

# London Borough of Brent's Local Development Framework Development Policies and Site Specific Allocations Development Plan Documents Preferred Options

## Sustainability Appraisal Report Appendices to Part B: Appraisal of the Development Policies Preferred Options

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



**June 2007**

**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 <sub>2</sub>	Carbon Dioxide	NO	Nitric Oxide
CP	Core Policy	NO <sub>2</sub>	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 <sub>10</sub>	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 <sub>2</sub>	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
LBPN	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

## **APPENDIX 8**

# **INITIAL SUSTAINABILITY APPRAISAL COMMENTARY AND LB BRENT RESPONSES**

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## Introduction

The tables which follow are recreated from the ***Initial Sustainability Appraisal Commentary*** prepared by Collingwood Environmental Planning based on a detailed review of the *Development Control Policies – Preferred Options*, March 2007 (as received 23/03/07 by email) and amended to reflect *Development Policies – Preferred Options*, May 2007 (as received 27/04/07 by email).

The tables also include (final column) the responses from LB Brent noting where the commentary and proposed changes were accepted, and if not the reason for this. Where comments have been accepted changes were made to the draft text which were included in the *Development Policies DPD Preferred Options*, June 1<sup>st</sup> May 2007.

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## Overall and General Comments

Topic	Suggested changes to the policy wording or supporting text as a result of the SA	LBB Response
<b>General comments</b>		
<b>Consideration of alternatives</b>	<p>The document includes boxes titled "Alternative options not included". However, there are some concerns that the justification of alternatives considered and rejected may not be sufficient within some of the sections / for some policies. This relates to both SA requirements for the consideration of alternatives and to meet the test of soundness of the DPD etc.</p> <p>A few more specific comments are included on these boxes within the sections below, but the approach between sections in the draft Preferred Options is not always consistent and generally they would benefit from additional references back to the policy direction set by the Core Strategy policies or the London Plan (and that therefore various options have already been foreclosed by this higher level documents) which would provide the justification needed in some cases.</p> <p>Some of the justifications on the alternatives not included just comment on that it is preferable to have a policy rather than not have one, which may well be correct but there are also potentially alternative policies / policy wording that could be used that it would be more useful to discuss.</p> <p>Comments on alternatives not selected does not appear to be included for every policy and in amending the document between the March and May versions not all the policy references in the boxes have been updated.</p> <p>Consider presenting several (ideally more than 2) for each policy (as presented from DP OS8). This should include the business as usual (i.e. existing UDP policy).</p>	Accepted. Further justification of alternative options not selected to be provided as indicated against relevant sections below.
<b>Possible additional policy areas</b>	Some potential additional areas for additional policy are included within the sections below.	
<b>Cross referencing of policies</b>	In some cases policies include cross-references to other policies which are relevant or related. We would recommend that the document is reviewed to ensure that they are consistent and also mutually supportive – for example UD3 Urban Structure: Space and Movement could be usefully cross-referenced to TRN2 and TRN4.	
<b>Policy "coding"</b>	Some policies do not have a reference number e.g. the policy on Sustainable Water – Demand and Efficiency and Wildlife Corridors. Adding these in will change the subsequent policy numbers.	
<b>Comments on the introduction</b>		
<b>DPD objectives</b>	Section 1 of the draft document includes a section on 'Purpose of the Development Control Policies Preferred Options' and 'What are Development Control Policies?'. The latter states that "this Development Plan Document sets out the detailed policies which will be used primarily for	Accepted. Additional information explaining the purpose of the Development Policies document and its relationship with other

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Topic	Suggested changes to the policy wording or supporting text as a result of the SA	LBB Response
	<p>the determination of planning applications for development in the Borough. As with the Core Strategy, it is guided by sustainable development principles and must be subject to a sustainability appraisal" (para 1.4).</p> <p>For the purposes of the SA process, which includes a task to "test the DPD objectives against the sustainability objectives", and for the clarity of the document it is recommended that specific objectives for the Development Policies DPD are included to convey what the document is aiming to achieve (in addition to the more general LDF objectives in the Core Strategy Preferred Options). These could include, for example:</p> <ul style="list-style-type: none"> <li>• To provide a framework and criteria for guiding the achievement of sustainable development in the Borough.</li> <li>• To provide the detailed interpretation of the spatial planning strategy set out in the Core Strategy.</li> <li>• To set out detailed policies for the determination of planning applications for development in the Borough.</li> </ul>	DPDs to be included.
<b>Monitoring</b>	It would be useful to include some details on how the effectiveness of the implementation of the plan will be monitored (via the AMR) and whether specific indicators will be required to achieve this (beyond those that are required / already monitored) etc	Accepted. A new section on Implementation & Monitoring will be included
<b>Cross referencing to the Core Strategy</b>	It would be useful to explain the relationship between the Core Strategy and the Development Policies DPDs in the Introduction. It would also be useful to include cross referencing between Development policies and to the relevant overarching Core Strategy policy(ies) throughout the document.	Accepted. Additional cross referencing to be included where appropriate.



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## Policy Specific Comments

### Promoting a Quality Environment

#### A Better Townscape – By Design

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
General / Introduction	The chapter (promoting environmental quality) has a useful introduction to urban design, but it would be useful to provide a summary of the purpose of the policies in this chapter overall and the link to the Core Strategy.	Accepted.
DP UD1 Urban Design Appraisal	<p><b>Suggested clarifications and amendments to supporting text:</b></p> <p>Para 1.6 (bullet 5) – whilst covered by this point (“...working, in partnership with the community”) it could be made clearer / emphasised that the community should be engaged with to ensure local needs and perspectives are incorporated into the design process.</p> <p><b>Suggested clarifications and amendment to policy wording:</b></p> <p>First line refers to “urban design objectives”, however what follows is a list of other policies in the document and not objectives. Consider amending wording to reflect this – e.g. state that proposals should be consistent with / meet the policy objectives set out in the following policies or amend wording so they are objectives (e.g. ensuring highest levels of townscape appropriate to local context and character are achieved as set out in policy DPUD2).</p> <p>The policy numbers referred to do not match those in the May version of the document and need amending.</p> <p>The distinction between / definition of “major development proposals” and “smaller-scale proposals” are not defined which could potentially lead to debate over which level of appraisal is required. Consider defining these – from a sustainability perspective this should ideally relate to the potential effects on the factors listed.</p> <p>Final sentence – cumulative effects of a number of “small-scale proposals” can still be significant. It would be beneficial to make clear what would be expected in the “brief design statement” (in the supporting text?). This issue was raised in our appraisal of the Core Strategy policies: <i>“Although the need to concentrate on significant developments is recognised, the cumulative effects of many smaller schemes can also be significant from a sustainability perspective. Some recognition of this fact and how to address design issues within smaller schemes should be dealt with in more detail in the forthcoming Development Control Policies DPD”</i></p>	<p>Accept – change word objectives</p> <p>To be added to glossary</p> <p>Included in SPG/SPD?</p>
DP UD2 Townscape – Local Context and Character	<p><b>Suggested clarifications and amendment to supporting text:</b></p> <p>Para 1.10 – 2<sup>nd</sup> sentence: suggest that “development proposals on <u>most</u> sites” be amended to “development proposals on <u>all</u> sites”.</p>	Accepted

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<p><b>Suggested clarifications and amendment to policy wording:</b> Point b) – although supporting text explicitly refers to “good architecture” and buildings which “surprise” – the policy text does not include any explicit reference to “architecture” which could be added to b)</p>	<p>‘Good’ architecture difficult to define</p>
<p><b>DP UD3 Urban Structure Space and Movement</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> This policy would benefit from cross referencing to the Transport policies relevant to walking, cycling and public transport. 2. Point i) – it would be useful to link to policy DC TRN7 as provisions of parking facilities will need to be appropriate. 2. Point iii) – minimising traffic conflicts is seen as positive. However it is important to ensure that “clear delineation of routes” does not mean that cycle and pedestrian routes become convoluted and indirect. Where pedestrian or cycle routes are indirect, over-long or complex cyclists and pedestrians are likely to take quickest route anyway – thus causing “traffic conflicts” even where specific, separate routes are provided (for example long spiralled foot/cycle bridges across roads in South Kilburn which are impractical as require walking two to three times the distance of simply crossing road – meaning that people breach barriers and walk directly across dangerous roads in spite of separate route provision). 2. Point iii) – Creating clear delineation should not result in street clutter and a detraction of local character. 2. Point iii) – it would be useful to link to policy DC TRN4 etc in relation to creating new / better cycling and walking routes.</p>	<p>Agreed</p> <p>Agreed</p> <p>Accepted- but appropriate for more detailed guidance</p> <p>Agreed</p>
<p><b>DP UD4 Inclusive Design – Access For All</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> 1<sup>st</sup> Para – the supporting text (para 1.18) highlights the needs of other groups (the elderly, pregnant women and parents with young children and pushchairs) but the policy focuses on the “disabled people”. It would be beneficial if the needs of these groups could also be incorporated into this policy.</p>	<p>Physical requirement for disabled people will generally meet the needs of other groups</p>
<p><b>DP UD5 Urban Clarity and Safety</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.25 – 1<sup>st</sup> sentence: suggest including reference to more specific spaces / places (shopping</p>	<p>Accepted</p>

