The positive effects likely from most of the policies reflect their nature, which are focused on enhancing and controlling specific aspects of the build environment and public realm.</p> <p>As with UD1 – UD12, there are no negative effects predicted.</p>									
Policy specific comments									
UD13:									
<ul style="list-style-type: none"> Minor positive effects predicted as policy UD13 and supporting text simply outlines areas in need of enhancement, and it is the nature of implementation of Core Strategy policy UD1 which will dictate the eventual outcomes. 									
UD14:									
<ul style="list-style-type: none"> Cross reference to policies SD1-7 could be made to encourage and promote further the use of passive / low energy systems. As noted in the earlier SA commentary, from a sustainability perspective the first option would be encouraging all efforts to design and architecture which negates the need for such equipment. 									
Key: Major positive: + Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+									

Table 19: Promoting a Quality Environment – Towards a Sustainable Brent, 2020 (DP SD policies 1 – 7) appraisal matrix

Objective	Policy No.							Comments on predicted effects
	SD1	SD2	SD3	SD4	SD5	SD6	SD7	
Social								
S1. To reduce poverty and social exclusion	+	+	+	0	0	0	0	SD1/2 – homes and developments built to higher standards of construction and to be more efficient will assist in exclusion issues such as fuel poverty and ill-health due to poor heating / damp etc. SD3 – better insulation, more efficient heating systems etc. are likely in the long-term to be an important factor in reducing fuel poverty and other energy costs for vulnerable people.
S2. To improve the health of the population	+	+	+	0	0	+	+?	SD1/2 – see S1. SD3 – improved insulation and efficient heating likely to have health benefits. SD6 – by addressing and protecting internal air quality from external poor air quality. This is likely to have beneficial health effects within these buildings. SD7 – improved facilities for waste storage in developments may decrease insect and vermin nuisance, and associated health problems.
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	+	+	0	0	0	+	+	SD1/2 – See S1 SD6 – by addressing poor internal air-quality. SD7 – See S2

Objective	Policy No.							Comments on predicted effects
	SD1	SD2	SD3	SD4	SD5	SD6	SD7	
S5. To provide everybody with good quality surroundings	0	0	0	0	0	0	+	SD7 – integral design to manage waste in developments likely to reduce visual impacts of current waste systems, especially in new developments.
S6. To reduce crime and anti-social activity	0	0	0	0	0	0	0	No significant effects predicted.
S7. To encourage a sense of local community; identity and welfare	0	0	0	0	0	0	0	No significant effects predicted.
S8. To improve accessibility to key services especially for those most in need	0	0	0	0	0	0	0	No significant effects predicted.
Environmental								
EN1. To reduce the effect of traffic on the environment	0	0	0	0	0	0	0	No significant effects predicted.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	+	+	0	++	0	0	0	SD1 – developments required to address water demand and use efficiency. SD2 – requirement to complete sustainability checklists likely to raise awareness of water demand and disposal issues. SD4 – requirement on development to address water demand / use of reclaimed water.
EN3. To improve air quality	+	+	0/-?	0	0	+	+?	SD1 – developments required to address air quality issues. SD2 – requirement to complete sustainability checklists likely to raise awareness of air quality issues. SD3 - possible negative impact on air quality if a large number of local small scale energy schemes are developed – however emissions from such developments are very limited, so impact not considered likely to be significant. SD6 – key aim of policy, though focus is on internal air-quality, so drivers of poor external air-quality are not addressed (as not focus of the policy) SD7 – better management of waste may improve local odour related air quality problems.
EN4. To conserve and enhance biodiversity	+	+	0	0	0	0	0	SD1 – developments required to consider environmental protection policies in relation to climate change adaptation and mitigation – this is likely to include habitat and biodiversity. SD2 – requirement to complete sustainability checklists likely to raise awareness of biodiversity issues.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	0	0	0	0	0	+	SD1 – particularly in the long-term, the effects of higher standards in building and materials is likely to be more attractive and resilient urban environments. SD7 – see S5.
EN6. To conserve and where appropriate enhance the	0	0	0	0	0	0	0	No significant effects predicted.

Objective	Policy No.							Comments on predicted effects
	SD1	SD2	SD3	SD4	SD5	SD6	SD7	
historic environment and cultural assets								
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+/++	+	++	+	+	0	0	SD1 - Central aim of the policy, however significant positive effect will depend on the implementation of other policies referred to. SD2 – requirement to complete sustainability checklists likely to raise awareness of climate change issues. Renewables requirement included in policy. SD3 – by reducing energy demand and increasing level of supply from renewables will reduce energy related climate change contributions of the borough – if successfully implemented, particularly in the long-term. SD4 – efficient water use and reducing demand will make developments more resilient to predicted climate change effects in relation to water supply. SD5 – by reducing demand for virgin materials, and encouraging recycling, likely to reduce energy and CO ₂ emissions related to aggregates and materials production.
EN8. To minimise the production of waste and use of non-renewable materials	+	+	+	0	++	0	+	SD1 – developments required to consider material / resource efficiency and operational waste – through other policies. SD2 – requirement to complete sustainability checklists likely to raise awareness of waste issues. SD3 – where biomass and other small scale energy generation uses local waste as a fuel resource. SD5 – main aim of policy is to encourage resource use efficiency and recycling / reuse of construction materials. SD7 – main focus is the management of waste, not its production, however better systems and more awareness of waste recycling may have positive effects on waste production.
EN9. To conserve and enhance land quality and soil resources	+	+	0	+?	+	0	0	SD1 – in longer term by designing spaces and development able to adapt to climate change effects likely effect is to protect land quality. SD2 – requirement to complete sustainability checklists likely to raise awareness of land and soil issues. SD4 – reducing water demand may reduce pressure on abstractions and thus maintain natural levels in groundwater and rivers and tributaries, thus supporting wildlife and biodiversity. SD5 – possible long-term effects on aggregates demand – could ease pressure on mining and other materials production environmental pressures – impact felt outside Brent.
Economic								
EC1. To encourage sustainable economic growth	+	0	+	+	+?	0	0	SD1 – more resilient and adaptable developments, designed to be comfortable for use with climate change effect taken into account, are more likely to offer the development foundations for sustainable economic success in the Borough. SD3 – more energy efficient developments are likely to become increasingly in demand

Objective	Policy No.							Comments on predicted effects
	SD1	SD2	SD3	SD4	SD5	SD6	SD7	
								if as many predict, future energy prices become more unpredictable and energy costs rise. This contributes to a more sustainable local economy. SD4 – by ensuring developments are more resilient to climate change impacts in relation to water. SD5 – possible creation of local employment in recycling, storage and management/treatment of construction and demolition waste.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	+	0	0	SD5 – see above
EC3. To reduce disparities in economic performance and promote regeneration	0	0	0	0	0	0	0	No significant effects predicted.
EC4. To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	0	0	No significant effects predicted.
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	0	0	0	0	0	No significant effects predicted.
Overall comments on Policies SD1 – SD7								
<p>The SD policies are likely to have positive effects under all the objectives they are relevant to. There are a large number of objectives under which no significant effects are likely, reflecting the specific and focussed nature of the Development Policies. Some very positive effects are predicted. These are assigned where a policy specifically addresses a specific SA objective – for example policy SD4 and objective EN2 – both concerned with water demand and conservation.</p> <p>The objective under which is predicted the greatest number of positive effects is EN7 – reducing contributions and vulnerability to climate change. This reflects the overall focus of the sub-chapter, as set out in the introduction and SD1.</p> <p>There is one potential negative effect predicted, although this effect is uncertain. This is the potential negative local air-quality impacts of an increase in small-scale biomass or other micro-generation initiatives in the Borough – policy SD3. This issue is noted in Policy ENV1, further limiting the potential for a negative effect.</p>								
Policy specific comments								
SD1:								
<ul style="list-style-type: none"> - Reference to and inclusion of information from the London and Brent Ecological Footprint studies is welcomed, as it draws attention in a clear manner to the need for new approaches if development at all levels is to meet sustainability objectives. - This policy cross-refers to a number of other policies in the chapter, and thus effects will depend on how these policies are implemented. - One of the additional documents suggested in the earlier SA commentary has been included – this is welcomed. It is also suggested that reference might usefully be made to the Mayor's forthcoming Climate Change Adaptation Strategy. - As noted in the earlier SA commentary the policy text (bullets) could refer to a wider range of other policies than those noted, for example planting and landscaping (OS7), reducing travel need (TRN2). 								
SD2:								
<ul style="list-style-type: none"> - In the earlier SA commentary it was recommended that the supporting text suggest, or allow for future increases in the share of renewable energy generation required. A 20% target is welcomed, and is recognised as being in line with the draft London Plan Further Alterations, however text could be included to allow for an increase in this target over time (such as to 30% by 2015). 								
SD3:								
<ul style="list-style-type: none"> - As noted in the earlier SA commentary it is important for the implementation of a policy like SD3 that the realisation of targets (such as 20% renewables) are actually met. It is thus critical that the energy performance of new developments are included in some way within the formal monitoring processes of the LDF (i.e. the AMR). 								

Objective	Policy No.							Comments on predicted effects
	SD1	SD2	SD3	SD4	SD5	SD6	SD7	
SD4:								
- The reference to the targets set out in the Mayor's draft Water Strategy is welcome – the policy could be further strengthened by the inclusion of these targets either in the supporting text, or the policy itself.								
SD5:								
- Bullet point a) as noted in the earlier SA commentary it is somewhat unclear how much weight is meant by "giving preference to". It is recommended that this could be clarified, perhaps by including an indicative percentage expected.								
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+								

Table 20: Promoting a Quality Environment – Environmental Protection (DP ENV policies 1 – 7) appraisal matrix

Objective	Policy No.							Comments on predicted effects
	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	
Social								
S1. To reduce poverty and social exclusion	+?	0	0	0	0	0	0	ENV1 – improving air quality may have effect on exclusion by making outdoor exercise and walking/cycling more attractive.
S2. To improve the health of the population	+	+	+	+	+?	+	0	ENV1 – improved air quality likely to reduce respiratory illnesses associated with air pollution. ENV2 – noise disturbance can have negative health effects, so reducing the likelihood of this should have beneficial health impact. ENV3 – by ensuring development does not give rise to significant pollution / is not located near sites or developments which impose risks. ENV4 – in the long term by seeking to remove / mitigate for previously contaminated land. ENV5 – possible health effects from improved water quality in watercourses in the Borough. ENV6 – positive effects likely in the long-term. Flooding, especially of homes has significant health impacts, thus preventing this will lead to relative health benefits.
S3. To improve the education and skills of the population	0	0	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	0	+	0	ENV6 – homes safe from flooding, and incorporating design (SUDS, green roofs etc.) which accounts for the possibility of flooding are likely to offer homes which are more durable, and adaptable to long-term conditions (including under climate change).
S5. To provide everybody with good quality surroundings	+	+	+	0	+	0	0	ENV1/2 – air quality and noise pollution can be factors in poor local environmental quality – seeking to minimise / prevent these likely to have positive effects. ENV3 – see S2 ENV5 – removal of culverting and impounding of surface water and improved access to watersides likely to improve the quality of surroundings in these areas.
S6. To reduce crime and anti-social activity	0	0	0	0	0	0	0	No significant effects predicted.
S7. To encourage a sense of local	0/+	0/+	0/+	0	0	0	0	No significant effects predicted. ENV 1-3 – However overall an improved

Objective	Policy No.							Comments on predicted effects
	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	
community; identity and welfare								environment can have beneficial social and community impacts by making people more proud and comfortable in the places they live.
S8. To improve accessibility to key services especially for those most in need	0	0	0	0	0	0	0	No significant effects predicted.
Environmental								
EN1. To reduce the effect of traffic on the environment	+	0	0	0	0	0	0	ENV1 – supporting text states that all effort will be made to reduce need to travel / traffic contributions to air quality.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	+	++	+	0	ENV4 – localised positive effects where current contaminated land has lead to / is a potential source of water pollution. ENV5 – prevents development which leads to pollution and encourages SUDS. Seeks to ensure that adequate sewerage and water supply capacity is a prerequisite for any development. Likely to have positive effects. ENV6 – measures such as SUDS, green roofs etc. while having a flood / run-off management role, also help to regulate water flows and run-off and can have beneficial effects on groundwater quantity and quality.
EN3. To improve air quality	++	0	+	0	0	0	0?	ENV1 – main aim of policy. ENV3 – by controlling for smell, dust and light pollution. ENV6 – possible negative impact – however policy explicitly recognises this and seeks to prevent it.
EN4. To conserve and enhance biodiversity	0	0	0	+	+	+	0	ENV4 – the specific habitat and biodiversity value of brownfield / potentially contaminated sites is recognised in the supporting text. ENV5 – by protecting waterside banks, and encouraging the opening-up of culverts and water impounding. Also, in long term may lead to improved water quality in rivers and streams. ENV6 – possible biodiversity benefits of SUDS and green-roofs.
EN5. To maintain and enhance the quality of landscapes and townscapes	0	0	0	+	+	0	0	ENV4 – Where previously derelict sites are brought back into use. Positive effects depends on the nature of developments on these sites, dictated by policy elsewhere (UD, SD). ENV5 – see S5
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	0	0	No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+	0	0	0	0	+	+	ENV1 – by not requiring such assessments on non-polluting renewables developments (wind, solar). ENV6 – planning for flooding is a key element in climate change adaptation. ENV7 – renewable energy generation plays an important part in the boroughs climate

