

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

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



June 2007

**Prepared for London Borough of Brent
by
Collingwood Environmental Planning**

Collingwood Environmental Planning
1E, The Chandlery
50 Westminster Bridge Road
London, SE1 7QY, UK
tel: 020 7407 8700
email: r.eales@cep.co.uk
web: www.cep.co.uk



CONTENTS

How to Find Your Way Around the Sustainability Appraisal Report	i
How to Comment on the Sustainability Appraisal Report	i
Non-Technical Summary	1
PART A: SUSTAINABILITY CONTEXT	3
1. Background	5
Location of Brent.....	5
Brent's Local Development Framework.....	5
Purpose of the Sustainability Appraisal and Sustainability Appraisal Report	10
Purpose of the Sustainability Appraisal Report	11
Structure and Content of this Sustainability Appraisal Report for the Development Policies and Site Specific Allocations	11
Compliance with the SEA Directive and Regulations	12
Consultation on the Sustainability Appraisal Report.....	13
2. The Appraisal Methodology	15
Overview of approach adopted.....	15
Programme and responsibility	17
Sustainability Appraisal Scoping Report.....	21
Appraisal of alternatives and preferred options	22
Development of Sustainability Appraisal Report.....	24
Stakeholder involvement - who was involved, when and how?	25
Difficulties encountered in compiling information or carrying out the appraisal	26
3. Sustainability Objectives, Baseline and Context	29
Links to other plans, programmes and sustainability objectives.....	29
Descriptions of the environmental, social and economic baseline characteristics and the predicted future baseline	34
Environmental, economic and social problems identified	61
Sustainability problems identified	61
Sustainability Appraisal Framework.....	65
4. Implementation and Monitoring	69
Links to other tiers of plans and programmes and the project level	69
Proposals for monitoring.....	70

PART B: APPRAISAL OF THE DEVELOPMENT POLICIES *(included in separate volume)*
..... **77**

5. Development Policies Issues and options.....	78
6. Appraisal of the Development Policies Preferred Options.....	105
7. Implementation and Monitoring of the Development Policies	163

PART C: APPRAISAL OF THE SITE SPECIFIC ALLOCATIONS *(included in separate volume)*..... **167**

8. Site Specific Allocations Issues and Options.....	169
9. Appraisal of the Site Specific Allocations Preferred Options	179
10. Implementation and Monitoring of the Site Specific Allocations.....	207

APPENDICES*(All included in separate volumes)***APPENDICES TO PART A: SUSTAINABILITY CONTEXT**

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

APPENDICES TO PART B: APPRAISAL OF THE DEVELOPMENT POLICIES

Appendix 8: Initial Sustainability Appraisal Commentary and LB Brent Responses
--

APPENDICES TO PART C: APPRAISAL OF THE SITE SPECIFIC ALLOCATIONS

Appendix 9: Site Specific Allocations Included in the Issues and Options Papers
Appendix 10: Summary of Information Included in Proformas Filled in by LB Brent
Appendix 11: Key Issues Identified for Individual Sites and SA Comment Including Mitigation and Enhancement
Appendix 12: Recommended Changes from SA Commentary and LB Brent Responses

TABLES

(In Part A of the SA Report only)

Table 1 : Components that make up the Environmental Report	12
Table 2 : Sustainability Appraisal stages and tasks	16
Table 3 : SA programme - key tasks, events and outputs	17
Table 4 : List of key regional plans and programmes reviewed and implications for the DPDs and SA.....	30
Table 5 : List of key local plans and programmes reviewed and implications for DPD and SA	32
Table 6 : Summary List of Baseline Data Topics	35
Table 7 : Summary of key sustainability problems.....	62
Table 8 : Sustainability objectives and criteria	66
Table 9 : Significant sustainability effects associated with the Draft Core Strategy and potential indicators	74

FIGURES

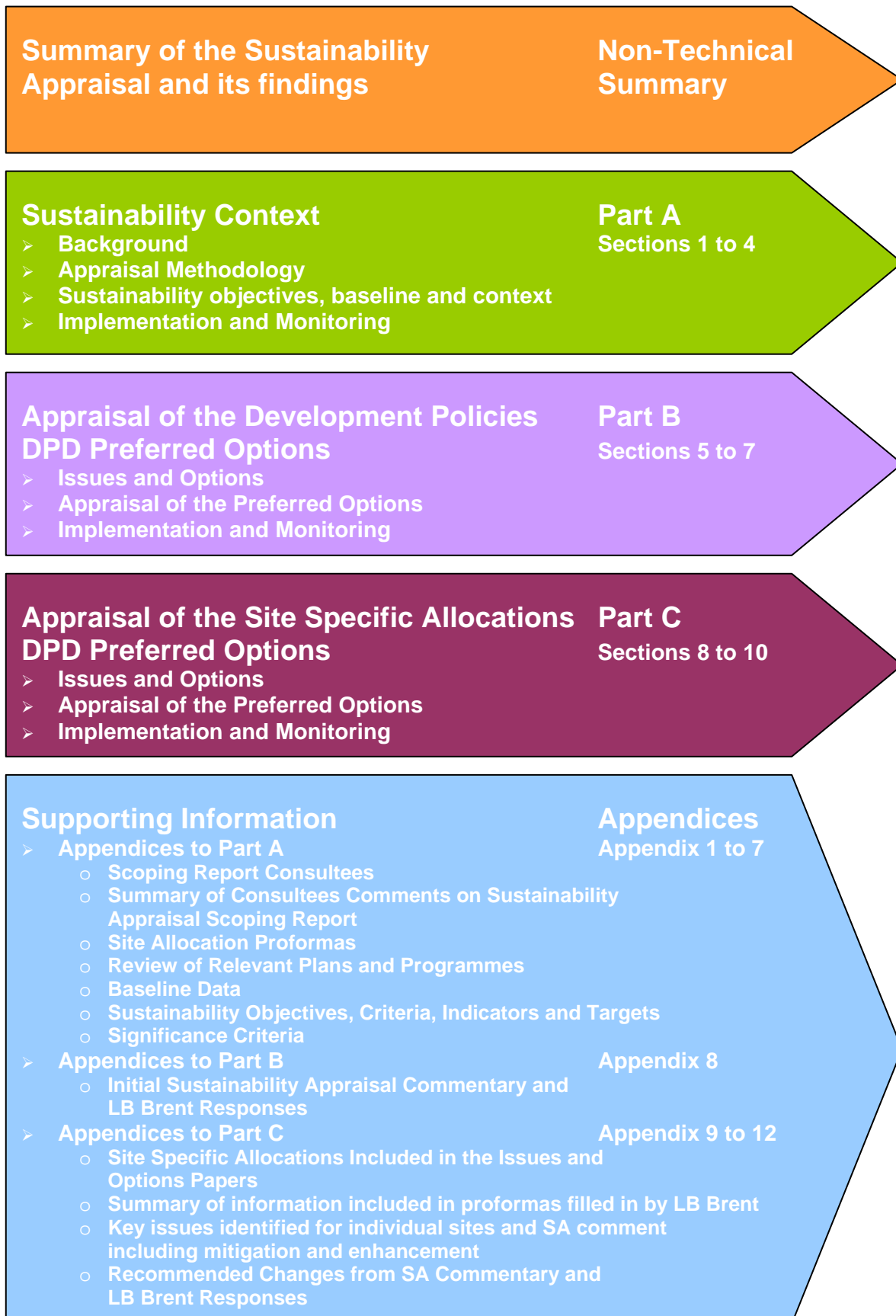
(In Part A of the SA Report only)

Figure 1 : Location of London Borough of Brent	5
Figure 2 : Local Development Framework context	6
Figure 3 : Index of Multiple Deprivation 2004 in Brent	36
Figure 4 : Number of households served per GP	38
Figure 5 : Cycle Routes and Cycle Parking in Brent.....	38
Figure 6 : Areas of Open Space Deficient	39
Figure 7 : Percentage 16 to 74 year olds with no qualifications, 2001, by ward	40
Figure 8 : Percentage 16 to 74 year olds with degree level qualification or higher, 2001, by ward.....	40
Figure 9 : Age pyramid of Brent.	41
Figure 10 : Population by ethnic group	42
Figure 11 : Percentage of owner occupied households by ward and percentage of privately rented households by ward, 2001	43
Figure 12 : Percentage social rented households by ward and average household size by ward, 2001	44
Figure 13 : Distribution of supported housing in Brent.....	45
Figure 14 : Noise complaints per hectare and housing density	46
Figure 15 : Crime levels in Brent versus national averages.....	47
Figure 16 : Street crime in Brent, 2003/04 and 2005/06	47
Figure 17 : Public transport accessibility and location of railways and underground	49
Figure 18 : Bus priority and cycle route network.....	50
Figure 19 : Flood Risk in Brent	51
Figure 20 : Brent Air Quality Management Areas and Major Roads	52
Figure 21 : Predicted annual mean NO ₂ levels for 2005 in Brent.....	53
Figure 22 : Areas of nature conservation importance	54
Figure 23 : Areas of nature conservation and access deficiency	55
Figure 24 : Areas of low townscape quality	56
Figure 25 : Conservation areas.....	57
Figure 26 : Potentially contaminated land in Brent	58
Figure 27 : Unemployment by ward, January 2004	60

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

HOW TO FIND YOUR WAY AROUND THE SUSTAINABILITY APPRAISAL REPORT



HOW TO COMMENT ON THE SUSTAINABILITY APPRAISAL REPORT

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

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

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

Comments can be provided by:

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

Email: ldf@brent.gov.uk

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

When you comment please include:

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

NON-TECHNICAL SUMMARY

[see separate volume]

PART A: SUSTAINABILITY CONTEXT

1. BACKGROUND

Location of Brent

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

Figure 1: Location of London Borough of Brent



Source: London Borough of Brent

Brent's Local Development Framework

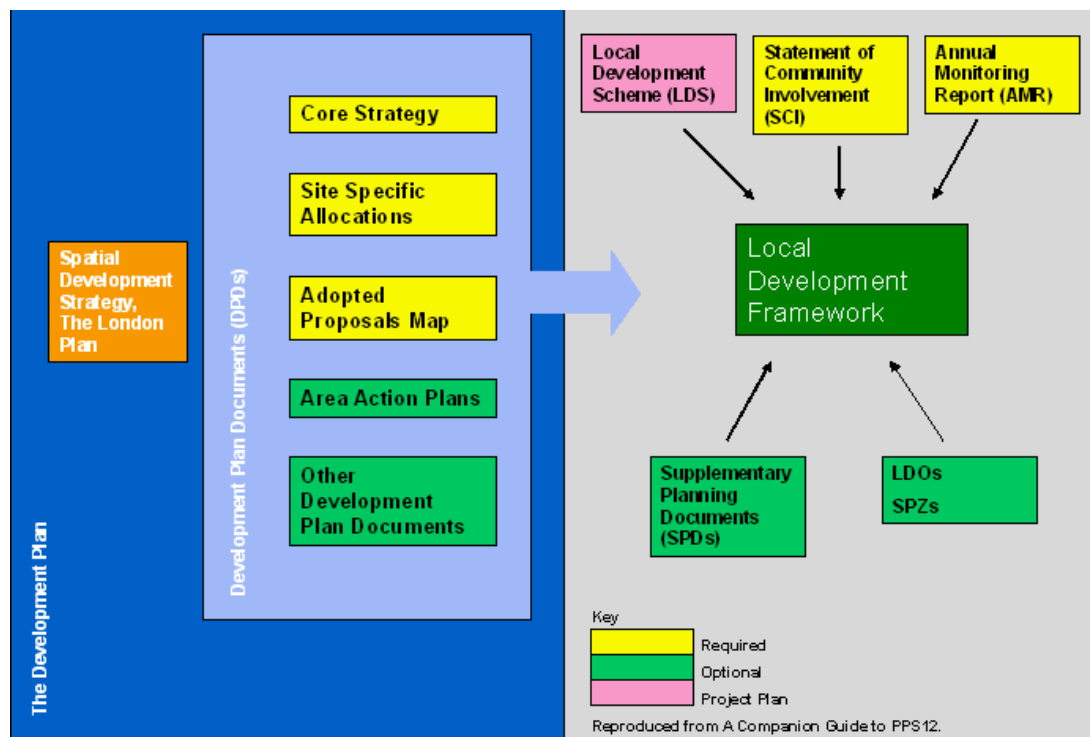
Background on Local Development Frameworks

- 1.2 The Planning and Compulsory Purchase Act 2004 and its accompanying Regulations have led to the replacement of the existing system of Unitary Development Plans (UDPs) with Local Development Frameworks (LDFs). This is the term used for the portfolio of local development documents which comprise the spatial planning strategy for a local planning authority's area.
- 1.3 LDFs comprise of Local Development Documents (LDDs), which include Development Plan Documents (DPD) and Supplementary Planning Documents

(SPD) which expand policies set out in a development plan document or provide additional detail. The LDF also includes:

- The **Local Development Scheme** (LDS), setting out details of each of the local development documents to be produced and the time scales and arrangements for production.
- The **Statement of Community Involvement** (SCI), specifying how the authority intends to involve communities and stakeholders in the process of preparing local development documents.
- The **Annual Monitoring Report** (AMR), setting out progress in terms of producing local development documents and implementing policies.

Figure 2: Local Development Framework context



1.4 DPDs can include:

- A **core strategy**, setting out the spatial vision, spatial objectives and core policies for the development of the local planning authority area.
- **Site specific allocations**, the sites which are proposed for development to meet the Council's and the Community's vision and core strategy including any policies which refer to the development of those sites, such as the mix of uses or the form of access arrangements.
- **Area action plans** (where needed).

- **Other development plan documents**, these can include thematic documents, for example, housing, employment and retail development.
 - A **proposals map** illustrating the geographical extent of policies.
- 1.5 The DPDs, together with the spatial development strategy prepared by the Mayor of London, form the statutory development plan within Brent.

Brent's Development Plan Documents

- 1.6 LB Brent commenced the preparation of its LDF in September 2004, which will eventually replace the current UDP which was adopted in January 2004. The LDF will comprise a suite of documents which taken together will provide the Council's vision, objectives, policies and proposals for meeting social, economic and environmental development aims. In replacing the UDP, the LDF for Brent will provide the framework and policies for the Borough in all aspects of land use and spatial planning.
- 1.7 Initially, the DPDs to be produced in Brent will include a:
- Core Strategy¹;
 - Development Policies; and
 - Site Specific Allocations.
- 1.8 In addition, a **proposals map** will also be produced to provide a spatial representation of the policies contained within the DPDs. If the **Annual Monitoring Report** (AMR) or other appropriate mechanism illustrates a need for a further DPD these will be produced.
- 1.9 The UDP policies for Wembley and Park Royal are agreed, by the service level agreement, to be saved beyond the three years period until the three DPDs proposed are adopted. The Council will seek to save the Wembley and Park Royal Inset Plans beyond this period until **Area Action Plans** are adopted for these areas. No timetable has yet been agreed for preparation of these Area Action Plans.
- 1.10 In relation to **waste planning**, the Council is currently examining the most appropriate way to deal with the potential for joint working with the other constituent Boroughs of the West London Waste Disposal Authority (WLWDA, known as WestWaste)². These boroughs comprise Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond. The Core Strategy DPD outlines that Brent will work as a member of the WLWDA to prepare a joint Municipal Waste Management Strategy. At this stage it is considered that this arrangement offers most potential for effective joint working. This may result in these Boroughs being able to produce a Joint West London Waste DPD. Only when further work has been completed, however, will it be

¹ Note consultation on the Core Strategy DPD Preferred Options was completed on December 11 2006

² LBB Annual Monitoring Report, 2005-06

possible to determine the appropriate course of action for setting out planning policies and / or specific site proposals. As a result, the Core Strategy DPD and Development Policies DPD Preferred Options only includes limited coverage of waste policies.

DPD Programme

1.11 The key stages in the proposed programme for developing the DPDs are detailed below:

- **Initiation of DPD process** – September 2004.
- **Issues and options consultation** - September / October 2005.
- **Preferred options statutory consultation** – Core Strategy began on 30th October 2006 (for 6 weeks); and Site Specific Allocations and Development Policies commencing on 18th June 2007 (for 6 weeks).
- **Submission of DPDs** - Core Strategy and Site Specific Allocations in October 2007; and Development Policies in June 2008.
- **Examination** - Core Strategy in March – April 2008; Site Specific Allocations in May - June 2008; and Development Policies in December - February 2009.
- **Adoption** - Core Strategy in approximately November 2008 – January 2009; Site Specific Allocations in approximately November 2008 – January 2009; and Development Policies in approximately July 2009 – October 2009.

Brent's Supplementary Plan Documents

1.12 In addition to the programme of Brent DPDs, the Borough has, or proposes to, prepare a number of SPDs to expand on and / or provide further details on DPD policies. Those that have reached at least consultation stage include³:

- Guinness Brewery SPD and Planning Position Statement (adopted);
- South Kilburn SPD (adopted);
- 103 - 123 Kilburn High Road and Kilburn Square SPD (adopted);
- Planning Obligations SPD (draft);
- Wembley West End (South) SPD (adopted); and
- Queens Park Station Area (adopted).

Outline of Contents of the Development Policies DPD Preferred Options

1.13 The main sections of the Development Policies DPD Preferred Options set out:

³ See the Local Development Scheme for other proposed SPDs which have not yet reached consultation stage.

- **Introduction**, including description of how Development Policies relate to Core Strategy policies (section 1).
 - **Development Policy** chapters structured in five sections mirroring those in the Core Strategy DPD Preferred Options:
 - Promoting a quality environment (section 2)
 - Meeting housing needs (section 3)
 - Connecting places (section 4)
 - A strong local economy (section 5)
 - Enabling community facilities (section 6).
 - **Monitoring and Implementation**, this chapter shows the relationship between the Development Policies and the objectives and strategic policies in the Core Strategy. It includes a set of indicators under each strategic objective so that progress towards meeting the objectives can be monitored.
- 1.14 Within the Preferred Options document summary details of alternative options not selected are included alongside each policy or set of policies.
- 1.15 The SA findings of the Development Policies DPD (see Part B of the SA Report) has been organised to follow the structure of the DPD chapters as far as possible.

Outline of Contents of the Site Specific Allocations DPD Preferred Options

- 1.16 The main sections of the Site Specific Allocations DPD Preferred Options set out:
- **Introduction**, including the Site Specific Allocations' objectives and links to the Spatial Strategy within the Core Strategy (section 1).
 - **Brent's spatial issues** (section 2) including the following topics:
 - Housing
 - Employment
 - Town Centres
 - Open Space
 - Waste
 - Health and Education
 - Environment.
 - **Site Specific Allocations** (section 3) including a description of the preferred option for each site; this section is structured in three parts that correspond with LB Brent's three area planning teams:

- North
 - South
 - West.
- **Site Specific Allocations considered but not included** (section 4). This chapter is also divided in three sections that match LB Brent's three area planning teams and details the allocations that were identified for issues and options stage consultation, but were eventually excluded from the preferred options.

Purpose of the Sustainability Appraisal and Sustainability Appraisal Report

Sustainability Appraisal of the Development Plan Documents

- 1.17 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA will consider the implications of the DPDs, from a social, economic and environmental perspective, by assessing options and the draft DPDs against available baseline data and sustainability objectives.
- 1.18 SA is mandatory for LDDs under the requirements of the Planning and Compulsory Purchase Act (2004)⁴, which includes DPDs. Article 19 (5) states that the local planning authority must also “(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal”. The Act also requires that SA is an integral part of the LDF production process.
- 1.19 The Government's guidance on Strategic Environmental Assessment (SEA)⁵ indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁶ – the SEA Regulations.
- 1.20 In November 2005 the Government published guidance on *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*⁷. While SEA and SA are distinct processes, the SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.
- 1.21 The SA process for the Brent DPDs has broadly followed the SA process set out in the SA guidance. The SA started in parallel for all three of the DPDs being prepared by Brent, but as the timescale for the preparation and consultation on the DPDs has

⁴ <http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs>

⁵ ODPM et al (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

⁶ Statutory Instrument 2004 No. 1633.

⁷ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

diverged the SA has focused on each in turn. However, a single SA Scoping Report was prepared and consulted upon (June 2005) to cover them all. LB Brent commissioned CEP to undertake the SAs of the first three DPDs being prepared by Brent.

Purpose of the Sustainability Appraisal Report

- 1.22 The purpose of the Sustainability Appraisal Report is to set out the findings of the SA process and the proposed next steps. It provides information for stakeholders and consultees responding to the to the DPD Preferred Options consultations on the sustainability implications of the DPDs Preferred Options.
- 1.23 The purpose of the SA Report is also to ensure compliance with the Planning and Compulsory Purchase Act 2004 which requires an SA to be undertaken on all LDDs and a report to be prepared and will inform the test of soundness of the DPD at the forthcoming examination in public. Furthermore, the SA Report incorporates the requirements for an Environmental Report under the SEA Regulations (see Table 1 and section 2).
- 1.24 The SA Report sets out an assessment of:
- the relationship of the DPDs with other relevant plans and programmes;
 - relevant sustainability objectives established at the national, regional or local level;
 - the current environmental, social and economic baseline and likely evolution thereof;
 - the characteristics of the area which are most likely to be affected by the DPDs;
 - the key sustainability issues for the Borough;
 - the compatibility of the DPDs and their respective sustainability objectives;
 - the potential effects of different DPD options to deliver its objectives;
 - the potential effects of the preferred options;
 - the measures to mitigate adverse effects and maximise beneficial effects of the preferred options; and
 - measures to monitor the significant effects of implementing the DPDs.

Structure and Content of this Sustainability Appraisal Report for the Development Policies and Site Specific Allocations

- 1.25 This Sustainability Appraisal Report presents the SAs of both the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options. See the diagram at the beginning of this document on “*How to Find Your Way Around the Sustainability Appraisal Report*” for a summary of the contents.

- 1.26 Part A of the SA Report provides the sustainability context to the borough and the evidence base for the appraisals and is equally relevant to the SAs of both DPDs. Part B details the appraisal of the Development Policies DPD Preferred Options and Part C the appraisal of the Site Specific Allocations DPD Preferred Options.

