SUSTAINABILITY APPRAISAL SCOPING REPORT

for

London Borough of Brent's Development Plan Documents:

Core Strategy
Development Control Policies
Site Specific Allocations

June 2005

Prepared for Brent Council

by

Collingwood Environmental Planning

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APPENDICES
(see separate volume)

TABLES

FIGURES

ABBREVIATIONS

AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
CMS	Convention on Migratory Species
CO	Carbon monoxide
DEFRA	Department for Environment Food and Rural Affairs
DETR	Department for Transport, Local Government and the Regions
DfT	Department for Transport
DPD	Development Plan Documents
EEC	European Economic Community
EC	European Commission
EIA	Environmental Impact Assessment
EU	European Union
GIS	Geographical Information System
GLA	Greater London Authority
Ha	Hectare
IMD	Index of Multiple Deprivation
LDD	Local Development Documents
LDF	Local Development Framework
LDS	Local Development Scheme
LGA	Local Government Association
LPA	Local Planning Authority
LIP	Local Implementation Plan
MOL	Metropolitan Open Land
NO2	Nitrogen dioxide
NVQ	National Vocational Qualifications
ONS	Office of National Statistics
ODPM	Office of the Deputy Prime Minister
PCT	Primary Care Trust
PM10	Particles measuring less than 10 microns
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SAP	Standard Assessment Procedure
SCI	Statement of Community Involvement
SD	Sustainable development
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SO2	Sulphur dioxide
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UDP	Unitary Development Plan
UNFCCC	United Nations Framework Convention on Climate Change
VAT	Value Added Tax

1. BACKGROUND

Location of Brent

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

Figure 1: Location of London Borough of Brent

Source: London Borough of Brent

Brent's Local Development Framework

Background on Local Development Frameworks

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

1.3 LDFs comprise of Local Development Documents (LDDs), which include Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) which expand policies set out in a development plan document or provide additional detail. The LDF also includes:

- The **Local Development Scheme** (LDS), setting out details of each of the local development documents to be produced and the time scales and arrangements for production.

- The **Statement of Community Involvement** (SCI), specifying how the authority intends to involve communities and stakeholders in the process of preparing local development documents.

- The **annual monitoring report**, setting out progress in terms of producing local development documents and implementing policies.

1.4   The LDF, together with the spatial development strategy prepared by the Major of London, form the statutory development plan.

1.5   DPDs can include:

- A **core strategy**, setting out the spatial vision, spatial objectives and core policies for the development of the local planning authority area.

- **Site specific allocations**, the sites which are proposed for development to meet the Council's and the Community's vision and core strategy including any policies which refer to the development of those sites, such as the mix of uses or the form of access arrangements.

- **Area action plans** (where needed).

- **Other development plan documents**, these can include thematic documents, for example, housing, employment and retail development.

- A **proposals map** illustrating the geographical extent of policies.

Brent's Initial Development Plan Documents

1.6   Brent Borough Council has recently commenced the development of its LDF, which will eventually replace the current UDP which was adopted in January 2004. The LDF will comprise a suite of documents which taken together will provide the Council's vision, objectives, policies and proposals for meeting social, economic and environmental development aims. In replacing the UDP, the LDF for Brent will provide the framework and policies for the Borough in all aspects of land use and spatial planning.

1.7   Initially, the DPDs to be produced for Brent include:

- a Core Strategy;

- a suite of generic policies for the management of development; and

- site specific allocations.

1.8   In addition, a proposals map will also be produced to provide a spatial representation of the policies contained within the DPDs. As the Annual Monitoring Report (AMR) or other appropriate mechanism illustrates a need for a further DPD these will be produced.

Objectives of the LDF

1.9   The draft LDF objectives identified below have been developed by the Borough with regard to national guidance and policy statements, the London Plan, Borough level strategies specifically; the Community Strategy, the Corporate Strategy and the Regeneration Strategy and also the Environment's Service Development Plan and the Planning's Service Operational Plan. The draft objectives are based upon the existing UDP objectives for the purposes of commencing the SA on the first tranche of DPDs. The draft objectives include:

1.   **Achieve Sustainable Development**; through prioritising locations, land-uses and mixed-use development with particular regard to parking and public transport to aid the creation of a sustainable and inclusive future for Brent residents, businesses, workers and visitors focusing on the importance of social cohesion.

2.   **Encourage Sustainable Development Practices**; through design, construction and demolition with particular regard given to energy, water and waste efficiency as well as minimising potential effects on climate change.

3.   **Reducing the Need to Travel**; through placing emphasis on meeting needs locally and the promotion and improvement of walking, cycling and public transport.

4.   **Protecting and Enhancing the Natural and Built Heritage and Environment of the Borough**; by respecting and enriching the special character of the Borough.

5.   **Meeting Housing Needs**; secure housing at the locations and of the size, density and tenure needed to meet Borough and Regional needs as appropriate.

6.   **Meeting the Impacts of Housing Development**; secure provision / contributions to satisfy the needs arising from new housing development; including education, health facilities, open space and play space.

7.   **Meeting Employment Needs and Aiding the Regeneration of Industry and Business**; creating a climate of certainty that appropriate employment sites and premises are available whilst acting as an attractor to new inward and indigenous investment, and improving employment and training opportunities.

8.   **Regenerating Areas Important to London as a Whole**; securing regenerative development in locations such as Wembley, Park Royal, South

Kilburn and Willesden Junction where the benefits will be felt both within and beyond the Borough boundary.

9. **Revitalise Town and Local Centres**; through the maintenance and enhancement of their vitality and viability and securing new development proposals.

10. **Promoting Tourism & the Arts**; for the benefit of Brent residents, businesses, workers and visitors and maximise their regenerative effect. Special regard is to be had to the role of Wembley as a key attractor.

11. **Protecting, Providing, and Enhancing Open Space and Leisure and Recreational Activities**; for the enjoyment of Brent residents now and in the future.

12. **Meeting the Community's Diverse Needs**; deliver a more responsive, sensitive and fair service to all members of Brent's diverse community securing the provision of community facilities and services for all.

13. **Treating Waste as a Resource**; ensuring that there is an appropriate network of facilities for integrated waste management.

14. **Creating a Safe and Secure Environment**; embrace a design-led approach to reduce crime and fear of crime.

1.10 These objectives are relevant to all three DPDs being initially prepared, but particularly the Core Strategy. The respective objectives for the three DPDs will be refined during their development.

LDF Programme

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

- Issues and options consultation commencing September / October 2005.

- Preferred options statutory consultation commencing January / February 2006.