Objective	Policy No.							Comments on predicted effects
	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	
								change mitigation efforts, by reducing CO ₂ emissions and reliance on other non-renewable sources of energy.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0	0	0	No significant effects predicted.
EN9. To conserve and enhance land quality and soil resources	0	0	0	++	+	+	0	ENV4 – central aim of policy. Localised effect on sites where contamination exists. ENV5 – positive effects likely through encouragement of SUDS, and prevention of pollution. ENV6 – better management of run-off through SUDS may have beneficial impacts on soil quality.
Economic								
EC1. To encourage sustainable economic growth	0	0	0	+	+?	+	+	ENV4 – by bringing currently derelict sites back into use. ENV5 – possible long-term positive effects where policy creates more attractive living and working environments. ENV6 – by ensuring that development in flood risk areas is appropriate and takes risks into account. The economic costs of flooding can be very significant to businesses. ENV7 – renewable energy and localised micro-generation may especially in the long-term be very attractive / important for local businesses, especially if energy prices continue to fluctuate unpredictably.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	0	0	No significant effects predicted.
EC3. To reduce disparities in economic performance and promote regeneration	0	0	0	0	0	0	0	No significant effects predicted.
EC4. To encourage and accommodate both indigenous and inward investment	0	0	0	+	+?	0	+	ENV4/ENV5/ENV7 – See EC1
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	0	0	0	0	0	No significant effects predicted.
Overall comments on ENV policies								
<p>These policies are generally likely to result in positive effects under all relevant objectives.</p> <p>Objectives against which the policies have the highest number of potential positive effects include S2 – health of the population, and the Environmental objectives. This is as expected as these policies seek to control and ensure that specific aspects of the local environment are managed and controlled in development.</p> <p>The positive health effects are predicted due to improvements that these policies imply in local environmental quality – especially improved air-quality and flood management. However these are likely to only be of minor significance, as the actual impact of these policies relative to other health drivers (exercise, diet, smoking etc.) is relatively small.</p> <p>Some major positive effects are predicted where a policy addresses specifically the issue behind particular SA objectives, for example ENV1, which focuses specifically on air quality.</p>								

Objective	Policy No.							Comments on predicted effects
	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	
Where environmental policies are effectively implemented, some beneficial economic impacts are also predicted – especially against SA objective EC1 – to encourage sustainable economic growth.								
Policy specific comments								
ENV1:								
- Additional text stating position on reducing need to travel / traffic, and on exemptions for solar and wind renewable generation is welcomed.								
ENV4:								
- Additional text recognising the possible biodiversity / habitat importance of existing contaminated / brownfield sites is welcomed, and strengthens this policy.								
ENV5:								
- Additional text in response to the earlier SA commentary is welcomed and makes this policy stronger from a sustainability perspective.								
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: --- Uncertain: ? Mixed: -/+								

Table 21: Promoting a Quality Environment – Enhancing Open Space and Biodiversity (DP OS policies 1 – 9) appraisal matrix

Objective	Policy No.								Comments on predicted effects	
	OS1	OS2	OS3	OS 4/5	OS6	OS7	OS8	OS9		
Social										
S1. To reduce poverty and social exclusion	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	All policies: No significant effects predicted. A lack of access to and availability of open and green spaces is an aspect of exclusion – as Brent has high levels in certain areas of open / green space deficiency the protection and provision of these spaces should in the long-term have a positive effect. OS8 – the need to include local communities in open space provision is recognised and supported.
S2. To improve the health of the population	+	+	+	+	+	+	+	+	+	All policies: By protecting, enhancing and improving access to all types of open space, positive health effects are likely. Physical health through increase levels of outdoor activity, mental health through improved surroundings and areas of tranquillity etc.
S3. To improve the education and skills of the population	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	+	All policies: Access to open and green space and the ability to see and interact with wildlife can be important for educational purposes, particularly for children. OS9 – play and recreation can play an important role in child development
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	0	0	0	0	0	No significant effects predicted.
S5. To provide everybody with good quality surroundings	+	+	+	+	+	+	+	+	+	All policies: By protecting open spaces from unfavourable / inappropriate development and enhancing existing or encouraging provision of new open spaces, long-term beneficial effects on surroundings are likely.
S6. To reduce crime and anti-social activity	+?	+?	+?	+?	0	+?	+?	+?	+?	All policies: Where participation and access to outdoor activities and spaces are improved, possible decrease in anti-social activity.

Objective	Policy No.								Comments on predicted effects
	OS1	OS2	OS3	OS 4/5	OS6	OS7	OS8	OS9	
S7. To encourage a sense of local community; identity and welfare	+	+	+	+	+	+	+	+	All policies: Open spaces are often an important aspect in the local community, providing a social space and community focus. Protecting and enhancing them and improving access is likely to have beneficial community effects, especially in the long-term.
S8. To improve accessibility to key services especially for those most in need	+	0	0	+	0	0	+	+	OS1 – where access is improved, especially through walking, cycling and public transport. OS5 – explicit consideration in policy of access and movement to LNRs and SINCs, particularly for visitors with limited mobility. OS8/9 – the location and access to open space is explicitly sought, especially by non-car means. Likely to lead to positive open space and play facility access levels in the medium to long-term.
Environmental									
EN1. To reduce the effect of traffic on the environment	0	0	+?	0	0	0	+	+	OS3 – possible positive effects in long term where improved navigation of blue-ribbon network provides opportunities for water-based transport. Also where green chains / blue ribbon encourages people to walk/cycle. OS8/9 – through enhanced provision of open space and play facilities throughout the borough, the amount of travel required to access existing spaces should be reduced, especially in the long-term. Encouragement of access “especially” by non-car means is also positive.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	+	+	++	0/+	0	0	0	0	OS1/2 – requirement to include SUDS and water efficiency measures in any development. OS3 – policy specifically seeks to protect and enhance the blue ribbon network. OS4/5 – Protection of Brent Reservoir SSSI.
EN3. To improve air quality	+	+	+	+	+	+	+	0	All policies: Provision and protection of green space likely to ensure and increase level of foliage / flora in the borough. This is likely to improve air quality.
EN4. To conserve and enhance biodiversity	+?	+?	+	++	++	+	+	0	OS1/2 – policies seek to prevent any significant adverse effects on habitat and biodiversity, however any development is likely to have some impact. OS3 – biodiversity/habitats along the blue ribbon network and the green chain is sought to be enhanced and protected. OS4/5 – seek to explicitly protect the nature, habitat and biodiversity value of SINCs, LNRs and Brent Reservoir SSSI. OS6 – provides strong protection for species and habitats identified at UK, London and Borough levels. In long-term is likely to leads to prevention of species and habitat loss, especially in conjunction with other OS policies. OS7 – protection and enhancement of wildlife corridors likely to lead to positive biodiversity effects, particularly in the long-term. OS8 – habitat creation is explicitly sought, which in the medium-long term should enhance biodiversity.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	+	+	+	+	+	+	+	All policies: Open space in all forms is an important aspect of the landscape and townscape. Protecting and enhancing these spaces will help maintain

Objective	Policy No.								Comments on predicted effects	
	OS1	OS2	OS3	OS 4/5	OS6	OS7	OS8	OS9		
									landscape and townscape quality.	
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	+	+	+	0	0	0	0	OS2 – MOL may in some cases represent historic open spaces, views etc. or be of cultural significance (such as memorial gardens etc.). OS3 – the blue ribbon network, including canals and other water ways represents important cultural and heritage value. OS4/5 – SINCs and SSSIs are culturally significant for the Borough.	
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	+	+	+	+	0	+	+	0	All policies: Protecting open space may be an important aspect of adaptation to climate change. Helping to minimise heat-island effects, for example.	
EN8. To minimise the production of waste and use of non-renewable materials	+	+	0	0	0	0	0	0	OS1/2 – requirement for use of renewable materials in any development	
EN9. To conserve and enhance land quality and soil resources	+	+	+	+	+	+	+	0	All policies: By protecting and enhancing open spaces, the quality of land / soil in these areas is likely to be also protected.	
Economic										
EC1. To encourage sustainable economic growth	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	0	All policies: Improvements to and the protection of open spaces are likely to improve quality of life in the borough, making it a more attractive place to live and work. In the long term this can be a key component in sustainable local economic activity. At the same time from a purely economic perspective, protecting green and open spaces, habitat and species may constrain certain types of development. However development which damages the environment and causes losses to open space will not be positive in the long-term for the true sustainability of the borough.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	0	0	0	No significant effects predicted.	
EC3. To reduce disparities in economic performance and promote regeneration	0	0	0	0	0	0	0	0	No significant effects predicted.	
EC4. To encourage and accommodate both indigenous and inward investment	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	+/- ?	0	See EC1
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	+?	0	0	0	0	0	OS3 – possible positive effects in long term where improved navigation of blue-ribbon network provides opportunities for water-based transport.	
Overall comments on OS policies										
Overall the OS policies are likely to have positive effects against those objectives to which they are relevant.										

Objective	Policy No.								Comments on predicted effects
	OS1	OS2	OS3	OS 4/5	OS6	OS7	OS8	OS9	
<p>A number of very positive additions and amendments have been made to the policies since earlier drafts, reflecting SA commentary recommendations. This is welcomed.</p> <p>Against social SA objectives minor positive effects are predicted, due to the community and health benefits arising from improved access, quality and availability of open and green spaces for recreation, and amenity.</p> <p>Major positive effects are predicted for policies OS4, 5 and 6 against objective EN4 – conserve and enhance biodiversity, in recognition of the role these policies are likely to have in protecting and enhancing species biodiversity, and habitats.</p> <p>The only possible minor negative is predicted against objective EC1 – to encourage sustainable economic growth. This minor negative effect reflects the possibility that protecting open space and habitats may to some extent constrain certain types of development – in fact this is precisely the role of such policy. However is also the potential for positive effect - as a good quality environment and attractive, sufficient open spaces are likely in the long term to make the Borough a more attractive location to live and work in, and overall quality of life will be higher.</p> <p>Policy DP OS7: Wildlife Corridors might be sensibly grouped with OS3: Green chains and the Blue Ribbon network. Suggestion that current OS7 follows, or is amalgamated with OS3, given the similarities / links between green chains and wildlife corridors.</p> <p>Policy specific comments</p> <p>OS1:</p> <ul style="list-style-type: none"> - Additional text included in line with suggestions made in the earlier SA commentary is welcomed here, and creates a stronger policy than in previous draft. <p>OS2:</p> <ul style="list-style-type: none"> - Golf courses maybe an appropriate use of MOL, however such development should ensure that public access to such spaces is in no way restricted. <p>OS3:</p> <ul style="list-style-type: none"> - Final sentence of policy – reference should be to points f) and g), rather than e) and f) as currently stated. <p>OS5:</p> <ul style="list-style-type: none"> - Supporting text, paragraphs 2.4.30 and 2.4.31 – reference is made to Brent Reservoir and Welsh Harp and it may be a little unclear that these refer to the same area. It may be worth clarifying text in these paragraphs to ensure no uncertainty. 									
<p>Key: Major positive: Minor positive: Neutral: Minor negative: Major negative: Uncertain: ? Mixed: </p>									

Summary of mitigation and enhancement

6.26 Table 22 brings together comments included in the above appraisal matrices on the mitigation and enhancement recommendations arising from the appraisal. This text draws particularly from the text included under “overall comments” and “policy specific comments” in each matrix.

6.27 Given the positive effects predicted, and the lack of any significant negative effects of the *Promoting a Quality Environment* policies, the mitigation and enhancement comments below are relatively limited.