Compliance with the SEA Directive and Regulations

- 1.27 This Sustainability Appraisal Report incorporates the requirements for an Environmental Report under the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633 which implements the requirements of the European Directive 2001/42/EC, known as the SEA Directive. The place or places in the Sustainability Appraisal Report where the components which are required in relation to the Environmental Report, in particular under Regulation 12 and Schedule 2, are sign-posted in the table below. This approach to meeting the requirements for an Environmental Report is recommended in Government guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

Table 1: Components that make up the Environmental Report

Information to be included in an Environmental Report under the SEA Regulations (Regulation 12 and Schedule 2)	Relevant sections in the Sustainability Appraisal Report: <i>Development Policies DPD Preferred Options</i>	Relevant sections in the Sustainability Appraisal Report: <i>Site Specific Allocations DPD Preferred Options</i>
➤ An outline of the contents, main objectives of the plan, and its relationship with other relevant plans and programmes;	Section 1 (paras 1.6 – 1.11 and 1.13 – 1.15) and Section 5 (para 5.3 – 5.11) Section 3 (paras 3.1 – 3.8) and Appendix 4	Section 1 (paras 1.6 – 1.11 and para 1.16) and Section 8 (para 8.4 – 8.5) Section 3 (paras 3.1 – 3.8) and Appendix 4
➤ The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;	Section 3 (paras 3.9 – 3.73, including environment section) and Appendix 5 (including environment section)	Section 3 (paras 3.9 – 3.73, including environment section) and Appendix 5 (including environment section)
➤ The environmental characteristics of areas likely to be significantly affected;	Section 3 (paras 3.7 – 3.72, including environment section), Appendix 5 (including environment section) and Section 6	Section 3 (paras 3.7 – 3.72, including environment section), Appendix 5 (including environment section) and Section 9
➤ Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 3 (paras 3.74 – 3.78, including environmental section in table 7) and para 3.49 (re areas designated pursuant to Directives 79/409/EEC and 92/43/EEC)	Section 3 (paras 3.74 – 3.78, including environmental section in table 7) and para 3.49 (re areas designated pursuant to Directives 79/409/EEC and 92/43/EEC)
➤ The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 3 (para 3.1 – 3.8) and Appendix 4	Section 3 (para 3.1 – 3.8) and Appendix 4
➤ The likely significant effects on the	Section 6 and Appendix 8	Section 9 and Appendix 9, 10

Information to be included in an Environmental Report under the SEA Regulations (Regulation 12 and Schedule 2)	Relevant sections in the Sustainability Appraisal Report: <i>Development Policies DPD Preferred Options</i>	Relevant sections in the Sustainability Appraisal Report: <i>Site Specific Allocations DPD Preferred Options</i>
environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; the interrelationship between the above factors;	(including environmental sections in matrices)	and 11 (including environmental sections in matrices)
➤ The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment caused by implementing the plan;	Section 6 and Appendix 8 (including 'mitigation / enhancement' sections in tables and matrices)	Section 9 and Appendix 11 (including 'mitigation / enhancement' sections in tables and matrices)
➤ An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5, Section 6 and Appendix 8 Section 2 (paras 2.29 – 2.35)	Section 8, Section 9 and Appendices 9, 10 and 11 Section 2 (paras 2.29 – 2.35)
➤ A description of measures envisaged concerning monitoring in accordance with Regulation 17;	Section 4 and 7	Section 4 and 10
➤ A non-technical summary of the information provided under paragraphs 1 to 9.	Section separate volume – Non-Technical Summary	Section separate volume – Non-Technical Summary

Consultation on the Sustainability Appraisal Report

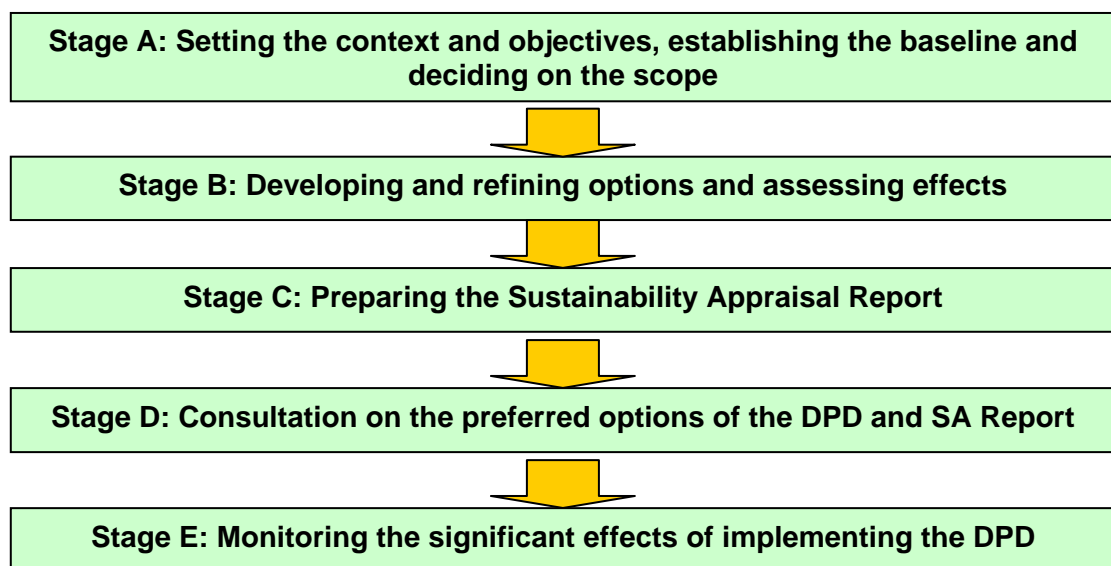
1.28 Consultation on SA Report is being undertaken alongside consultation on the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options. Comments on this SA Report have been invited from the three consultation bodies⁸ required by the SEA Regulations together with other key consultees representing social, economic and environmental interests in the Borough. These additional organisations and individuals have been drawn from the existing Statement of Community Involvement issued in January 2005 as part of the LDF development process.

⁸ Note that English Nature and the Countryside Agency were merged in October 2006 to create Natural England

2. THE APPRAISAL METHODOLOGY

Overview of approach adopted

- 2.1 The SA process for the Brent DPDs followed the SA process set out in the Government's SA guidance. The SA has also been conducted to meet the requirements of the SEA Regulations for the environmental assessment of plans and programmes. Initially the SA has been undertaken in parallel with the preparation of all three DPDs, and a single SA Scoping Report was prepared and consulted upon in June 2005.
- 2.2 Alterations to the timing of the preparation and consultation on the three DPD Preferred Options (i.e. the Core Strategy, Site Specific Allocations and Development Policies) have resulted in this SA Report being prepared for the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options separately to that of the Core Strategy DPD Preferred Options. The Core Strategy Preferred Options Sustainability Appraisal was prepared and consulted upon in October 2006.
- 2.3 This SA is also being conducted in the context of the *Sustainability Appraisal of Brent's Unitary Development Plan Deposit Draft 2000* (LB Brent, March 2001) and the SA of the adopted UDP. The findings of these previous SAs informed and assisted the process, for example by adapting objectives, identifying issues and understanding the wider development context of the DPDs.
- 2.4 The Government guidance advocates a five stage process to undertaking SA, with each stage divided into a number of tasks:



2.5 The SA process is illustrated in Table 2. This also shows which tasks are reported in which of the main outputs, although it should be noted that .

Table 2: Sustainability Appraisal stages and tasks

		Main SA outputs to date		
DPD Pre-Production		Core Strategy SA	Development Policies SA	Site Specific Allocations SA
SA Stage A: Setting the context & objectives, establishing the baseline & deciding on the scope		Included in SA Scoping Report (June '05)	Updated in Part A of SA Report of Core Strategy (October 2006) and SA Report of Development Policies and Site Specific Allocations (June 2007)	
Tasks				
1. Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the DPDs (Task A1)				
2. Collect relevant social, environmental and economic baseline information and produce characterisation of the DPD area (Task A2)				
3. Identify key sustainability issues for the SA to address (Task A3)				
4. Develop the SA framework, including defining the sustainability objectives, indicators and targets (Task A4)				
5. Produce Scoping Report and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible solutions (Task A5)				
DPD Production		Included in Part B of SA Report of Core Strategy (October 2006)	Included in Part B of SA Report of Development Policies and Site Specific Allocations (June '07)	Included in Part C of SA Report of Development Policies and Site Specific Allocations (June '07)
SA Stage B: Developing and refining options				
Tasks				
6. Test the DPD objectives against the sustainability objectives (Task B1)				
7. Develop the DPD options (Task B2)				
8. Predicting the effects of the DPD including options (Task B3)				
9. Evaluating the effects of the DPD including options (Task B4)				
10. Mitigating adverse effects and maximising beneficial effects (Task B5)				
11. Proposing measures to monitor the significant effects of the DPDs implementation (Task B6)				
SA Stage C: Preparing the SA Report				
Tasks				
12. Preparing the SA Report (Task C1)				
SA Stage D: Consultation on the draft DPD and SA Report				
Tasks				
13. Public Participation on the draft DPD and SA Report (Task D1)		Oct. – Dec. 2006	June – July 2007	June – July 2007
14. Assessing the significant changes (Task D2)				
DPD Examination				
Tasks				
15. Submission of DPD, Pre-Submission Consultation Statement and SA Report to Secretary of State				
16. Assessing significant changes made as a result of representations, if necessary (Task D2 cont.)				
DPD Adoption and monitoring				
Tasks				
17. Make the DPD and SA Report available for public viewing				
18. Produce an adoption statement				

19. Making decisions and providing information (Task D3)			
SA Stage E: Monitoring implementation of the DPDs			
Tasks			
20. Developing aims and methods for monitoring (Task E1)			
21. Publishing results of monitoring the sustainability effects of the DPD in the annual monitoring reports as new information becomes available			
22. Responding to adverse effects (Task E2)			

Programme and responsibility

- 2.6 The SAs of the evolving Development Policies DPD Preferred Options and Site Specific DPD Allocations Preferred Options has been undertaken by CEP independently of the London Borough of Brent, whilst working closely with them. In January 2004 CEP completed an SA of the adopted UDP (using a less robust SA methodology not fully compliant with the SEA Directive, similar to the SA carried out in 2001 by Brent on the draft deposit UDP as the UDP was prepared prior to the SEA requirements being introduced). CEP also carried out an SA of the South Kilburn SPD for the London Borough of Brent, which was completed in January 2005.
- 2.7 While the SAs of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options are new processes, as the LDF (of which the DPDs are components) are being developed to address spatial planning in precisely the same geographical, social and economic context as the UDP, the UDP appraisal framework was used as a starting point in the development of the SA framework for the LDF appraisal. Thus the sustainability objectives and criteria are based upon those used for the UDP SA. However they have been modified through consultation and assessment of the contemporary socio-economic and environmental baseline situation in the Borough (see Section 3).
- 2.8 Table 3 sets out the tasks and outputs of the SA processes for both DPDs (i.e. the Development Policies and Site Specific Allocations) to date, as well as providing details on the SA of the Core Strategy which provided much of the context to the subsequent SAs, with a timetable showing when these tasks were undertaken. Table 3 also identifies the key SA outputs and provides details of the consultation processes undertaken, which was a fundamental aspect of the SAs. Further details on the preparation of the key SA outputs is provided in the subsequent sections. Some of the tasks / events / outputs related to the SA's of specific DPD preferred / options, however others related to several / all the SAs. This is indicated in the table.

Table 3: SA programme - key tasks, events and outputs

Date	Tasks, events and key outputs
General / Initiation of the SA	
November 2004	Preparation of paper setting out the proposed SA methodology for the Brent LDF.
December 2004	CEP commissioned by LB Brent to conduct SA of Brent LDF.

Date	Tasks, events and key outputs
Throughout process	Meetings (various) between CEP appraisal team and LB Brent planning officers. CEP has maintained regular communication, and when appropriate held face to face meetings with LB Brent to ensure that each stage of the appraisal is closely linked, and useful to the DPD development process.
SA Stage A: Scoping	
<i>All three SAs – Core Strategy, Development Policies and Site Specific Allocations</i>	
8 th February 2005	SA Scoping workshop (facilitated by CEP) with LB Brent staff and external stakeholders to discuss baseline information and key sustainability issues in Brent.
23 rd June 2005	SA Scoping Report completed.
June and July 2005	Consultation on SA Scoping Report – the report was circulated for consultation by LB Brent to the four statutory consultees (Environment Agency, English Heritage, English Nature and the Countryside Agency ⁹) and a wide range of local stakeholders (5 weeks formal consultation period). A full list of those consulted is included in Appendix 1.
September 2005	Comments on the SA Scoping Report from the consultation were compiled and responses prepared by CEP (see Appendix 2).
Various – through the SAs	Contents of the Scoping Report
SA Stage B: Developing and refining options and assessing effects	
<i>All three SAs – Core Strategy, Development Policies and Site Specific Allocations</i>	
September – October 2005	Consultation on Issues and Options papers produced by LB Brent started and other consultation events
October 2005	SA commentary on Issues and Options papers produced by CEP
<i>SA of the Core Strategy</i>	
8 th March 2006	Emerging draft Spatial Strategy for the Core Strategy (working document) produced by LB Brent.
15 th March 2006	First assessment workshop (facilitated by CEP) with LB Brent officers, including those from services outside of Planning, to discuss the strengths, weaknesses, opportunities and threats posed by the emerging Spatial Strategy and the initial comments by CEP on the Issues and Options papers. Following the workshop, a report recording the discussion was prepared. At the assessment workshop, Policy Appraisal Proformas were also introduced for comment by CEP. These aimed to provide a framework to enable planning officers to record the policy options and potential sustainability effects as they were developing policy. An example proforma was included in Appendix 3 of the Core Strategy SA Report.
17 th March 2006	Informed by the discussion at the workshop, CEP prepared an SA commentary on the draft Spatial Strategy focussing on the sustainability strengths and weaknesses.
25 th May 2006	Second assessment workshop (facilitated by CEP) with LB Brent officers and external stakeholders. Workshop divided into morning and afternoon sessions. Morning session with planning officers - discussion on the emerging Core Strategy draft from an SA perspective and discussion on the draft Policy Appraisal Proformas as completed by LB Brent. Afternoon session with the wider stakeholder group - consideration of the key

⁹ Note that English Nature and the Countryside Agency are now part of Natural England.

Date	Tasks, events and key outputs
	sustainability issues and discussion on the policy options.
May / June 2006	<i>Emerging draft Core Strategy policy preferred options (working documents) produced by LB Brent.</i>
3 rd July 2006	Detailed SA commentary on the emerging draft Core Strategy policy preferred options produced by CEP. This was sent to the Planning Committee along with the draft Core Strategy for comment.
31 st August 2006	<i>Following several earlier drafts, Draft Core Strategy (version 9) including policy options and preferred policies completed by LB Brent and provided to CEP for appraisal.</i>
June - September 2006	Ongoing development of detailed SA 'significance criteria' by CEP as an aid to the appraisal of policies and options.
August / September 2006	Final Policy Appraisal Proformas completed by Brent Planning officers and returned to CEP alongside evolving drafts of the Draft Core Strategy. These appraisal proformas have been used as a key source of information in the appraisal of both the options considered and the preferred options.
September 2006	Appraisal of Draft Core Strategy DPD alternatives and Preferred Options by CEP, including completion of detailed appraisal matrices for each preferred option, and comparative matrices for other options considered. Summary / draft outputs provided to LB Brent for comment and to inform discussions with Planning Committee and the Executive.
22 nd September 2006	Detailed textual changes to the draft Core Strategy provided by CEP to LB Brent on the 22 nd September 2006 as a result of the appraisal process. This included suggested changes to the wording of the policies and supporting text based on the <i>Draft Core Strategy</i> (version 15) dated 31 st August 2006. Where LB Brent considered it appropriate, these changes were incorporated into the version submitted to the Executive for their meeting on the 9 th October 2006.
27 th September 2006	<i>Draft Core Strategy (version 15) including above changes completed by LB Brent and provided to CEP for final appraisal. LB Brent also supplied responses to CEP's suggested changes supplied on 22nd September 2006.</i>
September / October 2006	Revised appraisal of Draft Core Strategy DPD Preferred Options by CEP to reflect changes in the 27 th September version of the Draft Core Strategy and changes agreed with the Executive 13 th October 2006. [Note: the version of the Core Strategy appraised for the final SA Report was that provided by LB Brent on 27 th September 2006 (Version 15), with minor changes to policies as set out in and emailed from LBB on 13 th October 2006]
SA of the Development Policies	
May – June 2006	<i>Early drafts of some Development Control sections (later re-titled to Development Policies) prepared by LB Brent. With revised programme for the DPDs, this process was rescheduled with the focus of the Core Strategy and then developing the site allocations.</i>
4 th January 2007	Telephone discussion between LB Brent and CEP to discuss initial programme of work and key dates in development and consultation on draft Development Policies .
9 th February 2007	<i>First initial draft Development Policy chapters produce by LB Brent and made available to CEP</i>
16 th February	<i>First draft Development Policies DPD Preferred Options completed by LB Brent and provided to CEP for initial review and commentary.</i>
1 st March 2007	Meeting at CEP offices between CEP appraisal team and LB Brent to formally discuss appraisal process and timing for the draft Development Policies DPD Preferred Options .

Date	Tasks, events and key outputs
March – April	Various drafts of Development Policies DPD Preferred Options produced by LB Brent and made available to CEP. CEP preparation of SA commentary on the policies and supporting text – an ongoing process that at each stage had to reflect the most recent versions of the policies and supporting text.
2 nd May 2007	Detailed SA Commentary on draft Development Policies DPD Preferred Options produced by CEP and submitted to LB Brent. This included suggested changes to the wording of the policies and supporting text.
8 th May 2007	LB Brent response to SA Commentary produced by LB Brent, outlining where changes were to be made to the final Development Policies DPD Preferred Options .
May 2007	<i>Detailed SA commentary on the emerging draft Development Policies DPD Preferred Options produced by CEP was sent to the Planning Committee along with the draft Development Policies for comment.</i> <i>Comments from the Planning Committee and where LB Brent considered it appropriate changes recommended by the SA were incorporated into the version submitted to the Executive for their meeting at the end May 2007.</i>
23 rd May 2007	Final draft Development Policies DPD Preferred Options produced by LB Brent. CEP crosschecked recommendations in the SA Commentary against this version which was used for the final appraisal reported in the SA Report.
May – June 2007	Detailed Appraisal of Development Policies DPD Preferred Options by CEP.
SA of the Site Specific Allocations	
21 st July 2006	<i>Emerging draft Site Specific Allocations Preferred Options (working document) produced by LB Brent.</i>
14 th September 2006	<i>CEP prepared Site Appraisal Proformas for LB Brent to complete covering different types of preferred uses – residential, employment, mixed etc.</i>
August 2006 - February 2007	<i>Several drafts of Site Specific Allocations Preferred Options produced by LB Brent and provided to CEP for appraisal.</i>
October 2006 - February 2007	<i>Site appraisal proformas completed by Brent Planning officers for each site allocation and returned to CEP alongside evolving drafts of the text of the draft Site Specific Allocations DPD Preferred Options. GIS data provided for sites / additional sites as amendments made.</i>
14 th February 2007	Detailed SA commentary (including GIS analysis) on the emerging draft Site Specific Allocations DPD Preferred Options produced by CEP with detailed suggested changes to the draft text.
12 th March 2007	<i>Draft Site Specific Allocations Preferred Options considered at Executive meeting and consequently agreed for public consultation.</i>
March – May 2007	<i>Appraisal proformas completed by Brent Planning officers for additional site allocations included after SA commentary.</i>
1 st June 2007	<i>Site Specific Allocations DPD Preferred Options completed by LB Brent and provided to CEP for final appraisal. LB Brent also supplied responses to CEP's suggested changes supplied on 14th February 2007.</i>
May - June	Detailed Appraisal of Site Specific Allocations Site Specific Allocations DPD Preferred Options by CEP.
SA Stage C: Preparation of SA report	
SA of the Core Strategy	
September - October 2006	Preparation of the Core Strategy DPD Preferred Options Sustainability Appraisal Report by CEP. There were opportunities for LB Brent to comment on evolving drafts.

Date	Tasks, events and key outputs
SAs of the Development Policies and Site Specific Allocations	
May - June 2007	Preparation of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options Sustainability Appraisal Report Part A on the Sustainability Context by CEP. There was an opportunity for LB Brent to comment on an evolving draft.
SAs of the Development Policies	
May - June 2007	<i>Preparation of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options Sustainability Appraisal Report Part B on the Development Policies appraisal by CEP. There was an opportunities for LB Brent to comment on an evolving draft.</i>
SA of the Site Specific Allocations	
May - June 2007	<i>Preparation of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options Sustainability Appraisal Report Part C on the Site Specific Allocations appraisal by CEP. There were opportunities for LB Brent to comment on an evolving draft.</i>
SA Stage D: Consultation on the draft DPD and SA Report	
SA of the Core Strategy	
Commencing 30 th October 2006	Formal consultation on Core Strategy DPD Preferred Options SA Report and Draft Core Strategy DPD Preferred Options for six weeks.
SAs of the Development Policies and Site Specific Allocations	
Commencing 18 th June 2007	Formal consultation on SA Report (this report) and Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options for six weeks.

Sustainability Appraisal Scoping Report

2.9 In June 2005 an SA Scoping Report was produced to set out the initial context and findings of the SA and the proposed approach to the rest of the appraisal. The Scoping Report covered the three initial DPDs being prepared by LB Brent. The aim was to ensure that the SA was comprehensive, and addressed all relevant issues and objectives, by enabling input from key stakeholders and consultation bodies at an early stage in the process. The Scoping Report set out an initial assessment of:

- the relationship of the LDF (taken as the sum of its DPDs) with other relevant plans and programmes;
- relevant sustainability objectives established at the national, regional or local level;
- the current environmental, social and economic baseline and likely evolution thereof;
- the characteristics of the area which are most likely to be affected by the DPDs;
- the likely key sustainability issues within LB Brent – based on those identified during the SA of Brent adopted UDP, the discussions held at the scoping

workshop (February 2005) and an assessment of the baseline conditions as identified as part of the scoping process.

- 2.10 The report also set out the proposed methodology for the SA, including suggested SA objectives and criteria, the level of detail and scope of the SA, a proposed programme of work and draft structure of the final SA Report. This has now been modified somewhat following discussions with LB Brent and as a result of the revised programmes for the development each DPD.
- 2.11 Comments on the Scoping Report were invited from the four consultation bodies required by the SEA Regulations (Environment Agency, English Heritage, English Nature and the Countryside Agency¹⁰) together with a broad range of consultees representing social, economic and environmental interests within Brent, in adjacent boroughs and in London (e.g. GLA) (see Appendix 1). Further information on the consultation process, including local consultees is provided in the 'Stakeholder engagement' section, below.
- 2.12 Comments on the Scoping Report were compiled by CEP. A table summarising the key comments and how the SA has responded to them is included in Appendix 2. These comments have been incorporated into subsequent stages of the SA (such as changes to objectives, or additions to baseline information) and are reflected in the relevant sections of the SA Report.

Appraisal of alternatives and preferred options

- 2.13 The appraisal of the key alternatives and that of the evolving preferred options have been ongoing during stage B of the SAs and has involved three main phases of work.
- 2.14 First, appraisal commentaries have been produced at key stages in the process (see Table 3) to provide comments on the sustainability issues, strengths and weaknesses raised by different DPD options or policies and recommendations for amendments etc. These appraisal commentaries were used by LB Brent to further develop and refine the alternatives and preferred options. Generally, LB Brent provided a written response to the sustainability points raised.
- 2.15 Second, LB Brent planning officers were requested to complete 'Policy Appraisal Proformas' in the case of the SA of the Core Strategy and 'Site Appraisal Proformas' in the case of the SA of the Site Specific Allocations (see Appendix 3) as they drafted policy and appraised sites to record the alternatives they considered, the reasons for rejecting alternatives and the sustainability effects they felt might arise as a result of the policy, including the different alternative. These proformas have provided a very useful source of information for the CEP appraisal team in undertaking the formal appraisal (see below) and ensured that consideration of alternatives and sustainability have been integrated into the DPD development process.