- Submission of DPDs in September / October 2006.

- Examination in March 2007.

Sustainability Appraisal of the Development Plan Documents

1.12 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA will consider the DPD's implications, from a social, economic and environmental perspective, by assessing options and the draft DPDs against available baseline data and sustainability objectives.

1.13 SA is mandatory for LDDs under the requirements of the Planning and Compulsory Purchase Act (2004)[1], which includes DPDs. Article 19 (5) states that the local planning authority must also "(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal". The Act also requires that SA is an integral part of the LDF production process.

1.14 The Government's draft guidance on Strategic Environmental Assessment (SEA)[2] indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004[3] – the SEA Regulations.

1.15 In September 2004 the Government published a draft consultation paper *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks[4]*. While SEA and SA are distinct processes, the draft SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.

1.16 The draft guidance has recently been supplemented by an '*Interim advice note on frequently asked questions*' (ODPM, April 2005) in advance of publication of the final version of the guidance which is expected this Summer. The SA process for the DPDs will broadly follow the SA process set out in the draft guidance as amended and clarified by the Interim Advice (see Section 2). The SA is being undertaken in parallel for all three DPDs being prepared and this single Scoping Report covers them all. Brent Council has commissioned CEP to undertake the SA of the first three DPDs being prepared in Brent.

1.17 This SA is also being conducted in the context of the *Sustainability Appraisal of Brent's Unitary Development Plan Deposit Draft 2000* (Brent Council, March 2001) and the SA of the adopted UDP. It is intended to use the findings of these previous SAs to inform and assist the process, for example by adapting objectives, identifying issues and understanding the wider development context of the DPDs.

Purpose of this Scoping Report

1.18 The purpose this SA Scoping Report is to set out the initial context and findings of the SA and the proposed approach to the rest of the appraisal. The aim is to ensure that the SA is comprehensive, and addresses all relevant issues and objectives, by enabling input from key stakeholders and consultation bodies at an early stage in the process. In addition, the Scoping Report is being used to consult the four consultation bodies defined in the SEA Regulations on the likelihood of significant environmental effects.

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[1] http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs
[2] ODPM (2004) *A Draft Practical Guidance to the Strategic Environmental Assessment Directive*.
[3] Statutory Instrument 2004 No. 1633.
[4] ODPM (2004) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks.*

1.19   The Scoping Report sets out an initial assessment of:

- the relationship of the DPDs with other relevant plans and programmes;

- relevant sustainability objectives established at the national, regional or local level;

- the current environmental, social and economic baseline and likely evolution thereof. This is an ongoing process and where specific environmental, social or economic factors require assessment in relation to a specific DPD this will be collated throughout the SA process;

- the characteristics of the area which are most likely to be affected by the DPDs;

- the likely key sustainability issues for the Borough – based on assessment of the baseline, the results of an SA scoping workshop (8th February 2005) and existing reviews and assessments of the Borough, such as the SA of the adopted UDP. It is possible as they are developed that certain DPDs will raise specific sustainability issues. At this stage a generic list of sustainability issues applicable to all the DPDs is included, but these will be refined as necessary if there are certain issues of particular relevance to a specific DPD.

1.20   The report also sets out the proposed methodology for the SA, including suggested sustainability appraisal objectives and criteria, the level of detail and scope of the SA, a proposed programme of work and draft structure of the final SA Report. The report is also being used to determine whether or not a plan or programme is likely to have significant environmental effects (see below).

Consultation on the Scoping Report

1.21   Comments on this Scoping Report have been invited from the four consultation bodies required by the SEA Regulations together with other key consultees representing social, economic and environmental interests in the Borough. These additional organisations and individuals have been drawn from the existing Statement of Community Involvement issued in January 2005 as part of the LDF development process. A list of those being consulted is included in Appendix 1.

Issues or areas where consultees' input is particularly requested have been flagged throughout this Scoping Report in boxes like this one, as well as being listed in Table 1 at the end of this section. However, consultees are welcome to comment or provide input on any aspect of the content and process outlined in this report.

1.22   Please send responses to:

> **Ken Hullock**
> **The Planning Service**
> **Brent House**
> **349-357 High Road**
> **Wembley**
> **HA9 6BZ**
>
> **Email: ken.hullock@brent.gov.uk**

1.23   The Scoping Report is the first report to be produced as part of the SA process. Further information on the subsequent stages can be found in section 2.

Determination of the need for environmental assessment

1.24   As part of the SEA Regulations, responsible authorities (in this case Brent Council) are required to determine whether or not a plan or programme is likely to have significant environmental effects and as a result does or does not require environmental assessment (Regulation 9). As part of this determination, the consultation bodies (i.e. the Countryside Agency, English Heritage, English Nature and the Environment Agency) must be consulted for their opinion on the likelihood of significant effects. This Scoping Report is therefore partly being used to formally request the consultation bodies' opinion on the likelihood of significant effects for the three DPDs:

- a Core Strategy;

- a suite of generic policies for the management of development; and

- site specific allocations.

1.25   It is anticipated that all three of the DPDs being prepared are likely to have significant environmental effects and therefore the Borough is minded to undertake SA incorporating SEA on all three. However, the need for a determination is most relevant in this case for those DPDs which may only deal with the use of "small areas at local level" (Regulation 5(6)(a)). This could possibly be the case for the suite of generic policies and site specific allocations. To avoid confusing, the Borough has decided to make a formal determination on all three DPDs following consultation with the four consultation bodies.

> *Question 1:*
> *In accordance with Regulation 9 of the SEA Regulations (2004), the consultation bodies (the Countryside Agency, English Heritage, English Nature and the Environment Agency) are ask for their opinion on whether the three DPDs being prepared are likely to have significant environmental effects.*

Table 1: Issues upon which consultees opinions are being sought

Question 1:	*In accordance with Regulation 9 of the SEA Regulations (2004), the consultation bodies (the Countryside Agency, English Heritage, English Nature and the Environment Agency) are ask for their opinion on whether the three DPDs being prepared are likely to have significant environmental effects.*
Question 2:	Consultees are requested to comment on the proposed methodology, in particular whether the proposed scope and level of the detail of the SA is appropriate.
Question 3:	*Consultees are requested to comment on the proposed SA Report structure.*
Question 4:	*Consultees are requested to review Table 4 below and Appendix 2 and provide details of any other plans and programmes and sustainability objectives that they consider to be particularly relevant to the DPDs and should therefore be considered as part of the SA.*
Question 5:	*Consultees are requested to review Appendix 3 and identify any baseline data and sources of data that they consider to be missing and should be included as part of the SA of the DPDs and any key issues and trends this data identifies. The indicators identified are initial suggestions. Consultees are also invited to make suggestions for improved / additional indicators.*
Question 6:	*Consultees are requested to highlight any key problems omitted that they consider the SA of the Brent DPDs should address and comment on those identified in Table 6.*
Question 7:	*Consultees are requested to comment on the proposed appraisal objectives and criteria (see Table 7) and whether they are appropriate.*
Question 8:	*Consultees are requested to comment on the types of options that may be considered as part of the SA of the DPDs and whether they are appropriate.*

2. PROPOSED SUSTAINABILITY APPRAISAL METHOD

Overview of proposed method

2.1 The proposed approach to the Sustainability Appraisal of Brent's DPDs will broadly follow the SA process set out in the draft Government SA guidance – *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, Consultation Paper* (September 2004).