Table 22: Promoting a Quality Environment Policies – mitigation and enhancement proposals

Policy	Proposed mitigation and enhancement and SA comments
<p>UD policies:</p> <p>A Better Townscape – By Design</p>	<p>UD1:</p> <p>The appraisal of the draft Core Strategy, and the SA commentary on the earlier draft Development Policies Preferred Options, noted that the cumulative effects of a number of smaller scale proposals can still be significant. While this is recognised in policy UD1 with reference to the need for a “brief design statement” for smaller scale proposals, it is recommended that additional supporting text be included to outline what would be required in these statements. Reference to a relevant SPG might also be considered sufficient, where one exists.</p> <p>UD3:</p> <p>The policy could perhaps be strengthened by inclusion of a full reference to the Government’s publication “places, streets and movement”. Equally, a cross reference to policy DP TRN7 – Parking Standards, might also strengthen the policy.</p>

Policy	Proposed mitigation and enhancement and SA comments
	<p>UD8: It is noted that cross-over paving (front gardens paved to connect to roads) does not in itself require planning permission. However the SA previously commented that cross-overs increase urban run off, and that recent data (2004) from the London Assembly Environment Committee suggest that Brent has among the highest number of pavement cross-overs of the London Boroughs. Some recognition of this in supporting text could strengthen the policy. As recommended in the earlier SA commentary, reference could usefully be made to signage within the policy text as well as supporting text as it can greatly improve access and ease of movement.</p> <p>UD14: This policy may be strengthened through cross-reference to policies DP SD1-7, which might help further encourage and promote the use of passive heating / cooling and efficient energy systems. Note the suggestion made in the earlier SA commentary that, from a sustainability perspective, the first option should be encouraging all efforts to design and use architecture which negates the need for cooling / heating equipment.</p>
<p>SD policies: Towards and Sustainable Brent, 2020</p>	<p>SD1: Reducing the need travel as part of climate change mitigation was included in Core Strategy policy ENV1, however it does not appear within these policies – notably, this could be included in policy DP SD1. It is suggested that reference is made to the Mayor's forthcoming Climate Change Adaptation Strategy, as this will, when adopted be an important document for outlining the priorities for adaptation in response to Climate Change in London. As noted in the earlier SA commentary, the policy text could refer to a wider range of other policies than those noted, for example planting and landscaping (OS7) and reducing travel need (TRN2).</p> <p>SD2: In the earlier SA commentary it was recommended that the supporting text allow for future increases in the share of renewable energy generation required. A 20% target is welcomed, and is recognised as being in line with the draft London Plan Further Alterations, however text could be included to allow for an increase in this target over time (such as to 30% by 2015).</p> <p>SD3: It is important for the implementation of a policy like SD3 that the realisation of targets (such as for 20% renewables) are actually met. It is thus critical that the energy performance of new developments are included in some way within the formal monitoring processes of the LDF (i.e. the AMR).</p> <p>SD4: The reference to the targets set out in the Mayor's draft Water Strategy is welcomed – the policy could be further strengthened by the inclusion of these targets either in the supporting text, or the policy itself.</p> <p>SD5: As noted in the earlier SA commentary it is somewhat unclear how much weight is meant by "giving preference to", as stated in bullet point (a) of the policy text. It is suggested that this could be clarified, perhaps by including an indicative percentage expected.</p>
<p>ENV policies: Environmental Protection</p>	<p>No specific mitigation or enhancement recommendations.</p> <p>The additional text included in these policies reflecting suggestions made in the earlier SA commentary are welcome. These additions have strengthened the policies from a sustainability perspective, and thus no additional mitigation or enhancement changes or suggestions are felt necessary.</p>
<p>OS policies: Enhancing Open Space and Biodiversity</p>	<p>OS2: Golf courses are considered to be an appropriate use of MOL by policy UD2. Whilst not wishing to challenge this assumption, however it is recommend that care is taken to ensure that due to such development public access to such spaces is in no way restricted.</p> <p>OS5: Paragraphs 2.4.30 and 2.4.31 of the supporting text make reference to Brent Reservoir and Welsh Harp and it may be a little unclear that these are, in fact the same area. It may be worth clarifying text in these paragraphs to ensure no uncertainty.</p>

Meeting Housing Needs

Summary of potential effects

- 6.28 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.
- 6.29 The DP Housing policies are divided by four key housing issues, reflecting the policy structure of the draft Core Strategy Preferred Options. These are: *Housing Provision – Sources of Supply; Sustainable Housing Development; a Balanced Housing Stock; and Affordable Housing Provision.*
- 6.30 It should be noted that these policies are appraised based on their specific focus, and that the required additional number of homes to be provided in the Borough, and the new population implied by them, as set out in the draft Core Strategy policies on *Housing Provision (H1)* and *Population and Housing Growth (SS2)*, is considered to have been appraised already through the SA of the draft Core Strategy. The Development Control policies in essence are seeking to allow the Borough to meet these housing supply needs, while minimising potential negative environmental and social impacts, and the appraisal effects predicted here reflect this fact.
- 6.31 Broadly, the Housing policies are expected to have positive effects across the social and economic sustainability objectives, with mixed effects being predicted against some environmental objectives due to in particular to the probable generation of traffic (and associated impacts) in specific locations due to new large-scale developments, even where these effects are limited by policy – hence mixed effects are predicted.
- 6.32 A number of policies in the Housing chapter are predicted to have very minimal effects, but positive none-the-less. These have been recorded by showing a mixed zero/minor positive prediction (0/+). This has been used to indicate that while a positive effect is predicted, it is likely to be relatively insignificant either due to the specific nature of the policy, or due to the likely effect relative to other change / policy in the Borough.
- 6.33 Table 23 and Table 24 present the appraisal of the DP Housing policies. 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.

6.34 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.

6.35 Some minor policy clarifications and text changes are suggested in Table 25, below which provides an overview of *Mitigation and Enhancement* recommendations for the draft *Meeting Housing Needs Development Policies*. Reflecting the nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Table 23: Meeting Housing Needs – Housing policies (DP H policies 1 – 8) appraisal matrix

Objective	Policy No.						Comments on predicted effects
	H1	H2	H3	H4	H5/6/7	H8	
Social							
S1. To reduce poverty and social exclusion	+	+	0/+	0/+	0/+	0/+	All policies: Core aim of policies is to protect existing, increase provision of and ensure affordability of homes in the borough. Decent housing, and its affordability, are key components of social exclusion and poverty, so policies to protect and enhance provision will especially in the long-term have positive effects poverty and exclusion.

Objective	Policy No.						Comments on predicted effects
	H1	H2	H3	H4	H 5/6/7	H8	
							H1 – by protecting existing affordable and other housing provision. Policy also explicitly seeks to ensure suitability for residents in priority need.
S2. To improve the health of the population	0/+	0/+	0/+	0/+	0/+	0/+	All policies: Adequate housing both in quality and size is an important aspect in physical and mental health.
S3. To improve the education and skills of the population	0	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	+	+/++	+	+	+/++	+	All policies: Core aim of policies is to protect existing, increase provision of and ensure affordability of homes in the Borough. H6/7 – set out requirements on the external and internal design and layout of new housing – in H6 this is addressed by cross-reference to policies covering all aspects, elsewhere in the Development Policies. This is considered appropriate, however the effects of this policy, per se, will depend on the implementation of these other policies.
S5. To provide everybody with good quality surroundings	0	+?	0	+?	+	+	H2/H4 – possible positive effects where derelict and unattractive land or buildings are brought back into use in a positive and well designed manner (UD/SD/ENV/OS policies seek to ensure just this). H6 – see S4 H8 – policy seeks to ensure large schemes employ masterplanning and landscape design frameworks. These should, together with other policies (DP UD, SD, ENV and OS) ensure the quality of surroundings.
S6. To reduce crime and anti-social activity	0	+?	0	0	+?	+?	H2 – see S5. H6 – see S4.
S7. To encourage a sense of local community; identity and welfare	0/+	0/+	0/+	0/+	0/+	0/+	All policies: Housing, in the form of a decent home which meets the needs of its occupants is a key aspect in social wellbeing and quality of life. In the long-term, where these policies are effectively implemented, positive community and social welfare effects are predicted. H1 – resisting loss of residential accommodation is likely in the long-term to protect existing communities and allow a sense identity to develop / remain. H2 – See S5. H8 – supporting text seeks the involvement of local residents in the design of large-scale developments.
S8. To improve accessibility to key services especially for those most in need	0/+	0	0	0	+	0/+	H1 – by resisting loss of affordable housing, people in need / the vulnerable are less likely to be required to move. H 5/6/7 – seek to ensure development is appropriately located (H5) externally designed with residents amenity in mind (H6) and remains adaptable and accessible to changing needs of residents (H7). H8 – by ensuring major developments provide mix of facilities to secure balanced communities.
Environmental							
EN1. To reduce the effect of traffic on the environment	0	0	0/- ?	0	+	+/-	H3 – the subdivision of properties into flats may generate additional traffic in specific areas. Although the policy, and cross reference to TRN policies seek to ensure that congestion and parking impacts in certain areas are avoided, the environmental impact of increased car ownership / number of vehicles will be incurred even where these vehicles are in an area where congestion impacts are not considered a barrier. H5 – specifically seeks to ensure new housing development is assessed based on proximity to public transport and town-centres. H7 – encourages home-working, which can also impact

Objective	Policy No.						Comments on predicted effects
	H1	H2	H3	H4	H5/6/7	H8	
							positively by reducing employment related travel. H8 – policy text explicitly requires an “exemplary approach” towards measures to reduce the use of the car. However any very large development is likely to generate new traffic and journeys, which may more than offset these measures.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	0/+	No significant effects predicted. H8 – policy explicitly requires an “exemplary approach” to water consumption, and expects developers to avail of economies of scale in the installation of “sustainability enhancing” equipment and processes.
EN3. To improve air quality	0	0	0/- ?	0	+?	+?	H3 – see EN1 – where traffic is increased, air quality is likely to be negatively effected. H5 – where traffic is reduced by location of new housing in areas of good public transport accessibility and near to existing centres. H8 – where measures to reduce the use of the car are successful.
EN4. To conserve and enhance biodiversity	0	+/-	0	0	0	0	H2 – reference to the biodiversity value of some brownfield sites in policy text is welcomed. However the loss of all brownfield sites in the Borough may have negative effects on certain species – such as some bird and insect species.
EN5. To maintain and enhance the quality of landscapes and townscapes	0/+	+	0	0	+	+	H1 – allows loss of housing only where this improves the quality of affordable housing or brings properties up to Housing Act and Building Regulations standards. H2 – see S5. H6 – specific aim of policy, in the context of new housing development. H8 – landscape design frameworks are a requirement of the policy, and should ensure the quality of townscapes and landscapes created.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	0	No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	0	0/-	0	+?	+/-	H3 – see EN1 and EN3. H5 – see EN3. H8 – where traffic is effectively reduced. In addition policy requires an “exemplary approach” towards the use of renewables and energy consumption, and the installation of “sustainability enhancing equipment and processes”. However these developments mark a net increase in dwellings and thus energy / water use and traffic generation potential.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0/+	0	H6 – specific reference to need for refuse recycling and storage, may lead in long-term, at least in new developments, to improved recycling levels (in conjunction with other efforts, such as awareness raising and modified refuse collection).
EN9. To conserve and enhance land quality and soil resources	0	0/+	0	0	0	0	H2 – bringing brownfield land into development use will require the treatment of any damaged, contaminated soils (covered by policy DP ENV4).
Economic							
EC1. To encourage sustainable economic growth	0/+	0/+	0/+	0/+	0/+	0/+	All policies: Sufficient and attractive housing, providing an appropriate mix of tenure and affordability is a crucial component to a stable socio-economic base for the local economy. Positive effects are thus expected across all policies as they focus on specific aspects of this.

Objective	Policy No.						Comments on predicted effects
	H1	H2	H3	H4	H5/6/7	H8	
							E.g. H1 – by protecting existing residential properties, is likely in the long term to provide a secure population, and thus potential workforce.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0/+	0	0	H4 – policy explicitly seeks to protect existing employment uses of buildings and sites from conversion to housing.
EC3. To reduce disparities in economic performance and promote regeneration	0/+	0/+	0/+	0/+	0/+	0/+	See EC1
EC4. To encourage and accommodate both indigenous and inward investment	0	+	0/+	0	0	+	H2/H8 – development of new housing will require inward investment. H3 – allowing appropriate sub-division of houses and flat conversions may generate indigenous investment.
EC5. To encourage efficient patterns of movement in support of economic growth	0	0	0	0	0/+	0/+	H5 – seeks to ensure new housing development is assessed based on proximity to public transport, and existing centres. Where people do use public transport and use facilities available in walking distance – positive effects predicted. H7 – supports housing which encourages working from home, which can have positive effects on employment related travel. H8 – while major new developments will generate potentially traffic impacts, policy does seek to reduce use of the car, and ensure major developments provide facilities.
Overall comments on Policies H1 – H8							
<p>Overall the Housing policies H1 – H8 are likely to have positive effects against all relevant SA objectives.</p> <p>In particular positive effects are predicted for social objectives related to housing, communities and quality of life. As expected objective S4 – to provide everybody with the opportunity to live in a decent home is likely to have the most positive effects.</p> <p>For environmental and economic objectives housing policies H1 – H8 are generally expected to have minor positive effects.</p> <p>For environmental objectives, some mixed effects are predicted. However, reflecting the specific and focussed nature of the Development Policies none of these are expected to be very significant. Possible minor negative effects are predicted for some policies:</p> <ul style="list-style-type: none"> - H3 and H8 against objective EN1 – reduce the effect of traffic on the environment. These potential effects recognise that policy here, and elsewhere in the Development Policies seek to reduce travel need, and car use, however increasing the absolute number of dwellings in a particular area, and in the Borough as a whole is likely to produce a net increase in traffic, and car use / ownership – which may offset efforts elsewhere to reduce it. This is also the case for objective EN7 – to reduce contributions to climate change. - H2 recognises the biodiversity value of some brownfield sites, however loss of these sites across the borough may lead to some loss of habitat important to certain species. <p>Policy specific comments</p> <p>H6:</p> <ul style="list-style-type: none"> - In the earlier SA commentary it was noted that cross reference could be made to policies DP SD 1 – 3 together with some additional policy text recognising the need to design and construct new housing to adapt to and mitigate for the impacts of climate change. Internally this could include natural ventilation and cooling, for example. <p>H8:</p> <ul style="list-style-type: none"> - “Sustainability enhancing equipment and processes” – the expectation that developers will avail of economies of scale to ensure maximum installation of these is welcomed. However, what in practice is meant by “sustainability equipment and processes” could be set out within the supporting text, or examples (such as water saving kitchen and bathroom fittings etc.) could be included within the policy text. - In addition the earlier SA commentary suggested including text to ensure an exemplar approach to community engagement is used in all very large scale developments. It is recommended that this could also include a requirement for the preparation and implementation of an appropriate community development plan. 							
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-							