¹⁰ Note that English Nature and the Countryside Agency were merged in October 2006 to create Natural England

- 2.16 Third, more detailed formal appraisal was carried out by CEP, using appraisal matrices to record the results, on the evolving draft DPDs (as amended following the input from the appraisal commentaries). Commentaries were also prepared on the “Alternative options not selected” as described in the DPD Preferred Options.
- 2.17 The formal appraisal of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options (which is described in more detail in Section 6 of this SA Report) drew upon a set of ‘significance criteria’ which were developed to assist the process of scoring and the completion of appraisal matrices (these significance criteria were originally developed for the SA of the Core Strategy DPD Preferred Options). These criteria set out how particular appraisal scores have been assigned by presenting in some detail and in the context of Brent the potential effects on each sustainability objective which correspond each score on a five point scale (i.e. major positive effects (+ +), minor positive effects (+), neutral effects (0), minor negative effects (-) and major negative effects (- -), with additional categories where the likely effects are uncertain (?) or mixed). These significance criteria are included in Appendix 7.
- 2.18 This multi-faceted approach to appraisal is considered to be beneficial to the overall outcome, and sustainability of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options, as it has enabled an iterative and co-operative approach both to the appraisal, and to the development of alternatives and preferred options.
- 2.19 The purpose of the appraisal is to predict the effects of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options in sustainability terms. As discussed above, the potential effects were related back to the detailed significance criteria developed specifically for the appraisal of the Brent DPDs. Prediction of the effects involved:
- Identifying the potential changes to the sustainability baseline which are predicted to arise from the DPD Preferred Options.
 - Assigning appraisal scores to each objective (or each criterion) in relation to each policy and providing additional commentary to explain the evaluation of the potential impacts, with reference throughout to the detailed significance criteria. These include consideration of the magnitude of impacts, their geographical scale, the time period over which they will occur whether they are permanent or temporary, positive or negative, probable or improbable, frequent or rare, and whether or not there are likely to be cumulative and/or synergistic effects.

Appraisal of the preferred options

- 2.20 For the appraisal of the Preferred Options, the policies in the Development Policies DPD Preferred Options were either appraised individually or appraise as a group of policies around topics. This was partly dependant on the findings of the appraisal of

the Core Strategy and was felt to have the advantage of allowing the interactions of closely related policies to be explored and possible policy incompatibilities within topic areas to be easily identified. However, scores were still provided for each policy within the matrix. These policies were scored against each of the sustainability objectives, rather than for the individual criterion, as it was felt that any variation between the sustainability performance of each criterion under an objective could be adequately captured within the comments.

- 2.21 Accompanying each appraisal matrix are comments on the overall effects of the policy (or group of policies) and recommendations for 'mitigation and enhancement'. Recommendations to mitigate significant adverse effects and improve positive effects were identified. Summary comments and recommendations on the DPD Preferred options chapter by chapter and as a whole were also provided (see Sections 6 and 9 of the SA Report).
- 2.22 The types of enhancement and mitigation identified take a wide range of forms, including:
- Proposed amendments to the wording of the policies or supporting text to the policies or requirements on specific sites.
 - Proposed conditions, or specific mitigation measures that could be associated with the policies or sites. This could involve for example the inclusion of reference to other policies or the conditions included in SPDs or Planning Briefs produced.
 - Contingency arrangements for dealing with possible adverse effects and the need for further studies or evidence (including through monitoring arrangements).
 - General comments and observations.
- 2.23 Following consultation on the DPD Preferred Options, it may be necessary to undertake further appraisal of any significant changes proposed for the submission version of the Development Policies DPD and Site Specific Allocations DPD. Depending on the nature of these changes, an addendum to the SA Report or a revised SA Report will be produced.

Development of Sustainability Appraisal Report

Structure and content of the Sustainability Appraisal Report

- 2.24 This SA Report is made up of several main parts, as outlined in 'How to find your way around the sustainability appraisal report' at the beginning of this report, including:
- **A Non-Technical Summary**, which sets out in relatively simple language and in a précis form, the key findings and recommendations of the Sustainability Appraisal.

- **Part A: Sustainability Context** (this document), which provides background information relevant to the appraisal, such as baseline data and the policy context for the two DPD Preferred Options. This part also sets out the methodology and other issues.
 - **Part B: Sustainability Appraisal of the Development Policies DPD Preferred Options**, which presents the findings of the appraisal of alternatives and preferred options, including details of mitigation and enhancement and monitoring requirements.
 - **Part C: Sustainability Appraisal of the Site Specific Allocations DPD Preferred Options**, which presents the findings of the appraisal of alternatives and preferred options, including details of mitigation and enhancement and monitoring requirements.
 - **Appendices** (to Parts A, B and C), which provide detailed information and supporting documents relevant to the report. For example Appendix 4 sets out a detailed baseline for Brent, from which a summary is produced in the main Part A of the SA Report. This ensures that important information and messages are as accessible as possible, while providing detailed evidence and background for all assertions and comments made.
- 2.25 As outlined in Section 1 (paragraphs 1.6 -1.10), the LDF is to be initially made up of three DPDs, each of which are being appraised as part of an SA. While the timing of the DPDs has meant that separate SA Reports have been produced, many aspects of the reporting are similar, particularly Part A, as the background information and methodology is largely the same for all the DPDs.
- 2.26 As outlined in Table 3 close liaison took place throughout the SA process with LB Brent officers, including frequent telephone and email communication and many formal and informal meetings in Brent House, and at CEP's offices. This SA Report is the final output from this process.

Stakeholder involvement - who was involved, when and how?

- 2.27 Stakeholder involvement is a fundamental part of the SA. It enables those potentially affected by, or with a professional or personal interest in, the effects of the DPDs in question to engage with and input to the SA process.
- 2.28 Table 3 sets out the steps taken up until the development of this SA Report. The key stakeholder inputs to the process have been:
- Workshops held with LB Brent officers (both those in Planning, and those from other departments which may be affected by the LDF) and with external stakeholders. Three workshops were held in Brent House, both at the scoping stage (February 2005) and in the appraisal stage of the SA of the Core Strategy (March and May 2006). These provided a formal but open format for

stakeholders and Brent officers to comment on, input to and suggest modifications to the SA methodology and content. Prior to each workshop, background materials were circulated to allow effective participation, and following each workshop brief 'outcomes' reports were produced in order that the resulting actions remained transparent. These workshops during the earlier stages of the SA were important as they set the context for the subsequent appraisals and given that the development policies and site allocations are closely linked to the spatial strategy and core policies established by the Core Strategy DPD preferred Options.

- Meetings with LB Brent officers. Numerous formal and informal meetings have been held throughout the SA processes with individual officers, and with policy working groups (for example a meeting with the Environment Policy development working group 8th May 2006) and meetings to discuss the Site Specific Allocations with LB Brent officers, e.g. 8th September 2006 and 1st March 2007).
- Formal consultation on the Scoping Report (August – September 2005). In line with statutory requirements, the Scoping Report was made available for five weeks of consultation. A copy was sent with a covering letter setting out the purpose and scope of the consultation to the four statutory agencies (Environment Agency, English Nature, English Heritage and the Countryside Agency) along with a number of local and regional stakeholders. Local stakeholders included (for example) the Local Strategic Partnership, Brent Energy Network and local PCTs. Regional stakeholders included adjacent London Boroughs, GLA, GOL and so on. The Scoping Report was also made available via the Council website. A full list of those consulted at the Scoping stage and a summary of comments received (and actions taken in response to these comments) are included in Appendices 1 and 2.
- Formal consultation on this SA Report is to be undertaken alongside that for the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options, as set out in the LDF Statement of Community Involvement (LB Brent, 2005). Consultation on the SA Report, which incorporates an Environmental Report required under the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633 (see Table 1), is being undertaken in accordance with Regulation 13 of those Regulations. Copies of this SA Report will be made available as hard copies in all LB Brent libraries and One-Stop-Shops and via the Borough's website.

Difficulties encountered in compiling information or carrying out the appraisal

Relationship between the SAs of the Brent DPDs

- 2.29 There will be a close relationship between the three initial DPDs being prepared by LB Brent. The Core Strategy DPD provides the overall direction for spatial planning in the Borough, with more detail on the implementation of policy provided by the

Development Policies and the spatial expression provided by the Site Specific Allocations (and the Proposals Map).

- 2.30 Ideally the SAs of the three DPDs would have been undertaken together and presented in a closely coordinated way, tiered to reflect this increasing level of detail. This would have allowed the SA of the Core Strategy to draw on the more detailed DPDs to provide a clearer picture of how the Core Strategy policies are likely to be implemented. However, this has not been possible due to the practicalities of developing multiple DPDs simultaneously within the Borough and they have had to be staggered. The SA of the Draft Core Strategy Preferred Options was therefore undertaken with a greater degree of uncertainty than would ideally be the case and consequently the prediction of sustainability effects in the SA Report have a greater uncertainty associated with them. The Development Policies, and to a lesser extent the Site Specific Allocations, now provide the detailed conditions and criteria under which the Core Strategy will be implemented.

Level of detail and scope

- 2.31 As a relatively strategic appraisal, the SAs of the DPD Preferred Options cannot be expected to provide a very detailed and quantified assessment of the sustainability effects of the DPD and the policies it contains. However, the SA has attempted to provide a largely qualitative assessment of the broad implications of the DPD against the sustainability objectives and criteria and has sought to ensure that all the dimensions of sustainability were considered throughout the development of the DPD. In turn, more detailed policies and implementation plans, in other DPDs or SPDs for example, will need to be subject to more detailed appraisal under a common sustainability framework and, as appropriate, certain sites may require a formal Environmental Impact Assessment (EIA) as part of a future application.
- 2.32 At the strategic level, in particular, there are inevitable uncertainties associated with undertaking an appraisal of the sustainability implications of a DPD. There are limitations, including data availability and the need to rely on qualitative as well as quantitative data and appraisal. The SA Report seeks to be transparent about any assumptions that have been made and clearly states the uncertainties associated with any predictions.

Baseline data

- 2.33 There were some gaps identified in the baseline information that ideally would have been collected to inform the appraisal. These gaps are highlighted in Appendix 5. In some instances, only London or national level data was available rather than data specifically relating to LB Brent. Lack of historical/trend data was another key issue as, in many cases, it was difficult to assess whether the situation is improving or worsening. Lack of trend data also makes predicting the future baseline more difficult.

Timescales

- 2.34 As described above, the three initial DPDs being prepared by LB Brent were to be prepared simultaneously. However, this was not possible and there were several delays in the DPD preparation process. This meant that the SA had to be undertaken intermittently over an extended period and it was not possible to undertake the SAs of the different DPDs iteratively.
- 2.35 Given the timescales and needs of the council in terms of document approval and lead times for submitting documents to the Planning Committee and Executive etc, there has been very limited time available for the SA to input as the Preferred Options been have revised and finalised. There were several versions of the DPD Preferred Options prepared for the SA to comment upon and therefore the appraisal had to be revised to reflect changes made to the policies and supporting text.

3. SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT

Links to other plans, programmes and sustainability objectives

Purpose

- 3.1 The purpose of reviewing other plans and programmes, which includes policies, strategies and initiatives, and sustainability objectives as part of the SA is to ensure that the relationship with these other documents and requirements are explored to enable the Responsible Authority (in this case London Borough of Brent) to take advantage of any potential synergies and to deal with any inconsistencies and constraints. The plans, programmes and sustainability objectives that need to be considered include those at an international, national, regional and local scale.
- 3.2 Appendix 4 contains a list of all the plans and programmes considered during the SAs of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options and includes comments on:
- the relevance to the DPDs;
 - opportunities, synergies and constraints; and
 - how the DPDs can respond and the implications for the SA.
- 3.3 The SA of the Core Strategy DPD Preferred Options considered plans and programmes at all levels (i.e. international, national, regional / London and local / borough plans and programmes). However, for the SA of the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options it was decided it would be most relevant to focus on the regional / London and local / borough plans and programmes, as the higher level plans and programmes would have already been largely incorporated into lower level documents. However, newer international and national plans and programmes were included as they may not have been reflected in some lower level documents, as well as Planning Policy Guidance (PPG) and Planning Policy Statements (PPS).
- 3.4 Table 4 and Table 5 below summarise respectively the key London and local plans and programmes reviewed. These plans and programmes are considered to be of most relevance to the scale and level of detail of both DPDs. The regional and local plans and programmes should also have already taken into account the key national and European plans and programmes.
- 3.5 The tables indicate whether the plan or programme is particularly relevant to both or just one or other of the Development Policies DPD Preferred Options or Site Specific Allocations DPD Preferred Options. The full list in Appendix 4 does not, in general, include legislation (other than European Directives) as it is also assumed that the key

plans and programmes should already have incorporated all but the most recent relevant legislation.

Table 4: List of key regional plans and programmes reviewed and implications for the DPDs and SA

Plan or programme title	How the DPDs can respond / Implications for the SAs	Key Documents	
		Develop-ment Policies	Site Spec. Alloc.
The Mayor's London Plan: Spatial Development Strategy for Greater London; 2004	Both DPDs should conform with the London Plan and should reflect its strategic planning objectives. .	✓	✓
Draft Further Alterations to the Mayor's London Plan: Spatial Development Strategy for Greater London; 2006	Both DPDs should be in conformity with the London Plan and should reflect its strategic planning objectives. DPD should also take into account the proposed early and further alterations to the London Plan, especially the criteria based policies.	✓	✓
Planning for Equality and Diversity in London. The London Plan (Spatial Development Strategy for Greater London) Draft Supplementary Planning Guidance, 2006	The Development Policies DPD should take into account equality issues at the earliest stage in the preparation of DPD.	✓	
Providing for Children and Young People's Play and Informal Recreation. The London Plan (Spatial Development Strategy for Greater London) Draft SPG, 2006	Both DPDs will have to respond to and reflect this guidance in providing for play and recreational needs of children and young people.	✓	✓
The Mayors Sustainable Design and Construction: The London Plan Supplementary Planning Guidance, 2006	The Development Policies DPD should reflect this guidance and use the criteria for sustainable design and construction as appropriate. The SA should use these as a benchmark to inform the appraisal of the Development policies in particular.	✓	
Sustainability Appraisal of the draft further alterations to the London Plan (spatial development strategy for Greater London), Forum for the Future and Ben Cave Associates, 2006, re-issued, 2007,	This is a key contextual document. Note as part of the SA, including the findings of the assessment of policies as well as context.	✓	✓
A Sustainable Development Framework for London. London Sustainable Development Commission; June 2003	This is a key contextual document. Both DPDs and SA should reflect the vision and objectives of this high-level sustainability document.	✓	✓
The Mayor's Transport Strategy Revision (2004) and Transport Strategy Implementation Targets (2004)	This Strategy's objectives, policies and proposals are integrated within the London Plan (Spatial Development Strategy). LB Brent is required to produce a Business Plan and LIPs to set out how they will implement this Strategy which needs to be reflected in both DPDs.	✓	✓
Sustaining Success: The Mayor's new Economic Development Strategy	Both DPDs should consider the cross cutting issues included in the strategy and incorporate them within development principles.	✓	✓
Connecting with London's Nature. The Mayor's Biodiversity Action Plan (BAP)	Both DPDs should reflect the objectives included in the BAP. The importance placed on green space in Brent should be explicitly addressed in DPD policy and site allocations. The DPDs should seek to promote the importance of nature / biodiversity.	✓	✓

Plan or programme title	How the DPDs can respond / Implications for the SAs	Key Documents	
		Development Policies	Site Spec. Alloc.
Souder City: the Mayor's Ambient Noise Strategy; 2004	The Development Policies DPD should be proactive in approach to managing ambient noise and reflect the issues and priorities identified in this strategy. Noise should be considered as part of siting development.	✓	
Cleaning London's Air; The Mayor's Air Quality Strategy; 2002	Both DPDs should be aware of and contribute to the aims of the strategy. LB Brent is required to have regard to this Air Quality Strategy and should ensure that the DPDs is in general conformity with it. As road traffic is main source of air pollution in London, consider the role of the DPDs in changing transport patterns / modes / use; and in encouraging behaviour which will result in lower emissions. Air quality should be considered as part of siting development.	✓	✓
Green Light to Clean Power. The Mayor's Energy Strategy; 2004	This strategy will be important to a number of topics throughout the Development Policies DPD. Energy efficiency in building and construction; and the encouragement of renewables should be incorporated into the DPD principles and policies.	✓	
Towards Zero Carbon Development: supportive information for Boroughs, London Energy Partnership, 2006	The Development Policies DPD should heed the recommendations made in this report.	✓	
Integrating Renewable Energy into New Developments: Toolkit for Planners, Developers and Consultants. The Mayor's London Energy Strategy; 2004	This toolkit should inform several policies in the Development Policies DPD, for instance those on Sustainable Construction and Climate Change, and be promoted to developers as good practice.	✓	
Rethinking Rubbish in London. The Mayor's Municipal Waste Management Strategy; 2003	This strategy should be reflected in the Development Policies DPD, although the majority of policies on waste and spatial planning are proposed to be dealt with in a West London waste DPD. The need for sites for waste management should be considered in the Site Specific Allocations DPD.	✓	✓
London: Cultural Capital – Realising the potential of a world class city. The Mayor's Culture Strategy; 2004	The Development Policies DPD should reflect the importance of culture in its policies. The strategy identifies that the Mayor wishes to realise the potential of Wembley as a nationally and internationally significant sports, leisure and business location. The need for sites for the provision of the necessary facilities should be considered in the Site Specific Allocations DPD.	✓	✓
London Development Agency. West London Tourism Strategy and Action Plan; March 2005	The Development Policies DPD should reflect this document and take on board ways in which to encourage tourism for its economic benefits, but within sustainability limits.	✓	
The Mayor's Accessible London: Achieving an Inclusive Environment. SPG; April 2004	Accessibility is a key issue for Brent. Specific guidance and advice should be drawn upon in preparing the Development Policies DPD and in subsequent DPDs and SPDs which should make explicit reference to the SPG.	✓	
The Mayor's Draft SPG on Industrial Capacity; September 2003	This SPG should be used as a key reference in addressing industrial capacity in both DPDs.	✓	✓
The Mayor's SPG on Housing; 2005	This SPG should be used as a key reference in defining the Development Policies DPD affordable housing policy / principles, along with the London Plan and its alterations. Conditions on sites for affordable housing will also need to reflect the SPG.	✓	✓
Adapting to Climate Change: A Checklist for Development. Guidance on Designing Developments in a Changing Climate, GLA; 2005	The checklist includes several issues for new developments that are relevant to the Development Policies DPD including flood risk locations, site layout, drainage, water, outdoor spaces and connectivity and should be promoted to developers in the DPD as good practice. The need for the selection and conditions to be placed on sites to reflect climate change should be considered in the Site Specific Allocations DPD.	✓	✓
General Conformity with	Both DPDs should be in conformity with the London Plan and should reflect its strategic planning objectives.	✓	✓

Plan or programme title	How the DPDs can respond / Implications for the SAs	Key Documents	
		Develop-ment Policies	Site Spec. Alloc.
the London Plan: Principles and Procedures, GLA; 2006			
Water Matters: the Mayor's consultation on the Draft Water Strategy for London, 2007	The Strategy should be reflected in the Development Policies DPD which includes a hierarchy for water supply, water use, rainwater drainage, wastewater disposal and flooding. The flooding hierarchy in particular should be reflected in the site selection process.	✓	✓
The Mayor's Draft Climate Change Adaptation Strategy for London	This strategy currently being drafted. Depending on the timing this should be reflected in the DPDs prior to the submission stage.	✓	✓
Action Today to Protect Tomorrow. The Mayor's Climate Change Action Plan, 2007	Both DPDs can contribute to carbon dioxide emission reductions. The Action Plan should help guide CO2 reductions in Brent. Emissions from traffic will be particularly relevant to Brent considering its relatively high traffic volumes.	✓	✓
London's Urban Heat Island: A Summary for Decision Makers, Greater London Authority 2006	This report should provide useful information on guiding the Development policies DPDs to take into account and manage the UHI effect in Brent.	✓	✓
The London Plan, Sub-Regional Development Framework, West London; 2006	The document sets out 54 actions designed to achieve implementation of the London Plan and to provide guidance and a check-list of matters that need to be developed at the local level through LDFs.	✓	✓
London Housing Board London Housing Strategy 2005 - 2016; 2005	This Strategy includes a series of targets that should inform both DPDs on 'Meeting housing needs'.	✓	✓
Sustaining Success: the Mayor's Economic Development Strategy; 2005	This strategy should inform several policies including those under 'Strong local economy' in the Development Control DPD and the sites proposed in the Site Specific Allocations DPD.	✓	✓
Making London Better for all Children and Young People: the Mayor's Children and Young People's Strategy; 2004	This strategy should influence a number of policies included in the Development Policies DPD, as well as site selection and conditions placed upon sites, as it deals with several relevant issues such as reducing child poverty, improving safety of public transport and open spaces, creating new places for play and making cycling and walking easier.	✓	✓
GLA Draft SPG Industrial Capacity	Both DPDs should take this draft SPG into account, especially when formulating policies related to employment land and industrial development.	✓	✓
London Assembly, The Blue Ribbon Network, The Heart of London; 2006	Both DPDs should promote the principles set out in the Blue Ribbon Network document in issues affecting development close to the River Brent and other waterways such as the Grand Union Canal.	✓	✓

Table 5: List of key local plans and programmes reviewed and implications for DPD and SA

Plan or programme title	How the DPDs can respond / Implications for the SAs	Key Documents	
		Develop-ment Policies	Site Spec. Alloc.
LBB Core Strategy DPD Preferred Options; 2006	The Core Strategy DPD Preferred Options provides the spatial strategy and the key policies which sets the framework for both DPDs.	✓	✓
LBB draft Regeneration Action Plan 2007 – 2009	Both DPDs can play a major role contributing towards regeneration for Brent. The strategic objectives of this plan should be incorporated.	✓	✓
LBB Crime, Disorder and Misuse of Drugs Strategy 2005 - 2008	The Development Policies DPD should consider the role of spatial planning in addressing and responding to the issues and targets contained in this strategy.	✓	
LBB Corporate Strategy 2002 - 2006, Building a	The values and issues within this strategy should be incorporated within the overall objectives of both DPDs.	✓	✓

Plan or programme title	How the DPDs can respond / Implications for the SAs	Key Documents	
		Develop-ment Policies	Site Spec. Alloc.
Better Borough			
LBB Community Plan 2003 - 2008: A Plan for Brent (To be replaced by Brent Community Strategy 2006 - 2010)	A key document. Both DPDs and SAs should consider and reflect where appropriate the priorities of local people for the future of Brent included in this plan.	✓	✓
LBB Contaminated Land Inspection Strategy, adopted 2001, updated January and May 2007.	Both DPDs should incorporate relevant aspects of this Strategy in seeking the remediation and re-use of contaminated land.	✓	✓
LBB Air Quality Action Plan; 2005 - 2010	Both DPDs should take into account the measures included in this plan, particularly in the AQMA, including in policies relating to the siting, density, type, location and design of development.	✓	✓
LBB Parks Strategy 2004 - 2009	Open spaces and parks are of particular importance in Brent and large parts of the borough have a deficiency of open space. This strategy should be referred to when addressing open space within both DPDs.	✓	✓
LBB Biodiversity Action Plan; 2001	Both DPDs should reflect where appropriate the actions and priorities for species and habitats covered by the Biodiversity Action Plan; and be sensitive to biodiversity issues generally. The SA should reflect the priorities in the Plan.	✓	✓
LBB Sport and Physical Activity Strategy 2004 - 2009	Both DPDs should incorporate where appropriate the measures included in this strategy, especially those regarding the provision of sport facilities.	✓	✓
LBB Playing Pitch Strategy 2003 - 2008; May 2004	Both DPDs should reflect the need for and benefits of playing fields and account for future demand as appropriate / relevant.	✓	✓
LBB Draft Municipal Waste Strategy – 2006	Both DPDs should reflect these action areas, and seek to avoid any potential conflict with them through its objectives and principles, although the majority of policies on waste and spatial planning are proposed to be dealt with in a West London waste DPD.	✓	✓
LBB Local Implementation Plan (LIP) for Brent (Draft submitted to the Mayor for Approval)	The Development Plan DPD should incorporate policies appropriate to spatial planning which support the priorities of the LIP which include safety and security, reducing traffic congestion, improved bus services, accessibility and local area initiatives. The site sections process should reflect the priorities in the LIP.	✓	✓
LBB A Regeneration Strategy for Brent 2001 - 2021	This strategy sets the high-level Borough strategy for regeneration and is important context to both DPDs.	✓	✓
Nature Conservation in Brent. London Ecology Unit; 2000	Both DPDs should reflect the contents of the Ecology Handbook and the updated version and seek opportunities to conserve and enhance existing habitats as well as seek opportunities to create habitat and reduce areas of deficiency.	✓	✓
LBB School Organisation Plan 2005 - 2010	It is important for both DPDs to be aware of the Plan's findings and principles when developing policies which relate to or could affect schools / education.	✓	✓
LBB Sustainable Design, Construction and Pollution Control, Supplementary Design and Planning Guidance 19 (SPG 19)	The Development Policies DPD should include the policy context for the guidance on sustainable design and construction included in the SPD and where appropriate reflect current good practice where it has subsequently evolved, including that proposed by the Mayor's SPG and London Plan alterations.	✓	
LBB Cultural Strategy 2006 - 2009	Both DPDs should seek ways of contributing to achieving the objectives of this strategy.	✓	✓

Implications

- 3.6 As can be seen from Appendix 4 and the tables above, there are many plans and programmes which will influence the emerging DPDs to some degree. Some will be of particularly relevance, including the London Plan, as the spatial strategy for London, the Sustainable Development Framework for London and the various Mayoral strategies as well as the various Brent plans, strategies and guidance,

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

- 3.7 There is a clear hierarchy of plans and programmes in certain areas descending from the international and/or national level through to the local level. The implications for the DPDs generally tend to become more specific and precise at the more local level. The requirements and objectives of the higher level plans and programmes should in most cases have already been incorporated in the more local level plans and programmes.
- 3.8 Several issues are highlighted in the analysis of the plans and programmes as detailed in Appendix 4 and the above tables. It will be important that the DPDs reflect this context and incorporates the requirements of these other plans and programmes as appropriate and this has been considered during the SA process.