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<p>areas, local parks, sport / play facilities) to explain what is meant by “the environment”.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> No comments.</p>	
<p><b>DP UD6 Tree Protection and Promotion</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.31 – This para could seek to support more strongly tree planting as part of development proposals. Going beyond protection would have longer term sustainability benefits. Para 1.31 (or 1.37) – Reference could also be made to the need to use native species for new planting – which is preferable from a sustainability perspective as more likely to be in keeping with existing trees / shrubs and provide suitable food / habitat for local wildlife.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> The focus of the policy is on tree protection, even though “and Promotion” has been added to the policy titles and (d) added regarding compensation since the March version. Incorporating promotion of tree planting as part of this policy would be beneficial.</p>	<p>Agreed. Reference to need for tree planting on appropriate proposals to be added. Not accepted. Although native species may often be preferred they are not always appropriate, especially taking climate change into consideration.</p> <p>Agreed as above.</p>
<p><b>DP UD7 Public Realm – Landscape Design and Biodiversity</b></p>	<p><b>Suggested clarification in supporting text:</b> Para 1.38 – it is not clear what is meant by “climate change dynamics”. Reference could also be added regarding the need to facilitate adaptation of biodiversity under a changing climate. It is not clear what is meant by “Brent’s Design measures”.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> Point b) – as well as “adequately”, landscaped frontages should be in keeping with the local character. Point c) – from a sustainability perspective it would be preferable that the emphasis was that all mature trees, shrubs and hedges should be retained except in exceptional circumstances. Point d) – reference could also be made to appropriate species being those which are native. Point e) – is a little unclear what is meant by “integrally designed, structural landscaping on appropriate larger sites” The need to consider minimising water use as part of planting schemes and adapt to climate change would be beneficial. Bullet point before last para – sites may have habitats that are important in there own right even though they do not support specific protected or priority species. This bullet point should be worded to reflect this. Bullet point before last para – It is not clear what “mitigate” means in this context (mitigate from what?). References to the Brent Biodiversity Action Plan has been deleted from here and elsewhere in the</p>	<p>Accepted- delete the word ‘dynamics’ clarification needed.</p> <p>Policy already states that the expectation is that they will be retained , not considered that only nature species are appropriate. Detail to be included in supplementary guidance.</p> <p>Amendment to be made</p> <p>Reference to Bio-Diversity Action Plan to be included in section on enhancing</p>

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	document compared with the March version of the document. Its there a reason for this as it is assumed this provides useful context to what species and habitats are important locally and the actions that are needed locally?	open space & biodiversity.
<b>DP UD8 Public Realm – Streetscape</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.43 – It is also important to resist crossovers etc as it increases urban run-off (as highlighted in London Assembly’s Environment Committee report <i>Crazy Paving: the environmental importance of London’s front gardens</i>. This included a table of the number of applications for pavement crossovers to London Boroughs and for those boroughs that provided figures Brent had the most in most recent year report (2004)). It is recommended that this is given more prominence within policy.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> 1<sup>st</sup> and 2<sup>nd</sup> para – consideration should be given to the environmental effects of street elements and furniture in terms of the materials used and their sources etc. This consideration should be referred to here.</p> <p>The factors listed a – e do not just raise issues which “detract from the local character” – they raise a broader range of environmental issues (e.g. run-off and flood risk connected with c hard surfacing and front gardens)</p> <p>Point a) – ambiguity as to what may be deemed “excessive” infilling of space. Suggest expanding on this point to clarify.</p> <p>Point c) – “half of a front garden area” could still represent a major loss of green space adjacent to the street / open land. Any loss further should ideally be resisted.</p> <p><i>Possible omission:</i> signage. High-quality, clear signage can greatly improve permeability / access and ease of movement. This can be an integral part of / incorporated within street furniture and fittings. This is mentioned in the supporting text (para 1.39) however it is suggested this may merit inclusion within the policy text.</p>	<p>The formation of a crossover does not in itself require planning permission where permission is required the policy seeks to control the amount of hard landscaping</p> <p>Not agreed. Criteria a &amp; b are concerned primarily with character. Detail relating to a provided by SPG. On c it is considered unreasonable to not allow any hard paving on development, especially as paving does not generally require permission, so is not included in policy.</p>
<b>DP UD9 Public Realm – Lighting and Light Pollution</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy wording:</b> No comments.</p>	
<b>DP UD10 Architectural Quality</b>	<p><b>Suggested a clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b></p>	

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<p>Point e) – suggest could include reference to pedestrians / passers-by, who may be as effected by a new building or extension to an existing one as those likely to use or visit it.</p> <p>Final sentence – from a sustainability perspective it is suggested that attention to these design / architectural considerations are just as important in areas of low townscape quality.</p> <p>Point e or f) - a reference could be added here to the need to consider climate change / hotter average temperatures / urban heat island effect in design, use of materials, colour etc</p>	<p>Not agreed. It is considered to be especially important to respect the local positive design and landscape where this is of good quality. Can be dealt with by cross referencing to policy SD1.</p>
<p><b>DP UD11 Design-led Intensive and Mixed-use Design</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<p><b>DP UD12 High Buildings</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1st sentence – high building should <u>only</u> be appropriate where their visual and other impact can be accommodated (rather than being “most” appropriate in these locations).</p> <p>Second sentence - Possible changing of wording from “Preferred locations” to “The only locations”. The supporting text seems to suggest that the Council will try to limit high buildings to these locations – so wording the policy thus could strengthen the Council’s position in this regard.</p> <p>Point a) – suggest inclusion of shadows / relationship to natural light and movement of the sun in the visual impact study.</p> <p>Point e) – this point could also refer to how high buildings need to consider waste disposal / recycling issues and the need to adapt to climate change (increased temperatures etc) without increasing CO2 emissions etc.</p> <p>Point f) – “water channels” should also refer to groundwater flows is relevant.</p> <p>The policy could include or cross-refer to transport policies. Parking and localised traffic impacts may be a particularly important impact of such developments.</p>	<p>Accepted- delete ‘most’</p> <p>Not accepted- there may be other locations, depending upon assessment of a proposal in terms of impact. This issue is addressed in SPG.</p> <p>Not accepted- as these issues are dealt with in generic policy elsewhere, e.g. SD1 &amp; SD7.</p> <p>Not considered necessary as parking and traffic impact are an important consideration in all development.</p>
<p><b>Alternatives to Policies DP UD1 – UD11</b></p>	<p>Should refer to DP UD12 as well as DP UD 1-11.</p> <p>No specific policy alternatives have been recommended, although some justification is provided for this. However, the “return to an earlier, single design policy” would appear not to be the only reasonable alternative available.</p> <p>Some discrete policy alternatives can be imagined for Policy UD11 High Buildings, for example. It could be limited to fewer areas or allow across the borough, or restricted further in height.</p>	<p>Agreed</p> <p>The policies also flow from the core strategy i.e. policies SS1, SS9, UD1 &amp; UD2. This suite of policies provides the detail of how the core policies principles will be applied.</p>

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	If options are limited by the context provided by the London Plan or the Core Strategy, this should be stated.	Agreed and will be added.
DP UD13 Priority Enhancement Areas	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.68 – it is unclear which “qualities” are being referred to in the 1<sup>st</sup> sentence. Para 1.69 – Gateways should include railway stations as well as road junctions.</p> <p><b>Suggested clarifications and amendment to policy text:</b> General comment – the purpose and requirements of the policy are unclear from the limited details included. The sense of the policy also needs to be reviewed following the amendments from the March version.</p>	<p>Agreed- to further clarify Agreed- and will also be reflected in a map to be included</p> <p>The intention of the policy is to treat development within the gateways as a priority in terms of enhancing the area. This will be made clearer.</p>
Alternatives to Policies DC UD12	<p>Should refer to DP UD13.</p> <p>No specific policy alternatives have been recommended beyond dispensing with design area policies. See General Comments above.</p>	The only alternative is to not focus on key areas which is indicated, would not be in conformity with the London Plan.
DP UD14 Building Services Equipment	<p><b>Suggested clarifications and amendment to supporting text:</b> General comment – we would suggest including more comments promoting the use of passive solar design / passive heating and cooling systems and low energy cooling of buildings within the supporting text. This is important for reducing energy use / reducing greenhouse gas emissions, and adaptation to climate change / reducing the urban heat island effect.</p> <p><i>Possible policy omission</i> – there is no detailed policy obvious in the document seeking such passive and design led approaches to cooling / heating and ventilation. Also is relevant as climate change response – adaptability and mitigation.</p> <p><b>Suggested clarifications and amendment to policy text:</b> First sentence – possible typographical error – should “conditional” read “conditioning”? First sentence – suggest that this should include both “proposed buildings” and modifications / refurbishment to existing buildings. Penultimate sentence – suggestion that the policy text is re-ordered so that this comes first. The “best” option in all cases seems likely to be encouraging design / architecture which negates the need for such equipment. Last sentence – these effects should be avoided as far as possible, with mitigation (as a last resort) to an acceptable level where unavoidable.</p>	<p>The importance in reducing energy use is accepted although it is considered that this is highlighted sufficiently by relevant policies SD1-7. This policy is primarily concerned with the visual /amenity impacts of equipment – detailed guidance on how to achieve reduced energy demand as required by policy SD3, will be included in supplementary guidance. Agreed. Agreed- delete word ‘proposed’</p> <p>Not accepted</p> <p>Agreed.</p>
DP UD15 Telecommunic-	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.75 – Is it likely that it would be acceptable to erect a mast in an SSSI?</p>	Depends upon the impact.