2.2 The draft guidance advocates a five stage process to undertaking SA:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

- Stage B: Developing and refining options.

- Stage C: Appraising the effects of the preferred options.

- Stage D: Consultation on the preferred options and SA Report.

- Stage E: Monitoring implementation of the DPDs.

2.3 These stages are dived into a number of tasks in the draft guidance (see Table 2). According to the draft guidance, a Scoping Report should set out the findings of Stage A together with information on what happens next in the process. Stage A consists of six tasks, see Table 2.

Table 2: Proposed Sustainability Appraisal stages and tasks

Pre-Production
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Tasks
• Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the DPDs **(Task A1)**
• Collect relevant social, environmental and economic baseline information and produce characterisation of the DPD area **(Task A2)**
• Identify key sustainability issues for the SA to address **(Task A3)**
• Develop the SA framework, consisting of the sustainability objectives, indicators and targets **(Task A4)**
• Test the DPD objectives against the sustainability objectives and whether the DPD objectives are consistent with one another **(Task A4)**
• Produce Scoping Report and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible options for solutions **(Task A5)**
Production
Stage B: Developing and refining options
Tasks
• Develop the SA consulting relevant stakeholders, and test issues and options against the

SA framework **(Task B1)**
• Consultation on issues and options and initial SA Report **(Task B2)**
Stage C: Appraising the effects of the preferred options
Tasks
• Predict the effects **(Task C1)** and carry out detailed assessment of the effects of the preferred options **(Task C2)**
• Propose measures to maximise beneficial effects and mitigate adverse effects **(Task C3)**
• Develop proposals for monitoring **(Task C4)**
• Prepare the final SA Report(s) of the draft DPDs **(Task C5)**
Stage D: Consultation on the preferred options and SA Report
Tasks
• Consult on the final SA Report(s) along with the preferred options **(Task D1)**
• Carry out, where necessary, appraisal of any significant changes made as a result of consultation, including possible alternative site proposals **(Task D2)**
• Submit DPD and SA Report to the Secretary of State
Examination
• If necessary, carry out appraisal of any significant changes made as a result of representations, including possible alternative site proposals **(Task D2)**
Adoption and monitoring
Tasks
• Inform consultees that DPDs have been adopted as part of the LDF development processes
• Issue statement summarising information on how the SA results and consultees' opinions were taken into account, reasons for choice of options (i.e. policy approach and allocations), and proposals for monitoring, including in relation to any recommended changes **(Task D3)**
• Make DPDs and SA Report available to the public and other stakeholders
Stage E: Monitoring implementation of the DPDs
Tasks
• Monitor significant effects of the DPDs to identify at an early stage any unforeseen adverse effects **(Task E1)**
• Publish sustainability monitoring reports periodically as part of the Annual Monitoring Report as new information becomes available **(Task E1)**
• Undertake appropriate remedial action where necessary effects **(Task E2)**

Amendments following Interim Advice from Government

2.4   Consideration has been taken of the suggested amendments and clarification provided by the '*Interim advice note on frequently asked questions*' (ODPM, April 2005). The key changes and relevant points of clarification arising from the Interim Advice include:

• The removal of the requirement to prepare an "Initial Sustainability Appraisal Report" which the Interim Advice suggests is contrary to the more continuous nature of the LDD preparation process (note that as Brent propose to consult on

issues and options as part of the DPD preparation process it is currently proposed that it would be beneficial for this to be accompanied by an Initial SA Report).

- Amending Stages B and C to correspond more closely with the plan making process under the Planning and Compulsory Purchase Act 2004, including revising Stage B to encapsulate the body of the appraisal activity:

  o testing the plan objectives against the Sustainability Appraisal Framework;

  o developing and refining options;

  o predicting and assessing effects;

  o identifying mitigation measures; and

  o developing proposals for monitoring.

- Stage C will then involve documenting the appraisal process in the Sustainability Appraisal Report.

- A single Scoping Report can be prepared and consulted on for a number of LDDs provided adequate information on the scope and level of detail of the information to be included in the SA Reports for each LDD to which the Scoping Report applies is included.

- A determination is required under the SEA Regulations on whether or not a plan which deals with the use of "small areas at local level", or which makes "minor modifications" to an existing plan is likely to have significant environmental effects (whether positive or adverse). The Interim Advice suggests that this is more likely to apply to SPDs, but that in some cases a DPD may also do so. It also suggests that to meet the requirement to consult the Consultation Bodies before making its determination, the authority may conduct this as part of the consultation carried out on the SA Scoping Report on that LDD. It also suggests that LPAs may find it useful to consult on this as part of the consultation on a number of LDD SA Scoping Reports at the same time.

2.5 The proposed response to this recent advice and how the SA of Brent's DPDs will be amended includes:

- As Brent proposes to consult on issues and options as part of the DPD preparation process, it is currently proposed that it would be beneficial at the same time to consult on an Initial SA Report.

- Stage B and C will be revised to include those tasks suggested, including delaying task A4, the testing of the DPD objectives against the sustainability objectives, until Stage B.

- A single Scoping Report (this document) will be prepared covering the three DPDs initially being prepared in Brent.

- A formal determination process under the SEA Regulations will be undertaken, including consultation with the four consultation bodies.

Level of detail and scope

2.6   The level of detail and content of the three DPDs being prepared, and the relationship between them, is not clear at this early stage. It is therefore difficult to be precise about the level of detail and scope that the SA will need to adopt. This will therefore need to be refined as the DPD process continues.

2.7   It is anticipated that there will be a close relationship between the three DPDs. The Core Strategy is likely to provide the overall direction, with more detail on implementation provided by the generic policies for the management of development and the spatial expression provided by the site specific allocations. If this is the case, the SA will need to be tiered to reflect this increasing level of detail under a common sustainability framework. To reflect this relationship, it is likely to be appropriate to present the results of the appraisal in a closely coordinated way.