Descriptions of the environmental, social and economic baseline characteristics and the predicted future baseline

Environmental, social and economic baseline data

- 3.9 The SEA Directive requires information to be gathered on “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” and “the environmental characteristics of the areas likely to be most significantly affected”.
- 3.10 The Government's SA guidance stresses that baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. The collection and assessment of broad information / data about the current and likely future status of a broad range of indicators for the Borough is key to the SA process.
- 3.11 The baseline data collection and analysis was ongoing throughout the SA and was supplemented and updated following the initial baseline assessment included in this SA Scoping Report.
- 3.12 The baseline assessment was structured according to the sustainability objectives (see Table 8 for the full list of objectives), which are sub-divided for convenience and at the request of the Borough under three themes (social; environmental; and economic) (see Table 6) although it should be noted that many of the topics cut across these themes. The baseline information collated is presented in tabular format in Appendix 5 which includes the data itself and, where it exists, comparators with other areas, trends and targets. In addition, comments are provided on the

issues arising from the data. The section below summarises the data contained in Appendix 5 and includes a series of maps to illustrate key aspects of the baseline.

Table 6: Summary List of Baseline Data Topics

Data Themes and Topics
Social
S1: Prosperity and social inclusion
S2: Health
S3: Education and skills
S4: Housing and population
S5: Quality of Surroundings <i>See also Theme EN5 – Townscape and landscape quality</i>
S6: Crime and fear of crime
S7: Community identity and welfare
S8: Access to services
Environmental
EN1: Transport, traffic and noise
EN2: Water quality, water resources and flooding
EN3: Air quality <i>See also Theme EN1 – Transport and traffic (driver for air pollution)</i>
EN4: Biodiversity and habitat
EN5: Townscape and landscape quality <i>See also Theme S5 – Quality of surroundings</i>
EN6: Historic and cultural assets
EN7: Climate change and energy <i>See also Theme EN1 – Transport and traffic</i>
EN8: Waste management and materials
EN9: Land and soil quality
Economic
EC1: Economic growth and opportunity
EC2: Employment and unemployment
EC3: Disparity and regeneration <i>See also Theme S1 – Poverty and social inclusion</i>
EC4: Investment
EC5: Movement <i>See also Theme S8 – Access to services, and Theme EN1 – Transport and traffic</i>

Summary of baseline data and key trends

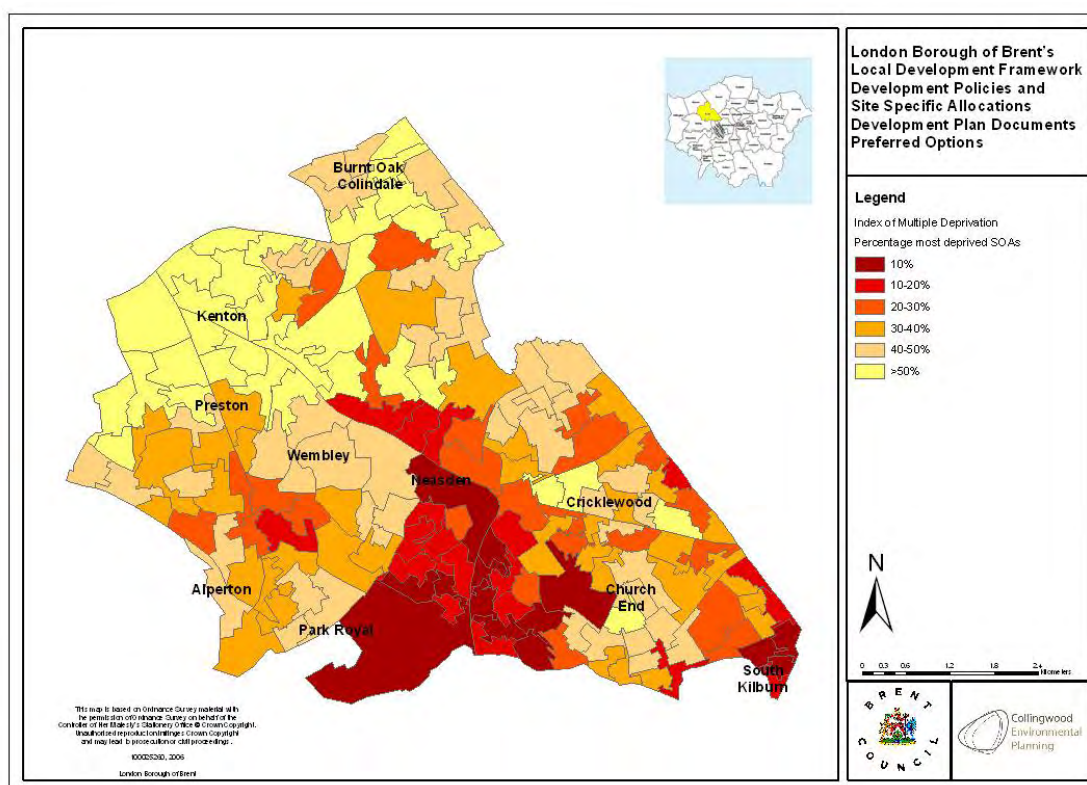
- 3.13 A brief summary is presented below of some of the key baseline data and associated trends. This is organised under the 22 sustainability objectives (see Section below). See Appendix 5 for further details.

Social

Prosperity and social inclusion (S1)

- 3.14 The Index of Multiple Deprivation¹¹ covers a range of domains (income, employment, health deprivation and disability, education skills and training, housing and geographical access to services) combined into a single deprivation score for each area. It is presented either as a score out of 100 or a ranking of local authorities or Super Output Areas. Brent includes areas of relatively high deprivation, but on average is less deprived in comparison with many inner London boroughs. Overall, Brent slightly improved its rank position of local authorities between 2000 and 2004; it is currently ranked 58th out of 354 local authorities on the local authority national deprivation index (AMR, 2005-06). However, the Borough performs relatively poorly against two of the measures that make up the multiple index in 2004, namely income and employment deprivation.
- 3.15 There is a disparity in deprivation across the Borough. Figure 3 shows that local deprivation is distributed unevenly within the Borough, with higher levels in central and southern wards. There are 174 Super Output Areas (SOAs) in Brent, and 14 of those are in the top 10% most deprived in England¹².

Figure 3: Index of Multiple Deprivation 2004 in Brent



Source: LB Brent (ONS data)

¹¹ English Indices of Deprivation 2004, Neighbourhood Renewal Unit, ODPN, 2004

- 3.16 Other examples of the signs of poverty in Brent include an estimate from Brent Energy that 18% of the Borough's residents suffering from fuel poverty in 2000¹³ and that the percentage of households with no employed adults with dependent children is higher in Brent than either the London or England averages¹⁴.

Health (S2)

- 3.17 Self assessment of health in the Borough is in line with National levels, with 70% of people expressing that they were in good health in the 2001 Census. However, a number of health related issues are of significance. Crime, fear of crime, road traffic and environmental pollution have all been identified by residents as impacting negatively on health and quality of life¹⁵.
- 3.18 Access to health services is another key issue. Figure 4 illustrates that in some parts of Brent there is a very large number of households served per GP.
- 3.19 Physical exercise is a key issue in promoting good health. While the Borough is served by a number of sports centres and facilities (see Appendix 5), the Borough also has significantly lower levels of walking and cycling (as means of travelling to work)¹⁶ than the average for London¹⁷, though relatively good connectivity to public transport may be a factor in these data indicators. Brent's Local Implementation Plan (LIP) of the Mayor's Transport Strategy includes proposals to improve walking routes and crossings, encourage residents to walk more, improve access and accessibility to local services, identify suitable cycle parking sites and improve rail and underground access and bus routes, amongst others. Figure 5 shows cycle routes and cycle parking in Brent.
- 3.20 Health issues related to poor air quality are considered in detail under Theme EN3.
- 3.21 Figure 6 illustrates levels of open space deficiency in the Borough. The maps show that while local open spaces are relatively evenly distributed within Brent, there are higher levels of deficiency (defined by distance from open space) in the south of the Borough. This discrepancy is more marked in the map on the right, showing that the majority of those living in the southern wards are more than 1200 metres from a public open space larger than 20 hectares.

¹² Government Office for London (<http://www.go-london.gov.uk/boroughinfo/borough.aspx?bid=4>)

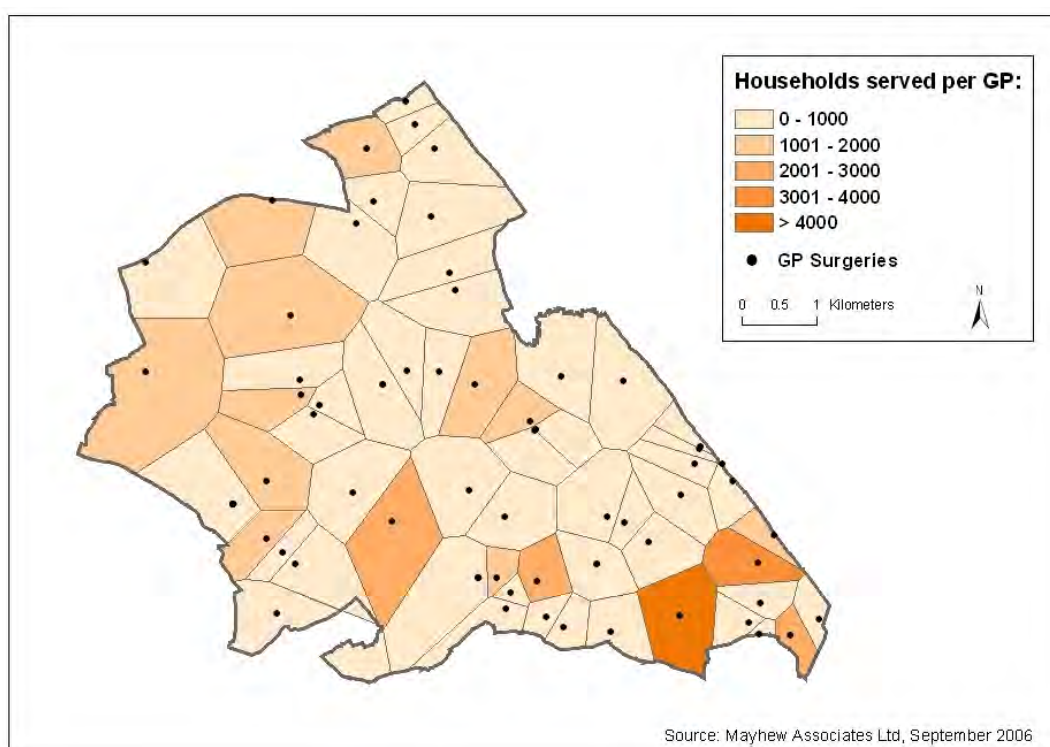
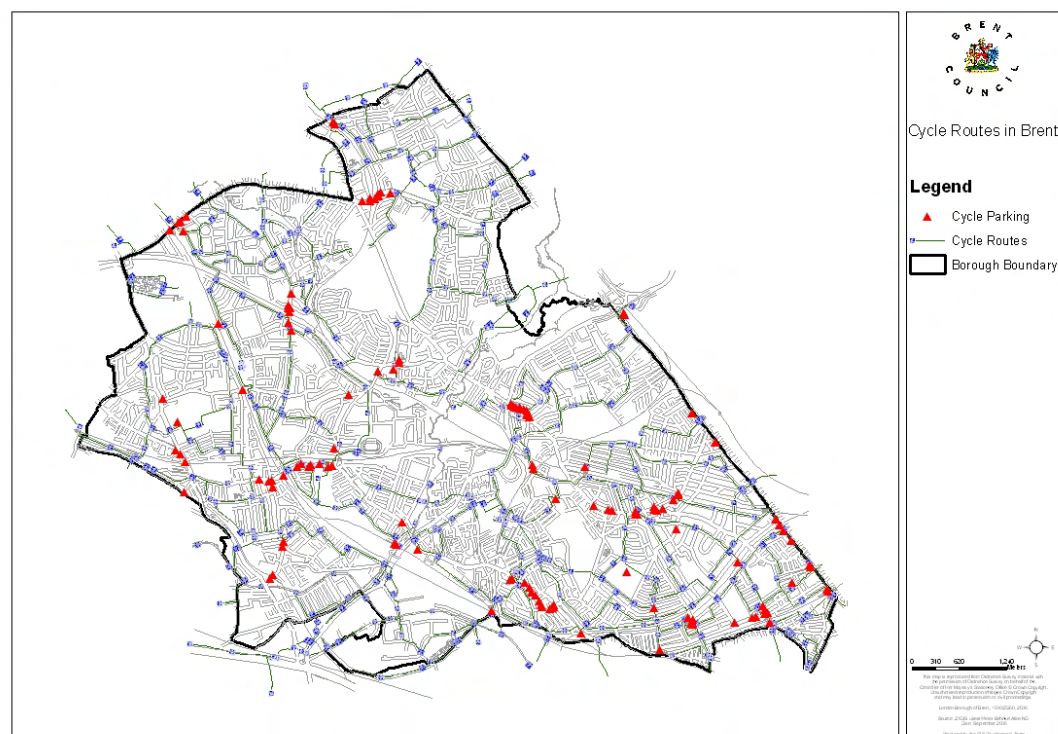
¹³ LBB (2001) Indicators for a sustainable Brent

¹⁴ Census 2001, accessed online at www.statistics.gov.uk

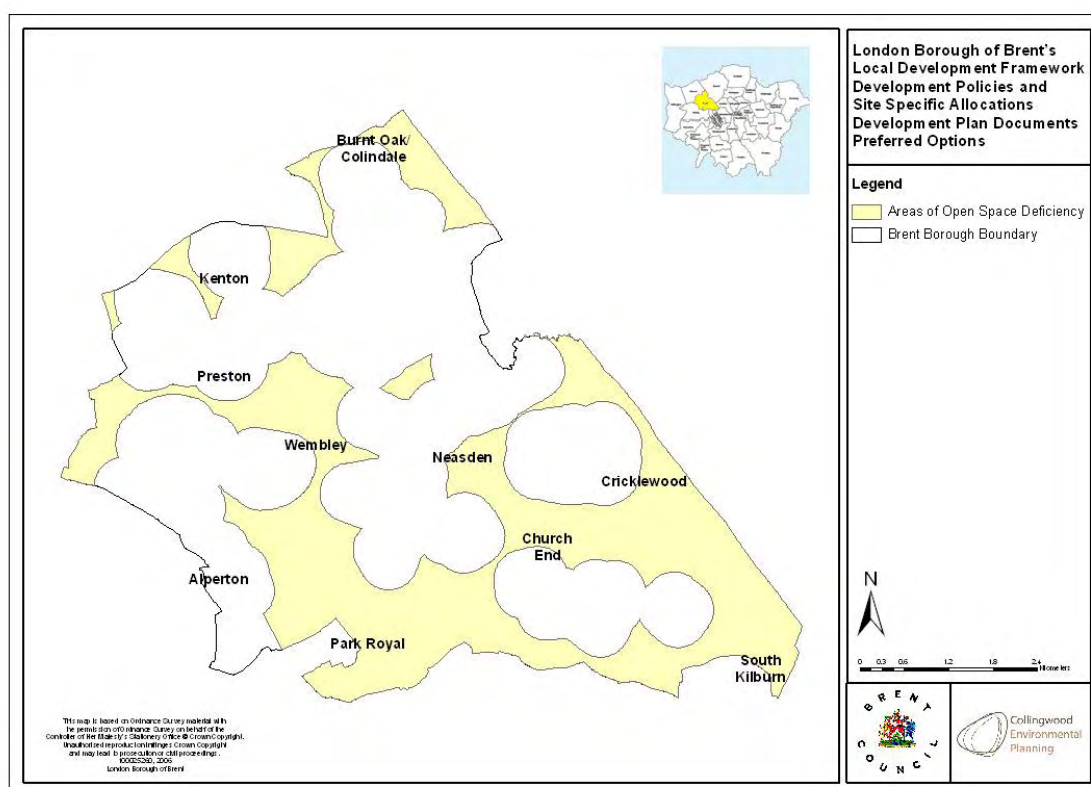
¹⁵ Living in Brent 2002 A Representative View. A MORI study for Brent Borough Council

¹⁶ LBB (2003) Brent summary of key statistics

¹⁷ Transport for London Statistics (<http://www.transportforlondon.gov.uk/tfl>)

Figure 4: Number of households served per GP**Figure 5: Cycle Routes and Cycle Parking in Brent**

Source: London Borough of Brent

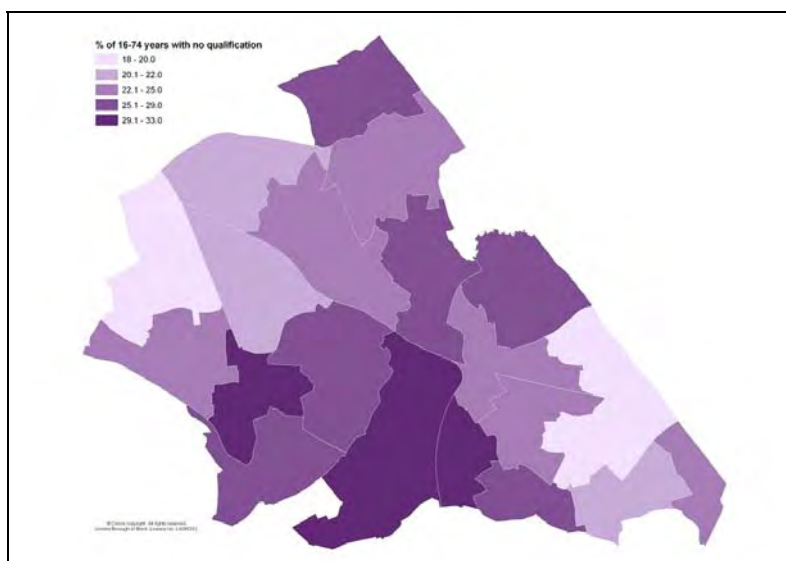
Figure 6: Areas of Open Space Deficient

Source: London Borough of Brent

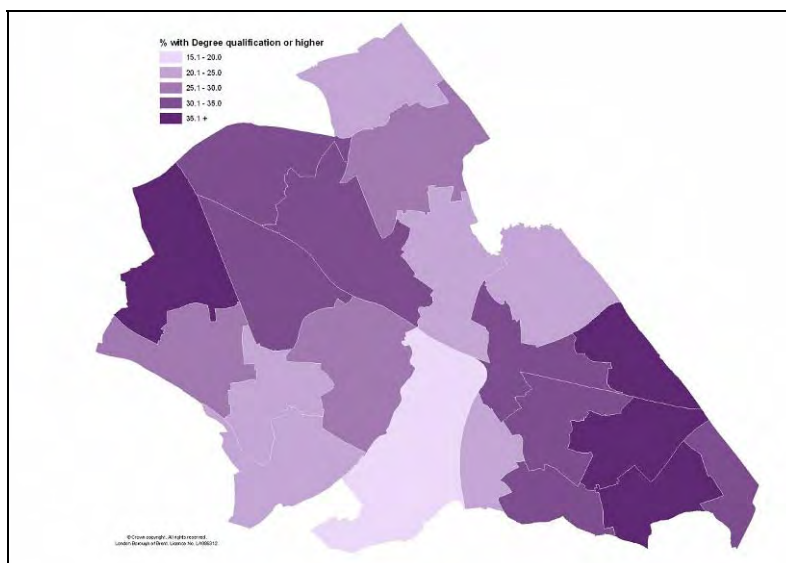
Education and skills (S3)

- 3.22 Data shows that average primary and secondary school attainment across the Borough is comparable with national figures at the same levels (key stage 2 primary, and level 2 secondary). However, further (NVQ equivalents) and adult education attainment show the Borough to be below national and London averages¹⁸. Figure 7 and Figure 8 also show a significant variation between education attainment between wards. Notably Stonebridge, Harlesden, Wembley Central and Queensbury have a high percentage of 16 – 74 year olds with no qualifications.

¹⁸ DfES (<http://www.dfes.gov.uk/performance/tables>)

Figure 7: Percentage 16 to 74 year olds with no qualifications, 2001, by ward

Source: London Borough of Brent

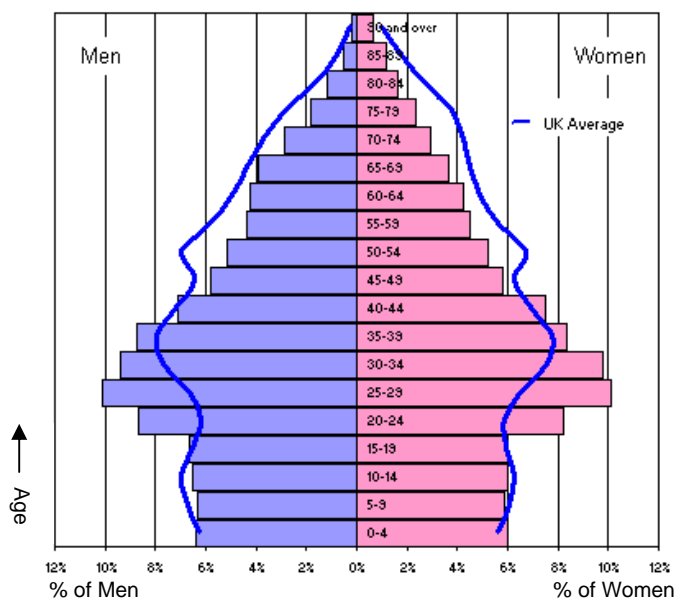
Figure 8: Percentage 16 to 74 year olds with degree level qualification or higher, 2001, by ward

Source: London Borough of Brent

Housing and population (S4)

- 3.23 The 2001 Census showed that the population of Brent increased for the first time in 50 years, by 8.4% from a population of 243,025 in 1991 to 263,466 in 2001¹⁹. If this trend continues the rising population will mean increased pressure on existing amenities and facilities, such as schools, health services, housing and transport. Brent has an age structure similar to that of London as a whole. 44% of Brent's population fall in the 20-44 age group (see Figure 9). The Borough's ethnic mix is particularly varied. Less than half (45%) of the population are white, compared to over 70% for London (see Figure 10). This ethnic and cultural diversity represents both challenges and opportunities for Brent.

