

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

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



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**Prepared for London Borough of Brent
by
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ABBREVIATIONS

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

PART C: APPRAISAL OF THE SITE SPECIFIC ALLOCATIONS DPD

8. SITE SPECIFIC ALLOCATIONS ISSUES AND OPTIONS

Introduction

8.1 Sections 8 to 10 of the SA Report (Part C) present the findings of the SA of the Draft Site Specific Allocations DPD Preferred Options and in particular Stage B of the SA process – *Developing and Refining Options* (see Section 2 of the SA Report which describes the Stages in the SA process). Sections 7 to 9 broadly cover the different tasks which make up Stage B of the SA process, namely:

- **Section 8:** testing the DPD objectives against the SA objectives (task B1) and developing the DPD options (task B2);
- **Section 9:** predicting and evaluating the effects of the DPD (tasks B3 and B4), mitigating the adverse effects and maximising the beneficial effects (task B5); and
- **Section 10:** proposed measures to monitor the significant effects of the DPD implementation (Task B6).

8.2 See Sections 1 to 4 (Part A) of the SA Report, the Sustainability Context, for details of the findings of the tasks broadly under Stage A of the SA process, as well as background on the LB Brent LDF, the three initial DPDs and the SA.

Compatibility of the DPD and sustainability objectives

Purpose of testing the compatibility of the objectives

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

Objectives of the DPD

8.4 The Site Specific Allocations DPD Preferred Options includes key objectives that aim to support the achievement of the Spatial Vision for Brent (Chapter 4 of the Core Strategy DPD Preferred Options). This vision is stated to be the spatial expression of four Brent strategies (i.e. Community Strategy, Corporate Strategy, Regeneration Strategy and the Vision for Wembley) and has also been developed from the views gathered during the consultation process on Issues and Options papers¹.

8.5 The Site Specific Allocations objectives are²:

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

² Reproduced verbatim from the Site Specific Allocations DPD Preferred Options (LB Brent, June 2007)

1. **To support the role of the Spatial Strategy, set out in the Core Strategy DPD**, with particular regard to growth areas at Wembley, Alperton, Church End, South Kilburn and Burnt Oak/Edgware Road by identifying potential development opportunities.
2. **To identify opportunities for particular uses or mixes of uses** following a robust and credible assessment of suitability, availability and accessibility.
3. **To facilitate new and/or improved community based facilities and services** to meet current and future demand by identifying appropriate sites.
4. **To demonstrate the advantages of assembly of land parcels** to encourage a comprehensive approach to achieve the best disposition of land uses and the creation of high quality places.
5. **To identify and manage the potential impacts of development** upon the natural and built environment, residents, workers, businesses and visitors.
6. **To establish broad principles of development and appropriate conditions** that may be applied having regard for social, economic and environmental factors.

Compatibility of the sustainability and DPD objectives

- 8.6 The results of testing the DPD objectives against the sustainability objectives are included in Table 33. Note that details of the sustainability objectives are included in Table 8 in Section 3 of the SA Report (Part A).
- 8.7 Objectives 1 to 3 of the Site Specific Allocations DPD Preferred Options focus on facilitating development in growth areas, identifying opportunities for particular uses and facilitating new or improved community facilities. These three objectives are therefore seeking to enable different types of development. Objectives 4 to 6 focus on providing criteria and the conditions on how the development will take place and how to manage the potential impacts.
- 8.8 The DPD objectives and the sustainability objectives are predominantly compatible, with a few areas of potential conflict. The areas of potential conflict are mainly between those DPD objectives seeking to support built development (objectives 1 to 3), and some of the sustainability objectives relating to the protection and enhancement of the environment. This is due to the potential increase in emissions, resource use and waste generated, for example as a result of both the construction and operation of these new buildings. It should be possible to reduce the scale of these potentially negative effects through conditions which are clearly stated in the description of the preferred use of each site, the forthcoming Development Policies DPD, by promoting sustainable construction and access to public transport for example. However, there is still likely to be a net increase in emissions, resource use and waste compared with the present baseline. This will be particularly significant where current problems or standards are being exceeded (e.g. air quality within AQMAs, water resources and noise nuisance levels in certain areas).

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- 8.9 The mixed scores for the DPDs objectives 1 and 2 under sustainability objective S5 *Quality of surroundings* reflect that these objectives have the potential to improve the quality of the areas where the new development will take place, but on the other hand they could have a negative impact on the levels of noise. The score for objective 3 of the DPD Preferred Options reflects that building new community facilities may improve the quality of surroundings but also affect the levels of noise, but this is not as certain as objectives 1 and 2 as the development of community facilities is likely to be of smaller scale than other types of development.
- 8.10 Objectives 4 to 6 are generally compatible or neutral with all the sustainability objectives, as these objectives generally aim to manage the impacts of the development.

Table 33: Compatibility of the DPD and sustainability objectives

DPD Objectives		Sustainability Objectives																						
Key: Positive compatible: <div>+</div> Neutral: <div>0</div> Possible conflict: <div>-</div> Uncertain <div>?</div>		Social								Environment									Economic					
		S1. Prosperity & Social Inclusion	S2. Health	S3. Education & Skills	S4. Housing	S5. Quality of Surroundings	S6. Crime Prevention & Community Safety	S7. Community Identity	S8. Accessibility	EN1. Traffic	EN2. Water Quality & Resources	EN3. Air Quality	EN4. Biodiversity	EN5. Landscape	EN6. Historic Environment & Cultural Assets	EN7. Climate Change	EN8. Waste Management	EN9. Land & Soil	EC1. Growth	EC2. Employment	EC3. Regeneration	EC4. Investment	EC5. Efficient Movement	
1. To support the role of the Spatial Strategy, set out in the Core Strategy DPD, with particular regard to growth areas at Wembley, Alperton, Church End, South Kilburn and Burnt Oak/Edgware Road by identifying potential development opportunities		+	+	0	+	+	-	0	0	+	+	-	-	0	0	0	-	-	+	+	0	+	0	+
2. To identify opportunities for particular uses or mixes of uses following a robust and credible assessment of suitability, availability and accessibility		+	+	0	+	+	-	0	0	+	+	-	-	0	0	0	-	-	+	+	0	+	+	+
3. To facilitate new and/or improved community based facilities and services to meet current and future demand by identifying appropriate sites		+	+	+	0	?	0	+	+	+	-	-	0	+	0	-	-	0	0	0	+	0	0	
4. To demonstrate the advantages of assembly of land parcels to encourage a comprehensive approach to achieve the best disposition of land uses and the creation of high quality places		+	+	0	+	+	0	+	+	+	0	0	0	+	+	0	0	+	+	+	+	+	+	
5. To identify and manage the potential impacts of development upon the natural and built environment, residents, workers, businesses and visitors		+	+	0	0	+	+	+	+	0	+	+	+	+	+	+	+	+	+	0	+	0	0	
6. To establish broad principles of development and appropriate conditions that may be applied having regard for social, economic and environmental factors		+	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	+	

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

Approach to the development of the Site Specific Allocations

- 8.11 The allocation of land for specific uses must be set out in a DPD under the requirements of PPG12 (para 2.15-2.16). The Brent Site Specific Allocations DPD Preferred Options therefore seeks to address this requirement and identifies sites which are proposed for development to meet the Council's and the Community's vision. It also sets out any policies which refer to the development of those sites, such as the mix of uses or the form of access arrangements.
- 8.12 The SA therefore did not consider, as it was decided it was not reasonable, alternative approaches (such as relying on windfall sites) to the identification and / or allocation of sites to achieve the Core Strategy's growth aspirations as part of the early strategic appraisal of options.

Developing the issues and options

- 8.13 The consideration of issues and options in the development of the Draft Site Specific Allocations DPD is described in this section. In autumn 2005, LB Brent produced a series of Issues and Options papers under the title '*A New Plan for a Better Brent – Your Views. Issues and Options Papers*'³. These papers sought to help the council make an informed choice as to how suitable land could best be developed, and for which purposes, and how the environment could best be protected through the LDF (all the LB Brent DPDs, not just the Site Specific Allocations). These papers covered a broad range of topics to be considered within the LDF:

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

- 8.14 These Issues and Options papers were available for public consultation through LB Brent's website, and LB Brent attended all of Brent's Area Consultative Forums throughout September 2005. Comments received went towards developing the preferred options for the Site Specific Allocations DPD.

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

- 8.15 The Site Specific Allocations Issues and Options paper consisted of a list of sites where LB Brent considered that there was a strong possibility that change, such as redevelopment and/or change of use, would occur in the next 10 or so years. In order to guide, and where desirable promote, development the Council has designated land and buildings for particular uses in its LDF.
- 8.16 In this first round of consultation LB Brent sought views on the alternative options for the development of a number of sites. Views were also sought on whether it was considered that other sites, not included in the schedule, should be allocated in the development plan as an alternative use.
- 8.17 Consultees were asked to comment on one or more sites and their preferred option/s for the use of the site. LB Brent received 47 'Duly made representations' on the Site Specific Allocations. The comments received came from individuals, housing associations, businesses and developers and the following organisations: the West London Waste Authority, Brent's Art Council, Network Rail, London Borough of Barnet, London Underground, Highways Agency, Environment Agency, English Heritage, British Waterways and the Greater London Authority (GLA).
- 8.18 Most of the comments received from individuals and businesses focused on one particular site they were interested in and the use they would prefer for the site or which uses would not be appropriate, etc.
- 8.19 The Environment Agency disagreed with the development of one of the sites included in the issues and options paper on the grounds of flood risk. The site was subsequently withdrawn by LB Brent and included in the section on SSAs considered but not included. The Environment Agency also considered that a Strategic Flood Risk Assessment should be the first stage in determining the suitability of the site allocations. Additional comments by the Environment Agency covered other issues such as the need for developers to undertake a fluvial flood risk assessment of those sites who are located within a flood risk zone. The Environment Agency's comments also highlighted the requirement for developers to undertake a surface water flood risk assessment of all sites over one ha in size.
- 8.20 Other Environment Agency comments were related to biodiversity matters, in particular for those site allocations that were adjacent to sites of nature conservation importance or watercourses. They would expect any development along a watercourse (which may include canals and smaller streams) to include an 8 metres buffer zone for main watercourses and 5 metres buffer for ordinary watercourses. In addition, any developments should protect and enhance the conservation interest of the site.
- 8.21 English Heritage comments urged LB Brent to consult them and involve the Council's conservation staff in the preparation of the LDF. English Heritage highlighted that

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several sites would affect listed buildings if developed, but did not comment on particular sites.

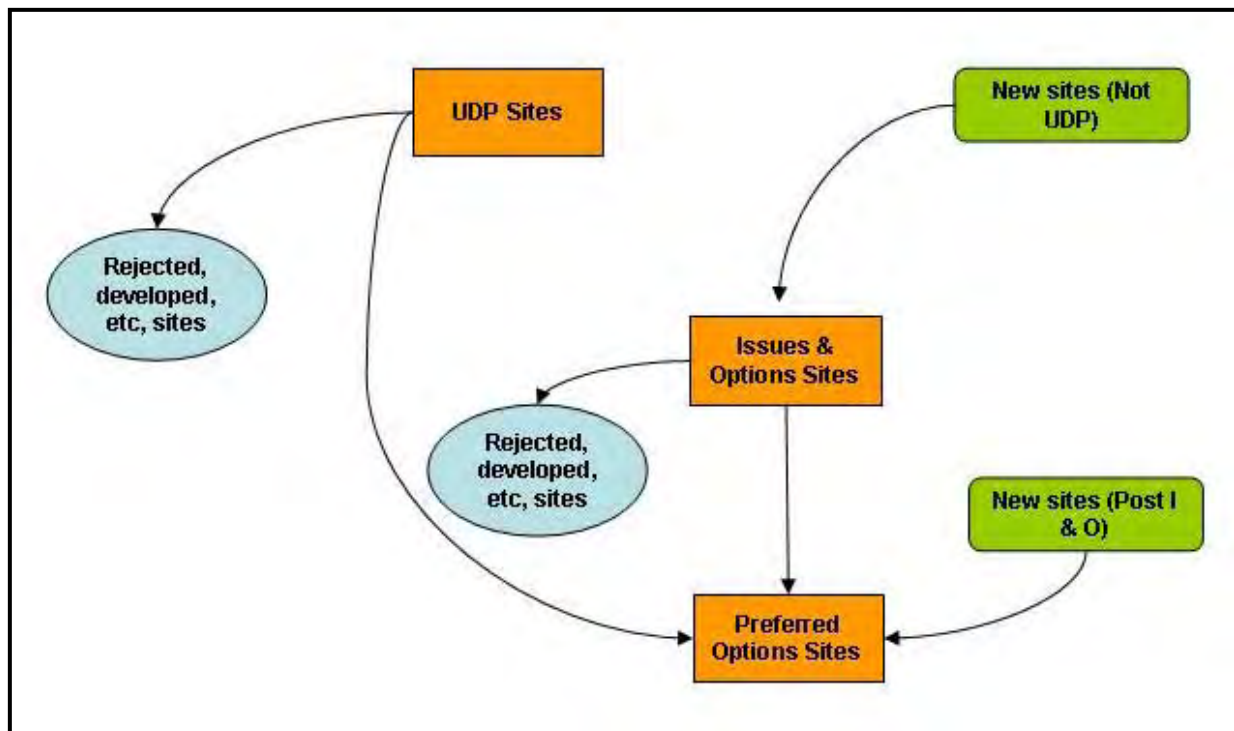
8.22 The full 47 representations can be accessed through LB Brent website⁴.