Table 24: Meeting Housing Needs – Housing policies (DP H policies 9 – 8) appraisal matrix

Objective	Policy No.						Comments on predicted effects
	H9	H10	H11	H12	H13	H 14/15/16	
Social							
S1. To reduce poverty and social exclusion	+	+	+	+	0/+	++	All policies: Core aim of policies H9 – H16 is to provide a balanced housing stock and to ensure affordability of homes in the Borough. Decent housing, across tenure needs, and its affordability, are key components of social exclusion and poverty, so policies to protect and enhance provision will especially in the long-term have positive effects poverty and exclusion. For example H9 seeks to increase the current levels of provision of family housing (by setting a 30% minimum share of new developments). Policies H14-H16 in particular address the supply of affordable housing, a key component in enabling people to break out of housing-benefit/employment traps.
S2. To improve the health of the population	0/+	0/+	0/+	0/+	0/+	0/+	All policies: Adequate housing both in quality and size is an important aspect in physical and mental health.
S3. To improve the education and skills of the population	0	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	+ /+++	+	+	+	+	+ /+++	All policies: Core aim of policies H9 – H16 is to provide a balanced housing stock and to ensure affordability of homes in the borough. H9 – by requiring 30% minimum for family accommodation, considerably higher than current completion rates, in the longer term the provision of homes suitable for families should increase – tackling under supply and over-crowding, both identified as issues in Brent.
S5. To provide everybody with good quality surroundings	0	0	0	0	0	0	No significant effects predicted.
S6. To reduce crime and anti-social activity	0/+	0	0	0	0	0	H9 – reducing overcrowding and providing appropriate living spaces may have positive effects on family groups and a beneficial impact on certain types of anti-social behaviour, especially in the long-term
S7. To encourage a sense of local community; identity and welfare	0/+	0/+	0/+	0/+	0	0/+	All policies: Housing, in the form of a decent home which meets the needs of its occupants is a key aspect in social wellbeing and quality of life. In the long-term, where these policies are effectively implemented, positive community and social welfare effects are predicted.
S8. To improve accessibility to key services especially for those most in need	0	+	0/+	0/+	0/+	0	H10 – positive effect predicted, as PTAL accessibility and availability of local shopping facilities are requirements of policy for sheltered housing. H11/12 – may have positive effect due to requirement to locate non self-contained accommodation in areas of good PTAL. H13 – requirement for such sites to be accessible to local services.
Environmental							
EN1. To reduce the effect of traffic on the environment	0	0/+	0/+	0/+	0/+	0	H10/H11/H12/H13 – see S8, however effects for these policies are likely to be very minor relatively due to likely the scale of these types of developments

Objective	Policy No.						Comments on predicted effects
	H9	H10	H11	H12	H13	H 14/15/16	
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	0	0/+?	0/+?	0/+?	0	0	H10/H11/H12 – where travel need is reduced due to location of sheltered housing close to public transport and near to facilities.
EN4. To conserve and enhance biodiversity	0	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	0	0	0	0	0	0	No significant effects predicted.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	0	No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	0/+?	0/+?	0/+?	0	0	H10/H11/H12 – where travel need is reduced – see S8.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0/-?	0	H13 – sites for nomadic peoples may during occupation become a source of additional waste.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	0	No significant effects predicted.
Economic							
EC1. To encourage sustainable economic growth	0/+	0/+	0/+	0/+	0/+	0/+	All policies: Sufficient housing, of an appropriate mix of tenure and affordability is a crucial component to a stable socio-economic base for the local economy. Positive effects are thus expected across all policies as they focus on specific aspects of this. Although those in care or the elderly (H10 – H12) may not be economically active, in the sense of being in employment, their spending patterns and economic needs also contribute to the local economy.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0/+	0	H13 – policy explicitly requires sites to where necessary provide opportunity for employment and entrepreneurial activities.
EC3. To reduce disparities in economic performance and promote regeneration	0/+	0/+	0/+	0/+	0/+	0/+	See EC1
EC4. To encourage and accommodate	0/+	0	0	0	0	0	H9 – See EC1. Also, by providing / ensuring in the long-term appropriate dwelling for families, local family businesses may be more able to thrive.

Objective	Policy No.						Comments on predicted effects
	H9	H10	H11	H12	H13	H 14/15/16	
both indigenous and inward investment							
EC5. To encourage efficient patterns of movement in support of economic growth	0	0/+?	0/+?	0/+?	0	0	H10/H11/H12 - See S8
Overall comments on Policies H9 – H16							
<p>Overall, policies H9 – H16 are likely to have positive effects against all relevant SA objectives. Reflecting the specific focus of these policies, there are no predicted significant effects for a number of objectives. No negative effects are predicted.</p> <p>The highest number and strongest positive effects, as expected are against objective S4 – to provide everybody with the opportunity to live in a decent home. H9 and H14-16 score very positively against this objective, while all policies score positively.</p> <p>Minor positive effects or mixed neutral / minor positive effects are recorded against most social objectives, due to the important role housing plays in quality of life, sense of community, individual wellbeing and health. The same is true of economic objectives, again due largely to the positive social and community effects predicted – which in the long-term are likely to create a borough in which people want to live and work – and can find suitable homes at an affordable price, where needed.</p> <p>Against environmental objective limited, minor positive effects are predicted – due to the potential travel need reductions implied by requirements in a number of policies for specific housing types (such as self-contained) to be located in areas of high PTAL and close to local amenities.</p>							
Policy specific comments							
No specific comments.							
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-							

Summary of mitigation and enhancement

- 6.36 Table 25 brings together comments included in the above appraisal matrices which concern the mitigation and enhancement recommendations arising from the appraisal. This text draws particularly from the comments included under “overall comments” and “policy specific comments” in each matrix.
- 6.37 Given the highly positive effects predicted, and the lack of any significant negative effects of the *Meeting Housing Needs* chapter, the mitigation and enhancement comments below are relatively limited, with only two policies (UD H6 and UD H8) having any recommended modifications.

Table 25: Meeting Housing Needs – mitigation and enhancement proposals

Policy	Proposed mitigation and enhancement and SA comments
DP H Policies: Meeting Housing Needs	<p>UD H6:</p> <p>In the earlier SA commentary it was noted that cross reference could be made to policies DP SD 1 – 3, perhaps together with some additional policy text recognising the need to design and construct new housing to adapt to and mitigate for the impacts of climate change.</p> <p>Internally this could include the use of design and materials for natural ventilation and cooling, for example.</p> <p>UD H8:</p> <p>Policy UD H8 refers to “sustainability enhancing equipment and processes”, and the expectation that developers will avail of economies of scale to ensure maximum installation of these. This is positive from a sustainability perspective, however, what in practice is meant by “sustainability equipment and processes” could be set out within the supporting text, or examples (such as water saving kitchen and bathroom fittings etc.) could be included within the policy text.</p>

Policy	Proposed mitigation and enhancement and SA comments
	In addition, the earlier SA commentary suggested including text to ensure an exemplar approach to community engagement is used in all very large scale developments. It is recommended that this could also include a requirement for the preparation and implementation of an appropriate community development plan.

Connecting Places

Summary of potential effects

- 6.38 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. Minor positive effects have been predicted rather than major positive effects due to the likely scale of these effects, reflecting the fact that these policies are somewhat limited by relating to new development only.
- 6.39 Table 26 presents the appraisal of the *Connecting Places* DP policies. Policies TRN 2 and 3 (public transport and buses) and TRN 7, 8 and 9 (parking) have been grouped, reflecting their focus on common themes.
- 6.40 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**.
- 6.41 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 relating to parking standards which are presented as an appendix to the *Connecting Places* policies, which are included in Table 26 below.

Table 26: Connecting Places – (DP TRN policies 1 – 9) appraisal matrix

Objective	Policy No.						Comments on predicted effects
	TRN1	TRN 2/3	TRN4	TRN5	TRN6	TRN 7/8/9	
Social							
S1. To reduce poverty and social exclusion	+	+	+	0/+	0	0	<p>Policies TRN1 – TRN5:</p> <p>Lack of affordable, accessible public transport / routes for safe walking and cycling is a key aspect of social exclusion and can act as a barrier to people's efforts to find meaningful employment. By addressing various aspects of these issues the transport Development policies all are expected to have minor positive effects.</p> <p>Specific comments:</p> <p>TRN1 – development accessible by public transport and providing safe and easy access for pedestrians and cyclists is likely to improve quality of life and wellbeing for all. Transport impacts are often felt most by those already excluded / vulnerable.</p>
S2. To improve the health of the population	0/+	0/+	+	0	0	0	<p>TRN1 – where walking and cycling access encourages more physical activity. Also where air pollution is reduced/avoided, positive health effects would be expected.</p> <p>However it should be noted, this policy is controlling new development – so these effects are likely to be small relative to existing impacts.</p> <p>TRN2/3 – where increased public transport use is realised, and reduced car use – air pollution and other negative health impacts of traffic are likely in the long-term to be reduced.</p> <p>TRN4 – walking and cycling can play an important role in health by increasing physical activity levels. Policy seeking to ensure that walking and cycling is easy, clear and sensible as an alternative is thus expected to have a positive health effect.</p>
S3. To improve the education and skills of the population	0	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	0/+	0	0	0	0	0	TRN1 – by controlling the transport impacts (noise, visual blight etc.) on existing homes / developments.
S5. To provide everybody with good quality surroundings	0/+	0	0	0	0	0	TRN1 – see S4
S6. To reduce crime and anti-social activity	0	0	+	0	0	0	TRN4 – emphasis on policy for safe routes, with good sight lines and no "hiding places". Likely to reduce crime opportunities. Also in long-term where more people use streets and paths, passive surveillance likely to have positive crime and anti-social behaviour impacts.
S7. To encourage a sense of local community; identity and welfare	0	0	+	0	0	0	TRN4 – neighbourhoods which are walkable and cycleable and safe for non-car movement, are more likely to have a sense of community – people are closer to each other and can interact while walking or cycling in a way not possible in cars.
S8. To improve accessibility to key services especially for those most in need	+	+/+	+/+	0	0	0	<p>TRN1 – policy seeks explicitly to ensure improved access to public transport in new developments. Also developments required to provide convenient and safe access for pedestrians and cyclists.</p> <p>TRN2/3 – by seeking benefit to public transport from development and the improvement of the bus network,</p>

Objective	Policy No.						Comments on predicted effects
	TRN1	TRN 2/3	TRN4	TRN5	TRN6	TRN 7/8/9	
							access to key services for all, and particularly those without access to a car (often the most vulnerable / excluded) is likely to improve. TRN4 – positive effect predicted where cycling and walking routes provide a meaningful alternative.
Environmental							
EN1. To reduce the effect of traffic on the environment	0/+	+	+	0	0/+	0/+?	TRN1 – where there is shift in transport mode from car to non-car modes, especially walking and cycling. It should be noted however that this policy is controlling new development – so these effects are likely to be small relative to existing impacts. TRN2/3 – where modal shift away from cars to public transport is achieved, environmental impacts of transport will be reduced. TRN4 – where modal shift away from cars is achieved. TRN6 – policy encourages rail and water freight transport, and where this is used environmental impacts will be lower than road freight. TRN7/8/9 – controls on car parking can help to encourage the use of other modes, thus reducing environmental impact of car transport – this effect depends on the effect on car use parking standard have.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	0/+	+	+	0	0/+	0	TRN1/2/3/4/6 – See EN1
EN4. To conserve and enhance biodiversity	0	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	0	0	0	0	0	0	No significant effects predicted.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	0	No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0/+	+	+	0	0/+	0	TRN1/2/3/4/6 – See EN1.
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0	0	No significant effects predicted.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	0	No significant effects predicted.
Economic							
EC1. To encourage sustainable	+	+	+	0/+	+	0/+	All policies: Predicted to have minor positive effects. An efficient, free-flowing and mixed-mode transport