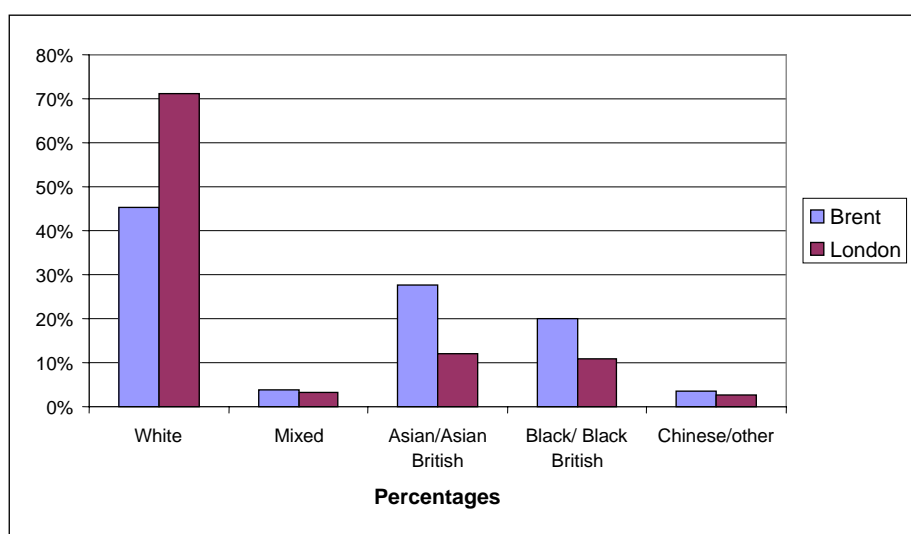
Figure 9: Age pyramid of Brent.



Source: National Statistics Online²⁰

¹⁹ Census 2001, accessed online at www.statistics.gov.uk

²⁰ <http://www.statistics.gov.uk/census2001/pyramids/pages/00ae.asp>

Figure 10: Population by ethnic group

Source: 2001 Census, available at: www.statistics.gov.uk

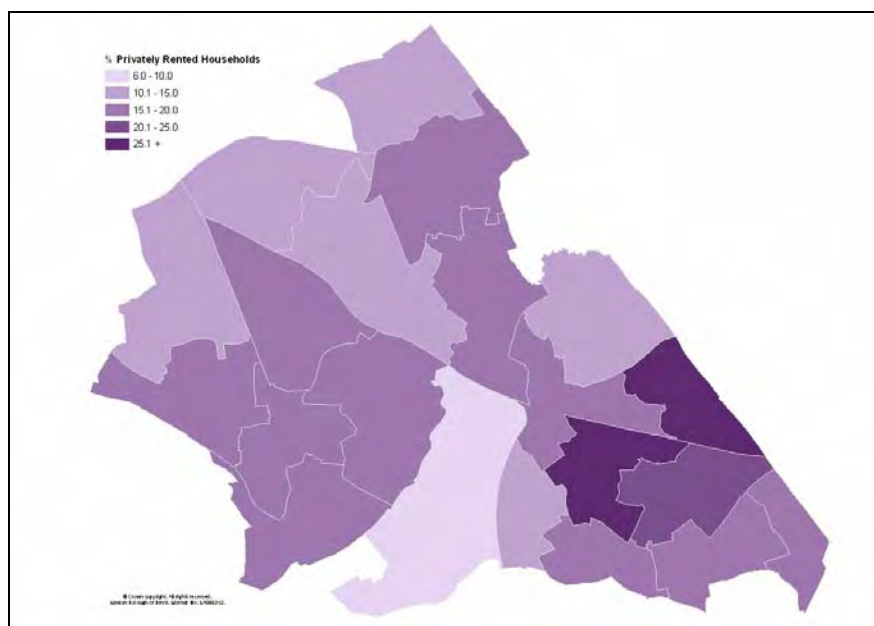
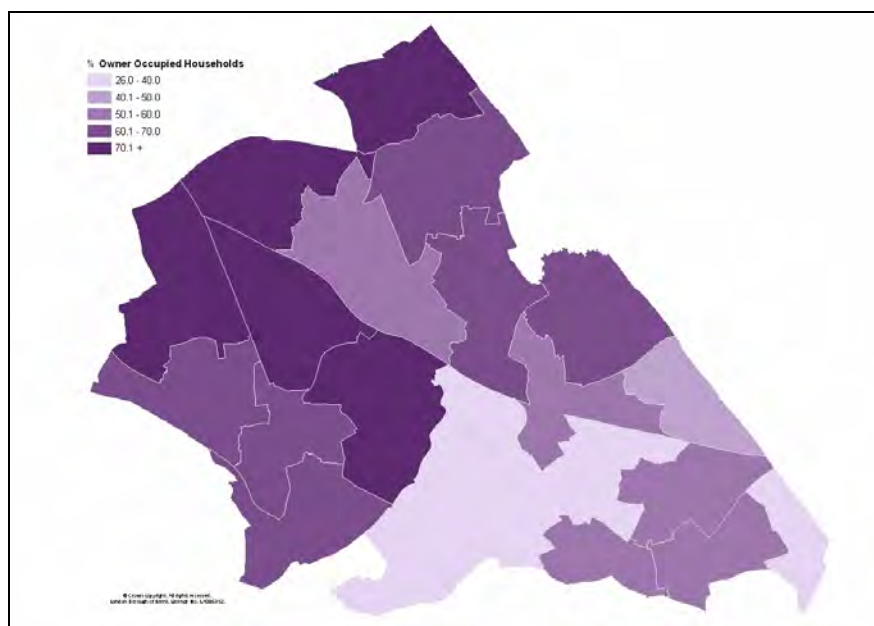
- 3.24 House prices in Brent are comparable to London averages and considerably higher than the England and Wales average²¹. The relatively high cost of housing compared to incomes is a major issue for the Borough, with the ratio of average house price to gross household income higher than comparable boroughs, London as a whole and the national averages²². There is also a lack of affordable housing. House prices have risen in Brent by 300% during the last decade, the largest rise in any London Borough. Household incomes have only risen by 8.5% between 1999-2004. In May 2005 there were 19,806 households on the housing needs and transfer register. It is estimated that there is a shortfall of affordable housing in the Borough of 3,382 homes per year, which represents a total of 16,910 dwellings to 2010²³.
- 3.25 There are also disparities in household tenure and household size within the Borough. Figure 11 and Figure 12 illustrate this at ward-level. They illustrate that north-western wards generally have the highest levels of owner-occupation, while southern and eastern wards tend to have higher levels of renting, both private and social. Figure 12 also illustrates the average household size by ward. It shows that the average household sizes are generally smaller in the south-eastern wards. It seems likely this is due to the predominance of flats and apartments in these more central wards.

²¹ Land Registry October – November 2006 (<http://www.landreg.gov.uk/propertyprice/interactive>)

²² Affordability differences by area for working households buying their homes, 2003 update. Joseph Rowntree Foundation, 2003 (<http://www.jrf.org.uk/knowledge/findings/housing/024.asp>)

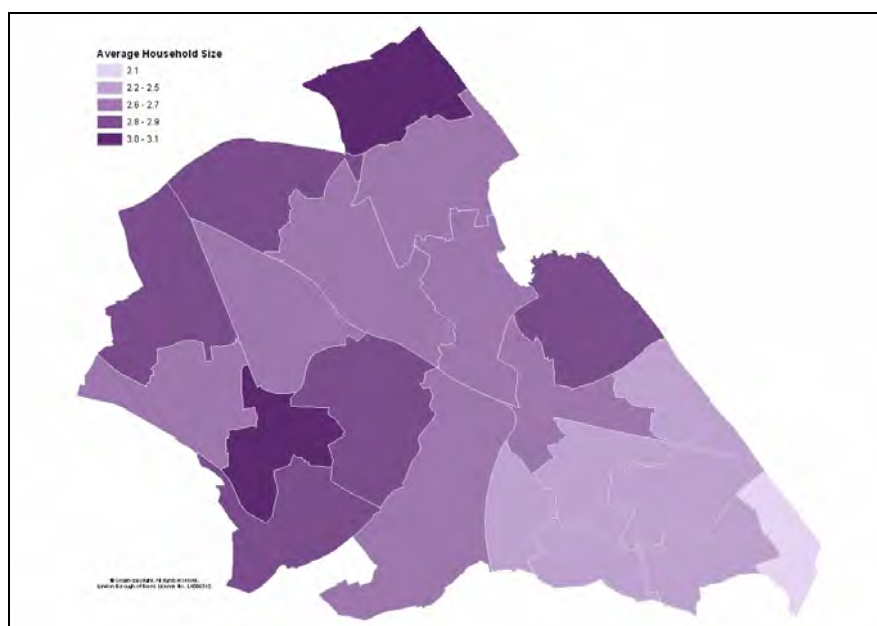
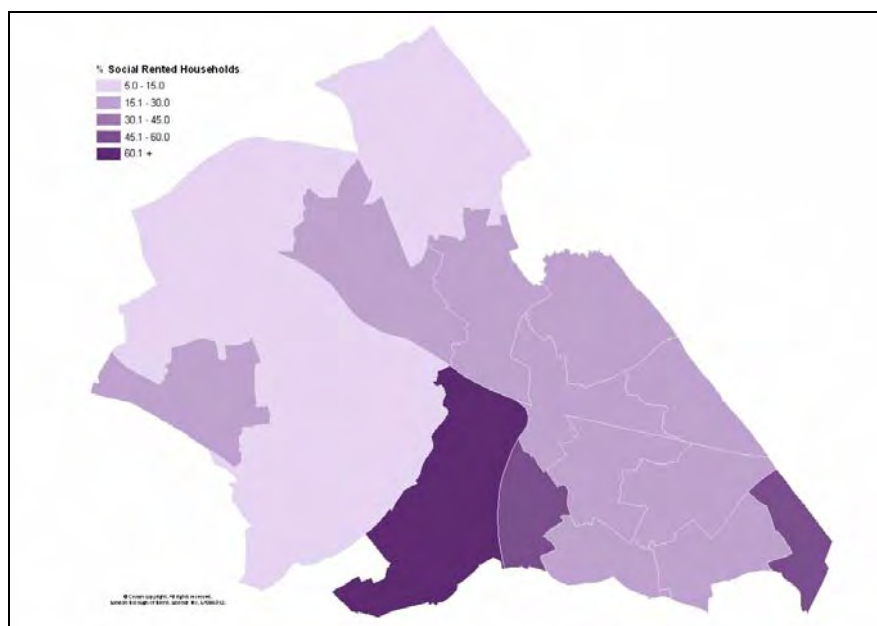
²³ Brent Housing Strategy Statement 2005

Figure 11: Percentage of owner occupied households by ward and percentage of privately rented households by ward, 2001



Source: The 2001 Census, A Profile of Brent, 2004

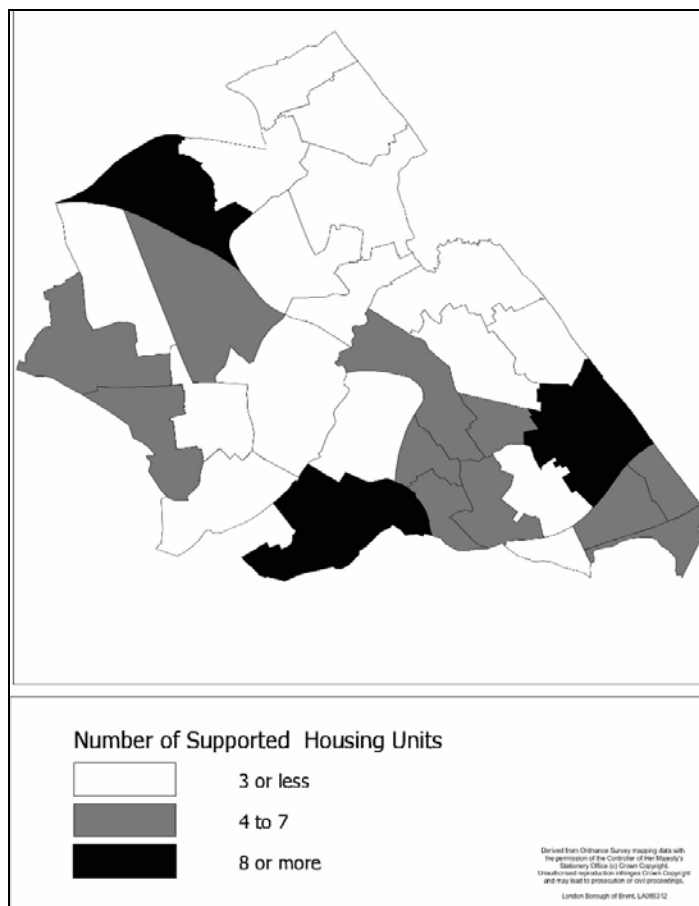
Figure 12: Percentage social rented households by ward and average household size by ward, 2001



Source: The 2001 Census, A Profile of Brent, 2004

- 3.26 Figure 13 illustrates the distribution of supported housing within the borough. Supported housing is concentrated in the South and North West of the Borough.

Figure 13: Distribution of supported housing in Brent



Source: London Borough of Brent

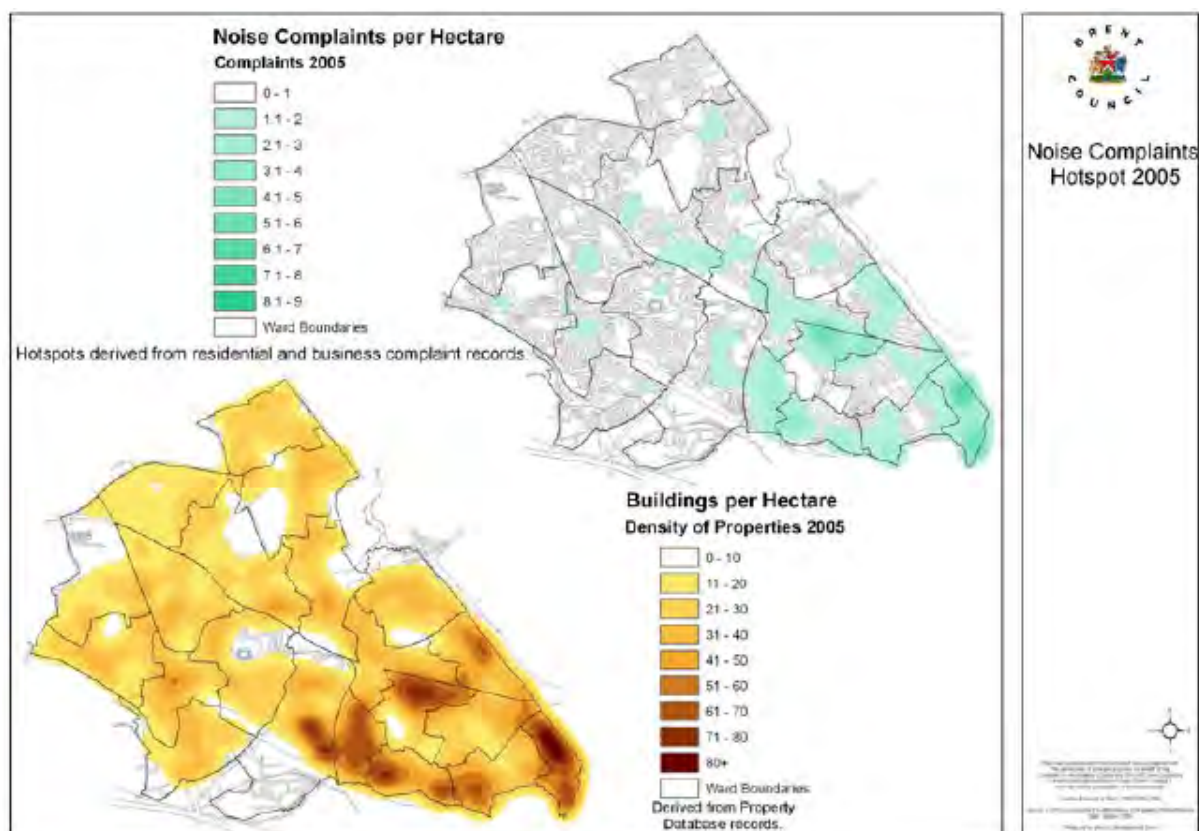
Quality of Surroundings (S5)

- 3.27 The percentage of vacant floor space in primary shopping frontages fell in almost all wards between 1997 and 2003. Between 2003 and 2005 the percentage has increased in most wards. High levels of vacant floor space are an indicator of urban centre decay²⁴.
- 3.28 The quality of townscape is considered more completely under Theme EN5 – Townscape and landscape quality, below.
- 3.29 Noise and vibration are common problems in Brent mainly arising from houses, roads, railways and industrial/commercial premises. Noise complaints are on the increase: in 2002/03, 2,198 complaints were received, in 2003/04 this increased to

²⁴ LBB Annual Monitoring Report 2005-06, 2004-05

2,647 complaints, rising to 2,925 complaints in 2004/05 to rise yet again to 3,574 complaints in 2005/06. One of the main factors contributing to the increase in complaints could be the increasing density of housing. Figure 14 illustrates the relationship between noise complaints and housing density²⁵. Noise nuisance from road traffic is also covered under objective EN1.

Figure 14: Noise complaints per hectare and housing density



Source: London Borough of Brent²⁶

Crime and fear of crime (S6)

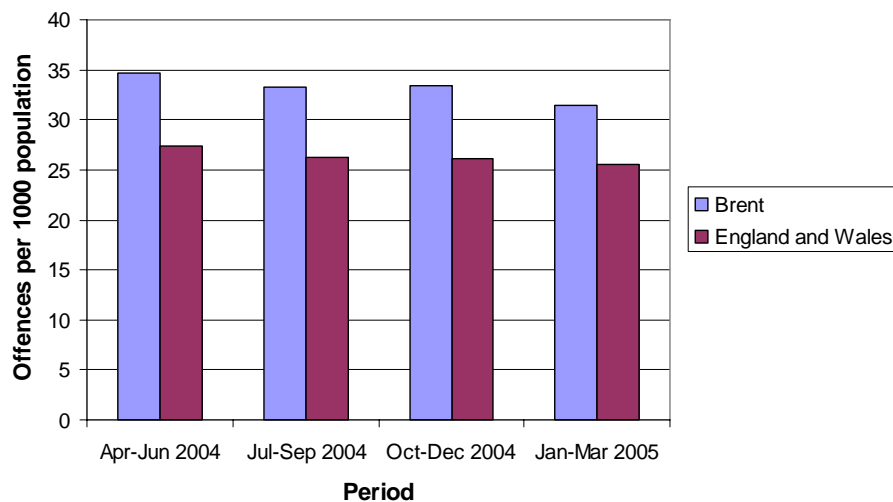
- 3.30 Of respondents to Brent's Crime Audit questionnaire, 66% of residents feel threatened a 'great deal' by crime in their area²⁷. Fear of crime is a major issue, and one which has effects on quality of life, access, mobility and health. Crime levels in the Borough are generally above national averages (see Figure 15) and have increased considerably since 2000-1²⁸.

²⁵ LBB Annual Monitoring Report, 2005-06

²⁶ Derived from Ordinance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

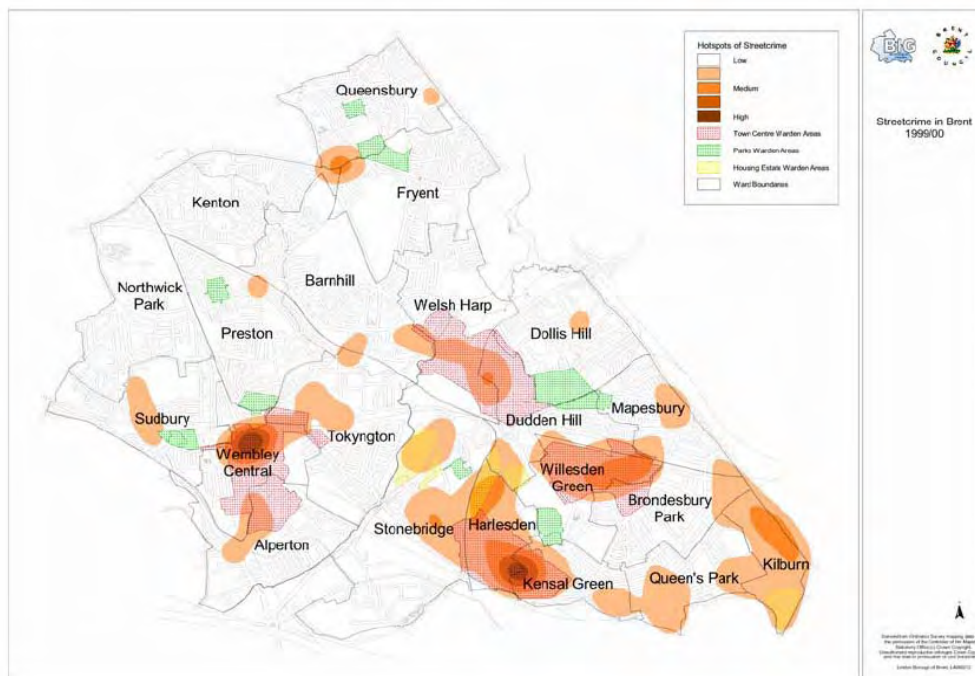
²⁷ Brent's Crime Audit questionnaire, 2004, cited in AMR 2005-06

²⁸ Census 2001, accessed online at www.statistics.gov.uk

Figure 15: Crime levels in Brent versus national averages

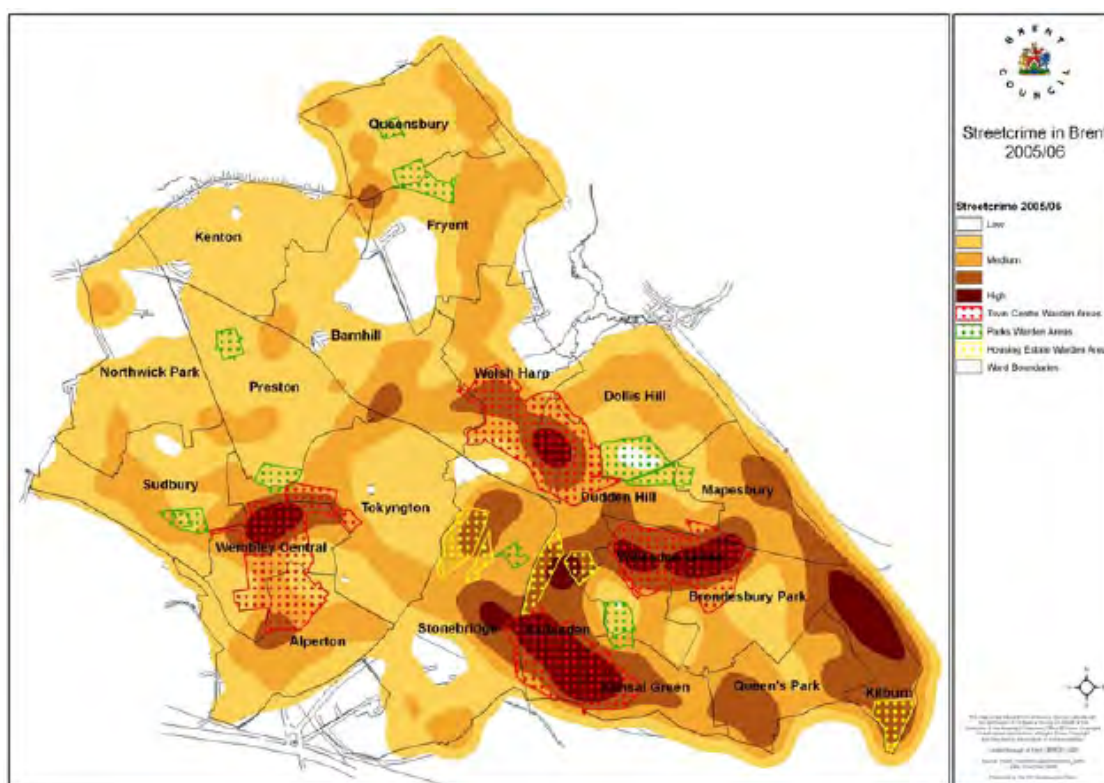
Source: Home Office, Crime Statistics for England and Wales

- 3.31 Figure 16 shows the distribution of street crime (street crime density) within the Borough and illustrates that there are pockets, or hot-spots, of crime in certain areas. Areas within Stonebridge, Harlesden and Kilburn have the highest incidence of crime and street crime. It seems probable that a number of factors contribute to these hot-spots, including social, economic, townscape and environmental factors.