Refining the Preferred Options

8.23 At the Issues and Options stage, up to three options were proposed for each site allocation, and these were put to public consultation. Following this process, one of the options or indeed a combination of two or all three were developed by LB Brent. It is these sites which are included in Chapter 3 of the Site Specific Allocations DPD Preferred Options. However, there are a number of allocations within the Site Specific Allocations DPD Preferred Options that have not followed this process, Figure 29 illustrates this. They may be, for example:

- Existing allocations carried forward from the adopted Unitary Development Plan 2004 (UDP sites in Figure 29); or
- Allocations introduced within the period between the issues and options stage and this preferred options stage (New sites (Post I & O) in Figure 29).

Figure 29: Approaches to Site Selection



⁴ http://consultation.limehouse.co.uk/representation.do?identifier=brent&draftId=6&action=list&contentId=chapter_18
(Accessed: 4 June 2007)

- 8.24 The respective sustainability effects of these sites were considered throughout the SA process. This included using appraisal 'proformas' (see Appendix 3), which provided a template for LB Brent planning officers to consider key issues, opportunities and constraints of each site and potential sustainability strengths and weaknesses associated with them. In addition meetings were held with LB Brent to discuss emerging sites and use options.
- 8.25 The process of consideration of site allocations at issues and options stage and leading up to this preferred options stage has entailed the inclusion and exclusion of many sites. As the Site Specific Allocations DPD Preferred Options evolved, details on the alternative sites or options not selected were recorded, along with the reasons why they were rejected.
- 8.26 Chapter 4 of the Site Specific Allocations DPD Preferred Options includes a list of the rejected sites and the reasons why they have not been included in the final list. Table 34 contains those allocations that have been considered by LB Brent, but were eventually excluded from the preferred options, and the reasons given by LB Brent why they have been excluded, plus an SA comment. In some cases, allocations were excluded because alternative configurations (of size and shape) have been included.
- 8.27 Other reasons for the exclusion of allocations cited by LB Brent were:
- development having started or being completed;
 - changes in needs and priorities;
 - the site is deemed unlikely to come forward for development; or
 - for an issue related to the planning history of a site.

Table 34: Site Specific Allocations - alternative sites not selected, reasons and SA overall comment

Site no.	Site Name	Brent Planning Team- / Ward	Options considered by LB Brent at issues and options stage	LB Brent's reasons for exclusion from preferred options stage
2	Abbey Manufacturing Estate, Woodside Close	West Alperton	1. Housing and industrial 2. Housing	New allocations at Sunleigh Road and Abbey Manufacturing Estate have been identified, allowing for an improved separation between industrial and new and existing residential development and encouraging improved vehicular access.
6	Former Heinz sidings	West Stonebridge	1. Employment use 2. Waste management 3. Retain as open land	Not only is this site of nature conservation and wildlife importance, vehicular access is restricted, precluding development.
8	T Choitham and Sons, Lancelot Road	West Tokyngton	1. Housing 2. Mixed including industrial and housing 3. Industrial	Permission for development has been awarded and development is nearing completion.
13	Swaminarayan School, Gwyneth Rickus Building	West Willesden Green	1. Affordable housing and community facilities 2. Education use 3. Affordable housing	The sites within this allocation are no longer available for development.
14a	Cullen House, Salisbury Road	South Kilburn	1. Bus interchange and housing 2. Bus interchange and mixed use including housing and retail 3. Housing	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14b	Station Car Park, Salisbury Road	South Kilburn	1. Residential with car park below 2. Mixed residential and retail with car park below	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14c	Times House, Claremont Road	South Kilburn	1. Residential with car parking below 2. Mixed residential and retail 3. Residential and community facilities	This has been included in a expanded allocation to include Cullen House and the Station Car park to support a comprehensive approach to development. The council has prepared a Supplementary Planning Document for the collection of sites.
14d	British Legion, Albert Road	South Kilburn	1. Residential 2. Community facility 3. Mixed including housing and community facilities	The collective allocation for Queens Park Station entails the provision of new community facilities commensurate with the British Legion and the Albert Road Day centre. Any redevelopment of the British Legion and/or Albert Road Day Centre will be contingent on this re-provision. Therefore it is not considered appropriate to encourage the redevelopment of this site at this stage and to leave any change to occur in time as part of the New Deal for Communities programme.
14e	Albert Road Day Centre	South Kilburn	1. Housing with re-provision of community facility 2. Housing 3. Community uses	The collective allocation for Queens Park Station entails the provision of new community facilities commensurate with the British Legion and the Albert Road Day centre. Any redevelopment of the British Legion and/or Albert Road Day Centre will be contingent on this re-provision. Therefore it is not considered appropriate to encourage the redevelopment of this site at this stage and to leave any change to occur in time as part of the New Deal for Communities programme.
18	Crcklewood Broadway, Edware Road	North Mapesbury	1. Housing 2. Housing and retail	This has developed into a viable spatial cluster of retailers specializing in interior decoration and design, with off street parking above. The site is also constrained by the motor vehicle operations to the rear that despite causing local environmental nuisance, have certificates of lawful use and represent thriving local employment. Considering these reasons, and in the absence of developer interest the council is minded not to promote this allocation at this stage.
20	Chalkhill Community	North Tokyngton	1. Public Open Space and community centre 2. New School and Public Open Space	The council does not generally support the loss of open space unless there is an exceptional reason to do otherwise - for example for a new school. Although the council believes that there is

Site no.	Site Name	Brent Planning Team- / Ward	Options considered by LB Brent at issues and options stage	LB Brent's reasons for exclusion from preferred options stage
	Centre and Chalkhill Public Open Space		3. Retain as community use and Public Open Space	both a need for a new secondary school and a shortage of suitable sites, there are more suitable locations for a school in terms of accessibility. A significant section of this site is land liable to flooding and therefore difficult to support any further development.
21	Alperton House, Bridgewater Road	West Alperton	1. Employment use 2. Education 3. Housing	This site is providing well occupied employment floor space for a range of operations in a town centre location
24	Capitol House, Capitol Way	North Queensbury	1. Retail 2. Housing 3. Mixed use including retail, housing and employment uses	This has been included in a larger allocation (number 85) encompassing the buildings to the east and north east.
26	Mercedes Garage, Edware Road	North Queensbury	1. Car sales and repair 2. Mixed use including housing and retail 3. Housing	This has been included in a larger allocation (number 85) encompassing the buildings to the south and south west.
30	Marvefairs House/Carlyon Road	West Alperton	1. Employment 2. Retail 3. Mixed use including residential	This allocation has been extended to include the public house and the vacant retail warehouse to the north. The new allocation is Carlyon Road.
112	The Lyon Industrial Estate, Staples Corner	North Welsh Harp	Representations were made at issues and options stage for a mix of residential and employment uses.	The land is designated by the London Plan as a Strategic Employment Location. The Council has identified sites to meet the planned housing capacity figures through the Growth Strategy as identified within the Core Strategy (preferred options).

Overall SA Comment on Sites Considered but not included:

The following sites have been incorporated in larger allocations or split into several smaller allocations: 2, 14a, 14b, 14c, 14d, 14e, 24, 26, and 30. Two further sites have been excluded, one because the development is nearing completion (number 8) and the other because the site is no longer available for development (13).

The comments focus on the remainder sites in this table:

- Site 6: this site is part of a nature conservation area and wildlife corridor so development should be avoided. In addition, the site has no access for vehicles which makes it unsuitable for employment or waste management use.
- Sites 18, 21 and 112 are currently used for employment. The options considered for the sites included housing or mixed use including housing and education but as the sites contribute to generate employment and business for the borough there are other more suitable sites for those uses. There are further issues which constrain the development of these sites: noise levels and lack of developers interest (18) additionally site 112 is within land designated as Strategic Employment Location in the London Plan.
- Site 20: Development of this site would have resulted in loss of open space. The site is also in a flood risk area and the Environment Agency recommended that it is not included in the preferred options in their comments during the issues and options consultations. These two issues mean that development of the site should be avoided.

9. APPRAISAL OF THE SITE SPECIFIC ALLOCATIONS PREFERRED OPTIONS

Introduction to the appraisal of the Site Specific Allocations Preferred Options

- 9.1 The methodology adopted for the Sustainability Appraisal (SA) of the Site Specific Allocations Preferred Options is described in Section 2 of this SA Report (Part A). The findings of the appraisal of the site allocations included in the version of the Preferred Options issued for public consultation is presented in this section. During the development of the Preferred Options, the SA process has led to a series of changes being made to earlier draft documents and therefore measures to improve the sustainability performance of the sites have already been incorporated. Consequently, what is presented here is a description of the residual effects and proposed mitigation and enhancement measures relevant to the latest version of the Preferred Options and any outstanding SA recommendations. Additionally, four site allocations have been included since the last SA commentary was received by LB Brent in February 2007.
- 9.2 A key output of the SA process was an initial commentary and recommendations, from a sustainability perspective, on the LB Brent's draft Site Specific Allocations DPD Preferred Options dated 14th February 2007. The version of the SSA Preferred Options considered in the commentary was that supplied by LBB on 6th February 2007. The commentary focused on the key initial SA findings that could result in proposed changes to the draft Preferred Options document. See Appendix 11 for key issues identified for individual sites and SA comments on mitigation and enhancement which was originally included in the SA Commentary of 14th February 2007.
- 9.3 The note aimed to identify the key findings from the SA on the February 2007 draft of the Preferred Options to inform its possible revision by LBB officers, prior to its submission to the LB Brent Executive for consideration at their March 2007 meeting. The note emphasised in particular any changes that were recommended to the document.
- 9.4 Appendix 12 shows the changes recommended by the SA to the draft DPD and the responses from LB Brent. These fed into the final version of the Site Specific Allocations DPD Preferred Options.
- 9.5 The final Site Specific Allocations DPD Preferred Options was supplied by LB Brent on 1st June 2007. A schedule and location map of all the site allocations are included below (see Table 35, Table 36, Table 37 and Figure 30).

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9.6 Note that the numbering used in the following tables and elsewhere is that currently used by LB Brent and includes gaps in the numbering of sites due to previous sites being rejected or not included in the DPD Preferred Options. It is expected that these will be rationalised at submission stage.

Table 35: Sites in Brent's North Planning Team Area

Site no.	Site Name	Ward	Area (Ha)	Preferred Use
11	London Transport Recreation Ground, Forty Avenue	Barnhill	4.3	Community (School)
12	Brent Town Hall, Forty Lane	Barnhill	2.1	Mixed (offices, housing, community)
19	Dollis Hill Estate, Brook Road	Dollis Hill	1.7	Mixed (school, employment)
22	Metro House, 1-3 The Mall	Barnhill	1.0	Housing
23	Morrison's, West Moreland Road	Queensbury	2.3	Housing/ mixed (housing and retail)
25	Oriental City, Edware Road	Queensbury	3.0	Mixed (housing, retail, food & drink, community and leisure)
39	Alpine House, Honey Pot Lane	Queensbury	0.9	Mixed (housing and affordable workspace)
42	Kingsbury Library and Community Centre, Stag Lane	Fryent	0.5	Mixed (library and community centre and housing)
49	Garages at Barn Hill, Barn Hill Road	Barn Hill	0.08	Housing
51	Dollis Hill House, Gladstone Park	Dollis Hill	0.2	Mixed (food & drink, community, conference and hospital plus car parking)
53	Gavin/Station House, Neasden Lane	Welsh Harp	0.14	Mixed (residential, retail, food and drink)
56	The Lancer PH, Kenton Road	Kenton	0.14	Mixed (residential and retail and/or food and drink)
57	Sainsbury's Car Park, Draycott Avenue	Kenton	0.6	Residential with some retail car parking
58	Prince of Wales PH, Kingsbury Circle	Queensbury	0.3	Mixed (housing, retail and/or food and drink)
59	Theoco Garage, 3-5 Burnt Oak Broadway, Edgware	Queensbury	0.4	Mixed (housing and retail)
62	655 North Circular Road	Dollis Hill	5.1	Regeneration of industrial estate
63	Old St Andrew's Church, Old Church Lane	Welsh Harp	0.8	Community facility including place of worship
85	Capitol Way	Queensbury	3.15	Mixed (retail / car showroom with residential above)
87	Kingsbury High School, Princes Avenue and Bacon Lane	Queensbury and Fryent	10.7	Consolidation of High School campuses and recreation/sports
88	12-24 Carlisle Road	Queensbury	-	Highway widening
90	Barningham Way	Fryent	-	Highway widening
91	Oxgate Lane	Dollis Hill	-	Link road
92	Humber Road	Dollis Hill	-	Service road
93	Site Adjoining the Link, Staples Corner	Dollis Hill	-	Link road
104	Sarena House, Grove Park	Fryent	1.1	Mixed (housing and affordable workspace)
107	1-15 Holmstall Parade	Queensbury	-	Parking bays and landscaping

Table 36: Sites in Brent's South Planning Team Area⁵

Site no.	Site Name	Ward	Area (Ha)	Preferred Use
15	117-119 Malvern Road	Kilburn	0.16	Housing
16	Kilburn Square, Kilburn High Road	Kilburn	0.6	Mixed (housing, residential, community and market space)
17	Former State Cinema/ Mecca Bingo, Kilburn High Road	Kilburn	1.4	Mixed (community, arts and culture, retail, employment)
27a	Asiatic Carpets, High Road, Church End	Dudden Hill	2.3	Mixed (residential, employment)
27b	Ebony Court, High Road, Church End	Dudden Hill	0.5	Residential
27c	White Hart PH, High Road, Church End	Dudden Hill	0.4	Mixed (residential and indoor market)
27d	Church End local centre, High Road, Church End	Dudden Hill	1.4	Mixed (residential, retail and