2.8   As a strategic appraisal, the SA will not include a detailed assessment of each potential development site, for example, that may come forward within the Borough. However, it will be appropriate to identify generic conditions and criteria that should be applied to sites generally as and when they come forward for development. The SA will seek to ensure that sustainability is at the centre of the development of the DPDs. In turn more detailed policies and implementation plans, in other DPDs or SPDs for example, will need to be subject to more detailed appraisal and, as appropriate, certain sites may require a formal Environmental Impact Assessment (EIA) as part of a future application.

2.9   At the strategic level, in particular, there are inevitable uncertainties associated with undertaking an appraisal of the sustainability implications of a plan. There may be limitations, including data availability and the need to rely on qualitative as well as quantitative data and appraisal. It will therefore be important in reporting the SA to be transparent about any assumptions that are made and clearly state the uncertainties associated with any predictions.

> *Question 2:*
> *Consultees are requested to comment on the proposed methodology, in particular whether the proposed scope and level of the detail of the SA is appropriate.*

Proposed programme

2.10   The SA will be ongoing during the production of the DPDs and therefore will follow the proposed DPD programme (see paragraph 1.11). It is currently proposed that a report discussing the sustainability implications will accompany the consultation on the DPDs issues and options report in September / October 2005, with formal

consultation on the final SA Report and preferred options documents for the DPDs in January / February 2006. The submission DPDs, which are expected in September / October 2006, will be accompanied by any amendments that are necessary to the SA Report.

Proposed structure and content of the Sustainability Appraisal Report

2.11   The results of the appraisal will be presented in a Sustainability Appraisal Report. It is proposed that this will broadly follow the structure proposed in the draft SA guidance (see Table 3). It is expected that there may be some modifications to these contents as the SA progresses.

2.12   It is yet to be finalised whether the SA of the three DPD's will be reported in a single SA Report or in three separate SA Reports. The proposed SA Report structure may need to be amended to reflect this.

Table 3: Proposed SA Report structure

SA Report Component	Contents
1. Summary and outcomes	- Non-technical summary - Statement on the difference the SA has made by changes to the DPD - How to comment on the report
2. Appraisal Methodology	- Approach adopted to the SA - When the SA was carried out - Who carried out the SA - Who was consulted, when and how
3. Background	- Purpose of the SA and the SA Report - Objectives of the DPD and outline of contents - Compliance with the SEA Directive / Regulations
4. Sustainability objectives, baseline and context	- Links to other strategies, plans and programmes and sustainability objectives - Description of the social, environmental and economic baseline characteristics and the predicted future baseline - Difficulties in collecting data and limitations of the data - The SA framework, including objectives, targets and indicators - Main social, environmental and economic issues and problems identified
5. DPD issues and options	- Main options consider and how they were identified - Comparison of the social, environmental and economic effects of the options - How social, environmental and economic issues were considered in choosing the preferred options - Other options considered, and why these were rejected - Proposed mitigation measures
6. DPD proposals	- Significant social, environmental and economic effects of the draft DPD - How social, environmental and economic problems were

SA Report Component	Contents
	considered in developing the DPD
	• Proposed mitigation measures
	• Uncertainties and risks
7. Implementation	• Links to other tiers of plans and programmes and the project level (environmental impact assessment, design guidance, etc)
	• Proposals for monitoring

Question 3:
Consultees are requested to comment on the proposed SA Report structure.

3. RELATIONSHIP TO OTHER PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES

Purpose

3.1 The purpose of reviewing other plans and programmes, which includes policies, strategies and initiatives, and sustainability objectives as part of the SA is to ensure that the relationship with these other documents and requirements are explored to enable the Responsible Authority (in this case London Borough of Brent) to take advantage of any potential synergies and to deal with any inconsistencies and constraints. The plans, programmes and sustainability objectives that need to be considered include those at an international, national and regional and local scale.

3.2 Table 4 below shows a summary list of plans and programmes included in the review as part of the SA. Appendix 2 contains details of an initial review of these and a summary of the implications for the DPDs.

> *Question 4:*
> *Consultees are requested to review Table 4 below and Appendix 2 and provide details of any other plans and programmes and sustainability objectives that they consider to be particularly relevant to the DPDs and should therefore be considered as part of the SA.*

Table 4: List of relevant plans and programmes reviewed

Plan or programme title
International
• The World Summit on Sustainable Development, Johannesburg (September 2002). Commitments arising from Johannesburg Summit.
• Bonn Convention on Conservation of Migratory Species (1979).
• Directive on Conservation of Wild Birds.
• Conservation of Natural Habitats and Wild Fauna & Flora (Directive 92/43/EC) (The Habitats Directive).
• Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979).
• Ramsar Convention on Wetlands of International Importance Especially Waterfowl Habitat (1971).
• United Nations Millennium Declaration (2000).
• Kyoto Protocol to the UN Framework Convention on Climate Change (1992).
• Air Quality Framework Directive (Directive 96/62/EC).
• Urban Waste Water Treatment Directive.
• Nitrates Directive (91/676/EEC).
• Water Framework Directive (2000/60/EC).
• Directive to Promote Electricity from Renewable Energy (2001/77/EC).
• Waste to Landfill Directive (93/31/EC).
National
• Securing the Future. The UK Government Sustainable Development Strategy, March 2005