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<b>Policy</b>	<b>Suggested changes to the policy wording, or supporting text, as a result of the SA</b>	<b>LBB Response?</b>
<b>ations</b>	<b><i>Suggested clarifications and amendment to policy text:</i></b> Final sentence – although the policy text is relatively strong as it stands (and perhaps goes as far as it can legally?) it is suggested that schools and other sensitive sites should only be considered as a last resort/exceptional circumstances. The text here could perhaps be strengthened to ensure this.	Considered strong enough for it to be demonstrated that there are no alternative sites and that potential impact will be carefully assessed.
<b>DP UD16 Building-Mounted and Freestanding Advertisements</b>	<b><i>Suggested clarifications and amendment to supporting text:</i></b> General comment – can / should fly-posting and temporary advertising (such as estate agents boards etc.) be included in this policy?  <b><i>Suggested clarifications and amendment to policy text:</i></b> Point b) – would it be possible to change “on or adjacent to” to “on, in, adjacent to as well as affecting” these areas as advertisements may be detrimental even if it is not on or adjacent to them?	This is an enforcement issue and does not need reference.  Considered that policy already goes into sufficient detail.
<b>Alternatives to policies UD13 - 15</b>	Should be DP UD 14 -16.  Limited policy alternatives are discussed. See General Comments above.	Accepted- amendments to be made.
<b>DP UD17 Locally Listed Buildings</b>	<b><i>Suggested clarifications and amendment to supporting text:</i></b> No comments.  <b><i>Suggested clarifications and amendment to policy text:</i></b> Point d) – to ensure that long-term ‘gap-sites’ do not occur could a specific time-frame be put on the construction of replacements?	A condition would be applied to planning consent.
<b>DP UD18 Conversation Areas</b>	<b><i>Suggested clarifications and amendment to supporting text:</i></b> Para 1.95 / 1.96 – is there any plan to produce SPDs of Conservation Area Character Appraisals? If so, they could be referred to here.  <b><i>Suggested clarifications and amendment to policy text:</i></b> No comments.	Although character appraisals are being produced it is not intended that these should be SPD.
<b>DP UD19 Areas of Distinctive Residential Character</b>	<b><i>Suggested clarifications and amendment to supporting text:</i></b> No comments.  <b><i>Suggested clarifications and amendment to policy text:</i></b> No comments.	N/A
<b>DP UD20 Views and Landmarks</b>	<b><i>Suggested clarifications and amendment to supporting text:</i></b> No comments.	N/A

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<b>Suggested clarifications and amendment to policy text:</b> No comments.	
<b>Alternatives to policies UD16-19</b>	Should refer to policies DP UD 17-20 No specific policy alternatives have been included beyond simply having no conservation policies. Make reference to options foreclosed by Core Strategy and genuine alternatives to the policies. See General Comments above. 2 <sup>nd</sup> para – 4 policies are included not 5.	Agreed Agreed Agreed

### Towards a Sustainable Brent, 2020

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>Overall comments:</b>	<p>The completion of the supporting text at the start of the section compared with the March version is welcomed.</p> <p>Referring back to the SA comments made during the appraisal of the Core Strategy, we would reiterate to reflect the London Plan alterations, the text could include reference to London targets to reduce carbon dioxide emissions e.g. “the council will seek to mitigate the effects of climate change locally to reduce carbon dioxide emissions by 25% by 2020 from 1990 baseline” (this is one of the figures in the London Plan alterations’ mitigating climate change policy – 4A.2ii, which is working towards 60% in 2050. The Borough could obviously have its own targets or use the target for a different year).</p> <p>Updating the Brent Sustainable Design and Construction SPG 19 to an SPD, in line with the London SPG and London Plan alterations and other developments, will ensure that sustainable design and construction in the Borough is in line with the latest good practice. A specific reference to this could be added to this in the introductory text.</p> <p>It would be beneficial that the measures included in the London Plan (further alterations) policy on sustainable design and construction which are not be given much weight in the current document are reviewed and incorporated where possible (in this section or elsewhere as appropriate):</p> <ul style="list-style-type: none"> <li>• design new buildings for flexible uses throughout their lifetime</li> <li>• avoid creation of adverse local climate conditions</li> <li>• promoting the use of alternative fuels for transport (partly covered by ENV1?)</li> <li>• minimising overheating, heat island effects and solar gain in summer</li> </ul>	<p>Agreed. Reference to London targets can be included.</p> <p>Agreed</p> <p>Consideration will be given to this.</p>
<b>DP SD1 Climate Change Mitigation and Adaptation</b>	<b>Suggested clarifications and amendment to supporting text:</b> Paras 1.178 – 1.181 and 1.188 – 1.190 – we welcome the inclusion of references to key documents etc. Possible additional documents that could be referred to or could be used as a resource in drafting these sections include:	Noted



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	<ul style="list-style-type: none"> <li>• Mayor's Energy Strategy, 2004 <a href="http://www.london.gov.uk/mayor/strategies/energy/index.jsp">http://www.london.gov.uk/mayor/strategies/energy/index.jsp</a></li> <li>• Planning response to climate change, ODPM, September 2004</li> <li>• Towards zero carbon development: supportive information for Boroughs, July 2006</li> <li>• Code for Sustainable Homes: a technical guide, March 2007 <a href="http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf">http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf</a></li> <li>• Adapting to Climate change: a case study companion to the checklist for development, March 2007 <a href="http://www.london.gov.uk/climatechangepartnership/docs/adapting-climate-change-case-study-ver2.pdf">http://www.london.gov.uk/climatechangepartnership/docs/adapting-climate-change-case-study-ver2.pdf</a></li> </ul> <p>Para 1.190 – reference could also be added to this para to the GLA's forthcoming Climate Change Adaptation Strategy.</p> <p><b>Suggested clarifications and amendment to policy text:</b></p> <p>First sentence – it is unclear whether 'major proposals' have to be both or either 1,000m<sup>2</sup>/10 dwellings. Suggested that major proposals qualify if they are either of these rather than having to be both (or is this meant to be commercial and residential thresholds? If so would be clear to state this).</p> <p>Bullet list – in terms of climate change mitigation and adaptation, a wider range of policies will be relevant than those in the SD or ENV sections. e.g. Adaptation of planting / landscaping to be water drought tolerant (e.g. UD7 and OS7?); reducing the need to travel (e.g. TRN2?); and passive heating / cooling etc (UD10?), for example.</p> <p>Bullet list – reference numbering of policies needs to be reviewed as appears incorrect / note that the sustainable water policy is not numbered below</p> <p>Bullet list – why is ENV5 not included under environmental protection? It includes water supply which is relevant here.</p> <p>Penultimate para, 1<sup>st</sup> sentence – DP ENV6 Flooding could also be referenced here, not just CP ENV1. Given the susceptibility of the Borough to surface and sewer flooding, adaptation to increased flood risk from these sources may not be associated with traditional flood risk areas and the need to increase resilience to these forms of flooding should be reflected here.</p> <p>Last para, 1<sup>st</sup> sentence – the supporting text (para 1.180) specifies that levels 4-5 will be required, but this is not explicitly stated within the policy – reference to 4-6 could be added here (6, 'zero carbon homes', should not be restricted to the sites listed in para 1.187 but encouraged elsewhere especially within Wembley Energy Action Area and the Growth Areas).</p>	<p>Clarification will be made that it is either 1,000m<sup>2</sup> or for residential development 10 units.</p> <p>Accepted- but will be made clear in supporting text.</p> <p>Agreed. Add cross reference</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed- minimum of level 4 to be added. 'zero carbon homes' are not restricted to these sites – as para 1.113 indicates these are initial designations</p>

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Alternatives to policy DP SD1	Continuation of the current policy is one of the options available, but not the only one. Levels could be higher everywhere for example not just in the Wembley EAA and Housing Growth Areas. Justification based on the Alterations to the London Plan could be added etc. See general comments above.	Agreed- alternative option of higher level will be included
DP SD2 Sustainable Householder Developments	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.194 – this point about the significance of small developments to mitigation is important, but these smaller development also need to incorporate adaptation to climate change and it should also be mentioned in this context.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Policy SD2 contains requirements to submit / prepare checklists and statements. Whilst some criteria are included (minimum code level 2 and a min. of half the relevant measures etc), by drafting this policy (and others) in this way with limited criteria / targets setting out explicitly what is expected, significant reliance is being placed on the robustness of these checklists etc (for the final SA it would be useful to review these to come to a view on the implications on sustainability of this policy). Reference to specific targets/criteria in the policy would provide weight to negotiations with developers. Whilst it is understood that there could be advantages in not tying your hands within the policy itself with criteria, allowing the checklists and statements to be strengthened over time.</p>	<p>Agreed- sentence to be added to end of paragraph 1.120 accepting need for adaptation as well</p> <p>It is necessary to minimise the level of detail within policy and provide more detailed criteria in supplementary guidance. This applies to guidance in filling in a checklist.</p>
Alternatives to policy DP SD2	Another option, for example, would be not to distinguish between the major and small developments and require them all to meet the standards set out in SD1. See general comments above.	Agreed- this option will be included.
DP SD3 Energy – Demand, Renewables and Efficiency	<p><b>Suggested clarifications and amendment to supporting text:</b> Note <i>Towards zero carbon development: supportive information for Boroughs</i> (July 2006 – <a href="http://www.london.gov.uk/mayor/environment/energy/partnership-steering-group/LEP_towards_zero_carbon_developments.pdf">http://www.london.gov.uk/mayor/environment/energy/partnership-steering-group/LEP_towards_zero_carbon_developments.pdf</a>) which suggests phasing requirements in major developments, and has an example policy from Kirklees council where “new council buildings incorporate a proportion of on-site renewable energy generation: at least 10% in 2005/6, rising by 5% each year, to at least 30% by 2010/11.” The current policy requires 20% straight away, which is welcomed, but the accommodation of future increases could usefully be included. The above document, and the Mayor’s Energy Strategy also suggest that boroughs should require “energy demand assessments” for all major new developments – we would recommend incorporating this in the policy.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 2<sup>nd</sup> bullet – generating - See comments above re 1,000m<sup>2</sup> / 10 dwellings. What is the percentage required for smaller sites? Would they have to comply with the 10% in the last para (as in policy</p>	Consideration will be given to reference in policy to seeking phased increases in the proportion of energy derived from renewables over time and to requiring energy demand assessments.