⁵ In Bold: sites added after SA Commentary (14 February 2007)

Site no.	Site Name	Ward	Area (Ha)	Preferred Use
				market space)
33	Mayo Road and St Mary's Open Space, Church End	Harlesden	2.0	Mainly housing subject to public open space
34	Queens Parade, Walm Lane, Willesden	Willesden Green	0.07	Mixed (retail and/or food and drink with residential above)
61	Queens Park Station, Salusbury Road	Kilburn	0.6	Mixed (residential, community, retail, open space and bus interchange)
71	Manor Park Road, Acton Lane	Harlesden	0.25	Housing
72	92a Villiers Road, Willesden	Willesden Green	0.2	Housing
73	103 Mount Pleasant Road, Brondesbury Park	Bondesbury Park	0.2	Housing
75	Hawthorn Road, Willesden	Willesden Green	0.2	Housing
80	Former Willesden Court House, St Mary's Road	Harlesden	0.15	Mixed (community facility with residential above)
82	387-395 Chapter Road	Willesden Green	0.25	Housing
84	Lonsdale Road, Kilburn	Queens Park	0.85	Mixed (retail/ food and drink, residential, affordable/creative workspace and education)
99	Junction of Sidmouth Road and Willesden Lane	Willesden Lane	-	Junction widening
100	Canterbury House, Canterbury Road	Kilburn	0.65	Mixed (office, community, residential)
103	Land rear of 12 - 14 Bridge Road	Harlesden	0.1	Housing
109	Dudden Hill Lane/ Grange Court	Dudden Hill	1.2	Mixed (retail and housing)
110	Dudden Hill Lane/ Birse Crescent	Dudden Hill	1.2	Mixed (retail and housing)

Table 37: Sites in Brent's West Planning Team Area⁶

Site no.	Site Name	Ward	Area (Ha)	Preferred Use
1	Atlip Site, Ealing Road, Alperton	Alperton	1.9	Mixed (housing, amenity, employment)
3	Twyford Tip, Abbey Road, Park Royal	Stonebridge	5.3	Mixed (waste facility, energy generation and employment)
4	Former Guinness Brewery, Park Royal	Stonebridge	8	Mainly employment but health/ and or education and some residential acceptable
5	Careys Site, Acton Lane, Park Royal	Stonebridge	2.5	Mainly employment and hospital expansion, with key worker housing for hospital workers
7	Former Unisys Site, North Circular Road	Stonebridge	2.85	Mixed (employment, sport and recreation, community, housing)
9	Vale Farm Leisure Centre	Sudbury	4.5	Indoor and outdoor sports and recreation
10	Northwick Park Hospital	Northwick	18.6	Hospital with ancillary retail and leisure and key worker housing for hospital workers
28	Wembley West End, Wembley High Road	Wembley Central	0.8	Mixed (retail, residential and car park)
32	Northfields Industrial Estate	Alperton	8.5	Mixed (employment and residential)
36	Abbey Estate, Beresford Avenue	Alperton	1.7	Mixed (work/live, affordable workspace and residential)
37	Dirkan Site, North End Road, Wembley	Tokington	0.5	Mixed (residential and workspace)
43	Abbey Manufacturing Estate, Woodside Close, Alperton	Alperton	1.2	Mixed (residential, amenity and workspace)
44	Sunleigh Road, Alperton	Alperton	1.6	Residential led mixed use
46	Carlyon Road, Ealing Road, Alperton	Alperton	2.6	Mixed (residential, amenity, employment)
83	Land Adjoining St Johns Church, 614 High Road	Sudbury	0.6	Mixed (residential and community facility)
97	Footbridge at Waxlow Road	Stonebridge	-	Footbridge
98	South Way	Tokington	-	Continuation and completion of Stadium Access Corridor
101	Shubette House/Karma House/Apex House/ Olympic	Tokington	0.89	Mixed (residential, hotel, office,

⁶ In Bold: sites added after SA Commentary (14 February 2007)

Site no.	Site Name	Ward	Area (Ha)	Preferred Use
	Way			workspace, leisure, food and drink)
102	Kelaty House/Wembley Stadium Industrial Estate	Tokington	5.4	Mixed (employment-led including leisure, offices and residential)
105	Brook Avenue, Wembley	Preston	0.9	Housing
106	Minavil House and Unit 7 Rosemont Road	Alperton	0.5	Mixed (affordable office and workspace and residential)
108	Land rear of 1-23 Vivian Avenue	Tokington	0.7	Improvement of facilities and access for open space and sports use and some housing to facilitate this.
111	Harlesden Plaza	Harlesden	1.9	Mixed (including town centre and retail uses, housing and open space)

Detailed appraisal of the key sustainability issues of the Draft Site Specific Allocations DPD Preferred Options

9.7 An appraisal was undertaken of each site allocation in the Preferred Options document. LB Brent planning team were asked to fill in a proforma which covered these key constraints and opportunities for each site. LB Brent was provided with five different proformas according to the preferred use of the site, all five have been included in Appendix 3:

- Housing
- Employment
- Community
- Transport
- Mixed use

9.8 An appraisal was undertaken of each site allocation in the Preferred Options document against a series of issues / constraints and opportunities using the proformas completed by LB Brent planning policy team and GIS information (See Appendix 3). The information contained in the proformas has been summarised in Tables A, B and C included in Appendix 10. The appraisal criteria varied depending whether the preferred use of the site was housing, employment, community, transport or mixed use, but include:

- Access to most deprived areas
- Location of sites in growth / strategic employment areas
- Location of sites areas that are a priority for regeneration
- Sites that will result in loss of open space
- Sites that are located in areas of open space deficiency
- Accessibility by public transport / PTAL Score of site

- Sites located in the proximity of nature conservation importance sites / SSSIs
- Sites located in flood risk areas
- Sites that affect listed buildings or are within a Conservation Area
- Sites located within an existing MOL boundary
- Sites within Air Quality Management Areas
- Noise Levels
- Sites located in greenfield land

9.9 Originally, other additional criteria/ constraints had been included in the proformas, namely: distance to a GP, Primary Schools and Secondary Schools and location of retail sites in town centres. However, these were not taken forward due to either lack of information or where the criterion would be best assessed on a site by site case.

9.10 Table 38 summaries the results of this appraisal. Please note that some of the recommendations for mitigation could be included in planning briefs and other guidance document that LB Brent has prepared or is preparing for some of the sites. A list of sites that will have accompanying guidance documents was provided by LB Brent and has been included in Table 39.

Table 38: Summary of all sites by key issues, SA Comments and mitigation and enhancement

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
Access to most deprived areas (for employment/ community/ mixed use including employment or community uses)	<p>See Figure 31 which shows the relevant allocated sites and multiple indices of deprivation.</p> <p>South: Most employment (including retail) or community sites or mixed sites that include either use are within or close to SOAs that are in the 10 or 20% most deprived. Two sites: 34 Queens Parade and 84 Lonsdale Road are accessible from SOAs in the 30% most deprived.</p> <p>North: The following sites which include employment and/or community are within or close to the 10 to 20% most deprived: 11 London Transport Ground and 12 Brent Town Hall. Three other sites are within or adjacent to SOAs in the 30% most deprived: 19 Dollis Hill Estate, Brook Road, 51 Dollis Hill House and 87 Kingsbury High School.</p> <p>West: The following sites are within or adjacent to the 10 or 20% most deprived SOAs: 3 Twyford Tip, 4 Former Guinness Brewery, 5 Carey's Site, 7 Former Unisys Site, 28 Wembley West End, 32 Northfield Industrial Estate and 111 Harlesden Plaza. Site</p>	<p>Promoting growth and regeneration in the most deprived parts of the borough an important objective underpinning the Core Strategy. This is particularly important factor for the employment and community allocations.</p> <p>The appraisal found that the majority of the employment (including retail) or community sites or mixed sites that include either use were within or close to SOAs that are in the 10 or 20% most deprived. The few sites not within or near the most deprived areas are justified by being near / within a growth area or being the redevelopment of existing use providing employment (e.g. site 10 Northwick Park Hospital)</p>	None identified

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
	<p>83 Land Adjoining St John's Church is within or adjacent a SOA in the 30% most deprived. Site 108 Vivian Avenue is located in the 30-40% most deprived wards.</p> <p><i>Note: based on GIS information only</i></p>		
<p>Location of sites in growth/ strategic employment areas</p> <p>(for employment/ community/ mixed use including employment or community uses)</p>	<p>The following employment (including retail) or community sites or mixed sites that include employment and/or community uses are <u>not</u> in strategic employment or growth areas:</p> <p>North: 19 Dollis Hill Estate, Brook Road 39 Alpine House 42 Kingsbury Library 53 Gavin House/ Station House 63 Old St. Andrews Church 87 Kingsbury High School</p> <p>West: 9 Vale Farm Leisure Centre 10 Northwick Park Hospital</p> <p>South: 34 Queens Parade 80 Former Willesden Court House, St Mary's Road</p> <p>A few additional sites are not located in designated employment or growth areas but are within town centres in decline and deprived areas: 111 Harlesden Plaza (West), 109 Dudden Hill Lane/ Grange Court and Dudden Hill Lane/Birse Crescent (South).</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Policy CP SS4 on Commercial Regeneration promotes Park Royal, Staples Corner, Wembley/ Neasden and East Lane as strategic industrial/ business locations where redevelopment for incompatible uses will be resisted, new development for business and industry will be encouraged, and investment in new infrastructure, such as transport improvements will be focused. In addition mixed use development, including employment generating uses, will be promoted in town centres and in the Wembley regeneration area.</p> <p>The majority of the relevant allocated sites are within strategic employment or growth areas. The few sites allocated outside these areas are generally small sites or are proposed for community uses (e.g. schools, hospitals, places or worship etc).</p> <p>Loss of employment land to other uses (particularly residential) in areas where employment is a priority appears to have been avoided.</p>	None identified
<p>Location of sites areas that are a priority for regeneration</p> <p>(for housing/ community/ mixed use including residential and community use)</p>	<p>The following sites (housing or mixed use including residential) are not located in areas that are a priority for regeneration:</p> <p>North: 22 Metro House, 1-3 The Mall 23 Morrison's West Moreland Road 49 Garages at Barn Hill, Barn Hill Road 56 The Lancer PH, Kingsbury Circle 57 Sainsbury's Car Park, Draycott Avenue 58 Prince of Wales PH, Kingsbury Circle</p> <p>South: 82 387-395 Chapter Road</p> <p>West: 83 Land Adjoining St John's Church, 614 High Road</p> <p>A few additional sites are not located in areas that are a priority for regeneration but are within deprived areas: 111 Harlesden Plaza (West), 109 Dudden Hill Lane/ Grange Court and 110 Dudden Hill Lane/Birse Crescent</p>	<p>Areas that are a priority for regeneration or growth benefit from good accessibility by public transport. Core Policy SS3 requires that these areas should be the focus for population growth and housing development. However, housing development outside these areas can be justified as it would contribute to delivering the additional homes that LB Brent are required to accommodate and would also contribute to the provision of affordable homes, which Brent is aiming to account for 50% of all new homes (see CP SS2).</p> <p>See also section below on accessibility</p>	<p>Where accessibility by public transport is an issue, improvements (see section on accessibility below) should be provided as part of the development of a site or group of sites.</p> <p>The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores⁷.</p>

⁷ See Table 3, Section 3.5.1 of 2004 London Housing Capacity Study

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
	(South). <i>Note: Based on information from proformas filled in by LBB's officers</i>		
Sites that will result in loss of open space	<p>Development of site 11 London Transport Recreation Ground (North) would result in some loss of open space. However, the majority of open space would be maintained and the development of the site would provide sports and recreational facilities open to the public.</p> <p>Development of site 9 Vale Sports Centre (West) would also possibly result in the loss of open space. However, the preferred use would result in improved sports and recreational facilities.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Open space should be protected in all but exceptional circumstances. Policy CP SS3 Protecting the Built and Natural Environment states that <i>'Development will not generally be permitted on the Borough's open spaces'</i>.</p> <p>The draft policy DP OS 1 reiterates this and states that development on open space will only be permitted where a series of criteria can be demonstrated, including that <i>'the open character is maintained, particularly along open areas prominent or visible from the main road network, and the open space is enhanced for amenity and outdoor recreation use and/or a place for plant and animal habitats'</i></p>	In the two cases highlighted, the circumstances would appear to justify the preferred uses. However, appropriate conditions set out in DP OS 1 will need to be applied to the sites.
Sites that are located in areas of open space deficiency (for housing/mixed use including residential sites)	<p>Numerous housing or mixed use including residential sites are located in areas of open space deficiency. See Figure 32.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers and GIS information</i></p>	<p>In areas of open space deficiency, opportunities to improve public and private outside space should be sought as part of the development of any of these allocated sites as required by the policies cited below. This requirement should be included in the description of the preferred use of sites that are located in areas of open space deficiency.</p> <p>Core Strategy , para. 6.4.8: <i>'where development would result in additional pressure on existing public open space, particularly where public open space is not easily accessible by foot, cycling or public transport, to a proposed development, on-site provision or contributions towards new or improved public open space, nature conservation and play facilities will be required. Usable on-site amenity space will also be required within new residential developments'</i>. Policy CP OS1 states that <i>'New or improved provision will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created'</i>.</p> <p>Policy DP OS 8 on the provision and enhancement of open space and nature conservation, requires that <i>'Adequate provision for new or improved open space and sites for nature conservation will be required from all major developments. Where this cannot be provided, compensation will be sought through appropriate conditions or contributions towards the value of new or enhanced provision'</i></p>	Contributions to new open, amenity and sports space should be sought as part of the development of those sites that are in areas of open space deficiency in accordance with the relevant Core Strategy and DP policies.