Objective	Policy No.						Comments on predicted effects
	TRN1	TRN 2/3	TRN4	TRN5	TRN6	TRN 7/8/9	
economic growth							system, with reliable and accessible public transport and facilities which make walking and cycling a realistic and safe alternative is a fundamental aspect of a successful, and sustainable local economy. Specific comments: TRN1 is predicted to have a minor positive effect, though in practice it is seeking to minimise the inevitable negative transport effects of additional development in the Borough.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	0	No significant effects predicted.
EC3. To reduce disparities in economic performance and promote regeneration	0/+	0/+	0/+	0/+	0/+	0	See EC1
EC4. To encourage and accommodate both indigenous and inward investment	0	0	0	0	0	0	No significant effects predicted.
EC5. To encourage efficient patterns of movement in support of economic growth	0/+	+	+	0/+	0/+	0/+	All policies – See EC1 Specific comments: TRN2/3 – public transport and buses where used at or near capacity, and on routes which serve people's needs is a more efficient means of transport than the car. If modal shift is realised, congestion will also be reduced. TRN4 – where a sensible walking and cycling network is provided. TRN6 – where freight movements by rail and water modes are increased and road freight decreased.
<p>Overall comments on Transport policies</p> <p>Generally the TRN DP policies are predicted to have positive effects under all relevant SA objectives.</p> <p>As the DP policies' focus is on controlling the negative impacts on traffic and ensuring a managed approach to transport planning of any new development, these positive scores are in line with expectations. It should be noted however that some effects are predicted to be relatively minor in comparison with overall impacts already occurring within Brent.</p> <p>However, where policy expects broader contributions to more sustainable transport modes (such as TRN4) these positive effects may also be more widespread and thus significant.</p> <p>Policies TRN2, 3 and 4 are predicted to have very positive effects in relation to SA objective S8 – to improve accessibility to key services especially for those most in need, reflecting the focus of these policies on public transport and walking/cycling provision and integration.</p> <p>No negative effects are predicted. This reflects the nature of these Development Policies. The appraisal is not saying that there will be no negative impacts due to transport arising from new development, however these policies taken alone all seek to minimise negative and maximise positive impacts relating to transport.</p> <p>Policy specific comments</p> <p>TRN4 – additional text included to help ensure cycle lanes do not end abruptly in unsafe or inconvenient locations is welcomed.</p>							
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-</p>							

Summary of mitigation and enhancement

- 6.42 There are no specific changes to policies recommended by the appraisal. However after reviewing the Parking Standards appendix the appraisal has generated some comments specific to these standards.

Comments on Parking Standards

- 6.43 The London Plan suggests that boroughs apply a degree of judgement and flexibility in parking standards, to reflect the specific needs and public transport issues within each borough. The standards included in the Development Policies appear to be in line with the guideline levels supported by the London Plan (ranges of level are included in the draft London Plan Further Alterations).
- 6.44 Parking standards do offer a useful tool in trying to encourage changes in behaviour in relation to transport. It is recognised that as a borough, Brent needs to protect the attractiveness of retail and other locations within its borders for a range of economic, social and environmental reasons, to avoid people simply travelling elsewhere with easier / more parking provision. As a result it is accepted that the standards as included in the current Development Policies DPD Preferred Options are appropriate.
- 6.45 That said, from a sustainability perspective it is recommended that, in the light of recent changes in perceptions, awareness and attitudes to environmental issues, and especially climate change, some flexibility could be built into the standards to enable them to be easily modified and made more stringent in future, should the acceptability of such controls increase in future, over the plan period.
- 6.46 In addition, the draft London Plan Further Alterations states that “it is important that boroughs manage on-street and off-street parking as a whole and prepare a Parking and Enforcement Plan, which forms part of the transport Local Implementation Plan”. The supporting text to policy DP TRN9 refers to the LIP, but no reference is made to a Brent Parking and Enforcement Plan. It is therefore recommended that a reference is added to this plan if it exists, and the council is encouraged to consider the development of such a plan if it does not exist.

A Strong Local Economy and Enabling Community Facilities

- 6.47 The *Strong Local Economy* chapter is made up of four into distinct sets of policies, or sub-chapters reflecting the policy structure of the Core Strategy Preferred Options. These are *Business Industry and Warehousing*, *Town Centres and Culture Sport and Tourism*. These have been appraised and comments provided together, along with the *Enabling Community Facilities* policies, to be consistent with the appraisal of the Core Strategy Preferred Options, with common overall effects discussion and mitigation and enhancement comments. However, the appraisal has been

subdivided by policy grouping, with matrices for each policy topic as summarised below:

- *Business, Industry and Warehousing* – policies DP BIW 1 - 5.
- *Town Centres* – policies DP TC 1 – 15 (included in two matrices).
- *Culture, Sport and Tourism and Community Facilities* – policies DP CST 1 – 3 and policies DP CF 1 - 3.

6.48 Table 27 to Table 30 present the appraisal of each set of policies.

Summary of potential effects

- 6.49 As with the previous chapters the effects of the policies in the *Strong Local Economy* chapter are generally less significant and more positive than was the case for the policies in the Core Strategy DPD Preferred Options. Again, this reflects the specific nature of these policies as seeking to provide the detailed control and implementation criteria for the higher level principals set out in the Core Strategy.
- 6.50 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. They are due to the nature of these policies, which while containing criteria to limit negative impacts, do seek new investment and development in town centres and other business facilities, and thus an implied increase in economic activity, traffic, resource and energy use and in some cases waste generation, for example.
- 6.51 It is predicted therefore that in spite of the mitigation contained within the supporting text and policies themselves that some minor negative effects will occur in relation to certain policies: Town Centre (DP TC4, DP TC10) and Culture Sport and Tourism (DP CST1).
- 6.52 As noted in the appraisal of the Strong Local Economy policies in the Core Strategy, efforts to promote business and cultural or leisure facilities related to local communities is particularly welcomed. Some tourism and leisure facilities will have very different potential effects to others. Conference facilities may, for example encourage increased travel to the area by car, whereas small local facilities may encourage more people to seek leisure opportunities in the Borough and thus improve local distinctiveness / vibrancy and reduce transport and related environmental impacts.
- 6.53 It is also noted that the policy title has been modified from *Culture, Leisure and Tourism (CLT)*, in the Core Strategy DPD preferred Options, to *Culture, Sport and Tourism (CST)* in the Development Policies DPD preferred Options. We would

recommend that it would aid consistency if the Core Strategy were updated to reflect this change in the submission version.

6.54 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.

6.55 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.

6.56 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.

6.57 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.

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

6.59 Mitigation and enhancement suggestions for *A Strong Local Economy* policies and *Community Facilities* policies are included in Table 31. Reflecting the nature of the predicted effects, these suggestions are relatively limited, although some specific text changes or amendments to certain policies are proposed.

Table 27: A Strong Local Economy - Business, Industry and Warehousing (DP BIW policies 1 – 5) appraisal matrix

Objective	Policy No.					Comments on predicted effects
	BIW1	BIW2	BIW3	BIW4	BIW5 ⁷	
Social						
S1. To reduce poverty and social exclusion	0/+	0/+	+	+	0	BIW1 – appropriate local employment is an important factor in providing people with opportunities. Protecting local employment areas is thus likely to have positive effects on poverty and exclusion. Specific requirement for “managed affordable workspace”. BIW2 – aim is to provide facilities which enable all sections of population to work (such as through childcare provision), however the cost of such facilities can sometimes be excessive for many low-wage earners, so the scale of this positive effect may be limited. BIW3/4 – by supporting new start-ups and enabling flexible working.
S2. To improve the health of the population	0	0	0	0	0	No significant effects predicted.
S3. To improve the education and skills of the population	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	0	0	0/+	0	0	BIW3 – policy explicitly seeks to ensure that work-live developments do not compromise residential.
S5. To provide everybody with good quality surroundings	0	0	0	0	0	No significant effects predicted.
S6. To reduce crime and anti-social activity	0	0	0	0	0	No significant effects predicted.
S7. To encourage a sense of local community; identity and welfare	0/+	0/+	0/+	+	0	BIW1 – small scale local businesses and employment can maintain a sense of a local-scale economy and thus community, and enhance feeling of identity. BIW2/3 – may have effect of creating more community atmosphere in employment areas. BIW4 – working from home can mean that local communities are more active during working hours – cafes and other informal meeting spaces for example can become more important, and local shops can benefit too.
S8. To improve accessibility to key services especially for those most in need	0	+	0	0	0	BIW2 – increased accessibility to specific facilities for those working in employment areas
Environmental						
EN1. To reduce the effect of traffic on the environment	0/+	+	+	+	0	BIW1 – by protecting local employment areas, some travel to employment elsewhere may be offset. BIW2 – where travel to facilities and amenities located away from employment areas is negated. BIW3/4 – home working and work-live developments in theory should reduce work related travel needs, and in the medium-long term reduce traffic related impacts.
EN2. To improve water quality; conserve water	0	0	0	0	0	No significant effects predicted.

⁷ BIW5 – has no predicted effects – it simply notes that the Council endorses the Park Royal Opportunity Area Framework. Specific impacts will depend on the contents, and implementation of this Framework.

Objective	Policy No.					Comments on predicted effects
	BIW1	BIW2	BIW3	BIW4	BIW5 ⁷	
resources and provide for sustainable sources of water supply						
EN3. To improve air quality	0	0/+	+	+	0	BIW2 – see EN1 BIW3/4 – See EN1
EN4. To conserve and enhance biodiversity	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	0	0	0	0	0	No significant effects predicted.
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0	0	0	0	No significant effects predicted.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0	0/+	+	+	0	BIW2 – see EN1 BIW3/4 – see EN1
EN8. To minimise the production of waste and use of non-renewable materials	0	0	0	0	0	No significant effects predicted.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	No significant effects predicted.
Economic						
EC1. To encourage sustainable economic growth	+	+	+	+	0	BIW1 – protecting local employment areas is likely to help maintain a balanced economy in the borough. Local and small businesses may generate less gross revenue than large national businesses, but more of the value created is likely to remain in the borough, through local multiplier effects. BIW2 – by making the borough, and employment areas within it more attractive places to work. BIW3/4 – by promoting more flexible ways of working and providing opportunities for new types of business, start-ups and the self employed.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	+	+	+	+	0	BIW1/2/3/4 – see S1 and EC1.
EC3. To reduce disparities in economic performance and promote regeneration	+	0/+	+	+	0	BIW1/2/3/4 – see S1 and EC1
EC4. To encourage and accommodate both indigenous and inward investment	+	0/+	+	+	0	BIW1 – See EC1. Also specific requirement to provide affordable workspace may encourage indigenous investment in particular where it enable new, local start-ups. BIW3/4 - by promoting more flexible ways of working and providing opportunities for new types of business, start-ups

Objective	Policy No.					Comments on predicted effects
	BIW1	BIW2	BIW3	BIW4	BIW5 ⁷	
						and the self employed.
EC5. To encourage efficient patterns of movement in support of economic growth	+	+	+	+	0	BIW1/2/3/4 – see EN1
Overall comments on BIW policies						
<p>The BIW policies are predicted to have positive effects under all relevant SA objectives, reflecting the focus of these policies on controlling and ensuring specific aspects of local employment / business development.</p> <p>Limited positive effects are expected in relation to social objectives, in the main in due to the poverty and social exclusion reduction potential of providing meaningful employment opportunities in local, accessible locations, and encouraging a range of scales and types of work, work-live and home-working possibilities.</p> <p>Beneficial environmental impacts are predicted where traffic and travel need is reduced through the provision and protection of local employment, the supply of facilities for employees close to where they work, and the encouragement of home-working and live-work developments.</p> <p>As expected positive effects are predicted for all economic objectives, reflecting the focus of these policies.</p>						
Policy specific comments						
BIW5 – has no predicted effects – it simply notes that the Council endorses the Park Royal Opportunity Area Framework. Specific impacts will depend on the contents, and implementation of this Framework.						
Key: Major positive: ■ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+						

Table 28: A Strong Local Economy - Town Centres (DP TC policies 1 – 8) appraisal matrix

Objective	Policy No.					Comments on predicted effects
	TC1	TC2/3	TC4	TC5/6/7	TC8	
Social						
S1. To reduce poverty and social exclusion	0	0/+	0/+?	0	0	TC2/3 – aim is to protect local retail amenities. Access to sufficient and appropriate shops is a key aspect of social exclusion. TC4 – boot sales can provide cheap source of certain recycled / second hand goods – though the effect of this on overall poverty in the borough is likely to be limited.
S2. To improve the health of the population	0	0	0	0	0	No significant effects predicted.
S3. To improve the education and skills of the population	0	0	0	0	0	No significant effects predicted.
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	0	No significant effects predicted.
S5. To provide everybody with good quality surroundings	0/+	0/+	0/-?	0/+	0/+	TC1/2 – by allocating retail development to existing centres and protecting existing retail uses (TC2), the likelihood in the long-term for these centres to become run-down and derelict should be minimised. TC4 – management plans should minimise negative impact on visual amenity arising from boot sales, however some damage due to litter, signage and increased levels of car traffic are possible. TC5/6/7 – by managing and encouraging appropriate non-retail uses, the vitality and maintenance of centres and communities can be increased / improved. TC8 – policy explicitly recognises the negative impacts such operations can have, and seeks to control for them.
S6. To reduce	0	0/+	0/-?	+?	0	TC2 – active and maintained local shopping parades can