Figure 16: Street crime in Brent, 2003/04 and 2005/06

Source: London Borough of Brent²⁹

²⁹ Derived from Ordinance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright



Source: London Borough of Brent³⁰

Community identity and welfare (S7)

- 3.32 The 'Living in Brent' study by MORI gathered residents' levels of satisfaction with their neighbourhood as a place to live. 74% of respondents were satisfied in 2002, a slight rise since 2000³¹.

Access to services (S8)

- 3.33 Access to services is a key issue, particularly for those on low incomes or living in deprived areas. There is little quantified data on access to and provision of essential services and amenities in the Borough, although the floor-space of childcare facilities has risen by 2100 m² in 2004-05³² and again by 1330m² the last financial year (2005-06). Availability and access to GPs is another key issue included under Theme S2 (health) and illustrated by Figure 4.
- 3.34 Public transport accessibility is a factor in accessing services. Brent is generally very well connected and has a number of underground, rail and bus links within and beyond its boundaries. However, Figure 17 illustrates areas of the Borough with poor public transport accessibility, showing that significant areas remain deficient.

³⁰ Derived from Ordinance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

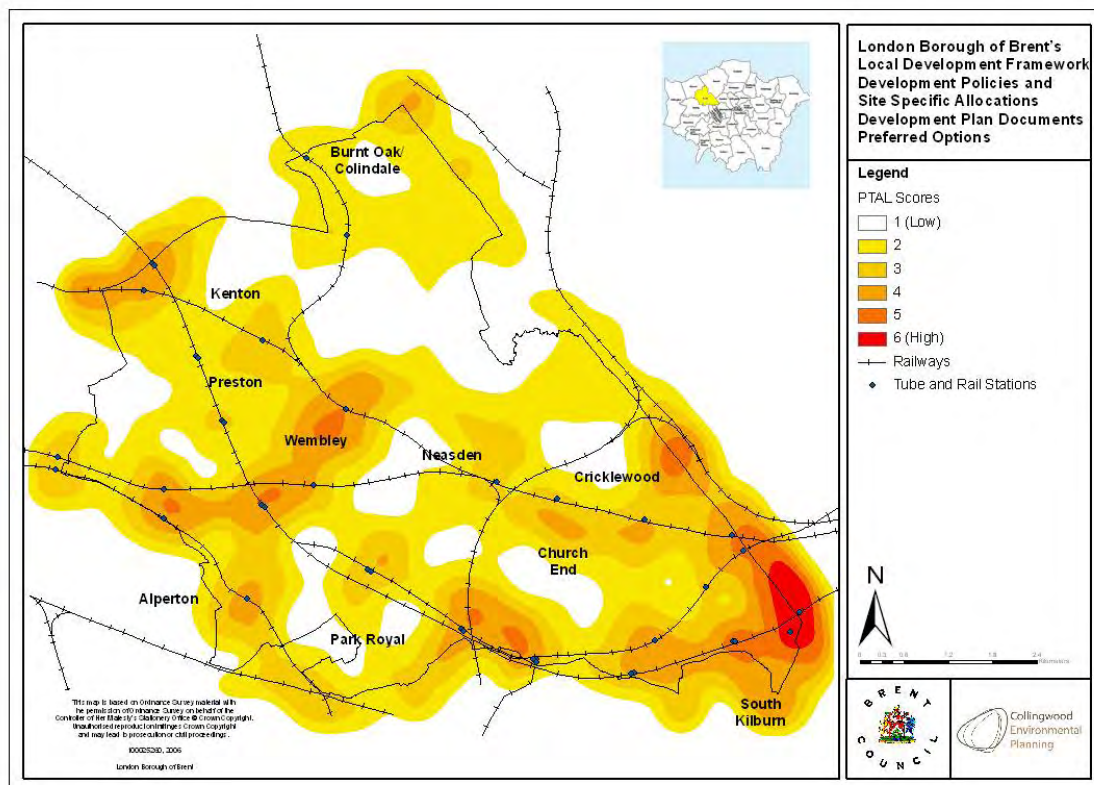
³¹ Living in Brent 2002 A Representative View. A MORI study for Brent Borough Council

³² LBB Annual Monitoring Report, 2004-05

June 2007

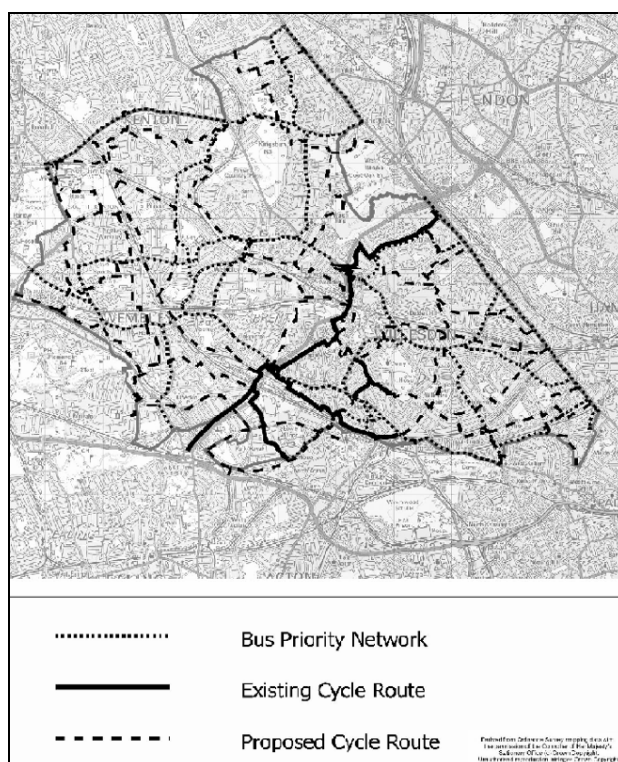
- 3.35 Figure 18 shows the London Cycle and London Bus Priority Networks in the Borough. Brent has two radial routes and one orbital route forming part of the 900 km London Cycle Network Plus (LCN+) that is due for completion in 2010. The implementation of the London Bus Priority Network (LBPN) has resulted in major benefits in Brent particularly on the Edgware Road and Harrow Road corridors.³³
- 3.36 There are some major public transport improvements planned for Brent. The most salient of these is the Wembley interchange. To accompany the new Wembley stadium, Wembley Park, Wembley Stadium and Wembley Central stations will receive capacity upgrades. Wembley Park is also being developed as a 'showcase' station.³⁴

Figure 17: Public transport accessibility and location of railways and underground



³³ Brent Draft LIP of the Mayor's Transport Strategy

³⁴ See Transport for London website: <http://www.tfl.gov.uk/tfl/initiatives-projects/wembley/>

Figure 18: Bus priority and cycle route network

Source: London Borough of Brent³⁵

Environmental

Transport, traffic and noise (EN1)

- 3.37 Road traffic and related issues (such as pollution, infrastructure) exacerbate a number of sustainability problems. They are also the major source of noise nuisance, vibration and air pollution in the Borough. Road traffic also has implications for health, quality of life and surroundings and biodiversity.
- 3.38 Between 1997 and 2004, Brent recorded an 80 million km, or 8.6%, increase in traffic flow. However, data for the period 2004-05 shows no percentage increase in traffic flow³⁶. The current trend is for traffic levels to continue to grow with increasing car ownership and consequent decreasing average journey speeds³⁷.

Water quality, water resources and flooding (EN2)

- 3.39 The River Brent and its tributaries suffer from pollution and are of only 'fair' or 'poor' quality according to the Environment Agency's General Quality Assessment (GQA) classification³⁸. The River Brent has been divided into three stretches for the Water

³⁵ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

³⁶ LBB Annual Monitoring Report, 2005-06

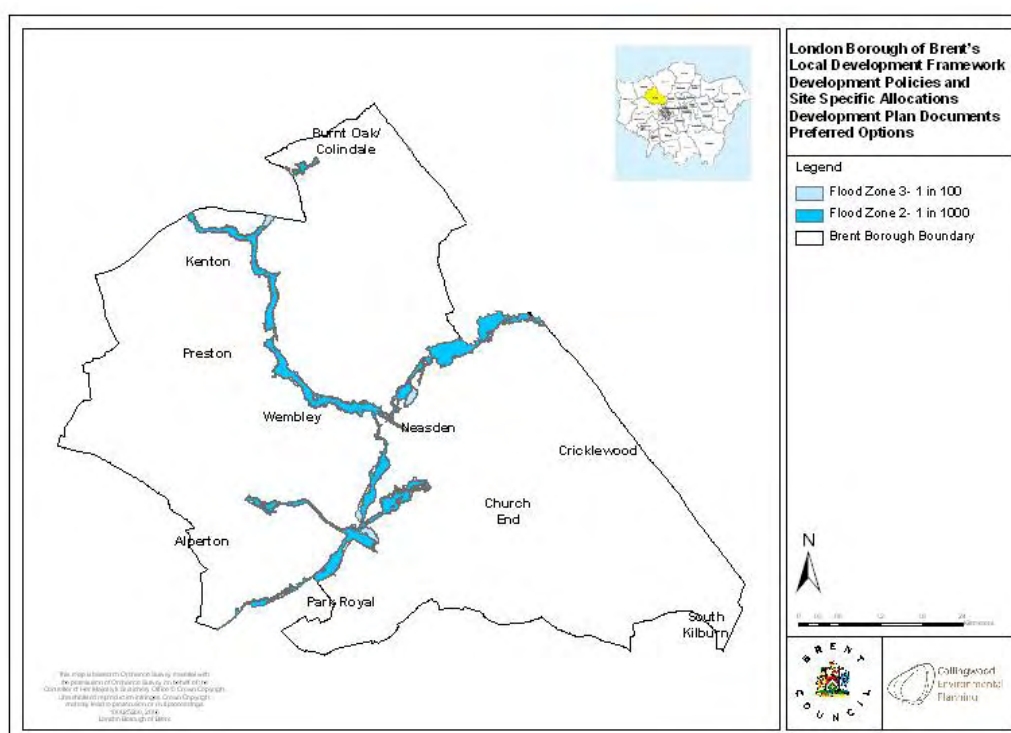
³⁷ LBB Draft Local Implementation Plan (LIP)

³⁸ Environment Agency (<http://www.environment-agency.gov.uk/maps/960669/?version=1&lang=e>)

Framework Directive classification. All three are considered to be 'at risk' of not achieving 'good status' by 2015 and have been provisionally classified as 'heavily modified' water bodies³⁹.

- 3.40 The main causes of water pollution in the Borough are sewerage misconnections, urban run off and effluents from industrial processes and sewage works⁴⁰
- 3.41 Part of the Grand Union Canal and its feeder go through the southern part of the Borough. This offers potential for water based recreation activities and freight by water. British Waterways has recently established a contract for gravel barge traffic on the Grand Union Canal and is currently working on further projects⁴¹.
- 3.42 Specific surface localised flooding is an issue in the Borough, particular at times of increased run-off. Potential areas of fluvial flood risk include Welsh Harp, River Brent and Wealdstone Brook⁴². Figure 19 shows the areas at risk of river flooding in the Borough. Climate change is likely to increase the risk and extent of flooding in Brent. New developments and existing trends such as paving front gardens will also increase run off and consequently the risk of surface flooding.

Figure 19: Flood Risk in Brent



Source: London Borough of Brent (Environment Agency data)

³⁹ Environment Agency (http://maps.environment-agency.gov.uk/wiyby/wiybyController?extraClause=RIVER_NAME~'Brent')

⁴⁰ LBB Draft Development Policies

⁴¹ London Assembly (2006) The Blue Ribbon Network, the Heart of London

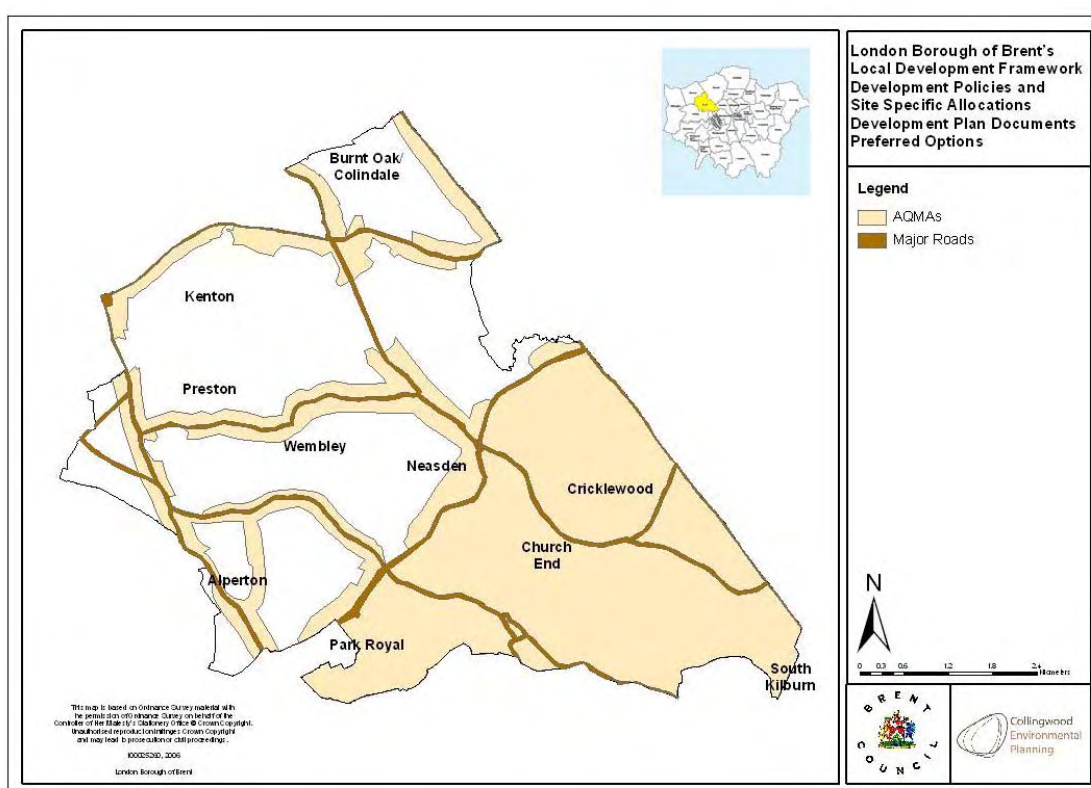
⁴² LBB website (<http://www.brent.gov.uk/services.nsf/0/3bbcd5d8f558ab1080256e6a005627c7?OpenDocument>)

- 3.43 Like the rest of London, and the South East generally, the combination of climate change, increased water use and new development are producing serious concerns about the adequacy of future supplies of water. This is predicted to be an increasingly important issue in the future.

Air quality (EN3)

- 3.44 Figure 20 shows that a large part of Brent has been designated as Air Quality Management Areas (AQMAs)⁴³, including the entire area south of the North Circular Road and the major road corridors to the north of the North Circular⁴⁴. This indicates areas where national pollution objectives will be breached.

Figure 20: Brent Air Quality Management Areas and Major Roads



Source: London Borough of Brent⁴⁵

- 3.45 The number of days when air quality was recorded as moderate or higher (worse) was 60 in 2003, slightly above the national urban average⁴⁶. Trend data (2002-2003) shows a significant increase from 24 days, however a similar increase was seen

⁴³ LBB (2001) Indicators for a sustainable Brent

⁴⁴ <http://www.brent.gov.uk/ehealth.nsf/97adad6ff206607c8025663c0065c536/a151d4583fe9674f80256a80005c1c4d!OpenDocument>

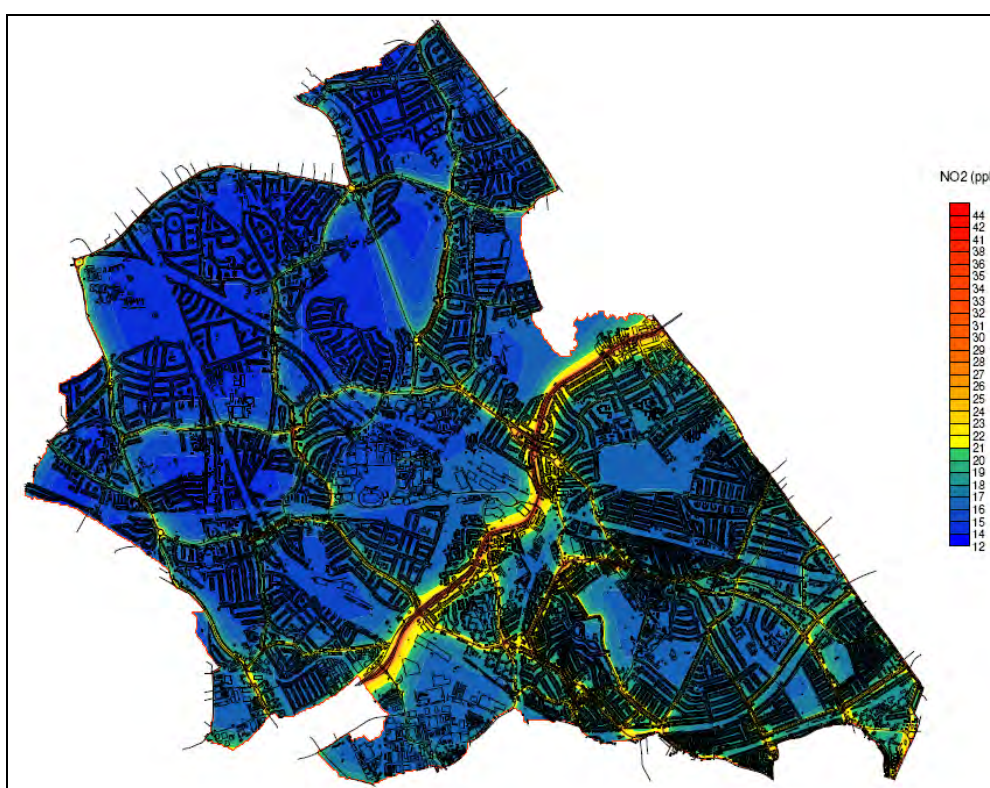
⁴⁵ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

⁴⁶ Defra (2004) Regional Quality of Life

across other London boroughs and this may reflect atmospheric and meteorological factors. This has serious implications for health, particularly for respiratory diseases.

- 3.46 In 2004, air quality in Brent exceeded national standards on several occasions. This was the case of nitrogen dioxide (NO₂) and particulate matter up to 10 micrometers in size (PM₁₀). In Brent, the primary source for these and other pollutants is road traffic⁴⁷. This is illustrated in Figure 21 showing predicted annual mean levels of NO₂, where roads are clearly highlighted, particularly the North Circular. The trend has been for road traffic levels to increase in Brent (see objective EN1) so the number of days of poor air quality will increase as a result which will cause more associated health problems.

Figure 21: Predicted annual mean NO₂ levels for 2005 in Brent



Source: London Borough of Brent⁴⁸

- 3.47 See also Theme EN1 – Transport and traffic (driver for air pollution).

Biodiversity and habitat (EN4)

- 3.48 Several parts of the Borough have significant nature conservation value, including Sites of Special Scientific Interest (SSSIs)⁴⁹, sites of Metropolitan and Borough

⁴⁷ LBB Air Quality Action Plan 2005-2010

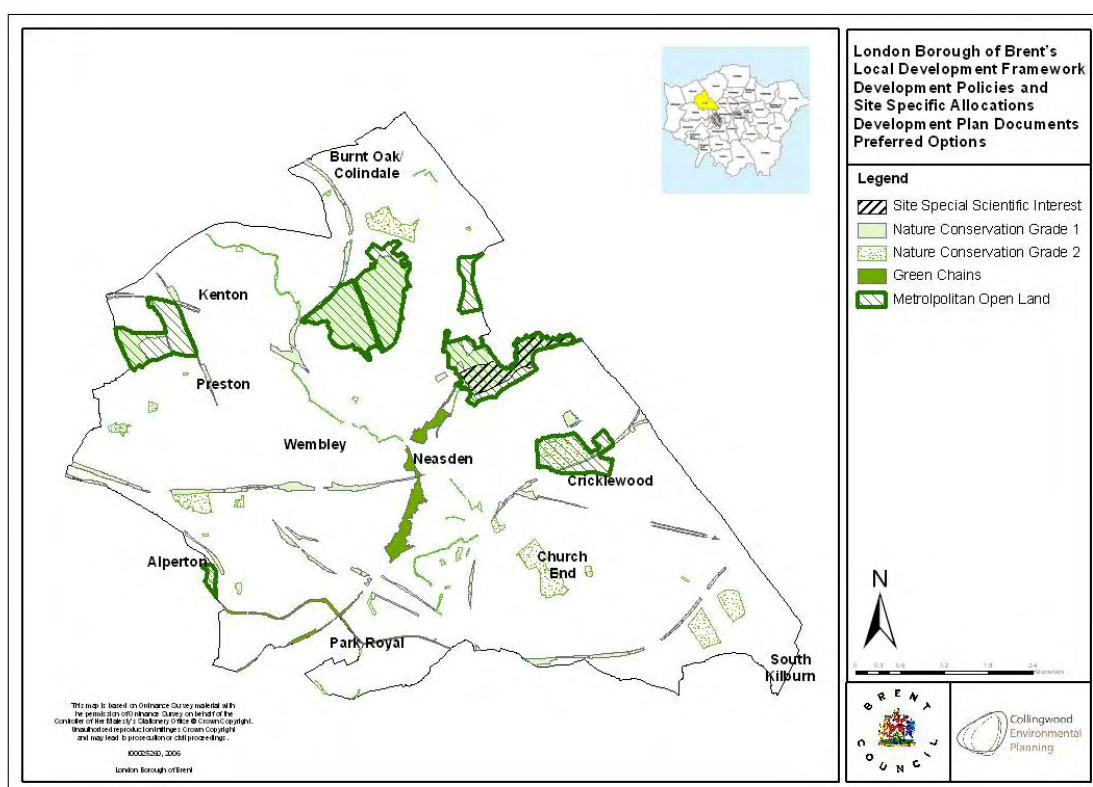
⁴⁸ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

⁴⁹ LBB (2001) Indicators for a sustainable Brent

(Grade I) importance, as well as sites of Borough (Grade II) and local importance in terms of their wildlife and nature conservation value. There are a total of 41 Sites of Importance for Nature Conservation (SINCs) in the Borough⁵⁰. In addition there are important wildlife corridors running along river corridors such as the Wealdstone Brook and the Grand Union Canal. The two largest nature conservation sites are Brent Reservoir and Fryent Country Park. Figure 22 and Figure 23 illustrates the scale and location of areas of nature conservation importance, Figure 23 also highlights the areas of deficiency.