Plan or programme title
• DEFRA (July, 2004). Making Space for Water: Developing a new Government Strategy for Flood and Coastal Erosion Risk Management in England. A Consultation Exercise. And First Response, DEFRA, March 2005.
• Department for Transport (2004). The Future of Transport: A Network for 2030.
• National Air Quality Strategy for England; Wales; Scotland and Northern Ireland; 2000.
• DETR and CABE (2000). By design: Urban design in the planning system: towards better practice.
• A New Commitment to Neighbourhood Renewal: National Strategy Action Plan; 2001.
• Communities Plan (Sustainable Communities: Building for the Future); 2003.
• Guidance on Tall Buildings; 2003 CABE and English Heritage.
PPGs and PPSs
• PPS1: Creating Sustainable Communities.
• PPG3: Housing.
• PPG4: Industrial and Commercial Development and Small Firms.
• PPS6: Planning for Town Centres.
• Draft PPS9: Biodiversity and Geological Conservation.
• Draft PPS10: Planning for Sustainable Waste Management.
• PPS12: Local Development Frameworks.
• PPG13: Transport.
• PPG15: Planning and the Historic Environment.
• PPG16: Archaeology and Planning.
• PPG17: Planning for Open Space, Sport and Recreation.
• PPS22: Renewable Energy and supporting guidance.
• PPS23: Planning and Pollution Control.
• PPG24: Planning and Noise.
• PPG25: Development and Flood-risk.
Regional / London
• The London Plan: Spatial Development Strategy for Greater London; 2004.
• Sustainability Appraisal of the London Plan, Final Report; April, 2004.
• A Sustainable Development Framework for London. London Sustainable Development Commission; June 2003.
• The Mayor's Transport Strategy; 2001.
• Sustaining Success: The Mayor's new Economic Development Strategy.
• Connecting with London's Nature. The Mayor's Biodiversity Action Plan.
• Design for Biodiversity; 2003. London Development Agency with English Nature; GLA and the London Biodiversity Partnership.
• Sounder City: the Mayor's Ambient Noise Strategy; 2004.
• Cleaning London's Air; The Mayor's Air Quality Strategy; 2002.
• Green Light to Clean Power. The Mayor's Energy Strategy; 2004.
• Rethinking Rubbish in London. The Mayor's Municipal Waste Management Strategy; 2003.
• London: Cultural Capital – Realising the potential of a world class city. The Mayor's Culture Strategy; 2004.
• London's Warming – The Impacts of Climate Change on London, Technical Report, 2002.
• London's Framework for Regional Employment and Skills Action (FRESA), the London Skills Commission.
• West London Tourism Strategy and Action Plan; March 2005.
• Accessible London: Achieving an Inclusive Environment. SPG April 2004.

Plan or programme title
• Draft SPG on Industrial Capacity, September; 2003
• Draft SPG on Affordable Housing; July 2004.
Local / Borough
• Adjoining Borough Strategies and DPD e.g. London Boroughs of Harrow, Ealing, Barnet, Westminster, Kensington and Chelsea, and Hammersmith.
• Brent Regeneration Action Plan 2004 – 2006.
• Brent Crime and Disorder Reduction and Community Safety Strategy 2002 – 2005.
• Brent Council's Corporate Strategy 2002 – 2006, Building a Better Borough.
• Brent Community Plan 2003-2008: A Plan for Brent.
• Land Decontamination Strategy (ongoing).
• Brent Air Quality Action Plan; 2004.
• Brent Parks Strategy 2004 – 2009.
• Brent Biodiversity Action Plan; 2001.
• Brent's Sport and Physical Activity Strategy 2004 – 2009.
• Brent Playing Pitch Strategy 2003-2008; May 2004.
• Brent Municipal Waste Strategy – Framework Document; September 2002.
• Action Plan 2001 for a Sustainable Brent (LA 21).
• Local Implementation Plan (LIP) for Brent (currently under consultation).
• A Regeneration Strategy for Brent 2001-2021.
• Nature Conservation in Brent. London Ecology Unit; 2000.
• London Borough of Brent Statement of Licensing Policy, 2005.
• School Organisation Plan 2003-2008; December 2003.

Implications

3.3   All of the plans and programmes will influence the emerging DPDs to some degree. However, the London Plan, as the spatial strategy for London, the Sustainable Development Framework for London and the various Mayoral strategies as well as the various Brent plans, strategies and guidance, including the Community Plan, are of particular relevance. The objectives contained within these will provide the direction for spatial planning within Brent. Many of the objectives of these plans are related to the sustainability objectives. These sustainability objectives will provide a framework within which the policies formulated within the DPDs should produce the desired outcomes of these plans in a sustainable manner.

3.4   There is a clear hierarchy of plans and programmes in certain areas descending from the international and/or national level through to the local level. The implications for the DPDs generally tend to become more specific and precise at the more local level. The requirements and objectives of the higher level plans and programmes should in most cases have already been incorporated in the more local level plans and programmes.

3.5   Several issues are highlighted in the analysis of the plans and programmes as detailed in Appendix 2. It will be important for DPDs to reflect this context and to

incorporate the requirements of these other plans and programmes as appropriate and for the SA to consider the sustainability implications during the appraisal process.

4.   BASELINE CHARACTERISTICS

Environmental, social and economic baseline data

4.1   The SEA Directive requires information to be gathered on "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" and "the environmental characteristics of the areas likely to be most significantly effected".

4.2   Government guidance stresses that baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.   The collection and assessment of broad information / data about the current and likely future status of a broad range of indicators for the Borough is key to the SA.

4.3   As noted in section 1, the three DPDs initially being prepared may require more detailed data and where relevant specific indicators tailored to the individual DPDs. However, these requirements will become clearer during the course of the production of the DPDs. The baseline data collection and analysis will therefore be an ongoing process during the subsequent stages of the SA and will supplement the initial baseline assessment included in this Scoping Report.   A fuller description of the characteristics of the Borough will be included as part of final SA Report.

4.4   The baseline assessment is structured according to the sustainability objectives (see section 6), which are sub-divided under three themes; social; environmental; and economic (see Table 5).   An initial set of key indicators has been identified under each objective (see Appendix 3). The information in Appendix 3 is presented in a tabular format which includes the data itself and, where it exists, comparators with other areas, trends and targets. In addition, comments are provided on the issues arising from the data. Following each objective, maps are included where relevant to present certain indicators and data spatially.

> *Question 5:*
> *Consultees are requested to review Appendix 3 and identify any baseline data and sources of data that they consider to be missing and should be included as part of the SA of the DPDs and any key issues and trends this data identifies.   The indicators identified are initial suggestions.   Consultees are also invited to make suggestions for improved / additional indicators.*

Table 5: Summary List of Baseline Data Topics

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

Summary of baseline data and key trends

4.5 A brief summary is presented below of some of the key baseline data and associated trends. This is organised under the 22 sustainability objectives (see Section 6). See Appendix 3 for further details.

Social

Prosperity and social inclusion (S1)

4.6 The Index of Multiple Deprivation covers a range of domains (income, employment, health deprivation and disability, education skills and training, housing and geographical access to services) combined into a single deprivation score for each area. It is presented either as a score out of 100 or a ranking of local authorities or Super Output Areas. Brent includes areas of relatively high deprivation, but on average is less deprived in comparison with many inner London boroughs. Overall, Brent slightly improved its rank position of local authorities between 2000 and 2004. However, the Borough performs relatively poorly against two of the measures that make up the multiple index in 2004, namely income and employment deprivation.