Objective	Policy No.					Comments on predicted effects
	TC1	TC2/3	TC4	TC5/6/7	TC8	
crime and anti-social activity						act as a community focus, though also a gathering point for youths and the possibility of anti social activity. The possibility of anti-social activity is likely to be minimised though where parades are busy and well maintained. TC4 – although the vast majority of traders are likely to be selling genuine second hand goods, it is possible that car boot sales could provide an accessible local market for stolen goods, such as consumer electrics/mobile phones. TC5/6/7 – by diversifying the uses in centres, it is possible that positive effects on crime and anti-social behaviour will be seen in the long-term, where the amount of pedestrian traffic, and variety of people using these spaces increases.
S7. To encourage a sense of local community; identity and welfare	0/+	+	0	+	0	TC1 – See S5. TC2 – local shopping parades can act as an important social resource and provide opportunities for social interaction for people who may have limited contact with others in their day-to-day lives. TC5/6/7 – see S5.
S8. To improve accessibility to key services especially for those most in need	+	+	0	0	0	TC1/2 – in terms of key services provided by retail/shopping – focussing allocation in existing centres should protect and ensure accessibility.
Environmental						
EN1. To reduce the effect of traffic on the environment	-/+?	+	-	-/+?	0/-	TC1 – by allocating retail development to existing centres, the generation of additional travel need should be minimised. However any increase in retail capacity, perhaps especially of comparison goods may generate travel, both within and to the borough. TC2 – neighbourhood shopping centres where providing for a good range of needs can reduce the need to travel further afield. TC4 – although transport assessment is required of boot sales – by their nature these events are likely to create additional car trips within and to the Borough. TC5/6/7 – where journeys to other centres are offset / negated by availability of non-retail uses locally, positive effects are likely. However an increase in activity within these areas may generate a net increase in traffic overall. TC8 – policy does not mention the possible environmental impact of mini-cab businesses – however it is recognised this is beyond the scope of this policy – rather being addresses in TRN policies.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	-/+?	+	-	-/+?	0	TC1 – see EN1 TC2 – see EN1 TC4 – see EN1 TC5/6/7 – see EN1
EN4. To conserve and enhance biodiversity	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	0/+	0/+	0	0/+	0	TC1/2 – See S5 TC5/6/7 – See S5
EN6. To conserve and where	0	0	0	0	0	No significant effects predicted.

Objective	Policy No.					Comments on predicted effects
	TC1	TC2/3	TC4	TC5/6/7	TC8	
appropriate enhance the historic environment and cultural assets						
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	-/+?	+	-	-/+?	0	TC1 – See EN1 TC2 – See EN1 TC4 – See EN1 TC5/6/7 – See EN1
EN8. To minimise the production of waste and use of non-renewable materials	0	0	-	0	0	TC4 – although the policy requires a management plan to include waste collection and disposal, by their nature these events are likely to create additional waste, requiring disposal within the Borough.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	No significant effects predicted.
Economic						
EC1. To encourage sustainable economic growth	+	+	+	+	0/+	TC1 – additional retail floor-space implies increased economic activity in the borough. However, see TC1 policy notes below. TC2/3 – local and neighbourhood shopping and centres can be an important focus of the local economy, and maintain local economic multiplier effects – bringing significant local benefit. TC4 – boot sales can generate a source of additional income for sellers, as well as generating new custom for adjacent businesses, and generating economic value in their own right. TC5/6/7 – diversifying town centres is likely to boost local economic activity and make the borough a more attractive place to live and work. TC8 – policy explicitly recognises the potential negative impacts of amusement centres and mini-cab offices – controlling these should protect the attractiveness of areas, and thus not damage other business / economic activity.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	+	0/+	0	0/+	0	TC1 – additional retail floor-space should require additional staff and thus employment in the retail sector. TC5/6/7 – possible employment creation in new uses in town centres.
EC3. To reduce disparities in economic performance and promote regeneration	+	+	0	0/+	0	TC1 – see EC1 TC2/3 – see EC1 TC5/6/7 – see EC1
EC4. To encourage and accommodate both indigenous and inward investment	+	0	0	+	0	TC1 – provision of additional retail floor-space will require investment. Whether this is indigenous or inward will depend on development type – a local food store is likely to be indigenous, a new supermarket, inward. TC5/6/7 – inward and indigenous investment may be encouraged by policy seeking to manage and facilitate new uses in town centres.
EC5. To encourage efficient patterns of movement in support of economic growth	-/+?	+	0/-	0	0	TC1 – see EN1. Although the principle of guiding retail development to existing centres should reduce the need to travel, the provision of new retail space may encourage additional journeys within and to the borough. TC2/3 – see EN1 TC4 – see EN1
Overall comments on policies TC1 – TC8						
Overall the predicted effects of these policies is positive under all relevant SA objectives. However these policies are predicted to						

Objective	Policy No.					Comments on predicted effects
	TC1	TC2/3	TC4	TC5/6/7	TC8	
<p>have slightly more mixed effects than those of previous chapters, particularly against environmental objectives – reflecting the complex issues surrounding the balance between successful and thriving local businesses and town-centres, while protecting environmental needs and values.</p> <p>The social and economic effects predicted are to be minor in magnitude, and largely positive. Some possible minor negative social impacts are predicted for policy TC4 – car-boot and other recycling sales. This is due to the particular nature of these events, which can bring traffic, people and thus nuisance and dis-amenity to residential areas.</p> <p>As noted there are some mixed and minor negative effects predicted under the environmental SA objectives. These relate to the possible traffic impacts of certain business, employment and town-centre activities, for example enabling / encouraging an increase in retail space, while meeting a social / economic need, is likely to create additional journeys, even taking the proactive approach taken by policy to ensure these uses are located in existing centres. The minor negative effects predicted thus recognises that all effort is being made to minimise negative impacts, but that some impact of such changes may occur all the same. Again policy TC4 has the highest number of negative effects predicted, though none of these are expected to be of major significance.</p> <p>Policy specific comments</p> <p>TC1:</p> <ul style="list-style-type: none"> - As noted in the appraisal of the Core Strategy and in the earlier SA commentary on the draft Development Policies, it is recommended that specific text is included, possibly within the supporting text to policy TC1 which recognises that while the focus of allocations will be as set out in policy, the Council will consider the impact on independent local services in all cases to ensure such impacts are minimised. <p>The rationale for this inclusion would be that independent, locally or regionally owned retail businesses are much more likely to lead to long-term economic benefit to the borough, than retail outlets owned by national or international retail chains, who may provide some local employment, but from which most profit will be siphoned off to other parts of the country due to ownership and management chains involved.</p> <p>TC2:</p> <ul style="list-style-type: none"> - The inclusion of additional text noting the importance of neighbourhood centres for local communities and a local economy is welcomed. <p>TC4:</p> <ul style="list-style-type: none"> - It might strengthen the policy to provide some additional text outlining which sort of sales are covered by this policy – for example it seems unlikely that a small local community fund-raising jumble sale (such as in a school or church hall) would need such a detailed management plan, although these could be considered as “recycling sales”. - The policy text refers to “regular” sales. This might equally apply to a monthly as a weekly sale, however the impact on local residents of more frequent sales seems likely to be much greater – some recognition / reference to this may strengthen the policy. <p>TC6:</p> <ul style="list-style-type: none"> - The previous SA commentary recommended that including some text on the need to consider the actual need for A5 (fast food take-away restaurants) might strengthen the policy – given that in some areas there appears (anecdotally) to be an over supply of such restaurants. It is felt this point remains relevant based on the current policies. 						
<p>Key: Major positive: + Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+</p>						

Table 29: A Strong Local Economy: - Town Centres (DP TC policies 9 – 15) appraisal matrix

Objective	Policy No.					Comments on predicted effects
	TC9	TC10	TC11	TC12	TC13/14/15	
Social						
S1. To reduce poverty and social exclusion	0	0/+	0	0	+	TC10 – markets can provide a useful source of local / cheap produce, and an opportunity for excluded groups to start-up small retail businesses – though this effect on overall poverty / exclusion is likely to be small. TC13/14/15 – by promoting regeneration in specific centres of Neasden, Harlesden and Willesden particular issues of social exclusion in these areas should be addressed, especially in the long-term.
S2. To improve the health of the population	0	0	0	0	0	No significant effects predicted.
S3. To improve the education and skills of the	0	0/+	0	0	0/+	TC10/TC13/14/15 – regeneration and markets based on or in areas of particular cultural interest can raise awareness of and interest in cultural diversity.

Objective	Policy No.					Comments on predicted effects
	TC9	TC10	TC11	TC12	TC13/14/15	
population						
S4. To provide everybody with the opportunity to live in a decent home	0/+	0	0	0	0	TC9 – requirement for new retail/leisure developments to be mixed use, where feasible should aid the increased supply of dwellings in town-centres.
S5. To provide everybody with good quality surroundings	0/+	0	+	0/+	0/+	TC9 – aim of policy is to help maintain, enhance the viability and vitality of town-centres. Where this is achieved, positive effects on surroundings are expected. TC11 – seeks to promote good urban design, and use of appropriate materials – through reference to policy DP UD1. TC12 – aim of town centre management is the improvement of shopping centres – actually scale of effect will depend on individual Town Centre Management outcomes. TC13/14/15 – regeneration in these particular centres can help improve public realm and town-centre vitality.
S6. To reduce crime and anti-social activity	0/+	0	0	0/+	0/+	TC9 – mixed uses and well-used town-centres can increase passive surveillance, and help prevent crime. TC12 – see S5 – these improvements likely to reduce certain types of crime and anti-social behaviour. TC13/14/15 – by promoting regeneration based on and in multi-cultural centres, community relations and understanding may be improved, and certain forms of anti-social activity reduced in the long-term.
S7. To encourage a sense of local community; identity and welfare	0/+	+	0	0/+	+	TC9 – see S5 TC10 – markets can be a vibrant and sociable focus of activity for a community – especially where they are managed, participated in, or sell goods produced by local people. TC12 – see S5 TC13/14/15 – see S5 – also regeneration based on the cultural identity of particular areas is likely to protect and promote community identities.
S8. To improve accessibility to key services especially for those most in need	0	0	0	0/+	0/+	TC12/13/14/15 – by helping to protect and promote the viability of town-centres.
Environmental						
EN1. To reduce the effect of traffic on the environment	0/+	-	0	0/+	0/+	TC9 – by encouraging development in town-centres, and mixed uses, some travel need is likely to be negated, though this impact may be relatively small. TC10 – markets may generate (as noted in supporting text to policy) traffic, even where located near public transport. TC12/13/14/15 – where travel to town-centres outside the borough is offset, due to improvements to town-centres in Brent.
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	0/+	0/-?	0	0/+	0/+	TC9 – see EN1 TC10 – see EN1 TC12/13/14/15 – see EN1
EN4. To conserve and enhance biodiversity	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the	+	0	0/+	+	+	TC9/11 – see S5

Objective	Policy No.					Comments on predicted effects
	TC9	TC10	TC11	TC12	TC13/14/15	
quality of landscapes and townscapes						TC12/13/14/15 – see S5
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	0	0/+	0	0	+	TC10 – local markets can provide important opportunities for ethnic and cultural groups. TC13/14/15 – regeneration based on the cultural identity of particular areas is, in the long term likely to lead to the protection and promotion of cultural assets.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	0/+	0/-?	0	0/+	0/+	TC9 – see EN1 TC10 – see EN1 TC12/13/14/15 – see EN1
EN8. To minimise the production of waste and use of non-renewable materials	0	-	0	0	0	TC10 – markets are potentially a source of additional waste within the Borough, although this is recognised within the policy.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	No significant effects predicted.
Economic						
EC1. To encourage sustainable economic growth	+	+	0	+	+	TC9 – mixed uses and flexibility of policy in Wembley and Kilburn seek to encourage economic activity / development in town-centres. A positive effect is thus expected, particularly in the longer-term. TC10 – markets provide retail opportunities for a diverse local economy, and opportunities for new start-ups / small scale retail. They also increase potential custom as nearby shops and businesses. As a result they can be important economic catalysts. TC12 – main aim of Town Centre Management is to protect and promote the ongoing vitality of town-centres – these are an important aspect of the local economy. TC13/14/15 – main aim is the promotion and enhancement of vitality in these specific town-centres.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	0	0/+	0	+	+	TC10 – where start-up and small retail business opportunities are created. TC12/13/14/15 – by protecting / promoting / creating employment within town centres.
EC3. To reduce disparities in economic performance and promote regeneration	0/+	+	0	+	+	TC9 – see EC1 TC10 – see EC1 TC12/13/14/15 – see EC1
EC4. To encourage and accommodate both indigenous and inward investment	0/+	+	0	+	+	TC9 – see EC1 TC10 – see EC1 TC12/13/14/15 – see S5 and EC1
EC5. To encourage efficient patterns of movement in support of economic growth	0/+	-?	0/+	0/+	0/+	TC9 – see EN1 TC10 – see EN1 TC11 – seeks to promote and protect adequate space at rear of retail premises for servicing. TC12/13/14/15 – where travel to town-centres outside the borough is offset, due to improvements to town-centres in Brent.