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
		<i>elsewhere in the Borough'</i>	
Accessibility by public transport / PTAL Score of site	<p>See Figure 33 which shows the accessibility of allocated sites to public transport.</p> <p>The following sites would require improvements to accessibility by public transport or/ and have low PTAL scores⁸:</p> <p>North: 19 Dollis Hill Estate, Brook Road 22 Metro House, 1-3 the Mall 25 Oriental City, Edgware Road 39 Alpine House, Honey Pot Lane 42 Kingsbury Library and Community Centre 49 Garages at Barn Hill 51 Dollis Hill House, Gladstone Park 59 Theoco Garage, 3-5 Burnt Oak Broadway, Edgware 62 655 North Circular Road 63 Old St. Andrews Church 85 Capitol Way 87 Kingsbury High School 104 Serena House</p> <p>South: 73 103 Mount Pleasant Road 75 Hawthorn Road 103 Land Rear of 12-14 Bridge Road</p> <p>West: 4 Former Guinness Brewery 5 Careys Site, Acton Lane 9 Vale Farm Leisure Centre 32 Northfields Industrial Estate 36 Abbey Estate, Beresford Avenue 43 Abbey Manufacturing Estate, Woodside Close 44 Sunleigh Road 46 Carlyon Road 102 Kelaty House/ Wembley Stadium Industrial Estate 108 Land rear of 1-23 Vivian Avenue</p> <p><i>Note: Based on information from proformas filled in by LBB's officers and GIS information</i></p>	<p>Development should occur in locations that are accessible by public transport, walking and cycling (Core Policy SS7 Sustainable Communities).</p> <p>Where a site is not accessible by public transport, walking and cycling contributions to improvements should be sought from developments in accordance with Core Policy CP TRN1.</p> <p>The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores⁹.</p>	<p>Where accessibility by public transport is an issue, improvements should be provided as part of the development of a site or group of sites. Additionally, other forms of transport, namely walking and cycling should be facilitated.</p> <p>The density of housing (i.e. dwellings per hectare) should reflect the PTAL score of the site, i.e. low densities are appropriate for areas with low scores¹⁰.</p>
Sites located in the proximity of nature conservation importance sites/ SSSIs	<p>See Figure 5 which shows the allocated sites and nature conservation designations.</p> <p>Sites of Special Scientific Interest</p> <p>Site 62 655 North Circular Road (North) is adjacent to Welsh Harp Reservoir which is an SSSI, local nature reserve and Grade 1 Nature Conservation Site.</p> <p>Green Chains</p> <p>The following sites (all of them in West</p>	<p>The following policies are relevant to the potential development of sites that may affect, are adjacent or within nature conservation areas.</p> <p>Sites of Special Scientific Interest</p> <p>The draft Policy DP OS 4 on SSSIs states that: '<i>Development on, adjacent to or potentially affecting the SSSI will only be permitted where it is clearly demonstrated that there will be no significant adverse effects on biodiversity and nature</i></p>	<p>In taking forward proposals for any of the sites within or adjacent to areas of importance for nature conservation, it should be done in accordance with the relevant Core Strategy policies and forthcoming DP policies. This includes requiring appropriate buffer strips along the</p>

⁸ Public transport accessibility levels (PTALs): 'A measure of the relative accessibility of buildings and uses with the higher the PTAL score, the better the accessibility. A score of four would apply to town centre sites indicating that higher density development was possible.' <http://www.pas.gov.uk/pas/core/page.do?pageld=12492>

⁹ See Table 3, Section 3.5.1 of 2004 London Housing Capacity Study

¹⁰ See Table 3, Section 3.5.1 of 2004 London Housing Capacity Study

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
	<p>planning area except for number 49, North) are adjacent/ part of the site is a Green Chain:</p> <p>1 Atlip Site 3 Twyford Tip 32 Northfields Industrial Estate 36 Abbey Estate, Beresford Avenue 44 Sunleigh Road 46 Carlyon Road 49 Garages at Barn Hill 97 Waxlow Road 106 Minavil House</p> <p>Nature Conservation Site - Grade 1 and 2</p> <p>The following sites are adjacent or in a Nature Conservation site (grade 1 or 2):</p> <p>North: 11 London Transport Sports Ground 49 Barnhill Garages, Barnhill Road 51 Dollis Hill House 57 Sainsbury's Car Park, Draycott Avenue 62 655 North Circular Road 63 Old St Andrews Church 87 Kingsbury High School</p> <p>South: 33 Mayo Road and St Mary's Open Space 84 Lonsdale Road</p> <p>West: 3 Twyford Tip 4 Former Guinness Brewery 7 Former Unisys Site 10 Northwick Park Hospital 32 Northfield Industrial Estate, Beresford Avenue 36 Abbey Estate, Beresford Avenue 37 Dirkan Site, North End Road 97 Waxlow Road Footbridge 105 Brook Avenue</p> <p>Wildlife Corridors</p> <p>The following sites are adjacent or in a Wildlife Corridor:</p> <p>North: 23 Morrison's West Moreland Road 39 Alpine House, Honey Pot Lane 57 Sainsbury's Car Park, Draycott Avenue</p> <p>West and South: 97 Waxlow Road Footbridge (West) 100 Canterbury House (South)</p> <p><i>Note: SSSIs, Green Chains and Nature Conservation site information obtained through GIS mapping. Wildlife Corridor information obtained from proformas filled in by LBB's officers.</i></p>	<p><i>conservation. The Council will consult with Natural England in the determination of any application which will potentially impact on the future biodiversity of the site'. This will need to be the case with site 62.</i></p> <p>Green Chains and Blue Ribbon Network</p> <p>Policy DP OS 3 states that Green Chain and the Blue Ribbon network will be enhanced, particularly for their biodiversity and landscape value. This policy also sets the requirements for any development adjoining or visible from Green Chains and the Blue Ribbon network.</p> <p>Local Nature Reserves and Sites Of Important Nature Conservation</p> <p>Policy DP OS 5 on local nature reserves, sites of important nature conservation and wildlife corridors states that: 'Development on or adjacent to Local Nature Reserves and Sites of Important Nature Conservation must conserve and enhance the special interest features appropriate to the hierarchy of designation, with Local Nature Reserves, Sites of Metropolitan and Borough Importance given the highest priority' The policy also sets out the requirements that any proposed development must demonstrate.</p> <p>Wildlife Corridors</p> <p>Policy DP OS 7 states that 'development on, adjacent to or potentially affecting wildlife corridors will be required to incorporate as part of their design, features which will enhance biodiversity and wildlife habitats without severing or unacceptably harming the importance for species and wildlife habitats'</p>	<p>sites in accordance with the relevant policies.</p>
Sites located	See Figure 35 which shows the allocated sites and flood risk zones.	PPS25 requires that planning applications for development	LB Brent should undertake a Strategic

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
in flood risk areas	<p>Parts of the following site allocations are in the 1 in 100 flood risk zone (zone 3):</p> <p>North: 39 Alpine House, 49 Barnhill Garages, 23 Morrison's Westmoreland Road</p> <p>West: 3 Twyford Tip, 7 Former Unysis Site (this site is almost completely in the floodplain) 32 Northfields Industrial Estate 101 Shubette House, 105 Brook Avenue</p> <p>In addition, allocation number 37 (North End Road) is completely within the 1 in 100 flood risk zone.</p> <p><i>Note: the above information obtained from GIS mapping and EA flood risk maps.</i></p> <p>In addition, the following sites are not located in flood risk areas but are 1 hectare of greater size and would require a FRA:</p> <p>North: 11 London Transport Recreation Ground, Forty Avenue 12 Brent Town Hall, Forty Lane 19 Dollis Hill Estate, Brook Road 22 Metro House, 1-3 The Mall 25 Oriental City, Edware Road 62 655 North Circular Road 85 Capitol Way 87 Kingsbury High School, Princes Avenue and Bacon Lane</p> <p>South: 17 Former State Cinema/ Mecca Bingo, Kilburn High Road 27a Asiatic Carpets, High Road, Church End 27d Church End local centre, High Road, Church End 33 Mayo Road and St Mary's Open Space, Church End 109 Dudden Hill Lane/ Grange Court 110 Dudden Hill Lane/Birse Crescent</p> <p>West: 1 Atlip Site, Ealing Road, Alperton 4 Former Guinness Brewery, Park Royal 5 Careys Site, Acton Lane, Park Royal 9 Vale Farm Leisure Centre 10 Northwick Park Hospital 36 Abbey Estate, Beresford Avenue 43 Abbey Manufacturing Estate, Woodside Close, Alperton 44 Sunleigh Road, Alperton 46 Carlyon Road, Ealing Road, Alperton 111 Harlesden Plaza</p>	<p>proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment (FRA), this is reflected in paragraph 6.3.3 of the Core Strategy preferred options. This should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed, taking climate change into account. A FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall¹¹.</p> <p>In addition, LB Brent should undertake a Strategic Flood Risk Assessment of the whole Borough in consultation with the Environment Agency as required by PPS25¹² and recommended by the EA in their comments during the Issues and Options - as referred to in para 6.3.3 of the Core Strategy Preferred Options.</p> <p>For sites outside flood risk areas, but of over 1ha, undertaking a Surface Water Flood Risk Assessment and providing Sustainable Urban Drainage (SUDs) will be particularly important. Where a planning brief is being prepared for sites, these requirements should be included.</p> <p>These requirements are also included in Policy DP ENV 6.</p>	<p>Flood Risk Assessment of the whole Borough in consultation with the Environment Agency as required by PPS25¹³ and recommended by the EA in their comments on the Issues and Options paper and as referred to in para 6.3.3 of the Core Strategy Preferred Options.</p> <p>All planning applications for developments in flood risk areas should be accompanied by a Flood Risk Assessment. Furthermore, any site over 1 ha outside a flood risk area should be accompanied by a Surface Water Flood Risk Assessment and should include provisions for Sustainable Urban Drainage (SUDs).</p> <p>Also note the comment above under nature conservation on the need for any sites near to main or ordinary watercourses to include appropriate buffer strips.</p>

¹¹ Ref to PPS25¹² Ref to PPS25¹³ Ref to PPS25

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
	<i>Note: Based on information from proformas filled in by LBB's officers</i>		
Sites that affect listed buildings or are within a Conservation Area	<p>The following sites contain or are adjacent to listed buildings:</p> <p>North: 12 Brent Town Hall 42 Kingsbury Library and Community Centre 63 Old St Andrews Church 87 Kingsbury High School</p> <p>South: 16 Kilburn Square, Kilburn High Road 17 Former State Cinema/ Mecca Building</p> <p>Note: the above information was obtained from the proformas filled in by LBB's officers.</p> <p>The following sites are adjacent to a Conservation Area:</p> <p>North: 11 London Transport Sports Ground 87 Kingsbury High School</p> <p>South: 16 Kilburn Square, Kilburn High Road 84 Lonsdale Road 100 Canterbury House, Canterbury Road</p> <p>The following two sites are within a Conservation Area: 63 Old St Andrews Church (North) 34 Queens Parade, Walm Lane (South) and part of 111 Harlesden Plaza</p> <p><i>Note: Based on information from GIS</i></p>	In taking forward proposals for any of the sites within or adjacent to listed buildings or Conservation Areas, it should be done in accordance with the relevant Core Strategy policies and forthcoming Policy DP UD 2 on Townscape: Local Context & Character which states that ' <i>Proposals should not cause harm to the character and/or appearance of an area, or have an unacceptable visual impact on Conservation Areas,...,listed buildings</i> '	Development within or adjacent to a Conservation Area or listed building should have regards to the relevant policies in the Core Strategy and Development Policies DPDs and avoid any visual impacts or loss of character.
Sites located within an existing MOL boundary	<p>Site 51 Dollis Hill House (North), Gladstone Park is completely within a MOL boundary but only involves the restoration of a fire damaged building within MOL.</p> <p>Two other sites are adjacent to a MOL boundary: 62 655 North Circular Road (North) 10 Northwick Park Hospital (West)</p> <p><i>Note: Based on GIS information</i></p>	MOL should be protected from inappropriate development, as stated in Policy DP OS 2. This policy also includes the criteria under which development will be permitted and also lists appropriate MOL uses.	None identified
Sites within Air Quality Management Areas (AQMA)	<p>A large number of the site allocations are within an AQMA, which indicates that air pollution is an issue for those sites.</p> <p>The south of the Borough (and all the allocations in South Planning Area) is completely covered by an AQMA, additionally most of the sites (or part of these sites) in the North and West Planning Areas are also within an AQMA.</p> <p>See Figure 36 to identify which sites are within or outside the AQMA.</p>	<p>Policy DP ENV 1 on air quality states that the potential impact of proposed developments on air quality will be taken into account when assessing planning applications, and where significant adverse impacts are predicted which cannot be satisfactorily mitigated, development will not be permitted.</p> <p>This will be an important factor in considering the impact of sites allocated within the AQMA as well as in considering the appropriate use and design of the sites. Exposing additional residents to</p>	Development of any site within an AQMA should incorporate adaptation measures to protect the indoor environment from poor external air quality and include measures to reduce emissions in accordance with Policies DP ENV 1 and DP SD 6.