4.7 There is a disparity in deprivation across the Borough. Five wards in Brent are in the top 10% most deprived in the UK. Map 1 in Appendix 3 shows that local deprivation is distributed unevenly within the Borough, with higher levels in central and southern wards. The two wards with the highest levels of local deprivation (based on 2000 data) are South Kilburn and Stonebridge.

4.8 Other examples of the signs of poverty in Brent include an estimate from Brent Energy that 18% of the Borough's residents suffering from fuel poverty in 2000 and that the percentage of households with no employed adults with dependent children is higher in Brent than either the London or England averages.

Health (S2)

4.9 Self assessment of health in the Borough is in line with National levels, with 70% of people expressing that they were in good health in the 2001 Census. However, a number of health related issues are of significance. Crime, fear of crime, road traffic and environmental pollution have all been identified by residents as impacting negatively on health and quality of life.

4.10 Physical exercise is a key issue in promoting good health. While the Borough is served by a number of sports centres and facilities (see Appendix 3). The Borough also has significantly lower levels of walking and cycling (as means of travelling to work) than the average for London, though relatively good connectivity to public transport may be a factor in these data indicator.

Education and skills (S3)

4.11 Data shows that average primary and secondary school attainment across the Borough is comparable with national figures at the same levels (key stage 2 primary, and level 2 secondary). However, further (NVQ equivalents) and adult education attainment show the Borough to be below national and London averages. Maps 4 and 5 in Appendix 3 also show a significant variation between education attainment between wards. Notably Stonebridge, Harlesden, Wembley Central and Queensbury have a high percentage of 16 – 74 year olds with no qualifications.

4.12 Brent is also a net exporter of secondary school pupils and the Brent Schools Organisational Plan predicts a shortfall in school places both in Brent and in adjacent boroughs in the future.

Housing and population (S4)

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

4.14 House prices in Brent are comparable to London averages and considerably higher than the England and Wales average. The relative high cost of housing compared to incomes is a major issue for the Borough, with the ratio of average house price to gross household income higher than comparable boroughs, London as a whole and the national averages. There is also a lack of affordable housing.

4.15 There are also disparities in household tenure within the Borough. Maps 6, 7 and 8 in Appendix 3 illustrate this at ward-level. They illustrate that north-western wards generally have the highest levels of owner-occupation, while southern and eastern wards tend to have higher levels of renting, both private and social.

Quality of Surroundings (S5)

4.16 The percentage of vacant floor space in primary shopping frontages has fallen in almost all wards between 1997 and 2003 although some areas continue to have relatively high levels of vacant floor space (an indicator of urban centre decay).

4.17 The quality of townscape is considered more completely under Theme EN5 – Townscape and landscape quality, below.

Crime and fear of crime (S6)

4.18   Of respondents to the MORI study 'Living in Brent', 58% felt threatened by crime in the area either a great deal (17%) or a fair amount (41%). Fear of crime is a major issue, and one which has effects on quality of life, access, mobility and health. Crime levels in the Borough are generally above national averages.

4.19   Maps 11 and 12 in Appendix 3 show the distribution of crimes (crime density) within the Borough and illustrate that there are certain pockets, or hot-spots, of crime in certain areas. Areas within Stonebridge, Harlesden and Kilburn have the highest incidence of crime and street crime. It seems probable that a number of factors contribute to these hot-spots, including social, economic, townscape and environmental factors.

Community identity and welfare (S7)

4.20   The 'Living in Brent' study by MORI gathered residents' levels of satisfaction with their neighbourhood as a place to live. 74% of respondents were satisfied in 2002 and slight rise since 2000.

Access to services (S8)

4.21   Access to services is a key issue, particularly for those on low incomes or living in deprived areas. There is little quantified data on access to and provision of essential services and amenities in the Borough, although the floor-space of childcare facilities has risen by 3,890m^2 in the ten years to 2004.

4.22   Public transport accessibility is a factor in accessing services. Brent is generally very well connected and has a number of underground, rail and bus links within and beyond its boundaries. However, Map 13 in Appendix 3 illustrates areas of the Borough with poor public transport accessibility, showing that significant areas remain deficient.

Environmental

Transport, traffic and noise (EN1)

4.23   Road traffic and related issues (such as pollution, infrastructure) exacerbate a number of sustainability problems. They are also the major source of noise nuisance, vibration and air pollution in the Borough.

4.24   Between 1997 and 2002 Brent has recorded a 62 million km, or 6.6%, increase in traffic flow.

Water quality, water resources and flooding (EN2)

4.25   The River Brent and its tributaries suffer from pollution and sewerage misconnections and are of only 'fair' or 'poor' quality according to the Environment Agency's General Quality Assessment (GQA) classification.

4.26   Specific localised flooding is an issue in the Borough, particular at times of increased run-off.   Potential areas of risk include Welsh Harp, River Brent and Wealdstone Brook.

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

Air quality (EN3)

4.28   A large part of Brent has been designated as Air Quality Management Areas (AQMAs), including the entire area south of the North Circular Rd and the major road corridors to the north of the North Circular.   This reflects, as a result of monitoring, areas where national pollution objectives will be breached.

4.29   The number of days when air quality was recorded as moderate or higher (worse) was 60 in 2003, slightly above the national urban average.   Trend data (2002-2003) shows a significant increase from 24 days, however a similar increase was seen across other London boroughs and this may reflect atmospheric and meteorological factors.

4.30   Refer also to Theme EN1 – Transport and traffic (driver for air pollution).

Biodiversity and habitat (EN4)

4.31   Several parts of the Borough have significant nature conservation value, including Sites of Special Scientific Interest (SSSIs), sites of Metropolitan and Borough (Grade I) importance, as well as sites of Borough (Grade II) and local importance in terms of their wildlife and nature conservation value.   There are a total of 41 Sites of Importance for Nature Conservation (SINCs) in the Borough.   In addition there are important wildlife corridors running along river corridors such as the Wealdstone Brook and the Grand Union Canal.   The two largest nature conservation sites are Brent Reservoir and Fryent Country Park.   Map 15 in Appendix 3 illustrates the scale and location of areas of nature conservation importance and areas of deficiency.

4.32   Since 1992, it is estimated that 180 trees have been lost each year through vandalism, old age, disease, driveway construction, subsidence claims and action by statutory bodies (utilities – gas, water, electricity, telecommunications etc).   There

has been no systematic tree replacement programme (Indicators for a sustainable Brent, 2001).