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	<p>SD2)?</p> <p>Last para – examples of the circumstances which would be considered an exception could be added to the supporting text for clarity.</p> <p>General - it is important to ensure that energy targets / aspirations are actually complied with / implemented post construction, especially where these targets are ongoing and progressive. If possible we would recommend that some formal requirement for ongoing energy performance reporting / assessment is included in this policy and incorporated into AMR monitoring.</p>	<p>Consideration will be given as to how policy will be mentioned.</p>
<p><b>DP SD4 Sustainable Water – Demand and Efficiency</b></p>	<p><b>Suggested amendments and clarifications to supporting text:</b> No comments.</p> <p><b>Suggested amendments and clarifications to supporting text:</b> Presumably this should be DP SD4?</p> <p>Points 1-3) - Whilst referred to in the draft strategy as a hierarchy, not all the 'hierarchies' operate solely sequentially and it would be useful to point out that all these approaches are likely to be required (not if you do one you don't need to do the others).</p> <p>General - By not including targets, just measures, this policy is potentially weakened and relies on enforcement through the Sustainability Statement etc. Reference to specific targets/criteria in the policy would provide weight to negotiations with developers.</p> <p>Last para – add 'and' before 'Growth Areas' as presumably this 'particular regard' should be for all major developments in the Wembley EAA and Growth Areas?</p> <p>Note that Water matters: the Mayor's consultation draft Water Strategy, 2007 (<a href="http://www.london.gov.uk/mayor/environment/water/index.jsp">http://www.london.gov.uk/mayor/environment/water/index.jsp</a>) includes (among others – these are selected for relevance) the following proposals (the targets from which could usefully be incorporated into this or other policies):</p> <p><i>Proposal 3 The water use in new residential developments in London should never exceed 40m3 per bedspace per year. The Mayor's Preferred Standards is 25 m3 per bedspace per year.</i></p> <p><i>Proposal 4 The Mayor will, and the Boroughs should, require major developments to supply a significant proportion of their water requirement from the site's own resources. The Mayor will expect major developments over 30,000 m2 to supply a minimum of 50 per cent of their water requirement through on site reclamation, and developments over 15,000 m2 or 500 dwellings to meet 25 per cent of their water requirement in this way.</i></p> <p><i>Proposal 7 The Mayor will, and the Boroughs should, require new developments (larger than 1,000 m2 or more than 10 dwellings) to manage their surface water runoff so that there is a 50 per cent reduction in the volume and rate of surface water drainage when compared to that of the undeveloped site at peak times.</i></p> <p><i>Proposal 8 The Mayor will, and the Boroughs should, require new developments (larger than 3,000 m2 or more than 100 dwellings) to establish separate foul sewer and surface water drains</i></p>	<p>Agreed- policy to be clarified. Although specific targets will be extremely difficult to monitor a reference to the need to have regard to the targets set out in the Mayor's draft water strategy 2007 will be added.</p> <p>As indicated above reference will be made to the need to have regard to the Mayor's draft water strategy 2007.</p>

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	<p><i>and not to discharge excess surface water into the combined sewer system.</i></p> <p><i>Proposal 16: Developers, in consultation with the relevant water company and sewerage undertaker, should demonstrate that there is an adequate water supply on and off site to serve the development, and that there is adequate capacity to dispose of the wastewater generated at the site. In some circumstances, it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of the existing water infrastructure.</i></p>	
<b>DP SD5 Resource Efficiency – sustainable materials and de/construction</b>	<p><b>Suggested clarifications and amendments to supporting text:</b> No Comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b> Point a) – it is unclear how much weight is meant by ‘giving preference’, does it mean all apart from exceptional circumstances for example – this could be clarified (e.g. by using a percentage) Point a-c) – does this really operate as a sequential hierarchy? Point c) – would it be possible to provide an increasing, date defined target – such as minimum 10% up until 2010, and 20% thereafter (to be reviewed) etc? Reference to specific targets/criteria in the policy would provide weight to negotiations with developers.</p> <p>General comment –a useful source of information on sustainable construction and demolition can be found in: Planning policies for sustainable building, Guidance for Local Development Frameworks, LGA October 2006. <a href="http://www.pas.gov.uk/pas/aio/27775">http://www.pas.gov.uk/pas/aio/27775</a> (In particular, see p.8, p.11 and p.14 for policy examples from LDFs and p.18 onwards provides an outline of should be possible in policy).</p>	<p>No- wording will be amended accordingly Not accepted- it is not clear how a date defined target would work and how it could be monitored</p>
<b>DP SD6 Poor Air Quality - Adaptation</b>	<p>General comment – a link is not made between this policy and DP ENV1. There would seem to be potential overlaps between them.</p> <p><b>Suggested clarifications and amendments to supporting text:</b> Section / policy title – the use of ‘adaptation’ in this context may be confusing and an incorrect assumption made that it is principally to do with climate change (whilst the comment in para 1.215 is acknowledged). Policy focus – it is unclear within the supporting text and the policy whether the focus is meant to be internal air quality or internal and external air quality. The supporting text and the policy would benefit from clarifying this.</p> <p><b>Suggested amendments and clarification to policy text:</b> General comment - More detail could be provided on the specific types of action and features which developers will be expected to implement.</p>	<p>Accepted – cross reference to be added to supporting text.</p> <p>Accepted- heading to be amended</p> <p>Accepted- policy is intended to deal with the impact of poor external air quality on internal air quality for sensitive uses. This will be clarified.</p> <p>More detail will be provided in revised SPD</p> <p>Accept- need for consistency</p>

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	<p>2<sup>nd</sup> para – replace ‘adjacent’ with ‘near’ as in the 1<sup>st</sup> para.</p> <p>Last para – whilst energy/CO2 is relevant the key source of poor air quality is likely to be traffic generation which is not addressed here. Requirements could be made to reduce the need to travel, reduce parking etc to compensate.</p>	Not accepted- policy ENV1 deals with the impacts of new development on external air quality.
<b>DP SD7 Operational Waste Management</b>	<p><b>Suggested amendments and clarifications to supporting text:</b></p> <p>Para 1.217 – to add to the urgency of this waste ‘message’ reference could be made to research by the Environment Agency, showing that at current rates of disposal to landfill, London only has landfill capacity for 4 years. Within the lifetime of the LDF dramatic changes will be required in the way the borough manages waste. <a href="http://www.environment-agency.gov.uk/subjects/waste/1031954/315439/1434288/1434300/?version=1&amp;lang=_e">http://www.environment-agency.gov.uk/subjects/waste/1031954/315439/1434288/1434300/?version=1&amp;lang=_e</a></p> <p>Para 1.193 – Suggest changing “Government planning policy” to “Government Planning Policy Statement (PPS) 10: Sustainable Waste Management” and providing a link / full reference.</p> <p>Para 1.220 and 1.221 – these 2 paragraphs appear incomplete.</p> <p><b>Suggested amendments and clarification to policy text:</b></p> <p>General comment – it is recognised that waste is to be addressed through separate SPD etc however reference to specific targets/criteria in the policy would provide weight to negotiations with developers.</p>	<p>Considered that the urgency of the waste message has been addressed sufficiently by both the document and the core strategy.</p> <p>Agreed- paragraph 1.444 will be amended.</p> <p>Paragraphs no longer included.</p> <p>Waste to be addressed through separated Joint Waste DPD for West London. Targets to be included in separate monitoring section.</p>
<b>Alternatives to policy DP SD3-7</b>	<p>More specific details on potential options for each of the 5 policies covered here would be useful. See general comments above.</p>	Agreed- alternative options will be more fully expressed.

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## Environmental Protection

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<p><b>DP ENV1: Air Quality</b></p>	<p><b>Suggested amendments and clarifications to supporting text:</b>            Para 1.226 – it is recognised that the need to manage the air quality impacts of traffic is necessary, however there may be some risk that the wording of the 1<sup>st</sup> sentence of this paragraph re development that “generates significant amounts of traffic” which could be taken to be acceptable so long as they undertake an air quality assessment. Reference could be included to clarify that all effort will need to be made to ensure that new development does not create air pollution problems by significantly increasing traffic and that the need to travel and public transport, walking and cycling should be promoted.</p> <p>Para 1.226 – 3<sup>rd</sup> sentence: could an exemption be made to the requirement for energy generation projects to have an air quality assessment for wind and solar? “Any energy generation project” may act as an (albeit minor) obstacle to appropriate renewables generation.</p> <p><b>Suggested amendments and clarifications to policy text:</b>            1<sup>st</sup> sentence – information on what is likely to be considered a “significant adverse impacts” within the supporting text would provide additional clarity.            1<sup>st</sup> bullet – policy SD6 refers to in or near AQMAs – could this also be used here (rather than just within)?            2<sup>nd</sup> bullet - see comments above on traffic generation.            5<sup>th</sup> bullet – see comments above on renewable energy generation projects.</p> <p><b>General comments:</b>            In Cleaning London’s Air, the Mayor’s Air Quality Strategy, 2002 (<a href="http://www.london.gov.uk/mayor/strategies/air_quality/index.jsp">http://www.london.gov.uk/mayor/strategies/air_quality/index.jsp</a>) a number of actions which boroughs can assist with were identified. Some of these which we would suggest could be included in the supporting / policy text are:  <u>Transport</u>            Low emission zones – excluding worst vehicles.            Help expansion of alternative fuelling infrastructure  <u>Buildings</u>            Efficient new / improved efficiency of old buildings            Lower construction pollution</p>	<p>Agreed. Additional text to be added stating “ every effort will be made to ensure new development will not create air pollution problems by generating significant amounts of traffic, and the council will promote reducing the need to travel and sustainable transport modes such as public transport, walking and cycling as promoted by Core policy CP TRN2 “Reducing the need to travel”.            Agreed.</p> <p>The significant adverse impacts of a development will vary from site to site, and it is used to allow flexibility. No change</p> <p>Agreed</p> <p>See changes above</p> <p>Will review the actions list in this document again.</p> <p>Will add reference to this document and to the importance of energy efficiency</p>
<p><b>DP ENV2: Noise &amp; Vibration</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b>            No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b>            No comments.</p>	