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
	<i>Note: Based on GIS information</i>	<p>poor air quality could have significant health implications.</p> <p>Policy DP SD 6 on addressing poor air quality effects states: 'Particular regard will be had to poor air quality effects in / near Air Quality Management Areas (AQMA's). The design of development, and Sustainability Statement, should demonstrate how adaptation measures are incorporated in development proposals for sensitive uses (health, education & housing) within / near to AQMA's, to protect the indoor environment from poor external air quality. Those proposals which are significantly above the major development threshold (equal or greater than 1,000 sqm or 10 dwellings) may otherwise, be required to achieve a higher level (or minimum level 4) in the Energy/ CO2 category of the Code for Sustainable Homes'.</p>	
Noise Levels (Day time levels relevant to all sites, night time relevant to sites that include residential use)	<p>Noise complaints in Brent have increased since 2002. Between 2002/03 there were 2,198 complaints, in 2003/04 there were 2,647, which rose to 2,925 complaints in 2004/05 and to 3574 in 2005/06¹⁴. Increasing housing densities is one of the reasons that the 2005-6 AMR cites for the increase: there is a correlation between noise complaints and building density in the Borough.</p> <p>High noise levels, both day and night time is an issue with many sites (see Appendix 10). Increasing development in areas where the noise levels are already high is not only a problem for new residents as it would exacerbate the issue for the existing residents. High noise levels do not only affect residential development but also other uses such as schools and hospitals.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Policy DP ENV 2 states that 'when considering development proposals, the council will take into account the cumulative impact of noise pollution on a locality. Where potential development will result in a significant adverse effect upon existing residents/ nearby occupiers and also within/between the proposed units in terms of noise or vibration generation, it will not be permitted unless acceptable mitigation measures are undertaken. In high density developments, particular regard should be given to the minimisation of noise levels between proposed units. Potentially noise-generating developments should be located away from existing or proposed noise sensitive land uses and noise sensitive development will not be permitted close to existing sources of significant noise'.</p>	<p>Development of any site should have regards to the noise levels in the vicinity of this site and also to the potential increase in noise levels as a result of the development. Mitigation measures should be incorporated to new developments that may affect noise and vibration levels of exiting or new residents (see Policy DP ENV 2).</p> <p>Noise and vibration levels should be an important factor in considering the appropriate use and design of the sites. Care should be taken not to expose additional residents to existing high levels noise pollution in order to avoid health and social implications.</p>
Sites located in greenfield land	<p>All sites are on brownfield land except for 11 London Transport Grounds and 9 Vale Farm Sports.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>The use of previously developed land and vacant or underused buildings should be optimised in accordance with CP SS7 Sustainable Communities. The allocated sites appear to respect this policy.</p>	None identified

¹⁴ AMR 2005-6

Key issues / criteria	Summary of appraisal findings	SA comments	Mitigation and Enhancement
Contaminated land	<p>A quarter of the land in Brent could be potentially contaminated as a result of historic industrial uses¹⁵; therefore numerous site allocations are either known or suspected to be contaminated.</p> <p><i>Note: Based on information from proformas filled in by LBB's officers</i></p>	<p>Policy CP ENV2 Protecting the environment includes a reference to 'seeking remediation and re-use of contaminated land' and refers to Policy DP ENV 4 on contaminated land which states that 'development on potentially contaminated sites will be permitted where the extent of contamination is known and mitigation measures and subsequent management measures will render it acceptable for the proposed use. In such circumstances, initially the Council will require a desk top study investigating the nature and extent of any contamination, and subsequently on-site investigations may be required where necessary, prior to the commencement of development, and will be secured by condition'.</p>	<p>Possible contamination of sites should be investigated and remediation appropriate to the use of the site should be undertaken. This needs to be dealt with on a site by site basis.</p>

Table 39: Site allocations and planning guidance

Number	Allocation	Guidance
39	Alpine House	LB Brent is preparing informal planning brief
87	Kingsbury School	LB Brent is preparing informal planning brief
42	Kingsbury Library and Community Centre	LB Brent is preparing informal planning brief
51	Dollis Hill House	Prepared planning brief
53	Gavin House	LB Brent is preparing planning brief
South area		
16	Kilburn Square	Adopted SPD
27a	Asiatic Carpets	LB Brent is preparing informal planning brief
27b	Ebony Court	LB Brent is preparing informal planning brief
27c	White Hart Public House	LB Brent is preparing informal planning brief
27d	Church End Local Centre	LB Brent is preparing informal planning brief
33	Mayo Road and St Mary's Open Space	LB Brent is preparing informal planning brief
35	Church End Car Park	LB Brent is preparing informal planning brief
61	Queen's Park Station Area	LB Brent is preparing Supplementary Planning Document
West area		
4	Former Guinness Brewery	There is an existing SPD for the site. The council is contributing to the Park Royal Opportunity Area Planning Framework
5	Carey's Site	The council is contributing to the Park Royal Opportunity Area Planning Framework
7	Former Unysis site	LB Brent is preparing informal planning brief
28	Wembley West End	Adopted SPD
32	Northfields Industrial Estate	The council is contributing to the Park Royal Opportunity Area Planning Framework
36	Abbey Estate, Beresford Avenue	LB Brent is preparing informal planning brief
37	North End Road	May prepare informal planning guidance
43	Abbey Manufacturing Estate	LB Brent is preparing informal planning brief
44	Sunleigh Road	LB Brent is preparing informal planning brief
46	Carlyon Road	LB Brent is preparing informal planning brief
101	Shubette House/Karma House/Apex House	LB Brent is preparing informal planning brief
102	Kelaty House/Cannon Trading Estate	LB Brent is preparing informal planning brief