Townscape and landscape quality (EN5)

4.33   Townscape quality varies across Brent. Map 16 in Appendix 3 illustrates that there are significant areas of the Borough judged to be of low townscape quality, though these tend to be clustered in particular areas / wards, notably Tokyngton and Stonebridge

4.34   Refer also to Theme S5 – Quality of surroundings.

Historic and cultural assets (EN6)

4.35   Brent has one Grade I listed building and 6 listed Grade II*. Brent also contains 24 sites of archaeological interest (Museum of London data). This is lower than many London boroughs, which highlights the importance of protecting such sites. Map 17 in Appendix 3 shows the location of conservation areas and Article 4 declarations in Brent.

Climate change and energy (EN7)

4.36   The 2003 progress report for the Home Energy Conservation Act, indicated that Brent had achieved a 15.9% improvement in domestic energy efficiency between 1996 and 2003. This compares favourably with other London boroughs. However, in general monitoring of energy and climate related issues is limited. Little is known of the achievement of BREEAM / Ecohomes standards in buildings in the Borough, or on SAP ratings. Equally there is no data on the percentage or amounts of energy being sourced in the Borough from renewable resources.

4.37   Refer also to Theme EN1 – Transport and traffic.

Waste management and materials (EN8)

4.38   With a recycling rate of 8.6%, Brent's waste management performance is slighty below London as a whole (9.3%). However, it is well below the current national targets of 25% by 2005/06 and 30% by 2010. In 2001, 71% of the population of Brent had access to kerbside recycling collections.

Land and soil quality (EN9)

4.39   A total of 373,020m² of open space, playing fields and allotments was lost to development in the Borough between 1994 – 2004.

Economic

Economic growth and opportunity (EC1)

4.40   In 2003, 14% of employment land was recorded as vacant in the Borough. 45% was either in industrial or wharehousing use, 17% retail or office use and 24% in other employment uses.

4.41   Refer also to Theme EC2 – Employment and unemployment.

Employment and unemployment (EC2)

4.42   Data from the Borough Policy and Research Unit shows a rate of unemployment (claimant count) of 4.5% (March 2004). However, more significant than the average is the disparities within the Borough. In the same period, Brent East recorded 4.6%, Brent North 2.7% and Brent South 6.1% claimant count unemployment. These data are also presented in Map 18 in Appendix 3.

4.43   Over the year 2003-2004 the average rate of unemployment for the Borough fell by 0.5%, but rose by 2.3% in Brent South.   Brent is ranked as the 32nd most employment deprived district in the country and within the top 10% most deprived.

4.44   Research by MORI in the Borough identified barriers to finding work: there not being enough jobs (15%), the need for child care (15%), not enough well paid jobs (13%), and lack of skills or qualifications (12%).

4.45   The ratio of those in full and part-time work is identical to those for London as a whole, with 74.8% of those working, in full time work.

4.46   Most recent data show that although there has been an increase in the stock of businesses (VAT registrations versus de-registrations) the number, size and growth of business is below the London average.

Disparity and regeneration (EC3)

4.47   Refer to Theme S1 – Poverty and social inclusion, as well as other social Themes.

Investment (EC4)

4.48   Data is available on VAT registrations and de-registrations (refer to theme EC2 above), however there is no data has been identified to date as part of the SA on indigenous or inward investment in the Borough.

Movement (EC5)

4.49   75.5% of retail and leisure floorspace approved in Brent in 2003-04 was in areas of moderate to very good Public Transport Accessibility Levels (PTAL). The UDP sets

a target of 90% at these levels by 2010. 67% of new retail or leisure floorspace developed between 1994 and 2004 was in or adjoining town centres. Low levels of car ownership mean that accessibility by public transport and / or foot and bike is very important in Brent.

4.50   Refer also to Theme S8 – Access to services, and Theme EN1 – Transport and traffic. Particularly Maps 13 and 14 in Appendix 3 (Objective 8).

5. KEY SUSTAINABILITY PROBLEMS

Sustainability problems identified

5.1 Many sustainability problems and issues within the Brent area have been identified from existing documents, strategies and assessments, such as the SA of the adopted UDP. The SA will not seek to duplicate this existing work, however other problems may emerge through the SA process. Consultation on this Scoping Report will be a key input into the identification of other key sustainability problems.

5.2 The problems also draw upon those raised during the SA scoping workshop held at Brent Borough Council in February 2005 and attended by departments across the council (including Planning Policy, Environmental Health, Policy and Regeneration, Transport, Landscape, Affordable Housing, Environmental Strategy, Design and Regeneration, Design and Regeneration, Wembley and Education) and key external stakeholders (including Environment Agency, Octavia Housing, College of North West London, Transport Planning International Consultants and Brent Primary Care Trust – note the other Consultation Bodies were also invited but did not attend). These issues were:

- Balancing more homes with the protection of employment land and open space

- Improving quality of surroundings, amenity space and biodiversity

- Improving accessibility for all members of community

- Addressing deprivation, in particular crime and income

- Creating sustainable communities (beyond physical buildings). Inclusion, community identity and disparities

- Dealing with waste locally and in a sustainable way

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

5.4 Table 6 below summarises the key sustainability problems as identified through the SA scoping workshop and a review of the baseline data and other plans and programmes.

> *Question 6:*
> *Consultees are requested to highlight any key problems omitted that they consider the SA of the Brent DPDs should address and comment on those identified in Table 6.*

Table 6: Summary of key sustainability problems

Problem	Summary and source of evidence
Social	
1. Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London.	There are five wards in Brent within the top 10% most deprived in the UK – namely South Kilburn, Stonebridge, St Raphaels/Brentfield, Harlseden and Roundwood (Brent Regeneration Strategy 2001-2021)
	Map 1 in Appendix 3 (Sustainability Objective S1) illustrates that local deprivation is distributed unevenly within the Borough, with higher levels in central and southern wards.
2. Disparity in social and economic conditions both between wards within Brent and with other areas.	Average full time weekly wages are estimated at £518.79 and for part time workers, £135.77: the lowest in London. £32,870 is the average mean annual household income for Brent. However, this rises to £40,692 in Brondesbury and £39,972 in Queens Park and falls to a low of £21,360 in Stonebridge and £26,541 in Harlesden. (Brent Economic and Social Bulletin, 2004)
3. Health inequalities and access to facilities.	The Brent PCT describes 'health gaps' and that certain areas have higher prevalence of ill-health, for example Harlesden has relatively high levels of diabetes (Brent PCT Annual Report 2003/04).
4. Education attainment and projected shortfall of school places.	Baseline indicators under Sustainability Objective S3 show that while primary and secondary school attainment is comparable with national averages, NVQ equivalent qualifications among working age residents remains below national and regional averages.
	The Brent Schools Organisational Plan predicts a shortfall in school places in the Borough and in adjacent boroughs.
	Maps 4 and 5 in Appendix 3 (Sustainability Objective S3) also illustrate education attainment inequalities within the Borough.
5. Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards.	Brent has one of the highest ratios of house prices to average incomes in the country, and since 1997 average hourly earnings have risen by 12.9% while house prices have increase by 65%. (Brent Regeneration Strategy, 2001-2021)
6. High incidence of crime and fear of crime in certain areas.	The Brent Crime and Disorder Reduction Strategy reports that the Borough has low levels of crime (compared to 11 'family' boroughs), however certain wards continue to have high incidence and levels of fear of crime. Maps 11 and 12 in Appendix 3 (Sustainability Objective S6) illustrate hotspots of certain crimes within the Borough.
	Baseline indicators under Sustainability Objective S4 also show that Brent has relatively high levels of residential overcrowding and a predominance of social and housing authority rental tenure.
7. Provision of and access to essential services and amenities.	Public transport accessibility level assessment (PTAL) for Brent shows 52.1% of retail / leisure applications in areas of good or very good public transport accessibility, with the remaining 47.9% in areas of moderate or low public transport accessibility. (UDP Annual Monitoring Report)