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<b>DP ENV3: Pollution and Amenity</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1<sup>st</sup> para, Final sentence – “acceptable” impacts may be open to interpretation. We would suggest reviewing the text in order that it is clearer what will be considered acceptable, or not.</p>	The word acceptable is used here as the impacts will vary from site to site, and it is used to allow flexibility. No change.
<b>DP ENV4: Contaminated Land</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.232 – mention could be made as a caveat of the potential ecological value of brownfield land / previously development land (e.g. as a habitat for protected species) and the need for this to be assessed and taken into account / appropriately mitigated / compensation proposed.</p> <p><b>Suggested clarifications and amendment to policy text:</b> General – mention could be made of the approach to the remediation of contaminated land and the need to consider its environmental impact and the potential for biological treatment, or bioremediation, for example and approaches which may reduce the environmental impact of remediation (within the context of the regulatory regime, risk assessment and the protection of human health etc).</p>	<p>Agreed will add additional text.</p> <p>Agreed will add additional text.</p>
<b>DP ENV5: Water</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.237, 1<sup>st</sup> sentence – the WFD was transposed into UK law via Regulations rather than just becoming law itself. Para 1.239 – The WFD may change these requirements as part of the process of classifying water bodies and setting standards and in terms of achieving good ecological and good chemical status .. General – reference could be made to the GLA's draft Water Strategy and implications for the policies considered. Para 1.242 – 1<sup>st</sup> sentence – the text could actively seek the removal of existing culverts and impounding as part of new development / redevelopment. This could also be included in the policy text. This is included in Open Space policy DP OS3 – so one suggestion is these policies are cross referenced here. Para 1.242, 3<sup>rd</sup> para – it would be beneficial to add 'at least' before the reference to an 8m or 5m buffer so a wider buffer is encouraged – this is a minimum. General – no mention is made of climate change and the potential effect this may have on water quality through reduced flows etc.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1<sup>st</sup> para, 1<sup>st</sup> sentence – although it is recognised that the individual effects of large developments is</p>	<p>Agree will amend.</p> <p>Agreed will cross reference accordingly.</p> <p>Agreed.</p> <p>Will add additional text to policy (individually or cumulatively) as in policy ENV6 flooding.</p>

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	<p>likely to be significant, the cumulative effects of smaller developments / changes can also be significant (see para 1.244). The policy could perhaps go further than encourage and actually require all developments to consider the sustainable drainage.</p> <p>1<sup>st</sup> para, 2<sup>nd</sup> sentence – suggest ‘appropriate’ is added before ‘sustainable drainage techniques’.</p> <p>2<sup>nd</sup> para, 1<sup>st</sup> sentence – suggest add that the removal of existing culverts and impounding as part of new development / redevelopment is sought rather than just avoiding new culverting and impounding.</p> <p>2<sup>nd</sup> para, 2<sup>nd</sup> sentence - suggest ‘at least’ is added before ‘8 metre’ and ‘5 metre’.</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>
<p><b>DP ENV7: Flooding</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b></p> <p>General – section could be titled ‘Flood and Drainage’ as two separate but related issues. See GLA’s draft Water Strategy (and the forthcoming Climate Change Adaptation Strategy) – reference could be made to the flooding and drainage hierarchies.</p> <p>General – no refence is made to surface water or sewer flooding (or groundwater flooding) all of which are potentially important issues within Brent and should be considered as part of FRAs (not just fluvial flooding).</p> <p>General – no mention is made of climate change and the need to incorporate planning for increased risk / the need for greater resilience (in the supporting text and the policy).</p> <p>General - while the financial impact of social costs may be very hard to calculate the social impacts are relatively well known. See for example: <i>The impact of flooding on urban and rural communities</i>, Environment Agency and Defra, December 2005, <a href="http://publications.environment-agency.gov.uk/pdf/SCHO1005BJTG-e-e.pdf">http://publications.environment-agency.gov.uk/pdf/SCHO1005BJTG-e-e.pdf</a></p> <p><b>Suggested amendments and clarifications to policy text:</b></p> <p>2<sup>nd</sup> para, last sentence – does not currently make sense.</p>	<p>Agreed</p> <p>Add additional text stating that the SFRA will identify areas at risk from surface water, sewer or groundwater</p> <p>flooding in addition to fluvial flooding. FRAs should consider all types of potential flooding.</p> <p>The first sentence of the flooding policy text justification mentions flood risk and its relationship with climate change. Will add additional text to enhance the current wording to emphasise the impacts on urban areas.</p>
<p><b>DP ENV8: Energy and Renewable Energy Generation</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b></p> <p>Para 1.257 – It would be useful to explain the link to policy DP SD 3.</p> <p><b>Suggested clarifications and amendments to policy text:</b></p> <p>2<sup>nd</sup> para, 1<sup>st</sup> sentence – after ‘demonstrable need’ add reference to also the need to demonstrate no significant impacts on the environment (air quality, congestion etc) or people (noise, health etc) etc as in the bullet points above which should also apply in these circumstances (traffic generation could be issue with such energy generation projects depending on the fuel). Any new non renewable energy generation should not conflict with policies relating to climate change, air quality etc,</p> <p>2<sup>nd</sup> para, 2<sup>nd</sup> sentence – The Mayor’s Energy Strategy also encourages boroughs to have “at least one showcase renewables project”. This could be referred to in the context of the EAA with further</p>	<p>Agreed – will amend to reflect this comment.</p> <p>Agreed.</p> <p>Agreed – this is also covered in sustainable development policies – which will be cross referenced here.</p>



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	details/guidance included in the supporting text.	
<b>Alternatives to ENV policies</b>	<p>It would be useful to include reference to policy numbers.</p> <p>The alternatives presented are generally whether to have a policy or not. This is a somewhat extreme position (and is an unrealistic option in most cases). There are likely to be alternatives to the content of each policy which should be explored and the selection of the preferred approach justified (which could include reference to the Core Strategy, London Plan or other requirements which restrict choices at this level).</p> <p>Alternatives can be imagined where much more stringent, binding targets are required for things like energy, air quality etc. and for those policies dictated by Government a further alternative could be to exceed these requirements / targets.</p>	Will amend alternatives with further options

### Enhancing Open Space and Biodiversity

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB response?
<b>Introduction</b>	<p><b>Suggested clarifications and amendment to supporting text:</b></p> <p>General comment – In the SA commentary on the Core Strategy policies we recommended that “in planning new or enhanced areas of open space, consideration could be given to accessibility by public transport, walking and cycling and the need to involve local residents and businesses in the process.” Our suggestion was that this could be addressed in the Development Control policies. We welcome the inclusion of reference to public involvement and the importance of accessibility in policy OS7 (provision and enhancement Of open space and nature conservation), however, given its importance from a sustainability perspective, suggest that some reference could also be made to this in the introduction.</p> <p>Para 1.258, final sentence - we suggest that the plan could also emphasise the need to enhancing existing and provide new open space wherever possible.</p> <p>Para 1.261, final sentence – the emphasis could also be to create new open space particularly in areas of deficiency.</p>	<p>Agreed and will amend introduction</p> <p>Agreed Agreed – additional text will be included - 'to create new open space particularly in areas of deficiency, where feasible'.</p>
<b>DP OS1: Open Space and Outdoor Recreation</b>	<p><b>Suggested clarifications and amendment to supporting text:</b></p> <p>No comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b></p>	<p>Agreed – cross reference will be made to relevant sustainable design policies</p>

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB response?
	<p>Point c) – reference to energy and water efficiency could also be added.</p> <p>Point d) – suggest delete reference to ‘natural’ (likely to be semi-natural at best) and add reference to ideally enhancing these areas not just avoiding negative effects.</p> <p>Point d) – is it likely that Natural England would accept even negligible impacts on SSSIs or the legislation (e.g. W&amp;C Act 1981) would allow any effect on protected species?</p> <p>Point e) – would it be relevant to also include reference to creating and connecting to cycle routes / networks here?</p> <p>Point f) – suggest rewording from “... proposals are avoided, reduced, or mitigated” to “... proposals are avoided. In exceptional cases where impacts are unavoidable, it may be acceptable for impacts to be reduced or mitigated to an acceptable / insignificant level”.</p>	<p>(SD3 &amp; SD4) Agreed – will amend accordingly</p> <p>Agreed – will amend text to ‘the development will have no significant effect’ &amp; cross reference to policies OS4/OS5/OS6</p> <p>Agreed</p> <p>Unnecessary wording – hierarchy can be clarified in supporting text</p>
<p><b>DP OS 2: Metropolitan Open Land (MOL)</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b> Point c) – reference to energy and water efficiency could also be added. Point d) – is it likely that Natural England would accept even negligible impacts on SSSIs or the legislation (e.g. W&amp;C Act 1981) would allow any effect on protected species? Point d) – suggest delete reference to ‘natural’ (likely to be semi-natural at best) and add reference to ideally enhancing these areas not just avoiding negative effects. Point e) – suggest rewording from “... proposals are avoided, reduced, or mitigated” to “... proposals are avoided. In exceptional cases where impacts are unavoidable, it may be acceptable for impacts to be reduced or mitigated to an acceptable / insignificant level”.</p>	<p>See changes above</p> <p>See changes above</p> <p>See changes above</p> <p>See changes above</p>
<p><b>DC OS3 Green Chains and the Blue Ribbon Network</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.278 – in para on the canal, reference to promoting river transport could be added.</p> <p><b>Suggested clarifications and amendments to policy text:</b> 2<sup>nd</sup> para – in the vicinity of or affecting could be a better way of describing the relationship of new development to the Blue Ribbon Network. 3<sup>rd</sup> para – as above.</p> <p>Point a) – would it be more correct to use the terms main rivers (the Brent Reservoir) and ordinary watercourses?</p>	<p>Agreed – will amend accordingly</p> <p>Agreed – ‘Visible from’ should be maintained</p> <p>See above</p> <p>It is useful to define in the policy text which watercourses are being referred to</p>