¹⁵ AMR 2005-6, p. 43

Figure 30: Site Specific Allocations

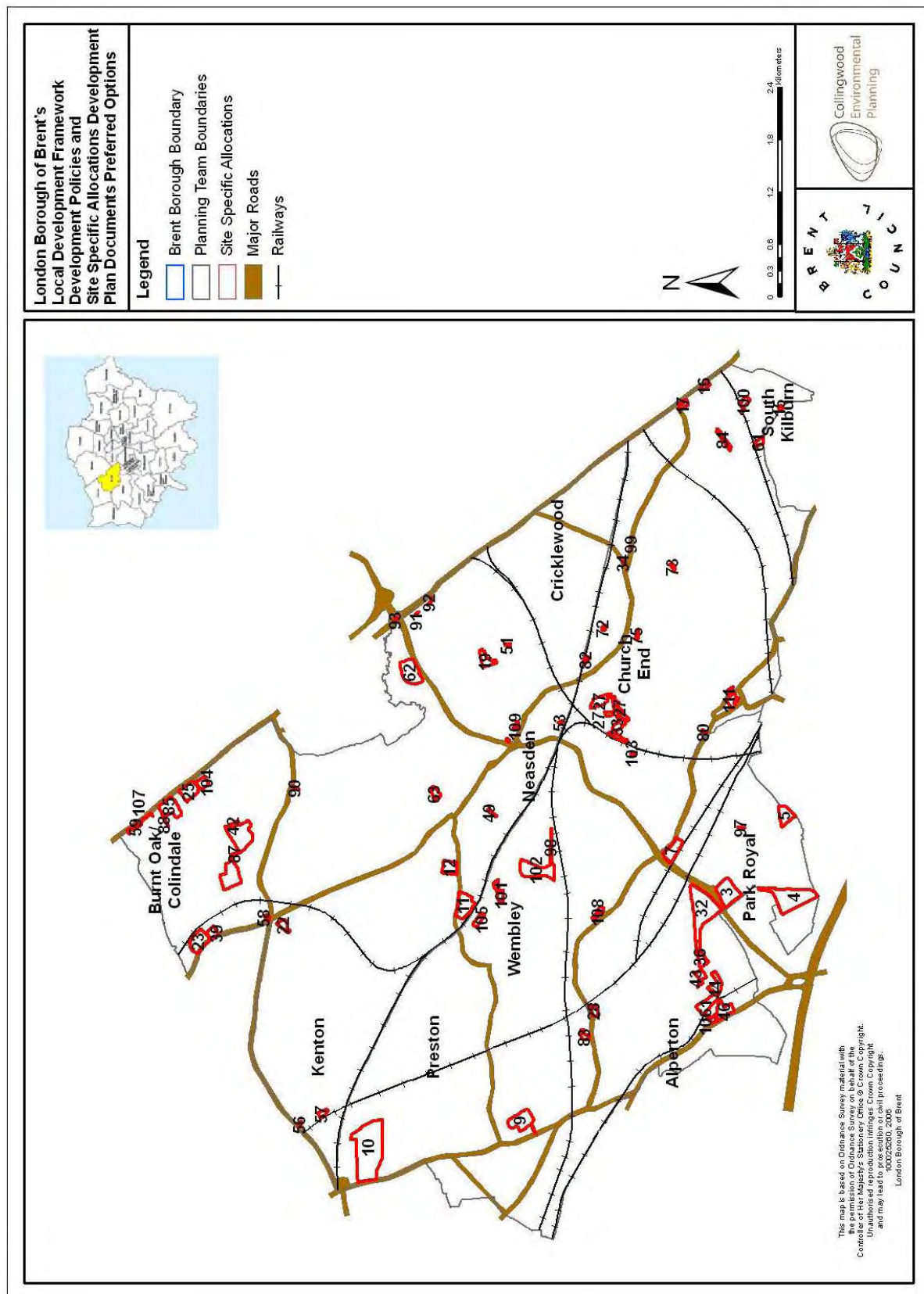


Figure 31: Index of Multiple Deprivation and Employment and/or Community Sites

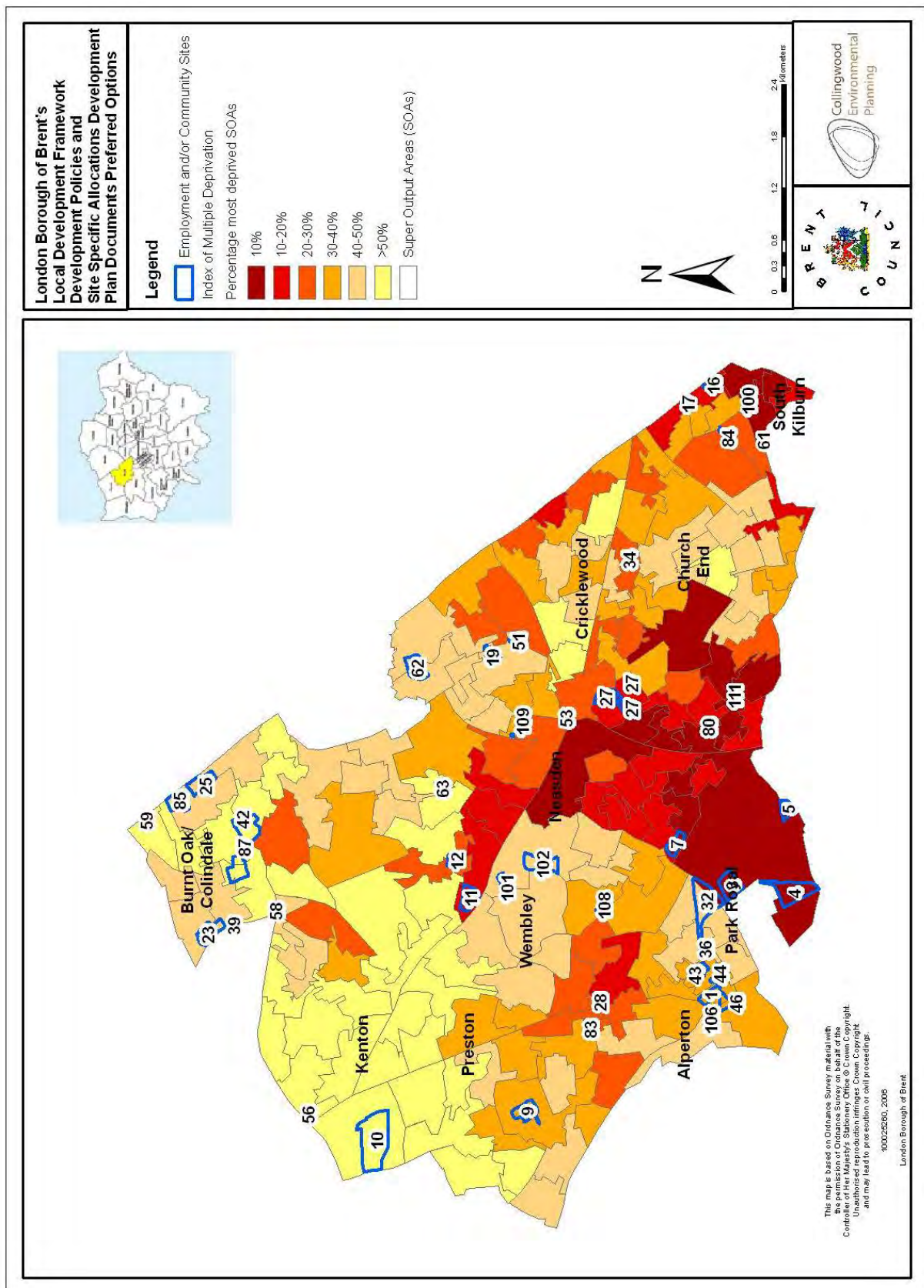


Figure 32: Site Specific Allocations and Areas of Open Space Deficiency

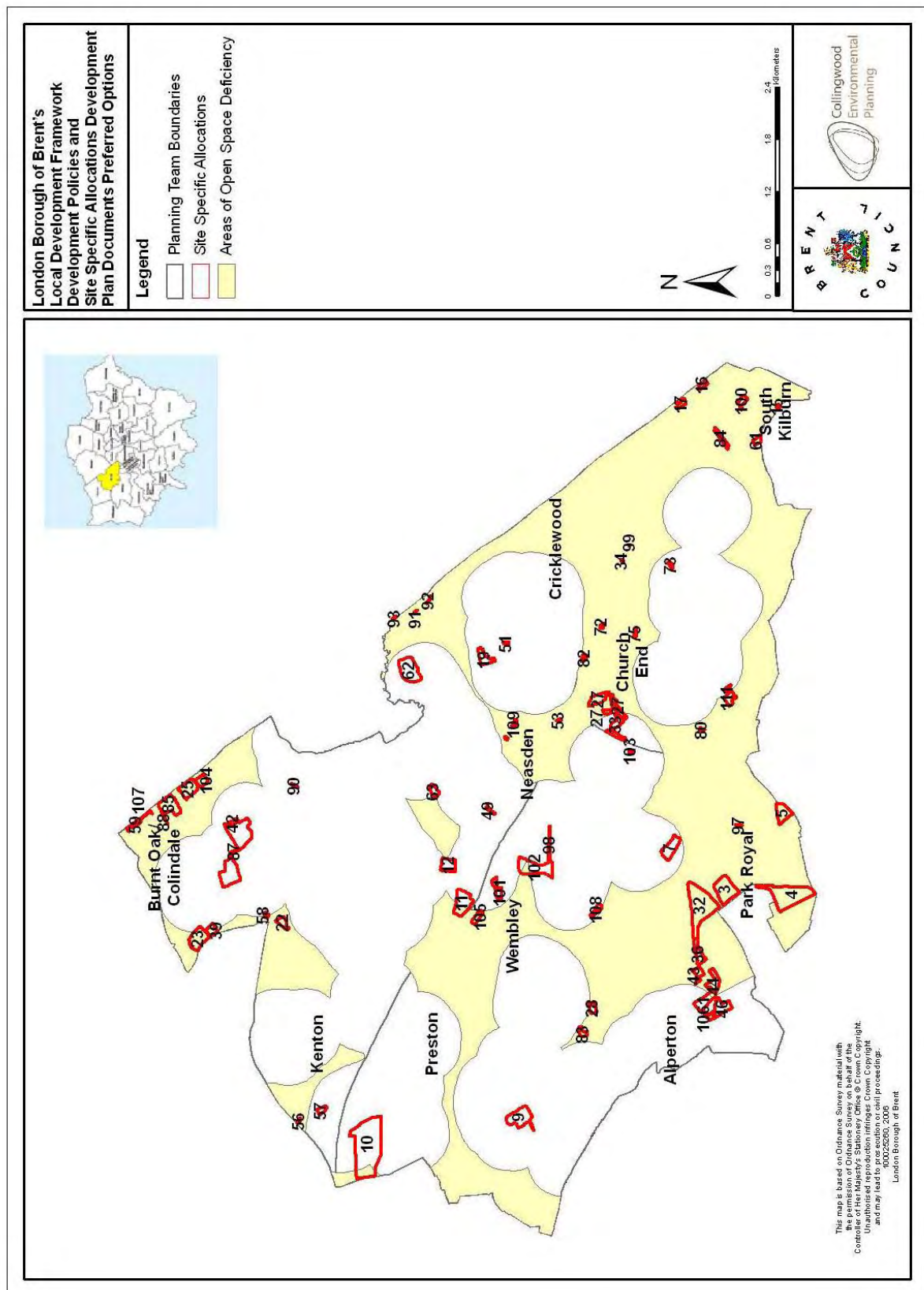


Figure 33: Site Allocations and Public Transport Accessibility Levels (PTAL)