Objective	Policy No.					Comments on predicted effects
	TC9	TC10	TC11	TC12	TC13/14/15	
Overall comments on policies TC9 – TC15						
Overall policies TC9 – TC15 are predicted to have positive effects under all relevant SA objectives.						
Minor positive effects are predicted against social objectives, with no negative effects expected, reflecting the social and community role that vibrant and accessibly town-centres play.						
Environmental effects are limited, however a possible minor negative impact is predicted relating to the traffic and waste generation associated with new markets in the borough – however these (policy TC10) do score positively against all other criteria.						
As expected the economic effects predicted are all positive – where town-centres in the borough can be maintained and regenerated a more sustainable local economy should be created – especially where these centres support locally based and managed businesses and shops.						
Policy specific comments						
No significant comments.						
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: - Uncertain: ? Mixed: -/+						

Table 30: A Strong Local Economy and Enabling Community Facilities - Culture, Sport and Tourism (DP CST policies 1 – 3) and Community Facilities (DP CF policies 1 – 3)

Objective	Policy No.						Comments on predicted effects
	CST1	CST2	CST3	CF1	CF2	CF3	
Social							
S1. To reduce poverty and social exclusion	+	0/+	0	++	0/+	0/+	<p>CST1 – policy and supporting text seek to ensure that such developments are accessible and offer benefit / well being for local people. A lack of access to sport and leisure facilities can be an important aspect of social exclusion, so efforts to improve this are likely to have positive effects, especially in the long-term. Size of effect will depend on affordability and ease of access for all.</p> <p>CST2 – cultural spaces can help social inclusion – protecting them therefore predicted to have a positive effect.</p> <p>CF1/2/3 – community facilities play an important role in providing social and other community needs. A lack of these facilities is a key aspect of social exclusion.</p>
S2. To improve the health of the population	+/ +	+	0	+	+	+	<p>CST1 – increased provision of sport and leisure facilities, as long as they are affordable and accessible to all likely to increase participation, with both positive physical and mental health effects.</p> <p>CST2 – supporting text seeks improved participation in sports.</p> <p>CF1/2/3 – community facilities include a wide-range of uses, including health and community sports, which are likely to have beneficial health impacts on local communities. The size of effect depends clearly on the level of any new or extended provision.</p>
S3. To improve the education and skills of the population	+	+	0/+	+	+	+/ +	<p>CST1 – sporting, cultural and tourism facilities can all play an active role in personal development and training / learning. Policy includes criteria to encourage access / shared facilities with local schools and other organisations.</p> <p>CST2 – see above.</p> <p>CST3 – by preserving historic and archaeological sites and their settings, these are protected as an educational / learning resource for local schools and people.</p> <p>CF1/2/3 – where new facilities include educational and training uses, and through protection of existing facilities.</p> <p>CF3 – seeks, in particular, contributions towards educational facilities. Supporting text refers to the</p>

Objective	Policy No.						Comments on predicted effects
	CST1	CST2	CST3	CF1	CF2	CF3	
							proposal for a new academy by 2009.
S4. To provide everybody with the opportunity to live in a decent home	0	0	0	0	0	0	No significant effects predicted.
S5. To provide everybody with good quality surroundings	+	+	0/+	+	0	0	CST1 – facilities required to be appropriate and meet all Promoting a Quality Environment policy requirements – likely to lead to improvements to local amenity / public realm. CST2 – cultural facilities / art can provide interest and quality in the public realm. Protecting and enhancing cultural facilities likely to improve public realm. CST3 – specific monuments are protected. CF1 – through improved community facility provision. Policy also requires all Promoting a Quality Environment Policies to be met.
S6. To reduce crime and anti-social activity	+	+	0	+	+	+	CST1 – sufficient, accessible facilities for sport and leisure should provide activity for children and young people (as long as they are affordable), which may have positive effects on certain types of crime and anti-social activity. CST2 – protecting cultural assets may lead to improved understanding / cohesion between groups, and reduce certain types of crime and anti-social activity. CF1/2/3 – as with CST1, community facilities and their sufficient provision can provide activities and focus for children and young people, and a focus for communities, which are likely to lead to the reduction of certain types of crime of anti-social behaviour.
S7. To encourage a sense of local community; identity and welfare	+	++	0/+	+/+ +	+	+	CST1 – cultural, tourism and sport facilities in an area can provide a positive community focus, and increase the sense of identity and feeling of being “a destination”. Also where accessible to all, and affordable, sport and leisure facilities can provide social and meeting spaces as well. CST2 – cultural assets can play a major role in communities and in providing a source of pride and identity. CST3 – historic settings, and a sense of history can enhance feelings of identity and sense of place. CF1/2/3 – decent, appropriate and sufficient community facilities are often the mainstay and focus of a local community. The size of effect will depend on the level of any additional provision actually seen over the plan period.
S8. To improve accessibility to key services especially for those most in need	+	+	0	+	+	+	CST1 – explicit requirement in supporting text for sport and leisure facilities to be accessible by public transport, and for those with mobility needs. CST2 – access to cultural assets / facilities. CF1/2/3 – where new community facilities are provided, access is likely to improve. Protection of existing facilities is likely to protect access. Policy CF1 encourages new facilities in accessible locations.
Environmental							
EN1. To reduce the effect of traffic on the environment	-/+	0/+	0	0/+	0/+	0	CST1 – while the policy seeks to ensure that facilities are accessible to public transport, walking and cycling, at the same time new developments, especially large scale tourist or sport facilities will, by their nature generate additional traffic within and to the borough. CST2 – protecting cultural assets in existing centres is likely to reduce need / negate need to travel elsewhere to access cultural centres. CF1/2 – increased local community provision may negate the need to travel for such facilities.

Objective	Policy No.						Comments on predicted effects
	CST1	CST2	CST3	CF1	CF2	CF3	
EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	0	0	0	0	0	0	No significant effects predicted.
EN3. To improve air quality	-/+	0	0	0	0	0	CST1 – see EN1
EN4. To conserve and enhance biodiversity	0	0	0	0	0	0	No significant effects predicted.
EN5. To maintain and enhance the quality of landscapes and townscapes	+	0/+	0	0/+	0	0	CST1/2 – see S5 CF1 – see S5
EN6. To conserve and where appropriate enhance the historic environment and cultural assets	+	++	++	0	0	0	CST1 – key policy focus is improved provision of cultural uses/facilities CST2 – protection of cultural assets is the main focus of policy. CST3 – main aim of policy is protection of archaeological sites and historic monuments of local importance.
EN7. To reduce contributions to climate change and reduce vulnerability to climate change	-/+	0	0	0	0	0	CST1 – see EN1.
EN8. To minimise the production of waste and use of non-renewable materials	-/+	0	0	0	0	0	CST1 – policy seeks to ensure potential adverse effects, including waste are “avoided, reduced or mitigated”. However any increase in activity, especially on a large scale, involving a large number of people is going to create additional waste.
EN9. To conserve and enhance land quality and soil resources	0	0	0	0	0	0	No significant effects predicted.
Economic							
EC1. To encourage sustainable economic growth	+	+	0	+	+	+	CST1/2 – Cultural, leisure and tourism facilities can play an important role in the local economy. Tourist uses can also bring investment and spending from outside the Borough. CF1/2/3 – sufficient levels of community facility provision will make Brent a more attractive location to live and work, enhancing long-term economic prospects for the borough. Improved education levels in the long term can also encourage local start-ups and encourage businesses to local to Brent.
EC2. To offer everybody the opportunity for rewarding and satisfying employment	+	0	0	0/+	0/+	0/+	CST1 – supporting text seeks recruitment and training programmes for local people. CF1/2/3 – new facilities may provide employment opportunities.
EC3. To reduce disparities in economic performance and promote regeneration	+	+	0	+	+	+	CST1/2 - see EC1 CF12/3 – see EC1
EC4. To encourage and accommodate both indigenous and inward investment	+	+	0	+	+	+	CST1/2 – see EC1. New large scale sport or tourist facilities will require additional investment. CF1/2/3 – see EC1

Objective	Policy No.						Comments on predicted effects
	CST1	CST2	CST3	CF1	CF2	CF3	
EC5. To encourage efficient patterns of movement in support of economic growth	-/+	0/+	0	0/+	0	0	CST1/2 – see EN1 CF1 – see EN1
Overall comments on CST and CF policies							
<p>Overall the CST and CF policies, reflecting their nature, are predicted to have positive effects against all relevant SA objectives.</p> <p>As expected the predicted effects for social objectives are all positive, with some major positive effects predicted against objective S7 – to encourage a sense of local community; identity and welfare, reflecting the importance of leisure, sport and community facilities for the well being of any community.</p> <p>Some mixed effects are predicted for policy CST1 relating specifically to transport generation which new large scale sport or leisure facilities may generate, even where all effort is made to locate these in areas of high public transport accessibility. Equally, large leisure and sport facilities, and the events held in them, are likely to generate additional resource use and waste requiring management and disposal in the Borough.</p> <p>Positive effects are predicted against economic objectives for both CST and CF policies, this reflects the role culture, leisure and sport and good community facilities play in making Brent a place people want to live and work in, as well as the need for inward and/or indigenous investment implied by the creation of new facilities in the Borough.</p> <p>Note - The positive nature of scores for CST policies depend to a large extent on any new or improved facilities being accessible and affordable to local people on all incomes. New facilities which are too expensive, or have exclusive / selective membership requirements (such as some privately run gyms and sport-centres) may in fact have a divisive impact on communities, creating a sense of “haves” and “have-nots”. The policies do seek to minimise this risk, however we would advise the Council to make every effort to ensure new sport and leisure facilities are as affordable to all as possible – for example, by encouraging flexibility of prices/entry fees, with local-rates, or reduced prices for the unemployed etc.</p>							
Policy specific comments							
<p>CST1:</p> <ul style="list-style-type: none"> - Supporting text which expects large scale leisure and hotel developments to include recruitment and training to help local unemployed people back into work is welcomed. We suggest that this point could also be included as a criteria within the policy itself. 							
<p>Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: +/-</p>							

Summary of mitigation and enhancement

6.60 Table 31 brings together comments included in the above appraisal matrices which concern the mitigation and enhancement recommendations arising from the appraisal. This text draws particularly from the text included under “overall comments” and “policy specific comments” in each matrix.

Table 31: A Strong Local Economy / Community Facilities – mitigation and enhancement proposals

Policy	Proposed mitigation and enhancement and SA comments
BIW policies: Business, Industry and Warehousing	No specific mitigation or enhancement recommendations.
TC policies: Town Centres and Shopping	<p>TC1:</p> <p>It is recommended that specific text is included, possibly within the supporting text to policy TC1 which recognises that while the focus of allocations will be as set out in policy, the Council will consider the impact on existing independent local services in all cases to ensure such impacts are minimised.</p> <p>The rationale for this inclusion would be that independent, locally or regionally owned retail businesses are much more likely to lead to long-term economic benefit to the borough, than retail outlets owned by national or international retail chains, who may provide some local employment, but from which most profit will be siphoned off to other parts of the country due to ownership and management chains involved.</p>

Policy	Proposed mitigation and enhancement and SA comments
	<p>TC4: The policy title refers to “<i>Car boot / other recycling sales</i>”, to clarify the policy an explanation of the types sales are covered could be added – for example it seems unlikely that a small local community fund-raising jumble sale (such as in a school or church hall) would need a detailed management plan as required by the policy, although these could be considered as “recycling sales”.</p> <p>The policy text refers to “regular” sales. This might equally apply to a monthly as a weekly sale, however the impact on local residents of more frequent sales seems likely to be much greater – some recognition / reference to this may strengthen the policy.</p> <p>TC6: The earlier SA commentary recommended that including some text on the need to consider the actual need for A5 (fast food take-away restaurants) might strengthen this policy – given that in some areas there appears (anecdotally) to be an over supply of such restaurants. This point remains relevant.</p>
<p>CST policies: Culture, Sport and Tourism</p>	<p>CST1: Supporting text which expects large scale leisure and hotel developments to include recruitment and training to help local unemployed people back into work is seen as very positive. It is suggested that this point could also be included as a criteria within the policy itself.</p>
<p>CF policies: Enabling Community Facilities</p>	<p>No specific mitigation or enhancement recommendations.</p>

Cumulative effects of the Development Policies DPD Preferred Options

- 6.61 There are different types of cumulative effects, but what we are principally concerned with here is the total effects of multiple actions on a single ‘receptor’, which could be certain group within the population or people living in a particular locality, the water environment or flora and fauna for example. Cumulative effects can be positive, or negative in nature.
- 6.62 A number of the effects arising from the Development Policies are likely to be cumulative. For example biodiversity effects from the protection of existing open and green space, and the creation of new space for habitat and species. From the detailed appraisal and summary commentaries presented in the section above, many effects which have been identified are cumulative in character. This is emphasised by the combined matrices used, which show where several policies are predicted to impact upon the same sustainability objective.
- 6.63 Table 32 identifies some of the most significant cumulative effects, both positive and negative, which are predicted to occur due to the effects of a number of policies on a particular issue or receptor. This is not an exhaustive list as predicting the interactions and additive effect of policies is complex and uncertain, however these cumulative effects are considered some of the most significant.