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB response?
	<p>Point e) – suggestion that the policy could seek that development not only “not interfere” with recreation potential etc. but actually seek to improve it.</p> <p>Last para – should now be “f) and g)” not “e) and f)” as a) has been added.</p>	<p>Agreed – will amend text to include ‘and where possible, seek to improve’</p> <p>Agreed</p>
<p><b>DP OS4 Sites of Special Scientific Interest (SSSI)</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b> 2<sup>nd</sup> sentence – development that is not on or adjacent to the SSSI could still adversely affect it. Therefore suggest this is broadened to include “development on, adjacent to or potentially affecting the SSSI”.</p> <p>2<sup>nd</sup> sentence - Is it likely that Natural England would accept even negligible impacts on SSSIs?</p>	<p>Agreed will amend accordingly although impacts of large scale development will be picked up by EIA</p> <p>Agreed – see above</p>
<p><b>DP OS5 Local Nature Reserves, Sites of Important Nature Conservation and Wildlife Corridors</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.283 – reference here is to Welsh Harp reservoir, but Brent Reservoir is used in para 1.280. To avoid confusion it is suggested that one or other name is used.</p> <p><b>Suggested clarifications and amendments to policy text:</b> 1<sup>st</sup> para – development that is not on or adjacent to a site could still adversely affect it. Therefore suggest this is broadened to include “development on, adjacent to or potentially affecting”.</p> <p>1<sup>st</sup> para – by referring to “development on” these sites it would appear that their loss / partial loss is acceptable despite the reference to “conserve and enhance the special interest features”. It is not clear if this intentional or not (the reference to “highest priority” implies that the others are not dispensable). Whilst there is clearly a hierarchy of designations, there should be a presumption against any loss of any site (with perhaps a caveat of exceptional circumstances for the more local sites with a requirement for compensation etc).</p> <p>Point b) – under the legislation (e.g. W&amp;C Act 1981) would “less harm” be acceptable for protected species?</p> <p>General – it would be beneficial to propose that development near or adjacent to these types of sites incorporates features / habitats within the development to complement them and extend / link wildlife corridors etc.</p>	<p>Agreed – amend text to ‘Brent Reservoir’</p> <p>Agreed – text will be amended accordingly</p> <p>An element of flexibility is maintained for conservation and habitat sensitive development.</p> <p>Agreed – amend text</p> <p>Agreed – additions can be made to point c), design features are also covered in OS7</p>
<p><b>DP OS6 Species Protection</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p>	

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB response?
	<p><b>Suggested clarifications and amendments to policy text:</b> It is slightly unclear from the policy whether the reference to 'protected species' is just including species protected under the law (e.g. W&amp;C Act 1981) or is using a wider definition as alluded to in the supporting text (e.g. including UK, London and Brent BAP species etc). It is assumed given table 1.2 it is the later definition, but the policy would benefit from this being clarified. Given the weight of UK and European law, the approach of the policy to allowing adverse effects where it cannot be prevented may not be acceptable for some of the species included in the definition of 'protected' here where they are protected by law.</p>	This policy has been revised to reflect these comments
<p><b>DP OS? Wildlife Corridors</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b> No policy number? Development that is not on or adjacent to a corridor could still adversely affect it. Therefore suggest this is broadened to include "development on, adjacent to or potentially affecting". In the supporting text and ideally in the policy it would be useful to make reference here to climate change and the need to allow habitats etc to adapt to a changing climate (corridors may be particularly important in this regard). Note the BRANCH project <a href="http://www.branchproject.org/">http://www.branchproject.org/</a> which will be developing tools for planners <a href="http://www.branchproject.org/tools/">http://www.branchproject.org/tools/</a> and see Natural England report <i>Spatial Planning for Biodiversity in our Changing Climate</i> <a href="http://www.branchproject.org.uk/available/reportsandpublications/ENRR677Spatialplanningforbiodiversityinourchangingclimate.pdf">http://www.branchproject.org.uk/available/reportsandpublications/ENRR677Spatialplanningforbiodiversityinourchangingclimate.pdf</a></p>	Agreed – text will be amended accordingly
<p><b>DP OS7: Provision and Enhancement of Open Space and Nature Conservation</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendments to policy text:</b> Location and security – although the text does refer to spaces needing to be "accessible" – this could perhaps be strengthened by making explicit reference to the need to ensure open spaces are accessible to local residents by non-car means, especially walking and cycling.</p>	Agreed – text will be strengthened to incorporate accessible by means of public transport, and walking and cycling in particular.
<p><b>Alternatives to DP OS1 – OS7</b></p>	As policies linked directly to Core Strategy policy CPOS1 – it is felt that the comment on is reasonable. However, some acknowledgement of the more detailed options policy by policy would be preferred.	
<p><b>DP OS8: Children's</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 1.305 – given that the Brent Play Strategy has identified significant areas of deficiency could</p>	S106 monies are only for arising

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB response?
<b>Play Facilities</b>	<p>the supporting text and ideally the policy make additional requirements of developments within these areas to not only compensate for the additional demand their development will cause but also address some of the existing local shortfall?</p> <p><b>Suggested clarifications and amendments to policy text:</b>            Location and security – although the text does refer to spaces needing to be “accessible” – this could perhaps be strengthened by making explicit reference to the need to ensure open spaces are accessible to local residents by non-car means, especially walking and cycling.            General – in areas of poor air quality (e.g. the AQMA) and noise pollution, particular consideration / provisions may be needed in relation to exposure to pollution (of all types).</p>	<p>deficiency not existing shortfall</p> <p>Agreed – will amend accordingly</p>
<b>Alternatives to OS8</b>	Three alternatives are outlined - this approach could be adopted as a useful approach for all the policies. Point c) is incomplete.	Agreed – alternatives options will be fully discussed.

### Meeting Housing Needs

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>General / Introduction</b>	The brief introduction is a very useful summary of the purpose of the policies in this chapter and the link to the Core Strategy. This format could usefully be repeated for the other chapters and also amalgamated to form the over objectives of the Development Policies DPD as requested in the general comments on the introduction above.	To be further considered
<b>Alternative options not considered</b>	<p>Boxes setting out the alternative options not considered are included under each policy which is welcomed and this format could usefully be repeated for the other chapters.</p> <p>However, some of the comments provide present a limited view of the options available (options may be foreclosed by the London Plan or the Core Strategy for example but it would be useful for this to be explicitly stated – as in DP H14 for example) and/or presents extreme options (e.g. the comment for DP H2 which refers to the option of prioritising new housing on greenfield sites when a more realistic option could be a lower percentage of brownfield than 95% but still the majority). The current UDP policy position should also be referred to where relevant to provide the business as usual option.</p>	<p>To be further considered</p> <p>Accepted in principle.</p>
<b>Housing Provision – Sources of Supply</b>		
<b>DP H1 Resisting Loss of Housing</b>	<p><b>Suggested clarifications and amendment to supporting text:</b>            No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b></p>	

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	No comments (apart from the second a) should be c)).	Agreed
<b>DP H2 Housing on Brownfield Sites</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 2.7, 3<sup>rd</sup> sentence – this contents of this sentence would benefit from further explanation. Care will be required in implementation of such a policy as there is potential conflict with other policies, especially ENV and OS policies, (e.g. brownfield sites may be of biodiversity or local recreational value). The need to manage these potential conflicts could be referred to in the supporting text and the policy.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Point d) – this should ideally be a presumption against development on any open space, not just open space which is deemed to be currently “of amenity value”.</p>	<p>Accepted in principle</p> <p>Accepted in principle</p> <p>Some open space is ‘left over’ from earlier development and is of no effective amenity value</p>
<b>DP H3 Sub-Division of Houses; Flat Conversions</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Although the need for more homes is acknowledged, care should be taken to protect the stock of family homes. This is noted in the supporting text (para 2.8), however we suggest this caveat might be included within the policy itself.</p> <p>The SA baseline (see SA Report Part A Appendix 5) study showed that Brent had in 2001 an above average household size – in fact the third highest average size (at Local Authority level) in England and Wales, and the second highest level of overcrowding in London. The critical shortage of family sized accommodation is also note in paragraph 2.32 under “A Balanced Housing Stock”. While Policy DP H9 addresses the need for new housing to provide family units (at 30%), this may partly be offset if existing family size dwellings are sub-divided in significant numbers.</p>	<p>The ‘conversion thresholds’ is considered sufficient to protect existing family housing</p> <p>Most conversions are of former Houses in Multiple Occupation rather than current single family dwellings. And as residential conversions have accounted for less than 10% of new housing completions in recent years in Brent, it is unlikely that “existing family size dwellings are sub-divided in significant numbers”.</p>
<b>DP H4 Change of Use</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>Sustainable Housing Development</b>		
<b>General</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 2.11 – clarify distinction between adaptation and mitigation. Housing development should be</p>	Accepted in principle

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	adapted to (inevitable) anticipated climate change and be design to incorporate mitigate measures to avoid exacerbating further climate change.	
<p><b>DP H5 Scale of New Housing: the Locational Approach</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1<sup>st</sup> sentence – the policy could perhaps go further than just seeking to ensure that new housing development is “without detriment” to local amenities and townscape and explicitly seek for new development to <i>enhance and contribute to</i> adjacent amenities and townscape.</p>	<p>Accepted in principle</p>
<p><b>DP H6 New Housing: External Design, Layout and Amenity Space</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Additional point – designing housing to adapt to and mitigate climate change could be added as a separate point cross referenced to policies DP SD 1-3 (in terms of adaptation, this could be in terms of ventilation and cooling for example)</p>	<p>Accepted in principle</p>
<p><b>DP H7 New Housing Development: Internal Layout and Amenity</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 2<sup>nd</sup> para, 1<sup>st</sup> sentence – reference here could be added on lifetime homes (as well as working from home) to provide flexible, accessible and adaptable housing (and references to it added to the supporting text).</p>	<p>Accepted in principle</p>
<p><b>DP H8 Very Large Housing Schemes, Including Major Estate Regeneration Areas</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Point d) – reference could be made to “generation of on-site renewable energy”, rather than “use of renewables”.</p> <p>Additional point – it will be essential to involve the local community in schemes of this type and therefore it is suggested that the following point is added: the employment of an exemplar approach to community engagement to ensure the views of the local community are incorporated into the design process, including the preparation and implementation of an appropriate community engagement plan.</p>	<p>Accepted in principle</p> <p>Accepted in principle</p>