- 3.49 There are no European or other internationally designated sites in the borough. The closest international sites are the Lee Valley (Special Protection Area), Richmond Park (Special Area of Conservation) and the Southwest London Waterbodies (Special Protection Area)⁵¹.

Figure 22: Areas of nature conservation importance

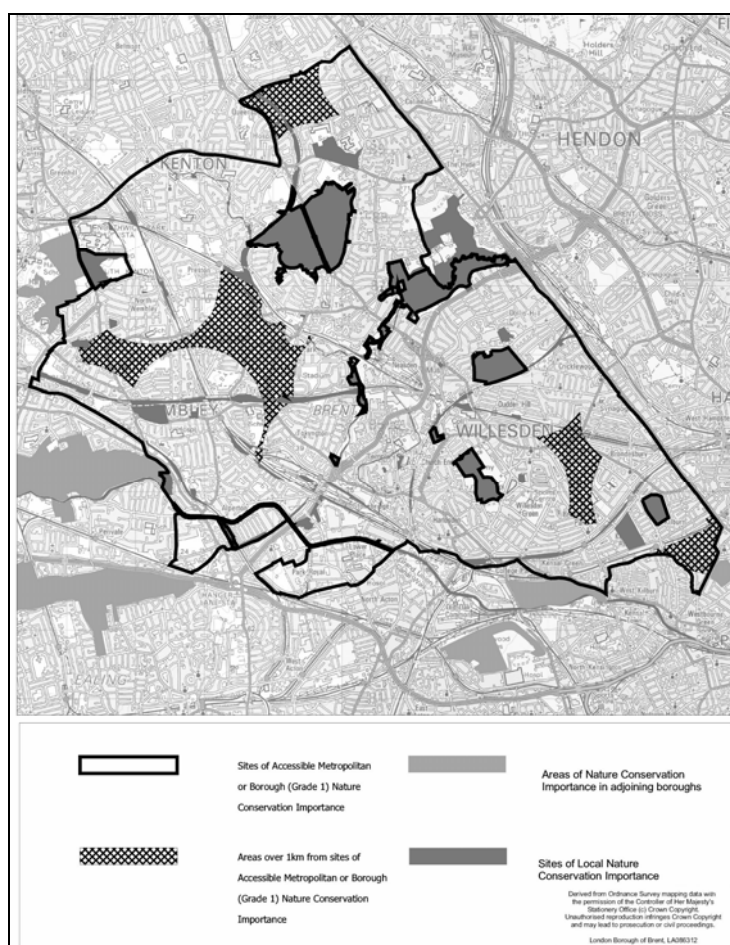


Source: London Borough of Brent⁵²

⁵⁰ Brent Parks Service & Brent Environmental Services (2001) Brent Biodiversity Action Plan

⁵¹ Natural England website http://www.natureonthemap.org.uk/map.aspx?m=int_sites

⁵² Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

Figure 23: Areas of nature conservation and access deficiency

Source: London Borough of Brent⁵³

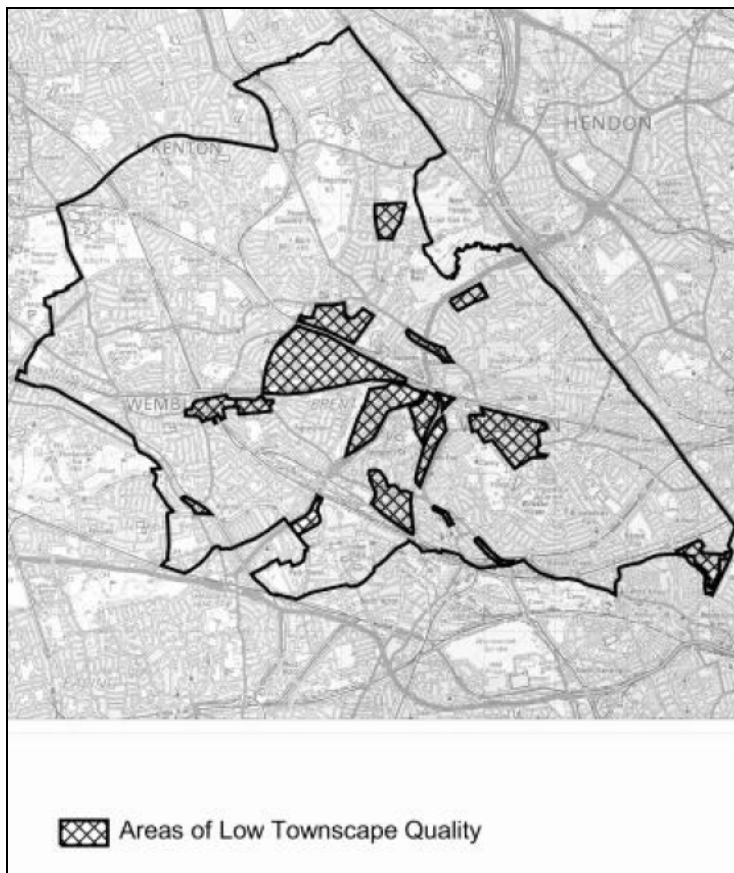
- 3.50 Since 1992, it is estimated that 180 trees have been lost each year through vandalism, old age, disease, driveway construction, subsidence claims and action by statutory bodies (utilities – gas, water, electricity, telecommunications etc). There has been no systematic tree replacement programme⁵⁴.

Townscape and landscape quality (EN5)

- 3.51 Townscape quality varies across Brent. Figure 24 illustrates that there are significant areas of the Borough judged to be of low townscape quality, though these tend to be clustered in particular areas / wards, notably Tokyngton and Stonebridge.

⁵³ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

⁵⁴ LBB (2001) Indicators for a sustainable Brent

Figure 24: Areas of low townscape quality

Source: London Borough of Brent⁵⁵

3.52 See also Theme S5 which deals with quality of surroundings.

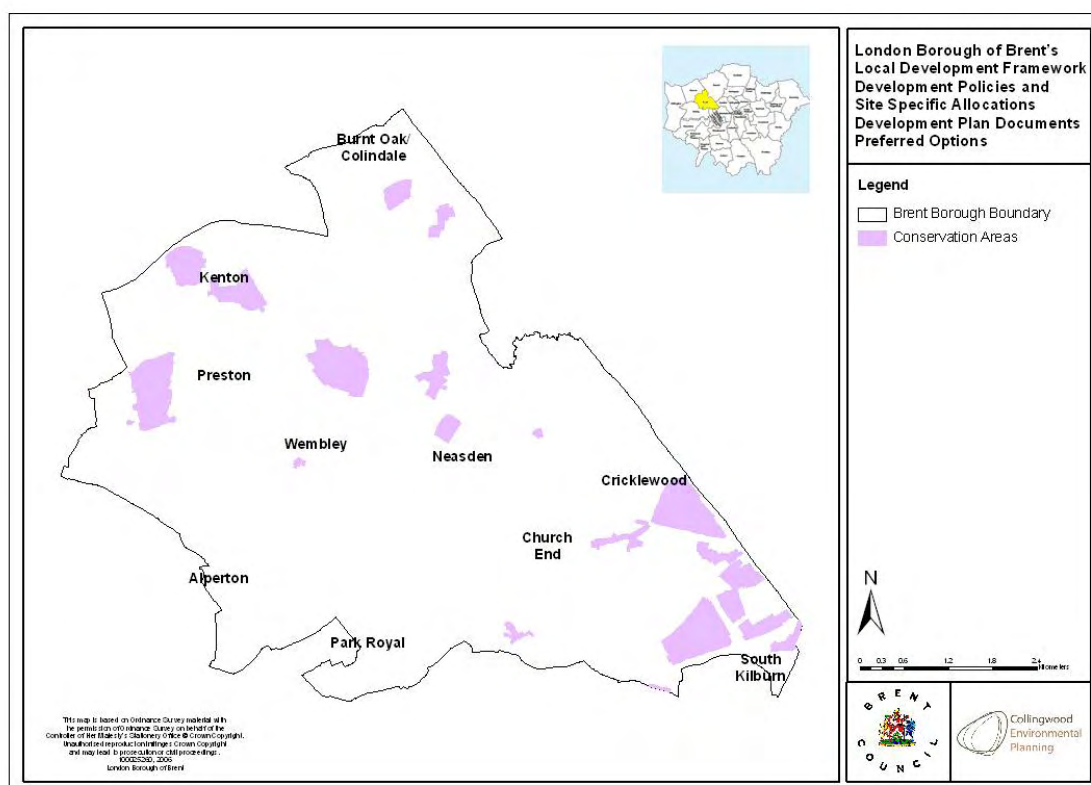
Historic and cultural assets (EN6)

3.53 Brent has one Grade I listed buildings and six listed Grade II⁵⁶. Brent also contains 24 sites of archaeological interest⁵⁷. This is lower than many London boroughs, which highlights the importance of protecting such sites. Figure 25 shows the location of conservation areas in Brent.

⁵⁵ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright. Source: Development Policies DPD Preferred Options (LBB, June 2007)

⁵⁶ LB Brent, Planning Service pers.comm.

⁵⁷ Museum of London catalogue of London archaeological sites.
http://mol.nethostinguk.com/laarc/laarc_shelp2.html#geography

Figure 25: Conservation areas

Source: London Borough of Brent⁵⁸

Climate change and energy (EN7)

- 3.54 The 2005 progress report for the Home Energy Conservation Act, indicated that Brent had achieved a 24.9% improvement in domestic energy efficiency between 1996 and 2005⁵⁹. This compares favourably with other London boroughs. During the financial year 2004-05, 40 major applications were evaluated through Brent's Sustainability Checklist process. Of these, 36 have had conditions and/or S106 terms requiring implementation of a range of measures and 'Very Good/Excellent' ratings to be achieved on the Building Research Establishment (BRE) sustainability assessments. No data was identified on SAP ratings. There are only a few renewable energy schemes scattered across the Borough⁶⁰.
- 3.55 Per capita domestic CO₂ emissions are similar to London and National averages. Per capita emissions from all sources are lower in Brent than in other London Boroughs and the Greater London averages.
- 3.56 Road transport is another mayor source of CO₂ emissions (see Theme EN1 – Transport and traffic).

⁵⁸ Derived from Ordnance Survey mapping with the permission of the controller of Her Majesty's Stationery Office © Crown copyright

⁵⁹ Defra (2006) Ninth progress report for 1996-2005, Home Energy Conservation Act 1995

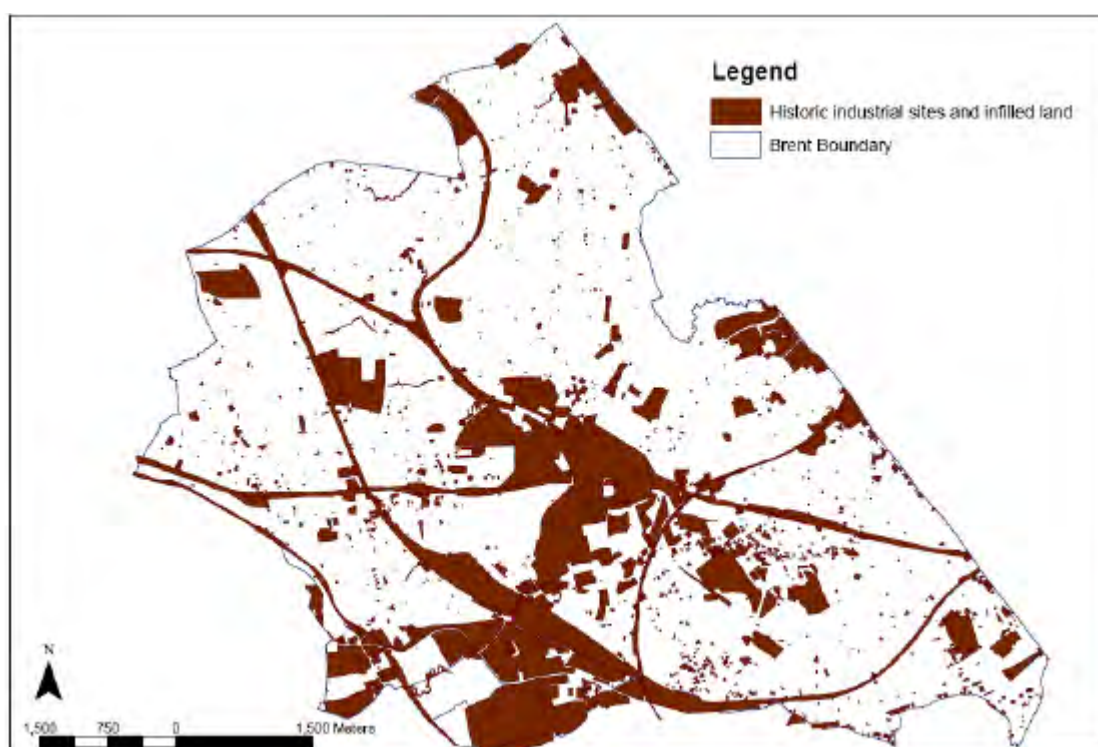
⁶⁰ LBB Annual Monitoring Report 2004-05

Waste management and materials (EN8)

- 3.57 With a recycling rate of 21% achieved between April and December 2005, Brent is close to the current national targets of 25% by 2005/06 and 30% by 2010⁶¹. In 2001, 74% of the population of Brent had access to kerbside recycling collections⁶².
- 3.58 In 2004-05 municipal waste arisings in Brent constituted 131,000 tonnes of which household waste accounted for 117,000 tonnes. Waste generated per household was 1121 kg. Municipal waste arisings in West London increased up to 2001/2 and have decreased in the last four years. This decrease reflects a decrease in civic amenity site and non-household waste arisings. This reduction is not likely to continue as household waste generation is increasing.

Land and soil quality (EN9)

- 3.59 Contaminated land covers approximately a quarter of the land in Brent according to the Contaminated Land Database. The database includes 10,300 km² of land with historical industrial uses, including in-filled land of which the origin is unknown, which may have generated the contamination of 1599 sites⁶³.

Figure 26: Potentially contaminated land in Brent

Source: Brent Contaminated Land Database (AMR, 2005-06)

⁶¹ LBB (<http://www.brent.gov.uk/waste>)

⁶² <http://www.capitalwastefacts.com>

⁶³ LBB Annual Monitoring Report 2004-05

- 3.60 There is a total of 412 hectares of open space in the Borough. Between 2000-2005 and 2005-2006, 2.7 and 0.7 hectares of open space were lost to development respectively. However, this is an improvement compared to the 38.5 hectares of open space lost between 1993-1999⁶⁴, with an increase in the number of open space applications determined in the 2005-2006 period.

Economic

Economic growth and opportunity (EC1)

- 3.61 There are a total of 432 hectares of land accounted for in Brent's Strategic Employments Areas (SEAs), Borough Employment Areas (BEAs) and identified Local Employment Sites (LESs). Of those 104.7 hectares are in industrial, 118.9 in warehousing and 43.9 hectares in office use⁶⁵.
- 3.62 Between 2000 and 2006, in SEAs, BEAs and LESs there was a decrease of land in industrial (10.5%), warehousing (7.8%) and retail (12.5%) use respectively. Conversely, during the same period there was an increase of land in residential use of 12.9%⁶⁶.
- 3.63 Theme EC2 deals with employment and unemployment in Brent.

Employment and unemployment (EC2)

- 3.64 Data from the Borough's Policy and Research Unit shows a rate of unemployment (claimant count) of 4.3% (June 2006)⁶⁷. Brent was ranked as the 39th most employment deprived district in the country in 2004⁶⁸.
- 3.65 However, more significant than the average are the disparities within the Borough. In October 2006, Brent East recorded 14.6%, Brent North 6.9% and Brent South 5.2% claimant count unemployment. Brent South has the second highest unemployment rate at London parliamentary constituency level⁶⁹. Unemployment data by ward are also presented in Figure 27.

⁶⁴ LBB Annual Monitoring Report 2004-05

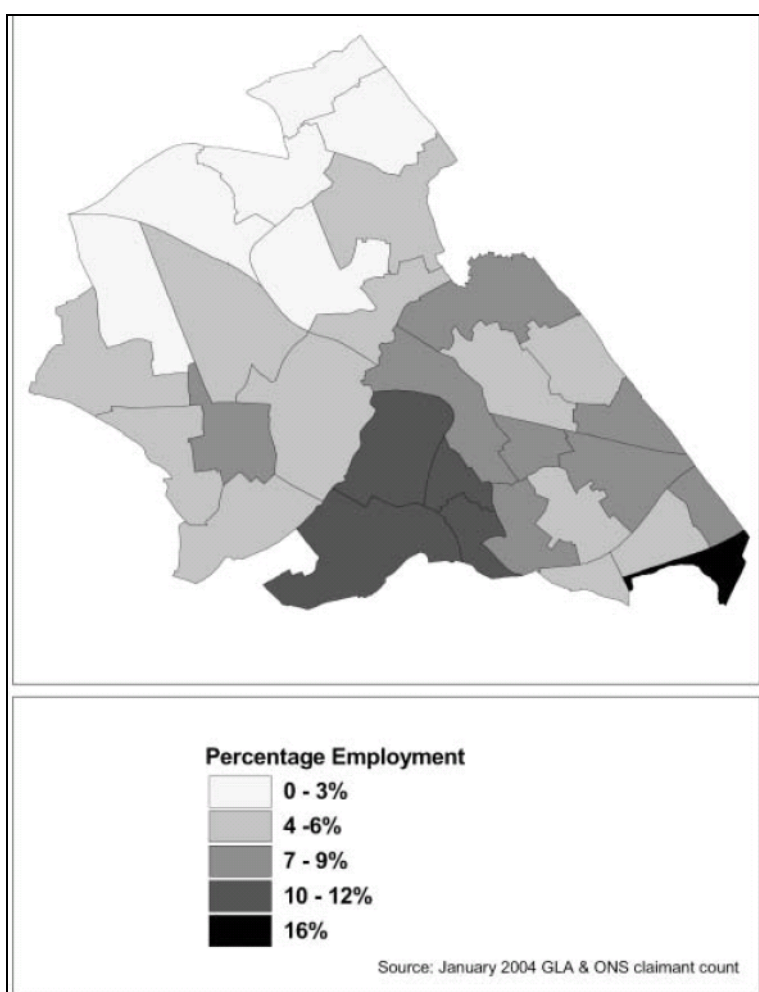
⁶⁵ URS (2006) LBB Employment Land Demand Study

⁶⁶ URS (2006) LBB Employment Land Demand Study

⁶⁷ LBB Policy and Research Unit, Economic and Social Bulletin for Brent, May 2006

⁶⁸ English Indices of Deprivation 2004, Neighbourhood Renewal Unit, ODPM, 2004

⁶⁹ LBB Annual Monitoring Report, 2005-06

Figure 27: Unemployment by ward, January 2004

Source: London Borough of Brent

- 3.66 Research by MORI in the Borough identified barriers to finding work: insufficient quantity of jobs (15%), the need for child care (15%), not enough well paid jobs (13%), and lack of skills or qualifications (12%)⁷⁰.
- 3.67 The ratio of those in full and part-time work is similar to those for London as a whole, with 74.0% of those working (in 2005), in full time work⁷¹.
- 3.68 Most recent data show that there has been an increase in the stock of businesses (VAT registrations versus de-registrations)⁷².

⁷⁰ Living in Brent 2002 A Representative View. A MORI study for Brent Borough Council

⁷¹ www.nomisweb.com

⁷² VAT registrations and de-registrations: www.nomisweb.com

Disparity and regeneration (EC3)

- 3.69 Deprivation and disparity between wards has been covered under Theme S1 – Poverty and social inclusion.
- 3.70 The area of vacant premises and vacant land increased by 12% and 27% respectively between 2000 and 2006⁷³.

Investment (EC4)

- 3.71 During 2005 there was an increase in the number of VAT registrations versus de-registrations⁷⁴, however no data has been identified to date as part of the SA on indigenous or inward investment in the Borough.

Movement (EC5)

- 3.72 100% of retail and leisure floorspace approved in Brent in 2004-05 was in areas of moderate to very good Public Transport Accessibility Levels (PTAL); this is a 16% increase on the previous year. It also exceeds the UDP target of 90% of retail and leisure floorspace in areas of moderate to very good PTAL by 2010. 67% of new retail or leisure floorspace developed between 1994 and 2004 was in or adjoining town centres⁷⁵. Low levels of car ownership mean that accessibility by public transport and / or foot and bike is very important in Brent.
- 3.73 Refer also to Theme S8 – Access to services, and Theme EN1 – Transport and traffic, particularly Figure 17 and Figure 18 (Objective 8).

Environmental, economic and social problems identified**Sustainability problems identified**

- 3.74 Many sustainability problems and issues within the Brent area have been identified from existing documents, strategies and assessments, such as the SA of the adopted UDP. The SA aimed not to duplicate this existing work, but consolidate and supplement it and other problems emerged through the SA process. Consultation on the Scoping Report and subsequent SA workshops were a key input into the identification of other key sustainability problems.
- 3.75 The problems also draw upon those raised during the SA scoping workshop in February 2005 and the assessment workshop in May 2006.

⁷³ URS (2006) LBB Employment Land Demand Study

⁷⁴ VAT registrations and de-registrations: www.nomisweb.co.uk

⁷⁵ LBB Annual Monitoring Report 2004-05

3.76 The social and economic problems facing Brent's community represent a fundamental sustainability issue. High levels of unemployment, low incomes, relatively low levels of education attainment, poor housing, health and a high incidence and fear of crime are also key issues. However, the SA also had to fully consider environmental problems, which in many cases are inter-related with social and economic problems.