6.64 These cumulative effects should ideally be seen in the context of the cumulative effects of the Core Strategy DPD Preferred Options, which are included in the Core Strategy SA Report, October 2006⁸.

Table 32: Key cumulative effects of the Development Policies DPD Preferred Options

Cumulative Effects	Receptor	Causes / Comments
Positive Effects		
Townscape and public realm	General population especially in areas of low townscape / public realm quality	Across the policies, there is an emphasis on improving the public realm, by ensuring high quality of design, layout and location of developments, and requiring sufficient open space and amenity. In the long-term, in particular the DP UD, but also DP SD and Housing policies seek to ensure developments which are both appropriate for local people, and adaptable to changing needs.
Crime and fear of crime reduction	General population, especially at-risk groups (youth, deprived, elderly etc)	Policies which seek to improve public realm and the layout / clarity of development, encourage walking, provide community facilities are likely to have a beneficial effect on crime and fear of crime. Cultural policies (CST) may also have a strongly positive cumulative effect by engendering pride and a sense of identity within communities. Passive surveillance, pedestrian and cycle traffic and vibrancy of town and local centres are all contributing factors.
Health	General population, particularly those in deprived areas or currently at risk.	Although no policies directly address health (though the definition of community facilities does include health facilities) the general improvements in the built environment, increased opportunities for walking and cycling and the provision of good quality affordable housing are likely, particularly in the long term to have beneficial cumulative effects on health.
Provision and increase accessibility to services and facilities	Communities in deprived areas, particularly those without a car	Throughout the draft Development Policies there is an emphasis on providing amenities and services in accessible locations and protecting those which already exist. Community involvement in amenity provision is also recognised in a number of policies, and others seek to improve non-car infrastructure. Such factors are likely to have a positive cumulative impact, particularly on currently deprived communities.
Open space and Biodiversity	Habitats and species at risk, native flora and fauna. Communities in open space deficient areas.	A large number of policies seek to provide protection or enhancement of open space and biodiversity. For example while specific protection is given to Local Nature Reserves, SINCs and SSSIs, policies also encourage the provision and maintenance of green-chains and the enhancement of the Blue-Ribbon network – such as through requirements to open-up previously culverts. Cumulatively these policies where implemented effectively will provide protection and enhancement for biodiversity in the Borough.
Enhanced image of Brent and employment opportunities	Business Local population (including working age population)	Positive effects (minor) are predicted for a large number of policies under Sustainability objective EC1 (Economic Growth). This is due to the probable impact of policies to improve public realm, enhance non-car transport infrastructure and connectivity, and improve facilities for residents, which are likely to act cumulatively in the long term, making the borough a more attractive location to live and work, and encouraging businesses to locate and invest in the area.
Negative Effects		
Increased traffic and congestion	Air and general population, especially those living close to main roads and in	There is considerable focus within the Development Policies on the need to locate new development near existing centres and in locations accessible by public transport, walking and cycling. However the new development implied by the Development Policies, and particular the development of new housing, community and cultural/tourist facilities as well as the growth of retail and other economic activity are all likely to cumulatively generate some new traffic, more journeys and

⁸ Available from the LB Brent website:

<http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/44465828647ed0b78025721b006013e3!OpenDocument>

Cumulative Effects	Receptor	Causes / Comments
	the Growth Areas such as Wembley	the associated congestion, noise, air pollution and CO ₂ emissions. This increase may outweigh mitigation measures included in policy.
Resource use and waste generation	Land, air, water (within and outside Borough)	The new development activities sought by policy will also consume resources, generate waste, use energy and water during both the construction and operational phases.

Potential overall effects of the Draft Development Policies Preferred Options

- 6.65 This section provides a brief summary of the most significant potential effects from the findings of the appraisal. As noted in the introduction to Section 6, it should be kept in mind that the Development Policies DPD Preferred Options seek to provide the detailed implementation and control criteria to ensure that the strategic policies set out in the Core Strategy DPD Preferred Options are delivered effectively, in line with the Core Strategy objectives. As a result the overall effects of Development Policies are in the case of many sustainability objectives less pronounced than was the case with the Core Strategy policies. This reflects the more focussed and specific nature of the Development Policies.
- 6.66 Overall the Development Policies are predicted to have positive effects. The appraisal matrices and summary discussions in Section 6 above show that the Development Policies are predicted to have almost exclusively positive effects under the social and economic objectives, however there are some mixed potential effects predicted in relation to some environmental objectives.
- 6.67 Overall positive social effects are predicted to include improvements to: poverty and social inclusion, the provision, protection and access to community services and amenities, the affordability of housing as well as the quality and adaptability of design in new development and the provision of infrastructure for public transport, walking and cycling.
- 6.68 Overall positive environmental effects are expected to include: improvements to the public realm and the quality of townscapes and landscapes, protection and enhancement of open spaces, parks and habitats, standards of design for all types of development (improving visual amenity, as well as functionality), and where infrastructure is effectively developed, positive effects due to increased walking and cycling.
- 6.69 Positive economic effects are predicted to be largely indirect, however they include: the development of attractive and vibrant communities in which people will chose to live and work, provision of facilities and amenities for employees as well as for business which may chose to locate to the Borough, flexibility in work-space availability including facilities for start-ups and home-working. Improvements to public transport and walking / cycling infrastructure are also predicted to have positive economic effects.
- 6.70 While there are no negative effects predicted of major significance, however some overall effects may be mixed, i.e. both positive and negative. These reflect the possible negative cumulative effects noted above. Notably, the increase in development implied by the policies, particularly new housing, cultural and tourist facilities and development to encourage increased economic activity are likely to

produce overall impacts such as: increased traffic generation and associated air pollution, CO₂ emissions and noise, increased resource use, including energy, water and materials, and the production of waste.

What difference the SA has made

6.71 The Sustainability Appraisal process and the development of the LDF, including the Development Policies were initiated at the same time and the SA has inputted throughout the evolving draft Development Policies as well as the evolving draft Core Strategy and Site Specific Allocations which. The SA has provided key input and led to changes in the Development Policies DPD Preferred Options in two key ways:

- The Development Policies seek to provide the detailed implementation criteria for the strategic policy framework set out in the Core Strategy. By providing key input to development of the Core Strategy policies, the SA led to sustainability improvements and modifications to minimise negative effects or enhance positive effects of the Core Strategy preferred options which in turn have helped inform the preferred options for the Development Policies.
- LB Brent completed a first draft of the Development Policies in April 2007. CEP reviewed this early draft and provided a detailed SA commentary (1st May 2007). The SA comments made led to a number of policy changes, clarifications to supporting text and the enhancement of certain policy alternatives proposed. This commentary, together with the responses made by LB Brent is included in Appendix 8 which provides an indication of the types of changes made.

7. IMPLEMENTATION AND MONITORING OF THE DEVELOPMENT POLICIES

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

- 7.1 The Development Policies DPD Preferred Options is part of a broader hierarchy of plans, which will not be developed nor implemented in isolation. Links and relationships exist at the local (Borough) level but also at the regional (London) and national level. The Development Policies DPD is a key DPD within the Brent LDF, which will ultimately replace the UDP as the statutory plan for Brent and will be made up of an evolving suite of DPDs and SPDs (known collectively as Local Development Documents – LDDs).
- 7.2 Although it is a stand-alone document, the relationship with the Core Strategy is intrinsic, as Development Policies DPD sets out the detailed implementation and ‘control’ criteria for the higher level Core Strategy policies. In addition, the Site Specific Allocations (see Part C of this SA Report) set out the site-specific development priorities and needs also reflecting delivery of the objectives of the Core Strategy. To provide further guidance or explanation, SPDs for specific issues linked to DPD policy, such as sustainable construction and South Kilburn Housing Regeneration, will be / have been prepared.
- 7.3 Once major sites and regeneration schemes identified within the Core Strategy and other DPDs come forward they may require an Environmental Impact Assessment to be undertaken.
- 7.4 The draft Development Policies DPD has been developed with reference to a large number of national and regional plans and strategies. At the highest level it reflects the broad agenda set out in Securing the Future - UK Government Sustainable Development Strategy, and for specific aspects it has been developed in line with national targets for issues such as housing, waste management, energy and transport. At the regional (London) level the Development Policies are linked to policies, strategies and targets set out in GLA documents and the London Plan (further alterations), which has for example set targets for housing development and affordable housing provision.
- 7.5 In addition, the Development Policies DPD is linked to and must be aware of a very large number of local (borough) plans and those developed by neighbouring boroughs, such as Local Implementation Plans (LIPs) which seek to deliver the London Transport Strategy within each borough, Waste Management Strategies, Biodiversity Action Plans and so on.

Implementation and monitoring of the Development Policies

- 7.6 The appraisal presented in section 6, above, has predicted that the draft Development Policies are likely to have almost universally positive effects against relevant sustainability objectives. This is indicative of the fact that as policies the Development Policies are seeking to provide the detailed implementation and 'control' criteria for the higher level Core Strategy policies. For example where there were four high level strategic policies for Housing in the Core Strategy, there are sixteen policies in the draft Development Policies, each focussing on a specific aspect to protect, deliver and control the manner of delivery in relation to housing in Brent.
- 7.7 As a noted above the Development Policies DPD, together with the Site Specific Allocations in essence set out the detailed implementation framework for the higher level policy set out in the Core Strategy, and it is through the application of these more detailed criteria, and the site specific development aspirations that the Core Strategy will be implemented in line with its objectives.
- 7.8 However, these more detailed policies will only be effective where they are in themselves implemented effectively, and as a result the positive sustainability effects predicted also rely on this. The key tool that the Council has in trying to ensure implementation is through the setting of realistic yet challenging targets and the monitoring of performance against these on a regular basis.
- 7.9 Chapter 7 of the Development Policies DPD Preferred Options sets out the proposed implementation and monitoring framework. This provides a very clear set of targets, indicators and monitoring proposals (referred to as "monitoring points") which link sets of Development Policies to the strategic and core policies set out in the Core Strategy. These targets and indicators are in turn structured according to the high level strategic objectives of the Core Strategy, and the Brent Community Strategy. This is felt to provide a very clear and where adhered to effective means of monitoring the effects of the Development Policies, and a framework for assessing the effectiveness of implementation.

Proposals for monitoring

- 7.10 Monitoring the significant sustainability effects of implementing the Development Policies DPD is a fundamental part of the SA process. It is important to monitor performance against the sustainability objectives, which form the core of this appraisal, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken.
- 7.11 The SEA Directive requires the significant environmental effects of a plan or programme to be monitored and that the Environment Report (this report) should include a description of measures 'envisaged' for monitoring the implementation of the plan.

- Annex 1(i) of the SEA Directive requires the Environment Report to include “a description of the measures envisaged concerning monitoring in accordance with Article 10”.
 - Article 10 (1) states that “Member States shall monitor the significant environmental effects of the implementation of plans and programmes...”
- 7.12 In addition, The Planning and Compulsory Purchase Act 2004 requires the local authority to prepare an Annual Monitoring Report (AMR) which should set out the extent to which the policies and objectives of DPDs and SPDs making up the LDF are being achieved.
- 7.13 Brent has produced two AMRs⁹ for the period 2004 – 2005 and 2005 – 2006. The 2005 – 2006 AMR has chapters entitled “Review of development in Brent, 2005 – 2006” and “Towards the Local Development Framework (LDF)”. The Development Policies DPD, and Site Specific Allocations DPD, as with the Core Strategy DPD will be monitored through updates to the AMR each year.
- 7.14 The SA of the Core Strategy DPD Preferred Options (October 2006) proposed a monitoring process in the context of the Core Strategy, but designed to provide a framework for the LDF as a whole. This was based upon guidance produced by ODPM (now DCLG) on good practice in the monitoring of LDFs¹⁰.
- 7.15 These monitoring proposals have been updated to reflect the additional requirements of the draft Development Policies and the Site Specific Allocations, and are included in Part A of this report, see Section 4.
- 7.16 It has been decided to present a single SA monitoring framework for two reasons:
- This reflects the AMR process, which monitors the implementation and development progress in Brent through a single report each year.
 - The sustainability effects identified in the appraisal of the draft Development Policies, and the Site Specific Allocations, are sufficiently covered by the proposed monitoring framework for the draft Core Strategy. Thus producing individual monitoring proposals was felt to add complexity without providing a more effective monitoring process.

⁹ *Enabling Development in Brent, Annual Monitoring Report 2004/05 and 2005/06:*
<http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/2219c74ce551d41780257225004aee35!OpenDocument>

¹⁰ *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005.
<http://www.communities.gov.uk/index.asp?id=1143905>

Next steps

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