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>A Balanced Housing Stock</b>		
<b>DP H9 Dwelling Mix (Self-contained Housing)</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> See comments on DP H4 – it would seem useful to cross-reference the two policies.</p>	NB No comments have been made on H4 so clarification of intent is required
<b>DP H10 Sheltered Housing (Self-contained Accommodation)</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP H11 New Non Self-contained Accommodation</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP H12 Housing Providing Care</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> This policy deals with new care housing, but is there a need in the borough for this policy / another policy to also cover the conversion of existing large residential / family properties into care housing – whilst a) suggests that the redevelopment of these types of property to build new care homes etc on the site would not be acceptable, it may be preferable for them to be retained and converted to care housing rather than redeveloped for other housing (assuming it is perhaps a larger / older style property of some architectural / townscape interest).</p>	<p>Definitely a need for a specific Housing Providing Care Policy, which covers new build as well as conversions.</p> <p>Criteria a) is not a 'presumption' against loss of existing family accommodation. The balance between the need for Housing Providing Care and the loss of family accommodation will be assessed on a site/location specific basis. Experience has shown that Housing Providing Care is more likely to involve the loss of larger family accommodation than in conversions to flats, particularly where several adjoining large houses would be converted into a single establishment.</p>



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<b>Policy</b>	<b>Suggested changes to the policy wording, or supporting text, as a result of the SA</b>	<b>LBB Response?</b>
<b>DP H13 Sites for Nomadic Peoples</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Point c) – would “local services” include services such as schools, shops and health care and adequate means of foul and surface water drainage etc? If not, consideration should be given to specifying them. “Accessible to local services” if taken in the physical sense would not include recognise the capacity or level of services available, which is also an important consideration.</p>	Foul and surface water drainage is not classified as a ‘local service’ but as a basic Building Regulations requirement. Local services’ accessibility in the context of ‘capacity, as opposed to distance, is a Policy CP H1 requirement.
<b>Affordable Housing Provision</b>		
<b>DP H14 Requirement for Affordable Housing</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP H15 Type of Affordable Housing</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP H16 Off-site Affordable Housing – ‘Provision in Lieu’</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	

### Connecting Places

<b>Policy</b>	<b>Suggested changes to the policy wording, or supporting text, as a result of the SA</b>	<b>LBB Response?</b>
<b>Assessing and Mitigation the Impact of Transport</b>		
<b>General / Introduction</b>	The chapter would benefit from a brief introduction to provide a summary of the purpose of the policies in this chapter and the link to the Core Strategy.	Accept- The policies in this chapter are structured around the four Transport Core Policies in the LDF Core Strategy and are intended to aid the implementation of these strategic policies. The policies in

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
		<p>this chapter are intended to ensure:</p> <ul style="list-style-type: none"> <li>• Sustainable transport modes,</li> <li>• Free flow of traffic</li> <li>• Safety of the road network and public highway</li> </ul>
<b>DP TRN1 Transport Assessment</b>	<p><b>Suggested clarifications and amendment to supporting text:</b>            Para 3.1, 2<sup>nd</sup> sentence – presumably a Transport Assessment will be needed anyway in order to determine if the development will have a significant effect on either the local road network or public transport services (if this shows it will not have a significant effect, then the Travel Plan would become unnecessary).</p> <p>General – whilst it is appreciated that applications have to be considered on their merits, it would be useful to mention in the supporting text, and integrate into policy if possible, that the cumulate impact of small scale developments can combine to have a significant impact and where an individual small scale scheme is responsible to adversely affecting a transport system in a small way but which means a threshold or level is reached it may mean the proposal is refused.</p> <p><b>Suggested clarifications and amendment to policy text:</b>            No comments.</p>	<p>Accept, will remove 2<sup>nd</sup> sentence</p> <p>Accept inclusion, however in application, we would advise that the developer includes the cumulative impact of other proposed developments in the vicinity of the subject site in Transport Assessment.</p>
<b>Alternatives to DP TRN1</b>	<p>A reasonable summary of alternatives and justification of their rejection is provided – one additional alternative that could be mentioned would be to limit the requirement for Transport Assessments and Travel Plans to only major developments in the policy (although this would not be the preferred approach in terms of sustainability).</p>	Accept- include alternative
<b>Sustainable Modes of Transport</b>		
<b>DP TRN2 Public Transport Integration</b>	<p><b>Suggested clarifications and amendment to supporting text:</b>            Para 3.9 – not clear whether the reference to UD10 is correct?</p> <p><b>Suggested clarifications and amendment to policy text:</b>            No comments.</p> <p><b>Possible amendment to policy text:</b>            No comments.</p>	N/A
<b>DP TRN3 Bus Improvements / Connections</b>	<p><b>Suggested clarifications and amendment to supporting text:</b>            No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b></p>	N/A

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	No comments.	
<b>Alternatives to DC TRN2 and 3</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	N/A
<b>DP TRN4 Cycling and Walking Environments</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> One possible addition could be to include text which seeks to promote a coherent network of walking and cycling routes – that is routes which are consistent, connected and provide common sense routes. Cycle routes and cycle lanes on roads should not end abruptly in unsafe or inconvenient locations, and special care should be taken at junctions and roundabouts. For example there has been criticism (there are many examples from grass-routes and more mainstream organisations such as Sustrans) that currently cycle lanes in many part of the UK often 'peter-out' just before dangerous junctions.</p>	<p>Unnecessary, information already included in policy text.</p> <p>Accept inclusion, important to cyclists and road safety.</p>
<b>Alternatives to DC TRN 4</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	N/A
<b>Brent's Road Network and Highway Design</b>		
<b>DP TRN5 Highway Design and Forming an Access to a Road</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 3.16 and 3.17 – as they are linked by purpose, it may be worth cross-referencing DP UD8 Public Realm – Streetscape (which in turn should cross-reference this policy).</p> <p><b>Suggested clarifications and amendment to policy text:</b> 3<sup>rd</sup> para - whilst this policy is focussed on access to the highway via crossovers and DP UD8 is concerned partly with loss of front gardens to hard-standing, the issues are clearly related. In our comments on DP UD8 we advocate that all loss of front gardens should be resisted (both in terms of streetscape but also drainage etc) and not "half of a front garden area". In turn we would advocate a more restrictive policy on crossovers (which also raise safety issues for children on the pavement etc). However, the policy stance in the two policies needs to be consistent.</p>	<p>Accept cross reference to UD8.</p> <p>Accept- change to policy, this will require joint working with the officer concerned.</p>
<b>Alternatives to DC TRN 5</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	N/A
<b>Freight</b>		
<b>DP TRN6 Freight</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Ideally the amount of freight movement in the borough by road would fall – however it is understood that the council must plan for the management of freight based on the assumption that it is likely to rise.</p>	<p>N/A</p> <p>Agreed but amendment is unnecessary</p>

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<b>Policy</b>	<b>Suggested changes to the policy wording, or supporting text, as a result of the SA</b>	<b>LBB Response?</b>
<b>Alternatives to DC TRN 6</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	N/A
<b>Parking in Brent</b>		
<b>DP TRN7 Parking: Residential and Non-Residential Developments</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p> <p><i>Possible omission:</i> Although parking for cycles is included in the Parking standards annex, this may also be a suitable location to include specific policy text on providing parking for bicycles. This should be conveniently located, secure, provide safe access to roads / cycle paths.</p>	<p>N/A</p> <p>Unnecessary, this is included in TRN4</p>
<b>DP TRN8 Restrictions of Off Street Parking</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p> <p>General - the development policies and Connecting Places should consider the Local Implementation Plan (LIP) and what spatial planning policies could do to further support its implementation.</p>	<p>N/A</p> <p>N/A</p> <p>Agreed, these have been considered in reference to Brent's Road Danger Reduction Plan in the LIP.</p>
<b>DP TRN9 Parking in Town Centres</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	<p>N/A</p> <p>N/A</p>
<b>Alternatives to DP TRN 7 - 9</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	N/A
<b>Parking Standards</b>	Note: an appraisal of the Parking Standards has not been undertaken.	N/A

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## A Strong Local Economy

### Business, Industry and Warehousing

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>General / Introduction</b>	<p>The chapter has a very useful introduction that provides a summary of the purpose of the policies in this chapter and the link to the Core Strategy.</p> <p>No mention of Areas of intensification / Area of Regeneration / Opportunity Areas (apart from Park Royal Opportunity Area - para 4.22) from the London Plan and Sub Regional Development Frameworks generally in the draft DP Preferred Options – do any of these occur in Brent and should the plan include policies related to these if they occur?</p>	Noted and accepted
<b>DP BIW1 Regeneration of Local Employment Areas</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> Even small scale B8 uses may generate traffic. The policy text could explicitly state that such uses in LEAs will only be allowed where there is no significant impact on local amenity, local traffic, noise, congestion etc.</p>	Noted and accepted
<b>DP BIW2 Facilities for Employees</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP BIW3 Work-live development</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP BIW4 Working at home</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
DP BIW5 Park Royal	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
Alternatives to DP BIW1-5	The alternatives proposed are essentially the opposite of the draft preferred policies. As such there is clear justification in them not being preferred, but there are potentially more realistic alternatives that could be presented, including the business as usual options i.e. the current UDP policy.	Noted and accepted

### Town Centres and Shopping

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
General / Introduction	Para 4.25 -4.26 – it cannot be denied that shopping is a central part of most people's lives. However it is suggested that the CS / DC policies could propose a vision for town centres as a centre of social and cultural gathering, in which shopping is just one activity. Although it is recognised that some policies (TC4, TC7-10) do focus on some of these more cultural issues, these opening paragraphs would seem also a good opportunity to present a vision of town centres as social and cultural centres.	Disagree. This would form an overarching vision to all boroughs' town centres. Certain local centres, especially neighbourhood centres should not have the same emphasis placed on them, in terms of their social and cultural role as the larger centres such as Wembley.
DP TC1 Brent Retail Need Allocations	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> The appraisal of the Core Strategy stated the importance of development at Wembley being complementary to existing local and independent retailers and other town-centre services: <i>"There may be some danger that a strong focus on a major retail centre at Wembley could damage the viability of local centres and retailers, thus undermining regeneration efforts elsewhere. It is vital that development at Wembley is complementary and not conflicting with existing local services. Major retail development is likely to attract external investment to the Borough, but equally much of the economic benefit accruing will leave the Borough, as retailers of a scale suitable for a major location are likely to be national, or multinational companies. The regenerative and local benefits may thus be limited to some low-skill employment – and the positive economic (multiplier) effects for the Borough smaller than hoped".</i> We would recommend therefore that policy TC1 / the supporting text states that although the focus</p>	Agree that impact needs to be assessed. Policy will be amended to cross refer to assessment of impact in policy CP TC2.