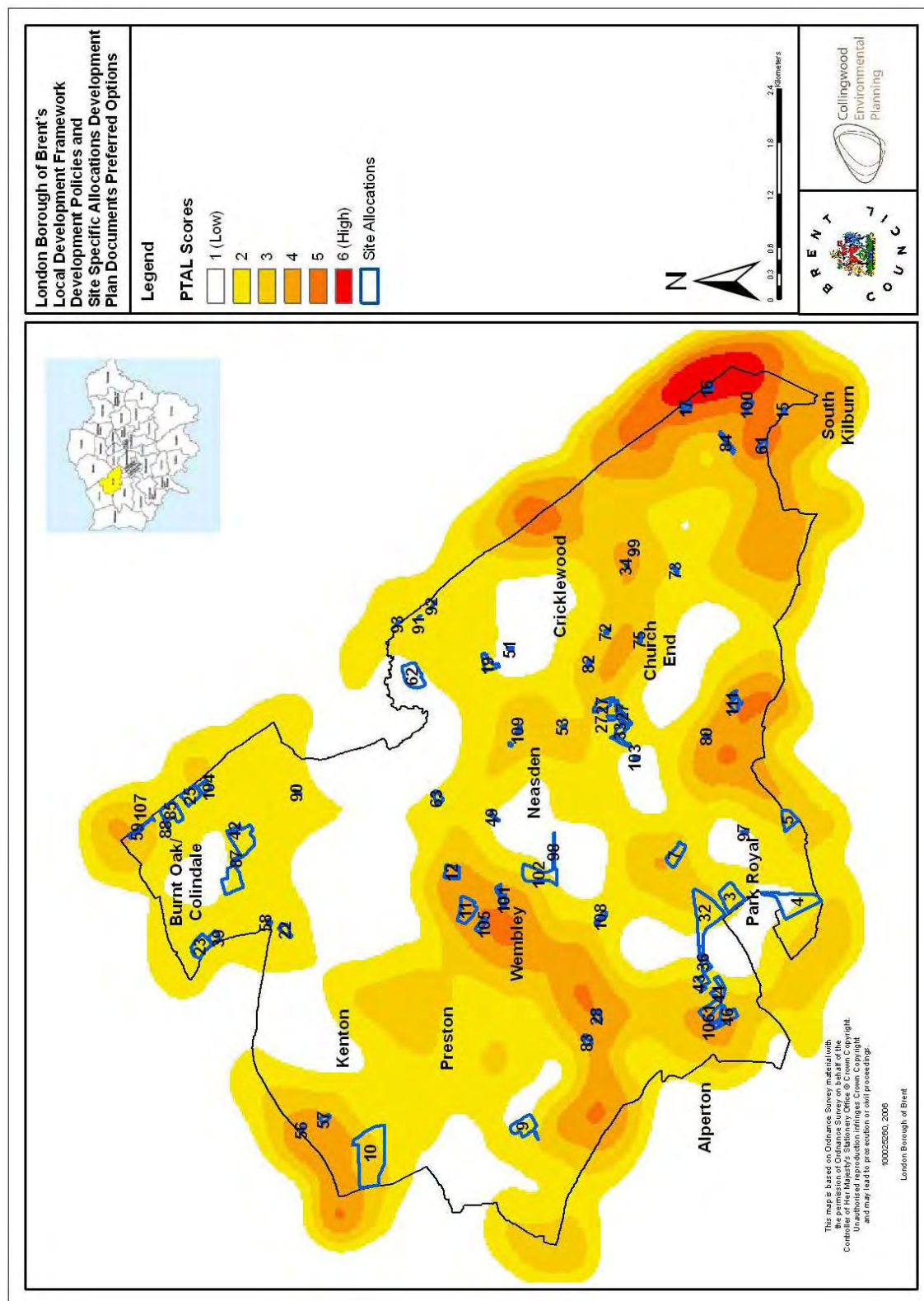


Figure 34: Site Specific Allocations and Nature Conservation Areas

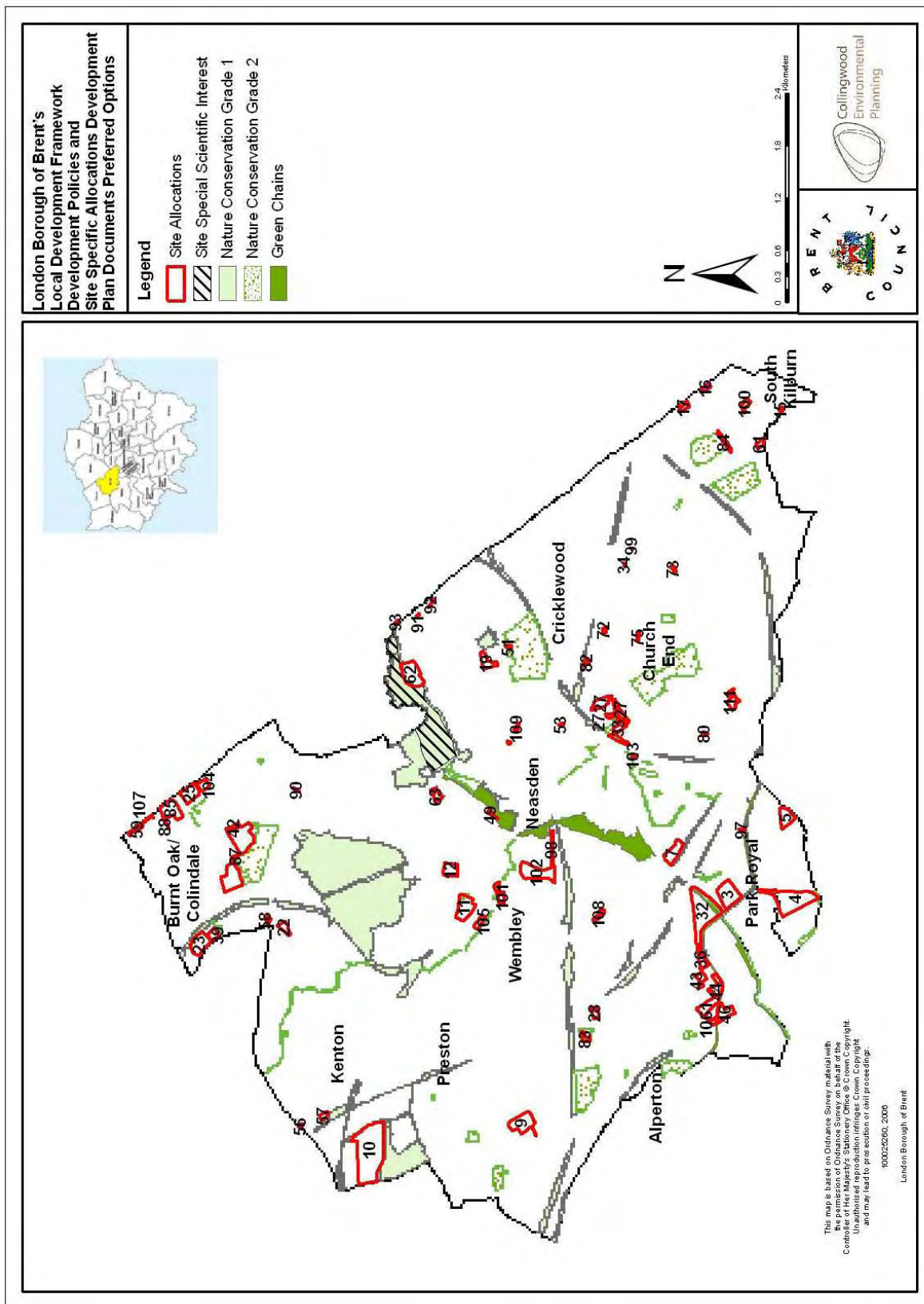


Figure 35: Site Specific Allocations and Flood Risk

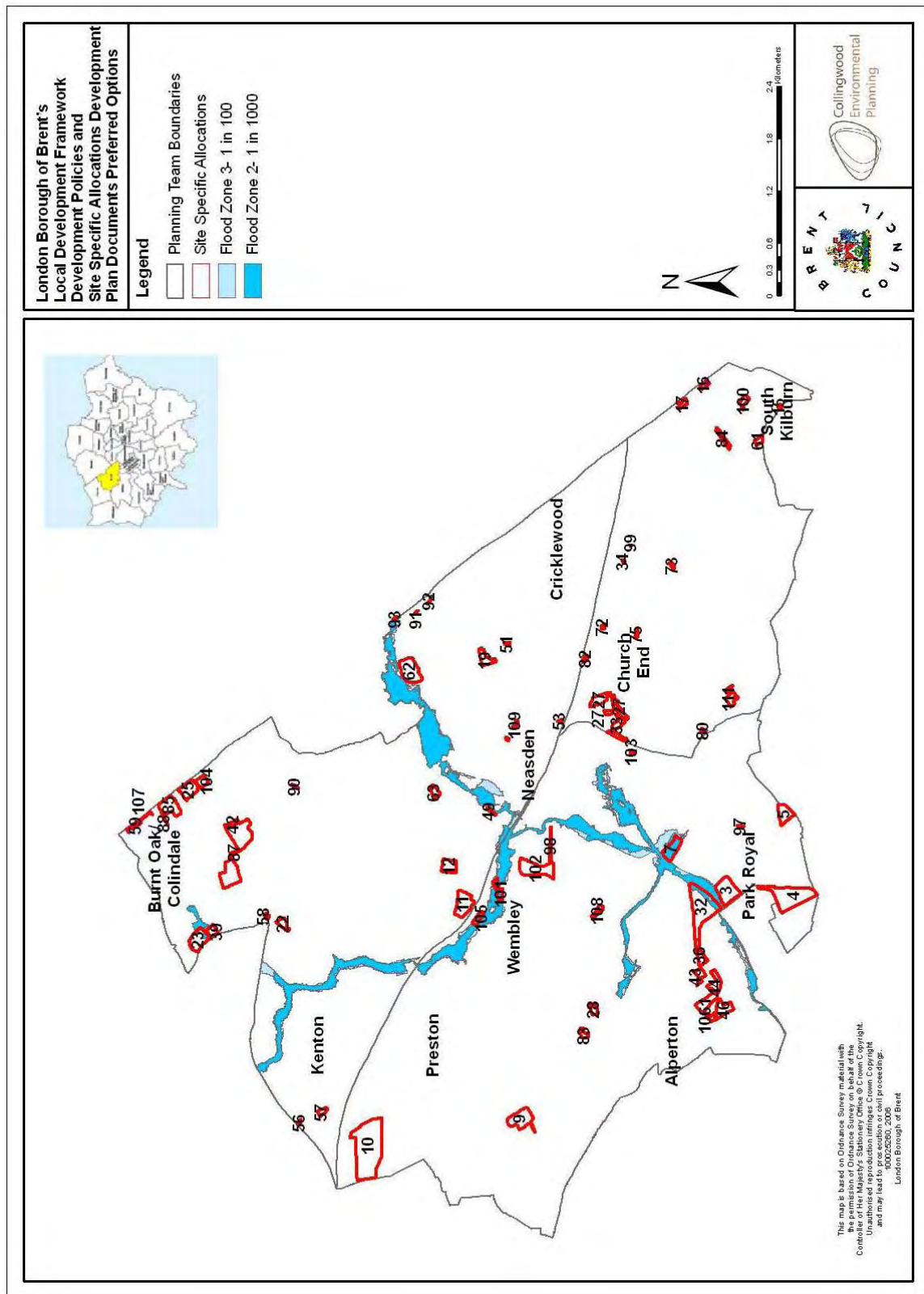
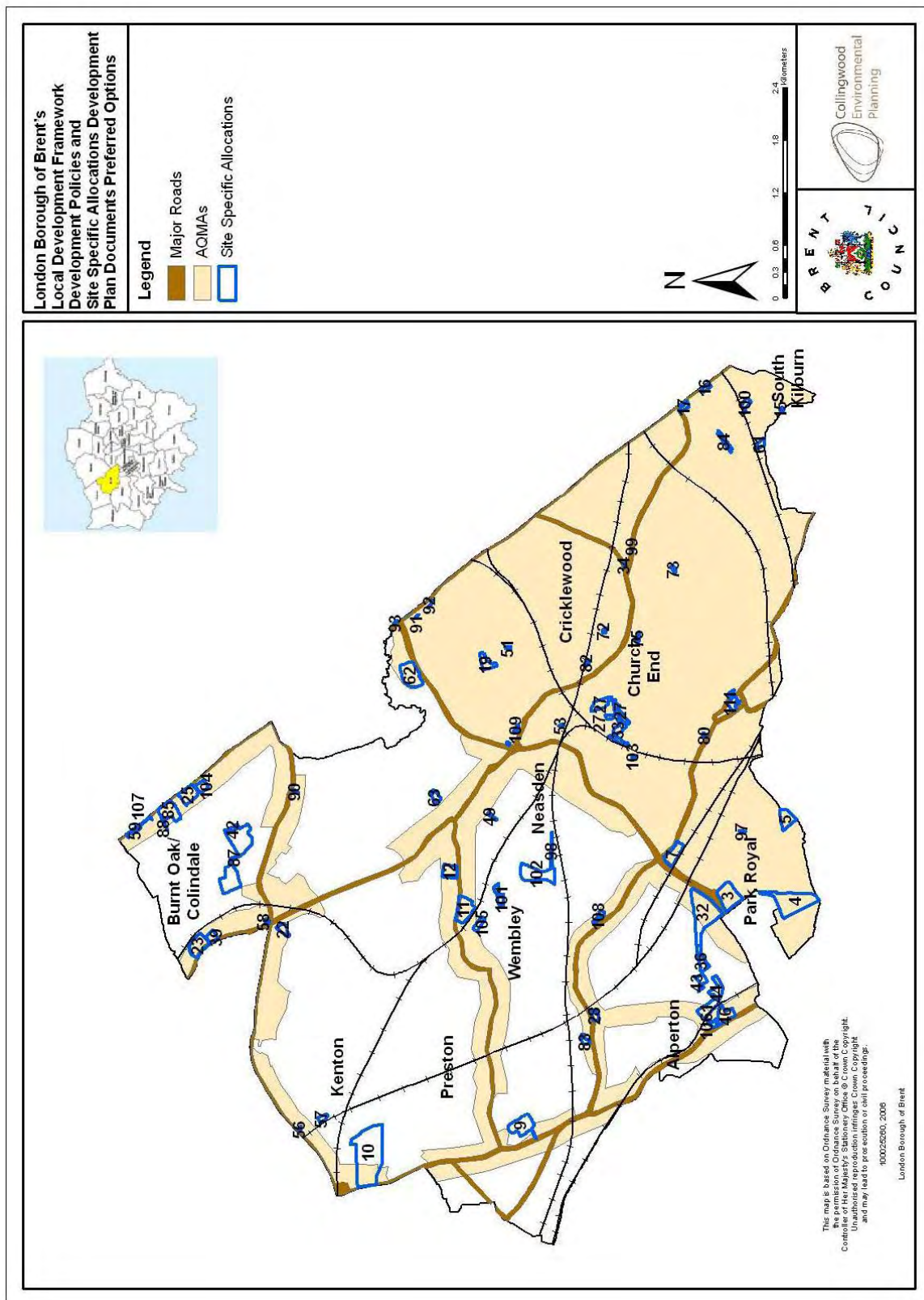


Figure 36: Site Specific Allocations and Air Quality Management Areas



Overall effects of Site Specific Allocations DPD Preferred Options

9.11 The following table presents the detailed appraisal of the overall effects of the Preferred Options on the sustainability objectives. The appraisal in Table 40 considers the effects of all the sites as a whole and therefore also identifies some of the key cumulative effects. The effects have been scored using a scale of five points from double positive to double negative. More detail on the scoring system and how significance was assessed has been included in Section 2 of the SA Report (Part A) and Appendix 7.

Table 40: Appraisal of the overall sustainability effects of the Site Specific Allocations DPD Preferred Options

Site Specific Allocations DPD			
Objective	Criteria	Score	Comments
Social			
1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	++	Effects: Most of the sites are located within or adjacent to highly deprived areas and many are located in areas that are a priority for regeneration which should reduce inequalities in those areas. Furthermore, CP SS2 in the Draft Core Strategy states that the borough will aim to achieve the London Plan target that 50% of new homes should be affordable so the development of the sites included in the SSAs DPD Preferred Options should provide a significant number of affordable homes. Mitigation / Enhancement: None identified
	Will it improve affordability of essential services?		
2. To improve the health of the population	Will it improve access to high quality health facilities?	+	Effects: Several site allocations will make contributions to health facilities and open spaces. In addition, development of the sites will provide new homes and employment in the borough and having a home and a job are two significant determinants of good health. However, many of the sites are located in areas of open space deficiency and their development will increase the pressure on the existing open spaces and deprive residents in new developments of access to amenity, recreation and sports facilities. Mitigation / Enhancement: Improvements and provision of additional open spaces should be sought as part of the development of those sites that area located in areas of deficiency.
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?		
	Will it reduce health inequalities?		
	Will it reduce death rates?		
3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?	0	Effects: The development of the sites will not per se guarantee that employment opportunities will match the skills of the population of Brent. Some of the sites are allocated to provide additional educational facilities but the impact of these is not likely to be significant in the context of the Borough as a whole. Mitigation / Enhancement: None identified
	Will it improve access to high quality educational facilities?		
	Will it help fill key skill gaps?		
4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?	+	Effects: The development of the site allocations included in the DPD Preferred Options should provide a number of new affordable housing. The DPD also includes recommendations that look at providing an appropriate range of home sizes and one of the objectives is to encourage a mix of uses. Mitigation / Enhancement: None identified
	Will it encourage mixed use and range of housing tenure?		
	Will it reduce the number of unfit homes?		
	Will it reduce homelessness?		

Site Specific Allocations DPD			
Objective	Criteria	Score	Comments
5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?	-	Effects: Development of the sites should contribute to improving neighbourhoods and amenities which would improve the satisfaction of people with their neighbourhoods. However, more significantly, the levels of noise in the vicinity of many sites are higher than WHO recommended standards; development of these sites could inflict high noise levels on new and existing residents.
	Will it improve residential amenity and sense of place?		
	Will it reduce actual noise levels?		
	Will it reduce noise concerns?		
6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?	0/?	Effects: No significant effects identified, although the development of some vacant/ derelict sites could reduce fear of and actual levels of crime.
	Will it reduce the fear of crime?		
7. To encourage a sense of local community; identity and welfare	Will it encourage engagement in community activities?	0	Effects: Although some of the allocations will provide new or improved community facilities, it is unlikely that the DPD will have a significant impact on this objective.
	Will it foster a sense of pride in area?		
	Will it increase the ability of people to influence decisions?		
	Will it improve ethnic relations?		
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?		
	Will it encourage people to respect and value their contribution to society?		
8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?	+	Effects: One of the objectives of the DPD is to identify new sites based on their accessibility. In most cases the sites are located in town centres or other areas well served by public transport.
	Will it improve the level of investment in key community services?		
	Will it make access more affordable?		
	Will it make access easier for those without access to a car?		
Environmental			
9. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?	+	Effects: By directing development to certain areas well served by public transport, the DPD should contribute to reduce the levels of traffic that new developments will produce.
	Will it increase the proportion of journeys using modes other than the car?		
	Will it encourage walking or cycling?		
10. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?	-	Effects: Development of the sites will cause an increase in the use of water resources and production of sewage.
	Will it reduce water consumption?		
11. To improve	Will it improve air quality?	-	Effects:

Site Specific Allocations DPD			
Objective	Criteria	Score	Comments
air quality	Will it help achieve the objectives of the Air Quality Management Plan? Will it reduce emissions of key pollutants?		Most of the sites are located in AQMAs, their development could contribute to worsen air quality in those areas. Mitigation / Enhancement: See suggested mitigation under the air quality constraint in Table 38.
12. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency? Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it encourage protection of and increase number of trees?	0/?	Effects: Some of the sites are adjacent to nature conservation areas; however it is uncertain whether the development will affect the wildlife in these sites. Mitigation / Enhancement: See suggested mitigation under the constraint on proximity to sites of nature conservation or SSSIs in Table 38.
13. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces? Will it enhance the quality of priority areas for townscape and public realm enhancements? Will it maintain and strengthen local distinctiveness and sense of place? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?	0/?	Effects: The development of the sites should not have a negative impact on open spaces or townscape if the development of the sites has regards to Policies DP OS 1 to 6. Mitigation / Enhancement: Development of any sites should have regards to the policies cited above.
14. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve, enhance and record archaeological features and their settings?	0/?	Effects: Several sites are located within or adjacent to a Conservation Area or listed buildings. Mitigation / Enhancement: See suggested mitigation in Table 38 under the constraint on conservation areas and listed buildings.
15. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?	--	Effects: Any new development will consume more energy during construction and occupation and consequently increase emissions. Any development on fluvial flood risk areas will increase the risk for new residents. Furthermore, any development within or outside flood risk areas will increase the risk of surface water flooding and storm events. Mitigation / Enhancement: For mitigation against flood risk see suggested mitigation under the same constraint in Table 38. Policy DP SD 3 requires the design of a development to demonstrate how the energy management approach reflects the Mayor's energy hierarchy: reducing energy demand, generate on site renewable energy and supplying energy using decentralised, low carbon technologies.
16. To minimise the production of waste and use of non-renewable	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?	-	Effects: The development of the sites will lead to the consumption of construction materials and resources plus to the generation of construction waste. The increase in population allowed by the new developments will increase the total amount of

Site Specific Allocations DPD			
Objective	Criteria	Score	Comments
materials	Will it reduce waste in the construction industry?		household waste. Mitigation / Enhancement: The development of the sites should have regards to Policy DP SD 5 which requires the environmental impact of specified materials to be taken into account in the design of a development and the use of a Construction Management Strategy in order to maximise recovery and reuse of materials and includes targets for minimising waste production over the construction phase. Additionally, LB Brent should promote and facilitate reduction and recycling of household waste not just for new developments but in the borough as a whole.
17. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings? Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?	+	Effects: Only two of the sites are on greenfield and their development is in accordance with relevant policies (see Table 38). Several sites are currently underused or vacant and their development should address this. Many sites are potentially contaminated but their development will be conditioned to appropriate remediation. Mitigation / Enhancement: See suggested mitigation in Table 38 regarding sites on contaminated land.
Economic			
18. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people? Will it improve business development and enhance productivity? Will it improve the resilience of business and the local economy? Will it promote growth in key sectors? Will it promote growth in key clusters? Will it enhance the image of the area as a business location?	+	Effects: Development of the sites will provide several new or improved employment locations and should provide opportunities for local business and people. However, LB Brent can facilitate business locations but cannot completely determine which sectors will grow or that opportunities will be mostly for local people. Mitigation / Enhancement: None identified
19. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked? Will it help to improve earnings?	0	Effects: As above, development of the sites will provide new or improved sites for employment but will have little impact on this objective. Mitigation / Enhancement: None identified
20. To reduce disparities in economic performance and promote regeneration	Will it promote regeneration; reducing disparity with surrounding areas?	++	Effects: The development of the sites will facilitate regeneration as most of the sites are located within areas that are a priority for regeneration of within the most deprived areas. Mitigation / Enhancement: None identified
21. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business? Will it encourage inward investment? Will it make land and property available for business development?	+	Effects: The DPD will facilitate new land and property for business development. Mitigation / Enhancement: Mechanisms to favour local business could be investigated.
22. To encourage efficient patterns of	Will it reduce commuting? Will it improve accessibility to work by public transport; walking and cycling?	+	Effects: By encouraging development in growth areas and town centres and a mixed of uses, the development of the sites should contribute to reduce commuting and locate