3.77 Table 7 below summarises the key sustainability problems as identified through the SA process.

Table 7: Summary of key sustainability problems

Problem	Summary and source of evidence
Social	
1. Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London.	<p>There are five wards in Brent within the top 10% most deprived in the UK – namely South Kilburn, Stonebridge, St Raphaels/Brentfield, Harlesden and Roundwood (Brent Regeneration Strategy 2001-2021).</p> <p>There are no data on child poverty in the Borough but using a surrogate measure, percentage of children on benefits, four wards have levels at least twice the national average: Stonebridge, Harlesden, Kilburn and Willesden Green. (Source: http://www.jrf.org.uk/child-poverty/documents/London.doc)</p> <p>The Map of IMD 2004 Figure 3 (Sustainability Objective S1) illustrates that local deprivation is distributed unevenly within the Borough, with higher levels in central and southern wards.</p>
2. Disparity in social and economic conditions both between wards within Brent and with other areas.	<p>£21,552 (excluding benefits) is the average mean annual household income for Brent. The average household income is £6,000 less than London average (Brent Housing Needs Survey, 2004, cited in AMR 2004-05).</p> <p>However, the average household income is £21,752 in Brent North and falls to £17,193 in Brent South giving them the respective rankings of 41st and 67th lowest in London's 71 constituencies (Barclays Bank press release, 8/12/2005, cited in AMR 2004-05).</p>
3. Health inequalities and access to health facilities.	<p>The Brent PCT describes 'health gaps' and shows that certain areas have higher prevalence of ill-health, for example Harlesden has relatively high levels of diabetes (Brent PCT Annual Report 2003/04).</p> <p>There is a lack of GPs in some areas of Brent as illustrated by Figure 4.</p>
4. Education attainment and projected shortfall of school places.	<p>Baseline indicators under Sustainability Objective S3 show that while primary and secondary school attainment is comparable with national averages, NVQ equivalent qualifications among working age residents remains below national and regional averages.</p> <p>The Brent Schools Organisational Plan predicts a shortfall in school places in the Borough and in adjacent boroughs.</p> <p>Figure 7 and Figure 8 (Sustainability Objective S3) also illustrate education attainment inequalities within the Borough.</p>
5. Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards.	<p>Brent has one of the highest ratios of house prices to average incomes in the country, and since 1997 average hourly earnings have risen by 12.9% while house prices have increased by 65%. (Brent Regeneration Strategy, 2001-2021).</p> <p>Baseline indicators under Sustainability Objective S4 also show that Brent has relatively high levels of residential overcrowding and a predominance of social and housing authority rental tenure.</p>

Problem	Summary and source of evidence
6. High incidence of crime and fear of crime.	66% of residents feel threatened a 'great deal' by crime in their area (Brent's Crime Audit questionnaire, 2004, cited in AMR 2004-05). Other than sexual offences, all crime rates are above the national average within Brent. Violent crimes, robbery and burglary are particularly high (Crime Statistics for England and Wales www.crimestatistics.org.uk).
7. Provision of and access to essential services and amenities.	Public transport accessibility level assessment (PTAL) for Brent shows 84% of retail / leisure applications in areas of moderate to very good public transport accessibility (AMR, 2004 - 2005)
Environmental	
8. Mixed quality of the built environment and the need for improved architectural design quality.	Figure 24 (Sustainability Objective EN5) shows that there are a number of significant areas within the Borough considered to be of low townscape quality.
9. Pressure on biodiversity and habitats and lack of green space, particularly in southern wards.	Biodiversity is recognised as a key issue for the Borough through the development of a Local Biodiversity Action Plan, which seeks to protect and enhance both critical habitats and species, as well as create new habitats. Brent should also aim to restore and enhance degraded habitats in the borough.
10. Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner.	Brent's waste management performance is comparable with the figures for London. However existing national waste management targets and new / emerging legislation mean managing waste in a sustainable manner is a critical issue for the Borough.
11. Contaminated land and soils present a potentially significant restriction / cost in developing brownfield / derelict sites	Approximately a quarter of the land of Brent is potentially contaminated (AMR, 2004-2005)
12. Water quality and pollution are key issues for the watercourses running through Brent.	The rivers in Brent are generally classified as only 'fair' or 'poor' using the Environment Agency's General Quality Assessment (GQA) classification and many watercourses suffer from pollution and sewerage misconnections. The River Brent has been divided into three stretches for the Water Framework Directive classification. All three are considered to be 'at risk' of failing the environmental objectives and have been provisionally classified as 'heavily modified' water bodies (Environment Agency). Brent should also aim to restore and enhance degraded habitats in the Borough, including heavily modified water bodies.
13. Availability of water resources to meet current and future demand.	Sufficient water resources to accommodate current and future needs with a growing population and increasing demand is an issue not only for Brent, but for London and the South East as a whole (as identified by the Environment Agency, water companies and the Greater London Authority). This will be an increasingly important issue given the impacts of climate change. Reducing leakage, managing demand and the possible development of new strategic water resource developments are some of the measures being undertaken to try to address this problem.

Problem	Summary and source of evidence
14. Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent.	<p>Localised surface flooding is an issue in the Borough particular at times of increased run-off.</p> <p>The LB Brent website identifies four problem areas / issues for river flooding: Welsh Harp, River Brent, Wealdstone.</p> <p>See also Figure 19: flood risk areas.</p>
15. Quality of and access to open spaces and parks, including open air sport grounds.	<p>40% of Brent residents live in open space deficient areas. (UDP).</p> <p>See also Figure 22 (Areas of nature conservation and access deficiency) under Sustainability Objective S2.</p>
16. The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment.	<p>There are 22 Conservation Areas in Brent.</p> <p>The Borough has a wide range of architectural styles from the simple to the ornate, from Victorian Italianate and Gothic Revival to Suburban 'Arts & Crafts' and planned "village" settlements. Such a diverse heritage is an essential part of the character of the Borough. (UDP)</p>
17. Energy use, energy efficiency and renewable energy, and CO₂ emissions	<p>Data on domestic energy efficiency in the Borough are not available. However efficiency is a key element in issues such as fuel poverty and health, and reducing contributions to climate change is a key commitment.</p> <p>There are only a few renewable energy schemes in the borough (AMR, 2004-05).</p> <p>Total estimated per capita CO₂ emissions in Brent in 2003 were lower than the Greater London average and that of several London boroughs (Defra (2005) Local and Regional CO₂ Emission Estimates for 2003). However, emissions have to be greatly reduced in order to meet national targets to reduce emissions to 23% below 1990 levels by 2016 (London Plan Annual Monitoring Report, 2006).</p>
18. Poor air quality along major roads and in the south of Brent, with much of southern Brent an AQMA	<p>For example Neasden Lane is the most polluted area in London for PM10 Particulate.</p>
19. Noise nuisance, both from domestic and industrial sources as well as from noise and vibration from major road routes in the Borough	<p>London Noise Mapping service (http://www.noisemapping.org/frames/Map.asp) shows that all major roads in the Borough are a source of severe localised noise pollution.</p>
Economic	
20. Unemployment and job opportunities for local people	<p>Unemployment rates are, on average, 13% and 40% above the Greater London and national figures respectively. A large proportion of Brent residents do not have the necessary basic skills for employment - 29% have basic or no numeracy skills, 17% have basic or no literacy skills and 51% have basic or no IT skills (LB Brent website).</p> <p>Figure 27 (Sustainability Objective EC2) illustrates ward-level unemployment and shows significant differences in average rates between wards.</p>

Problem	Summary and source of evidence
21. Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership.	<p>Although the Borough is generally well served by public transport it is also characterised by issues of poor interchange, particularly in key regeneration areas such as Park Royal, Wembley and Harlesden.</p> <p>The UDP states that the regeneration of some areas may be hindered unless the public transport infrastructure can be upgraded to cope with planned development and local residents are able to travel to work using alternatives to the private car.</p> <p>Figure 17 (Sustainability Objective S8) highlights areas within the Borough which are currently deficient in access to public transport.</p>
22. The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space	Land use pressures and conflicts were identified as a key issue by a workshop of council officers and other local stakeholders.
23. The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal.	Wembley and Park Royal are two key regeneration areas in the Borough and whilst realising their regeneration objectives it will also be important to ensure the adverse impacts are avoided or at least mitigated.
24. The need to support development in existing centres and ensure the health of town-centres.	The councils 'Health Check' and other evidence suggest that the relative importance of Brent's shopping centres has declined over the last few decades.

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

Sustainability Appraisal Framework

Sustainability objectives and criteria

- 3.79 The establishment of SA objectives and criteria is central to the SA process. The SA framework, based on these objectives provides a way in which sustainability effects can be described, assessed and compared. Sustainability objectives will be distinct from those of the DPDs, but in some cases may overlap.
- 3.80 The objectives for the SA proposed in the SA Scoping Report were based on those already developed for the appraisal of the adopted Brent UDP. However, the

detailed criteria were modified through the SA process to reflect the particular needs and issues identified by the three DPDs as they evolve and comments from consultees. These objectives and criteria were used for the appraisal of the Core Strategy DPD as it is intended that a common set of SA objectives and criteria will be used for the SAs of all three DPDs to provide a common appraisal framework, including the Development Policies DPD Preferred Options and Site Specific Allocations DPD Preferred Options.

- 3.81 The set of objectives and criteria used for the SAs of the Preferred Options DPDs is included in Table 8. An extended version of Table 8 is included in Appendix 6 and adds potential indicators and, where available, targets.

Table 8: Sustainability objectives and criteria

Objective	Criteria
Social	
Prosperity and Social Inclusion S1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
	Will it improve affordability of essential services?
Health S2. To improve the health of the population	Will it improve access to high quality health facilities?
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?
	Will it reduce health inequalities?
	Will it reduce death rates?
Education and Skills S3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?
	Will it improve access to high quality educational facilities?
	Will it help fill key skill gaps?
Housing S4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?
	Will it encourage mixed use and range of housing tenure?
	Will it reduce the number of unfit homes?
	Will it reduce homelessness?
Quality of surroundings S5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?
	Will it improve residential amenity and sense of place?
	Will it reduce actual noise levels?
	Will it reduce noise concerns?
Crime Prevention and & Community Safety S6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?
	Will it reduce the fear of crime?
Community Identity S7. To encourage a sense of community; identity and welfare	Will it encourage engagement in community activities?
	Will it foster a sense of pride in area?
	Will it increase the ability of people to influence decisions?
	Will it improve ethnic relations?
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?
	Will it encourage people to respect and value their contribution to society?
Accessibility	Will it improve accessibility to key local services?

Objective	Criteria
S8. To improve accessibility to key services especially for those most in need	Will it improve the level of investment in key community services?
	Will it make access more affordable?
	Will it make access easier for those without access to a car?
Environmental	
Traffic EN1. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?
	Will it increase the proportion of journeys using modes other than the car?
	Will it encourage walking or cycling?
Water Quality & Resources EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?
	Will it reduce water consumption?
Air Quality EN3. To improve air quality	Will it improve air quality?
	Will it help achieve the objectives of the Air Quality Management Plan?
	Will it reduce emissions of key pollutants?
Biodiversity EN4. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency?
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?
	Will it maintain and enhance sites designated for their nature conservation interest?
	Will it maintain and enhance woodland cover and management?
	Will it encourage protection of and increase number of trees?
Landscape & Townscape EN5. To maintain and enhance the character and quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?
	Will it enhance the quality of priority areas for townscape and public realm enhancements?
	Will it maintain and strengthen local distinctiveness and sense of place?
	Will it minimise visual intrusion and protect views?
	Will it decrease litter in urban areas and open spaces?
Historic Environment & Cultural Assets EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites, features and areas of historical and cultural value?
	Will it protect listed buildings?
	Will it help preserve, enhance and record archaeological features and their settings?
Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?
	Will it lead to an increased proportion of energy needs being met from renewable sources?
	Will it reduce emissions of ozone depleting substances?
	Will it minimise the risk of flooding from rivers and watercourses to people and property?
	Will it reduce the risk of damage to property from storm events?
Waste Management EN8. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?
	Will it reduce household waste?
	Will it increase waste recovery and recycling?
	Will it reduce hazardous waste?
	Will it reduce waste in the construction industry?
Land and Soil	Will it minimise development on greenfield sites?

Objective	Criteria
EN9. To conserve and enhance land quality and soil resources	Will it ensure that, where possible, new development occurs on derelict; vacant and underused previously developed land and buildings?
	Will it ensure land is remediated as appropriate?
	Will it minimise the loss of soils to development?
	Will it maintain and enhance soil quality?
	Will it reduce the risk of subsidence?
Economic	
Growth EC1. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people?
	Will it improve business development and enhance productivity?
	Will it improve the resilience of business and the local economy?
	Will it promote growth in key sectors?
	Will it promote growth in key clusters?
	Will it enhance the image of the area as a business location?
Employment EC2. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment?
	Will it provide job opportunities for those most in need of employment?
	Will it help to reduce long hours worked?
Regeneration EC3. To reduce disparities in economic performance and promote sustainable regeneration	Will it help to improve earnings?
	Will it promote regeneration, reducing disparity with surrounding areas?
Investment EC4. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?
	Will it encourage inward investment?
	Will it make land and property available for business development?
Efficient Movement EC5. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?
	Will it improve accessibility to work by public transport; walking and cycling?
	Will it reduce journey times between key employment areas and key transport interchanges?
	Will it facilitate efficiency in freight distribution?

4. IMPLEMENTATION AND MONITORING

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

- 4.1 The Core Strategy, Development Policies and Site Specific Allocations are 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.
- 4.2 The Brent LDF will replace the UDP as the statutory plan for Brent and will be made up of an evolving suite of DPDs and SPDs (known collectively as Local Development Documents – LDDs). The Core Strategy is the key DPD in that it sets the highest level strategic objectives and policies for the LDF. However ensuring these objectives are met will depend on the detailed implementation and site-specific expression set out in the Development Policies DPD, Site Specific Allocations DPD, Proposals Map DPD and Area Action Plan DPDs (such as those proposed for Wembley and Park Royal). In addition to provide further guidance or explanation, SPDs for specific issues linked to DPD policy, such as sustainable construction and South Kilburn Housing Regeneration, will be / have been prepared.
- 4.3 Once major sites and regeneration schemes identified within the Core Strategy and other DPDs come forward they may require an Environmental Impact Assessment undertaken.
- 4.4 The DPDs are being developed with reference to a large number of national and regional plans and strategies. At the highest level they need to reflect 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 DPDs are linked to policies, strategies and targets set out in GLA documents and the London Plan (alterations), which has for example set targets for housing development and affordable housing provision.
- 4.5 In addition, the DPDs are 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.
- 4.6 Specific aspects of implementation in relation to the Development Policies DPD and Site Specific Allocations DPD are explored in more detail in sections 7 and 10 of Parts B and C of this SA Report respectively.

Proposals for monitoring

- 4.7 The SA Report for the Core Strategy DPD Preferred Options (October 2006) set out monitoring proposals for the significant sustainability effects of implementing the Core Strategy, which is a fundamental part of the SA process. It is important to monitor performance against the sustainability objectives, which form the core of the appraisal process, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken. Much of this section on Implementation and Monitoring is a repeat of what was stated for the Core Strategy, as the DPDs will be implemented in combination and their effects will be monitored within a coordinated framework rather than separately. However, where there are specific aspects of monitoring in relation to the Development Policies DPD and Site Specific Allocations DPD that need to be highlighted these are explored in more detail in sections 7 and 10 of Parts B and C of this SA Report respectively.
- 4.8 The SEA Directive requires the significant environmental effects of a plan or programme to be monitored and that the Environment Report (which is incorporated into 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..."
- 4.9 In addition, The Planning and Compulsory Purchase Act 2004 requires a 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.
- 4.10 Brent has produced an AMR⁷⁶ for the period 2005 – 2006, which sets out "a *concise overview of development activity within Brent during 2005 – 2006*" and an "outline [of] progress towards the new Local Development Framework (LDF)". As the Core Strategy DPD, Development Policy DPD and Site Specific Allocations DPD are finalised and other elements of the LDF are developed, the monitoring of these will be explicitly addressed through updates to the AMR.
- 4.11 ODPM (now DCLG) has published a good practice guide on monitoring LDFs⁷⁷, which proposes (though these are not a statutory requirement) three levels of indicators:

⁷⁶ *Enabling Development in Brent, Annual Monitoring Report 2005 - 06.*

⁷⁷ *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005.
<http://www.communities.gov.uk/index.asp?id=1143905>

- **Contextual indicators** – which provide monitoring of the background against which the LDF operates.
 - **Output indicators** – which enable monitoring of specific policies included in the LDF.
 - **Significant effects indicators** – which provide monitoring of the important ‘effects’ of the LDF as identified by the Sustainability Appraisal.
- 4.12 This hierarchy of indicators provides a practical approach which enables SA monitoring to be incorporated within the wider AMR process required for the LDF. It is proposed that such an approach and indicator hierarchy be considered for monitoring purposes in relation to this SA and the Brent LDF.
- 4.13 Although the significant effects indicators proposed here are in relation to the effects identified for the Core Strategy DPD Preferred Options, this framework will be adapted and expanded to meet the monitoring needs of the SAs of other DPDs as these emerge, including the Development Policy DPD Preferred Options and Site Specific Allocations DPD Preferred Options (see sections 7 and 10 of Parts B and C of this SA Report respectively).
- 4.14 Further information and description of these three levels of indicators is provided below, including discussion of the significant effects of the Core Strategy as identified by its SA, and proposed indicators for monitoring them.

Contextual and output indicators

- 4.15 Contextual indicators aim to provide the background information (i.e. set the context) against which the effects of implementation of the DPD can be measured (in the case of Brent’s AMR, this is likely to consider effects of the LDF as a whole). The Government best practice guide on monitoring LDFs suggests that contextual indicators should draw on existing sources of information and be structured to build an environmental, social and economic baseline for the area. Chapter 1 of the existing Brent AMR contains a baseline for the Borough entitled “*Brent: Between Inner and Outer London*”. While it may be necessary to adapt this in light of the emerging LDF, and increase the coverage of environmental indicators, it does cover the majority of key topics for contextual indicators as suggested by the Government guidance:

Key topics for contextual indicators:

Demographic structure: population size, household types, ethnic composition, and social groups

Socio-cultural issues: crime rates, unemployment level and deprivation

Economy: economic activity rates, household income, house price level, productivity and employment

Environment: key assets in the natural environment

Housing and built environment: housing stock conditions and quality and assets of the

built environment

Transport and spatial connectivity: transport accessibility, regional hub, spatial inequality / uneven distribution of activities

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

LDF Core Output Indicators⁷⁸:

Business Development

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

Housing

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

⁷⁸ Based on Table 4.4 of *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005 – see note 2

Transport

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

Local Services

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

Minerals (for minerals planning authority only)

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

Waste (for waste planning authority only)

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

Flood Protection And Water Quality

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

Biodiversity

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

Renewable Energy

- 9. Renewable energy capacity installed by type.

Significant effects indicators

- 4.18 The guidance on monitoring LDFs states that significant effects indicators should be linked to the SA objectives and indicators. The monitoring of significant effects is intended to enable a comparison between the predicted effects (as set out in the appraisal) and the actual effects seen during implementation of the policies (as set out in the DPD). Taken with the contextual and output indicators, sufficient numbers of significant effects indicators should be developed to ensure robust assessment of policy implementation.
- 4.19 Table 9 sets out potential indicators for the significant sustainability effects identified through the SA process (each significant effects relates to one or more of the sustainability objectives). Where possible, existing indicator sources are used. In addition, where we are aware that there is a lack of data or no existing indicator relevant to a particular significant effect this is noted.

Table 9: Significant sustainability effects associated with the Core Strategy DPD Preferred Options and potential indicators

Significant effects (most relevant sustainability objective code)	Potential indicators⁷⁹	Comments / gaps⁸⁰
Increased housing development (S1, S4, EN7)	Population and demographics (age structure etc.) Number / percentage increase in housing development / completions (See Core Output indicators 2a – 2d) Development in flood risk areas (See Core Output indicators 7)	Already monitored / available
Decreased affordability of housing (S1, S4)	Number / percentage of affordable home completions	Already monitored / available
	House prices Income to house price ratio	Already monitored / available Suggested source - Joseph Rowntree Foundation (www.jrf.org.uk)
Reduced social exclusion and inequalities deprivation, including access to services and amenities (S1, S2, S3, S8)	(See Core Output indicators 3a, 3b and 4a – 4c) Index of Multiple Deprivation % households experiencing fuel poverty Surveys of access / ease of access Net change of floorspace in D2 use % of people living within easy walking distance of local amenities (local shops, post office, etc.) No of GPs per 1000 population Qualifications of working age residents Provision of new or extended community facilities / Protection of existing community facilities Developer contributions towards new or improved community facilities	Already monitored / available
Improved townscape and public realm (S5, S7, EN5)	Area of townscape considered to be of low quality % vacant floorspace in primary shop frontages % residents who are satisfied with their neighbourhoods as a place to live	Already monitored / available
Reduced crime and fear of crime (S6)	Fear of crime Actual levels of crime	Already monitored / available
Improved standards of design and construction in development (EN2, EN3, EN7)	Number of developments meeting EcoHomes 'good' or 'very good' standards	Already monitored / available

⁷⁹ Note the Core Output Indicator reference numbers used here relate to the list above of "LDF Core Output Indicators". Also note that the Development Policies Preferred Options document presents details of Core Output Indicators and Local Output Indicators organised by the LDF Strategic Objectives included in the Core Strategy Preferred options (see section 7).

⁸⁰ Note the comments and gaps have been updated since SA Report where there have been key changes in data availability etc.

Significant effects (most relevant sustainability objective code)	Potential indicators⁷⁹	Comments / gaps⁸⁰
Increased pressure on open space, biodiversity and habitats (S5, EN4, EN5)	(See Core Output indicator 8) % development on previously developed land Area of outdoor sports land for community use Loss of Greenfield land % population living within 200m of open space Meeting Brent BAP targets Provision of new or improved children's play areas Improvement of existing and provision for new or extended Public Open Space	Already monitored / available
Increased noise and nuisance (S5)	Population density Noise complaints Road / ambient noise mapping	Already monitored / available
Increased resource use, waste generation and CO ₂ emissions (EN1, EN2, EN3, EN7)	See Core Output indicators 6a and 6b Domestic energy efficiency CO ₂ emissions from all sources % energy from renewable sources Renewable energy installed by type (megawatts) No. of major applications incorporating onsite renewable energy generation Number of developments meeting EcoHomes 'good' or 'very good' standards Waste collection, composition and disposal routes / %s Domestic water consumption Sustainable water use in new development	Most already monitored / available Likely gap - domestic energy efficiency and CO ₂ emissions and % energy from renewable sources – possible source Brent Energy Network Likely gap - domestic water consumption
Improved public transport infrastructure (S8, EN1, EN3, EN7, EC5)	Transport modal split Access to public transport PTAL score for new development	Already monitored / available
Increased walking and cycling (S2, S8, EN1, EN3, EN7, EC5)	As above	Already monitored / available
Increased traffic (S2, S8, EN1, EN3, EN7, EC5)	Traffic levels per annum Peak / off peak traffic flows and speed	Already monitored / available
Reduced air quality (S2, EN1, EN3, EN7)	Days when air quality is moderate or higher Air quality monitoring results (based on results from the 5 monitoring stations in LB Brent)	Already monitored / available
Reduced loss of employment land (EC1, EC2, EC3, EC4)	See Core Output indicators 1a – 1f	Already monitored / available

Significant effects (most relevant sustainability objective code)	Potential indicators⁷⁹	Comments / gaps⁸⁰
Reduced unemployment (S1, EC1, EC2, EC3)	Change in claimant count unemployment rate Long-term unemployment (percentage of unemployed who have been out of work for over one year) % People in Work-less Households	Already monitored / available
Increased investment in regeneration areas (EC1, EC2, EC3, EC4)	Percentage change in the total number of VAT registered businesses in the area	Already monitored / available
Enhanced perceptions / image of Brent (S5, S7, EC3, EC4)	Surveys of perceptions	Possible gap – suggested source: Mori polls Brent may need to commission new surveys