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	of allocations will be as set out, it is important for the council to consider the impact on independent local services in all cases to ensure such impacts are minimised.	
<b>Alternatives to DP TC1</b>	A reasonable summary of the justification for rejecting the alternatives is provided	
<b>DP TC2 Neighbourhood Centres</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> Para 4.32 – from a sustainability perspective it is important to ensure that neighbourhood centres provide as many retail and other town centre amenities as possible – for all local residents. This can play a strong role in regeneration, reducing travel need and supporting a genuinely local economy. We suggest therefore that although the needs of the “disabled and less mobile” are clearly important, neighbourhood centres are valuable for the whole community.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	Agree to amend wording as follow ‘It is important to retain the function of neighbourhood centres and parades to meet the day- to- day needs of the local residents. They are valuable for the local community especially for disabled people and the less mobile.’
<b>DP TC3 Other Shopping Parades and Units</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP TC4 Car-Boot / Other Recycling Sales</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> From a sustainability perspective the text could be strengthened by adding to the “considerations” something like:</p> <ul style="list-style-type: none"> <li>- All efforts will be made by the organiser of such activities to encourage people to travel by foot, bicycle or public transport. This could, for example, include the provision of specific information on walking and cycle routes and public transport times with any promotional materials.</li> <li>- Sufficient safe access must be provided to the site for pedestrians and cyclists. Sufficient, secure cycle parking space should also be provided.</li> </ul> <p>Another aspect that does not appear to be covered is the frequency that sales will be held – although this would presumably be covered by permitted development rights? However, impact on local residents etc will be significantly effected by the frequency e.g. whether they are occasional or regular events.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1<sup>st</sup> para - additional point could be added related to the comments above on public transport, walking and cycling and frequency.</p>	<p>Agree. The policy will cross refer to the Connecting Places policy DP TRN1 which requires development that is likely to have significant impact on the transport network to submit a Transport Assessment. The amended policy wording will read as ‘Proposals for regular Car-boot/ other recycling sales will be assessed with regard to their overall impact. The development will be subjected to a Transport Assessment (see policy DP TRN1) and will not be permitted unless.....’</p> <p>It is considered that there is no evidence showing need to remove permitted</p>

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
		development rights relating to frequency of sales.
<b>Alternatives to DP TC2-4</b>	A reasonable summary of the justification for rejecting the alternatives is provided. Comments could be added to refer to the current UDP policy position, the business as usual option, and why it is not the preferred policy (assuming it has changed from the UDP to the DPD).	See response above.
<b>DP TC5 Non-Retail Uses</b>	<b>Suggested clarifications and amendment to supporting text:</b> No comments.  <b>Suggested clarifications and amendment to policy text:</b> No comments.	
<b>DP TC6 Managing A3, A4 and A5 Uses</b>	<b>Suggested clarifications and amendment to supporting text:</b> No comments.  <b>Suggested clarifications and amendment to policy text:</b> Some town centres (anecdotally) appear to have considerable over-supply of fast-food takeaway restaurants (A5). One possible additional consideration could be the actual <i>need</i> for a specific type of use (especially A5), based on existing similar uses in the vicinity.	Agree. Add new criteria to give stronger environmental regards to A5 uses in town centres. And possibly apply a percentage of A5 proportion in town centres shopping frontage.
<b>DP TC7 Food and Drink (Café) Quarters</b>	<b>Suggested clarifications and amendment to supporting text:</b> No comments.  <b>Suggested clarifications and amendment to policy text:</b> No comments.	
<b>DP TC8 Amusement Centres and Mini-cab Offices</b>	<b>Suggested clarifications and amendment to supporting text:</b> No comments.  <b>Suggested clarifications and amendment to policy text:</b> No comments.	
<b>DP TC9 Offices and Residential Above Shops</b>	<b>Suggested clarifications and amendment to supporting text:</b> No comments.	



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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<p><b>Suggested clarifications and amendment to policy text:</b> Point 2 – what is considered to be “long-term vacant” could be clarified / specified to avoid any ambiguity in this policy.</p>	Disagree. The use of ‘Long-term vacant’ allows flexibility. This is to avoid units being left vacant purposively to fulfil the ‘vacant’ criteria for change of use above shops.
<b>DP TC 10 Existing and New Markets</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>Alternatives to DP TC5-9</b>	<p>A reasonable summary of the justification for rejecting the alternatives is provided. Comments could be added to refer to the current UDP policy position, the business as usual option, and why it is not the preferred policy (assuming it has changed from the UDP to the DPD).</p> <p>No mention of alternatives to DP TC10.</p>	Agree. Add the following to the Alternative statement ‘It is evident in the Town Centre Policy Performance section in the AMR that the relevant UDP policy has been under used because of the minimal level of change from residential above shops to commercial uses. However, it is also important in order to promote the diversity of town centre uses by allowing commercial uses above shops using long term vacant residential units.
<b>DP TC11 Design and Infrastructure</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>Alternatives to DP TC11</b>	A reasonable summary of the justification for rejecting the alternatives is provided.	
<b>DP TC12 Town Centre Management Initiatives</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>DP TC13 Neasden – Development</b>	<b>Suggested clarifications and amendment to supporting text:</b>	

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>Opportunities</b>	No comments.  <i>Suggested clarifications and amendment to policy text:</i> No comments.	
<b>DP TC 14 Brent's Distinctive Multi-cultural centres</b>	<i>Suggested clarifications and amendment to supporting text:</i> No comments.  <i>Suggested clarifications and amendment to policy text:</i> No comments.	
<b>DP TC15 Willesden Arts Quarter</b>	<i>Suggested clarifications and amendment to supporting text:</i> No comments.  <i>Suggested clarifications and amendment to policy text:</i> No comments.	
<b>Alternatives to DP TC5-9</b>	A reasonable summary of the justification for rejecting the alternatives is provided. Comments could be added to refer to the current UDP policy position, the business as usual option, and why it is not the preferred policy (assuming it has changed from the UDP to the DPD) and reasonable alternatives to the policies as included.	

### Culture, Leisure and Tourism

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
<b>DP CLT1 Culture Leisure and Tourism uses</b>	<i>Suggested clarifications and amendment to supporting text:</i> Para 4.41 – encouraging facilities with a “community element” is welcomed. This text could be strengthened further perhaps by recommending / seeking to ensure that local communities are involved in the planning, design, location and decisions over which types of facilities may be provided in their area.  Para 4.44 – We would recommend that any “major tourist generating activities” are only sought / provided in areas of excellent public transport (PTAL) and walking / cycling access – otherwise they can have significant impacts on local traffic problems, especially during large / popular events. This comment also applies to point v) in the policy.  Para 4.45 – this point regarding recruitment, training etc could be included as one of the criteria in	Whilst this suggestion is good in theory, in practice it is unrealistic. Supporting text will be strengthened to include the benefit of community involvement.  Major developments are encouraged in Town Centres according to the sequential approach. Our main Town centres already have very good public transport. This accords to criteria iii of the policy, which states the scale and

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Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	LBB Response?
	<p>the policy.</p> <p><b>Suggested clarifications and amendment to policy text:</b> See comments on the supporting text above.</p>	<p>use of the facility is appropriate to its location. Major tourist activities could also improve PTAL to some areas.</p> <p>Accepted.</p> <p>Not needed.</p>
<p><b>DP CLT2 Protection of Brent's Cultural Assets</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments (should be policy DP CLT2 not 1).</p>	<p>Fixed.</p>
<p><b>DP CLT3 Archaeological Sites and Monuments</b></p>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> (should be policy DP CLT3 not 2).</p> <p>Is it the case that it will never be appropriate / necessary to consider archaeology / undertake archaeological investigations etc on sites outside Sites of Archaeological Importance or in Archaeological Priority Areas? Should the possibility that it will be appropriate to consider currently unknown archaeology for sites outside these areas be included in the policy?</p>	<p>It would be unrealistic for every development to carry out an archaeological investigation. Areas of Archaeological Importance and Priority areas just flag this up.</p>
<p><b>Alternatives to DP CLT1-3</b></p>	<p>A reasonable summary of the justification for rejecting the alternatives is provided. Comments could be added to refer to the current UDP policy position, the business as usual option, and why it is not the preferred policy (assuming it has changed from the UDP to the DPD).</p> <p>No alternatives to DP CLT3 are provided.</p>	<p>Accepted</p>

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**Enabling Community Facilities**

<b>Policy</b>	<b>Suggested changes to the policy wording, or supporting text, as a result of the SA</b>	<b>LBB Response?</b>
<b>General / Introduction</b>	<p>The chapter has a useful introduction but would benefit from a summary of the purpose of the policies in this chapter and the link to the Core Strategy.</p> <p>Involving the local community and key stakeholders in planning for infrastructure is important and could be reflected more in the supporting text and policies.</p>	
<b>DP CF1 New Community Facilities and Extensions to Existing</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 1<sup>st</sup> para – needs could arise from the cumulative impact of several small developments and this should be reflected rather than just providing for major developments.</p>	Yes, agreed.
<b>DP CF2 Protection of Existing Community Facilities</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> 2<sup>nd</sup> bullet – it would strengthen this policy from a sustainability perspective to state clearly that any relocation must also be to a location with equal or better ease of access / accessibility by public transport, walking and cycling for the community it serves.</p>	No, this is not the intent of the criteria. Suitably relocated mainly means better provision has been made elsewhere and it better serves the community. New facilities are to be located in accessible areas, covered by policy CF1.
<b>DP C3 Developer Provision and Contributions Towards Community Facilities</b>	<p><b>Suggested clarifications and amendment to supporting text:</b> No comments.</p> <p><b>Suggested clarifications and amendment to policy text:</b> No comments.</p>	
<b>Alternatives to DP C1-3</b>	A reasonable summary of the justification for rejecting the alternatives is provided. Comments could be added to refer to the current UDP policy position, the business as usual option.	Agreed