Site Specific Allocations DPD			
Objective	Criteria	Score	Comments
movement in support of economic growth	Will it reduce journey times between key employment areas and key transport interchanges?		development in areas accessible by public transport. Mitigation / Enhancement: Development of some sites should include improvement to public transport accessibility and access by foot or cycle. Additionally, for sites not very accessible by public transport lower residential densities may be appropriate.
	Will it facilitate efficiency in freight distribution?		
Key: Major positive: ++ Minor positive: + Neutral: 0 Minor negative: - Major negative: -- Uncertain: ? Mixed: -/+			
Overall Summary			
Effects: <p>The appraisal of the sites as a whole scores positively on several sustainability objectives particularly on those related to reducing poverty and regeneration mainly because the great majority of the sites area located in areas of high deprivation or regeneration areas and also for the potential contribution that the sites could make to new affordable homes. The DPD also has positive effects on the sustainability objectives related to health and living in decent homes due to the potential for providing new affordable homes, living in a decent home and being in employment are two important determinants of health and the development of the sites could provide an important contribution to this.</p> <p>The DPD also performs well against objectives related to reducing the effects of traffic, improving accessibility and encouraging efficient patterns of movement as the sites are mostly located in town centres or growth areas relatively well served by public transport. The sites also perform well against the objective of conserving and enhancing land and soil as many of the sites are currently derelict, underused or contaminated and development should help address these issues. Finally, the DPD also performs well against the objectives of sustainable economic growth and encouraging investment in the Borough as it will provide new and improved sites for employment use.</p> <p>Regarding negative effects, these are mostly inherent to providing new development and are mostly related to resource use, waste and other environmental impacts such as noise, air quality and especially contributions to increasing the risk of flooding and the effects of climate change.</p>			
Mitigation / Enhancement: <p>Many of the recommendations for mitigation and enhancement are dependent on developments complying with the Core Strategy and Development Policies, which will provide conditions and criteria on the type and nature of development on a particular site. Detailed recommendations for mitigation against each objective have been included in this table and also in Table 38 however as a summary, the key areas that will need mitigation are:</p> <ul style="list-style-type: none">increases in fluvial and surface flood risk;resource use, including water use and materials for construction;waste production, including construction waste and wastewater;minimising emissions from new developments; andaccess improvements for some sites.			

Contribution that the Site Specific Allocations DPD Preferred Options will make to achieving the policies in the Draft Core Strategy

- 9.12 The Core Strategy policy CP SS2 *Population and Housing Growth* has a target of 10,146 new homes to be developed in the Borough by 2017. In order to put the sites included in the Site Specific Allocations DPD Preferred Options into perspective, it was decided to try to estimate the number of units that the sites which incorporate a residential element could provide.
- 9.13 A rough estimate is that if all the housing sites were developed, between **3,413** and **14,848** additional homes could be provided. The large range is a result of taking extremes of the possible densities. In order to calculate these estimates a number of assumptions have also been made, for example on the proportion of mixed sites that would be residential. Therefore these estimates are extremely approximate and should not be used for other purposes.
- 9.14 In order to calculate the potential number of new homes provided if all sites are developed the following steps were followed:
1. Calculated area of all housing sites (in hectares). Added area of all housing sites plus 50% of area of all mixed sites that include housing.
 2. In order to calculate the maximum and minimum number of houses per hectare looked at Table 4B.1 in London Plan 'Density location and parking matrix'.
 3. To calculate the minimum number of homes took lowest density for urban setting in sites along transport corridors and sites close to town centres (PTAL scores 2-3): 100 dwellings per ha.
 4. To calculate maximum number of homes took highest density for central setting in sites within 10 minutes walking distance of a town centre (PTAL scores 4-6): 435 dwellings per ha.
 5. Calculated minimum and maximum by multiplying the area of housing development calculated in 1 above by number of dwellings per hectare (4 and 5): 3,413 and 14,848.
 6. Taking the mid point between the minimum and maximum gives **9,131** as a very rough estimate of the potential number of new homes that can be delivered if all housing sites are developed.
 7. The number of homes in LB Brent is currently 105,000, so the development of the sites could add approximately 9% to the current number of homes.
- 9.15 The development of all the housing sites would provide additional affordable homes, but would also have some impacts on resource use, waste production and CO2 emissions. As part of the SA of the Core Strategy DPD Preferred Options, consideration was given to the potential effects of the level of growth proposed.

Following this approach, this exercise has been repeated for the potential number of new homes calculated above (see Table 41).

Table 41: Potential effects on resource use and emissions of developing all housing sites in LB Brent

A study by CPRE¹⁶ estimated the building of one new home¹⁷ as being responsible for:

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

In addition the occupation of each additional house will:

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

Construction:

Based on these figures an estimated overall impact of the potential new homes that could be delivered for construction would be (obviously making various assumptions on size of unit etc):

- Approximate emissions equivalent to 319,585 tonnes of CO₂. CO₂ emissions from all sources totalled 1,514,000 tonnes in Brent (2003)¹⁸, so additional emissions from building new homes could account for a significant increase in CO₂ emissions (approximately).
- The production of 102,724 tonnes of solid waste (no data for construction waste production in Brent). For comparison in 2004-5 the total municipal waste arisings in Brent were 131,000 tonnes.
- The consumption of 547,860 tonnes of aggregates quarried from the ground or dredged from the seabed (although some is recycled).

Occupation:

- Each household in Brent produced an average of 1121 kg of waste in 2003 and the total household waste produced in the Borough 117,000 tonnes¹⁹. The waste produced by the occupation of 9131 homes would produce an extra of 10.236 tonnes of household waste (approximately).
- Water (and approx equivalent sewage), approximately an additional 16,435,800 litres of water per year while producing a roughly equivalent quantity of sewage effluent
- Road transport and CO₂ emissions: currently (2003) road transport produces approximately 275,000 tonnes of CO₂ per year, an increase of 9% in the population will increase emissions accordingly
- Domestic CO₂ emissions: 4.05 tonnes per additional home per year, 36, 980.55 tonnes extra per year.

¹⁶ CPRE (2005), *Building on Barker - How we can continue to improve housing for everyone without damaging the environment and sprawling over the countryside*

¹⁷ These figures are based on a typical 90 square metre new home meeting current Building Regulations and occupied by three people.

¹⁸ Defra (2005) Local and Regional CO₂ Emission Estimates for 2003

¹⁹ West London Waste Authority and Constituent Boroughs (2005) Draft Joint Municipal Waste Management Strategy

What difference the SA has made

9.16 The Sustainability Appraisal process and the development of the LDF, including the Site Specific Allocations were initiated at the same time and the SA has inputted throughout the evolving draft Site Specific Allocations as well as the evolving draft Core Strategy and Development Policies which. The SA has not led to any sites being rejected or their preferred use modified but influenced the draft SSA DPD Preferred Options in other ways. CEP reviewed an early draft Site Specific Allocations DPD Preferred Options and provided a detailed SA commentary (14th February 2007). The SA commentary led to a number of changes to the draft DPD including:

- Adding overall objectives to the draft DPD.
- Including a section on environmental issues in the draft DPD recognising the importance of these issues in relation to the development of the sites.
- Adding requirements for the development of some sites, e.g. undertaking Flood Risk Assessments, contributions to the provision of amenity/open spaces or contributions to public transport improvements.

10. IMPLEMENTATION AND MONITORING OF THE SITE SPECIFIC ALLOCATIONS PREFERRED OPTIONS

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

- 10.1 The Site Specific Allocations DPD is part of a broader hierarchy of plans, which will not be developed nor implemented in isolation. Links and relationships exist at the local (Borough) level but also at the regional (London) and national level. The Site Specific Allocations DPD is a key DPD within the Brent LDF, which will replace the UDP as the statutory plan for Brent and will be made up of an evolving suite of DPDs and SPDs (known collectively as Local Development Documents – LDDs).
- 10.2 Although it is a stand-alone document, the relationship with the Core Strategy is intrinsic, as Site Specific Allocations set out the site-specific development priorities and needs also reflecting delivery of the objectives of the draft Core Strategy. In addition, the Development Policies DPD sets out the detailed implementation and ‘control’ criteria for the higher level Core Strategy policies.
- 10.3 To provide further guidance or explanation, SPDs and planning briefs for specific sites or collections of sites will be / have been prepared. These have been listed in Table 39. Once major sites and regeneration schemes identified within the Core Strategy and other DPDs come forward they may require an Environmental Impact Assessment to be undertaken.
- 10.4 The Site Specific Allocations DPD Preferred Options has been developed with reference to a large number of national and regional plans and strategies. At the highest level it reflects the broad agenda set out in Securing the Future - UK Government Sustainable Development Strategy, and for specific aspects it has been developed in line with national targets for issues such as housing, waste management, energy and transport. At the regional (London) level the Development Policies are linked to policies, strategies and targets set out in GLA documents and the London Plan (alterations), which has for example set targets for housing development and affordable housing provision.
- 10.5 In addition, the Site Specific Allocations DPD is linked to and must be aware of a very large number of local (borough) plans and those developed by neighbouring boroughs, such as Local Implementation Plans (LIPs) which seek to deliver the London Transport Strategy within each borough, Waste Management Strategies, Biodiversity Action Plans and so on.

Implementation and monitoring of the Development Policies

- 10.6 The appraisal of the overall effects of the Site Specific Allocations DPD Preferred Options presented in section 9 above, has predicted that the DPD is likely to have

positive effects against several sustainability objectives particularly on those related to reducing poverty, regeneration, health, reducing the effects of traffic, etc. However, the Site Specific Allocations DPD Preferred Options is also likely to have negative effects on other sustainability indicators especially those related to resource use, waste and other environmental impacts such as noise, air quality and especially contributions to increasing the risk of flooding and the effects of climate change.

- 10.7 As noted above the Site Specific Allocations DPD, together with the Development Policies in essence set out the detailed implementation framework for the higher level policy set out in the Core Strategy, and it is through the application of these more detailed criteria, and the site specific development aspirations that the Core Strategy will be implemented in line with its objectives.
- 10.8 However, these more detailed policies will only be effective where they are in themselves implemented effectively, and as a result the positive sustainability effects predicted also rely on this. The key tool that the Council has in trying to ensure implementation is through the setting of realistic yet challenging targets and the monitoring of performance against these on a regular basis.

Proposals for monitoring

- 10.9 Monitoring the significant sustainability effects of implementing the Site Specific Allocations DPD is a fundamental part of the SA process. It is important to monitor performance against the sustainability objectives, which form the core of this appraisal, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken.
- 10.10 The SEA Directive requires the significant environmental effects of a plan or programme to be monitored and that the Environment Report (this report) should include a description of measures 'envisaged' for monitoring the implementation of the plan.
- Annex 1(i) of the SEA Directive requires the Environment Report to include "a description of the measures envisaged concerning monitoring in accordance with Article 10".
 - Article 10 (1) states that "Member States shall monitor the significant environmental effects of the implementation of plans and programmes..."
- 10.11 In addition, The Planning and Compulsory Purchase Act 2004 requires the local authority to prepare an Annual Monitoring Report (AMR) which should set out the extent to which the policies and objectives of DPDs and SPDs making up the LDF are being achieved.

- 10.12 Brent has produced two AMRs²⁰ for the period 2004 – 2005 and 2005 – 2006. The 2005 – 2006 AMR has chapters entitled “Review of development in Brent, 2005 – 2006” and “Towards the Local Development Framework (LDF)”. The Development Policies DPD, and Site Specific Allocations DPD, as with the Core Strategy DPD will be monitored through updates to the AMR each year.
- 10.13 The SA of the draft Core Strategy (October 2006) proposed a monitoring process in the context of the Core Strategy, but designed to provide a framework for the LDF as a whole. This was based upon guidance produced by ODPM (now DCLG) on good practice in the monitoring of LDFs²¹.
- 10.14 These monitoring proposals have been updated to reflect the additional requirements of the draft Site Specific Allocations and the draft Development Policies, and are included in Part A of this report, Section 4.
- 10.15 It has been decided to present a single SA monitoring framework for two reasons:
- This reflects the AMR process, which monitors the implementation and development progress in Brent through a single report each year.
 - The sustainability effects identified in the appraisal of the draft Development Policies, and the Site Specific Allocations, are sufficiently covered by the proposed monitoring framework for the draft Core Strategy. Thus producing individual monitoring proposals was felt to add complexity without providing a more effective monitoring process.

Next steps

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

²⁰ *Enabling Development in Brent, Annual Monitoring Report 2004/05 and 2005/06:*
<http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/2219c74ce551d41780257225004aee35!OpenDocument>

²¹ *Local Development Frameworks: A Good Practice Guide*, ODPM (DCLG) March 2005.
<http://www.communities.gov.uk/index.asp?id=1143905>

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