Problem	Summary and source of evidence
Environmental	
8. Mixed quality of the built environment and the need for improved architectural design quality.	Map 16 in Appendix 3 (Sustainability Objective EN5) shows that there are a number of significant areas within the Borough considered to be of low townscape quality.
9. Pressure on biodiversity and habitats and lack of greenspace, particularly in southern wards.	Biodiversity is recognised as a key issue for the Borough through the development of a Local Biodiversity Action Plan, which seeks to protect and enhance both critical habitats and species, as well as create new habitats.
10. Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner.	Brent's waste management performance is comparable with the figures for London. However existing national waste management targets and new / emerging legislation mean managing waste in a sustainable manner is a critical issue for the Borough.
11. Water quality and pollution are key issues for the watercourses running through Brent.	The rivers in Brent are generally classified as only 'fair' or 'poor' using the Environment Agency's General Quality Assessment (GQA) classification and many watercourses suffer from pollution and sewerage misconnections.
12. Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent.	Localised flooding is an issue in the Borough particular at times of increased run-off. The Brent Council website identifies four problem areas / issues: Welsh Harp, River Brent, Wealdstone Brook and surface water.
13. Quality of and access to open spaces and parks, including open air sport grounds.	40% of Brent residents live in open space deficient areas. (UDP). See also Maps 2 and 3 in Appendix 3 (Sustainability Objective S2).
14. The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment.	There are 22 Conservation Areas in Brent. The Borough has is a wide range of architectural styles from the simple to the ornate, from Victorian Italianate and Gothic Revival to Suburban 'Arts & Crafts' and planned "village" settlements. Such a diverse heritage is an essential part of the character of the Borough. (UDP)
15. Energy use and energy efficiency	Data on domestic energy efficiency in the Borough are not available. However efficiency is a key element in issues such as fuel poverty and health, and reducing contributions to climate change is a key commitment.
16. Poor air quality along major roads and in the south of Brent, with much of southern Brent an AQMA	For example Neasden Lane is the most polluted area in London for (PM10 Particulate)
17. Noise nuisance and vibration from major road routes in the Borough.	London Noise Mapping service (http://www.noisemapping.org/frames/Map.asp) shows that all major roads in the Borough are a source of severe localised noise pollution.
Economic	
18. Unemployment and job opportunities for local people	Unemployment rates are, on average, 12 per cent and 32 per cent above the Greater London and national figures respectively (Brent Borough website). Map 18 in Appendix 3 (Sustainability Objective EC2) illustrates ward-level unemployment and shows significant differences in average rates between wards.

Problem	Summary and source of evidence
19. Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership.	Although the Borough is generally well served by public transport it is also characterised by issues of poor interchange, particularly in key regeneration areas such as Park Royal, Wembley and Harlesden.
	The UDP states that the regeneration of some areas may be hindered unless the public transport infrastructure can be upgraded to cope with planned development and local residents are able to travel to work using alternatives to the private car.
	Map 14 in the Baseline (Sustainability Objective S8) highlights areas within the Borough which are currently deficient in access to public transport.
20. The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space	Land use pressures and conflicts were identified as a key issue by a workshop of council officers and other local stakeholders.
21. The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal.	Wembley and Park Royal are two key regeneration areas in the Borough and whilst realising their regeneration objectives it will also be important to ensure the adverse impacts are avoided or at least mitigated.
22. The need to support development in existing centres and ensure the health of town-centres.	The councils 'Health Check' and other evidence suggests that the relative importance of Brent's shopping centres have declined over the lst few decades.

6. DEVELOPING THE SUSTAINABILITY APPRAISAL FRAMEWORK

Sustainability objectives and criteria

6.1 The establishment of SA objectives and criteria is central to the SA process. The SA framework, based on these objectives provides a way in which sustainability effects can be described, assessed and compared. Sustainability objectives will be distinct from those of the DPDs, but in some cases may overlap.

6.2 It is proposed to base the objectives for the SA of the DPDs on those already developed for the appraisal of the adopted Brent UDP. However, the detailed criteria may be modified through the SA process to reflect the particular needs and issues identified by the three DPDs as they evolve.

6.3 An initial set of objectives and criteria to be used for the SA of the draft DPDs is included in Table 7.

Question 7:
Consultees are requested to comment on the proposed appraisal objectives and criteria (see Table 7) and whether they are appropriate.

Table 7: Draft sustainability objectives and criteria

Objective	Criteria
Social	
Prosperity and Social Inclusion S1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
	Will it improve affordability of essential services?
Health S2. To improve the health of the population	Will it improve access to high quality health facilities?
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?
	Will it reduce health inequalities?
	Will it reduce death rates?
Education and Skills S3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?
	Will it improve access to high quality educational facilities?
	Will it help fill key skill gaps?
Housing S4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?
	Will it encourage mixed use and range of housing tenure?
	Will it reduce the number of unfit homes?
	Will it reduce homelessness?
Quality of surroundings S5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?
	Will it improve residential amenity and sense of place?
	Will it reduce actual noise levels?
	Will it reduce noise concerns?
Crime Prevention and & Community Safety S6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?
	Will it reduce the fear of crime?

Objective	Criteria
Community Identity S7. To encourage a sense of community; identity and welfare	Will it encourage engagement in community activities?
	Will it foster a sense of pride in area?
	Will it increase the ability of people to influence decisions?
	Will it improve ethnic relations?
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?
	Will it encourage people to respect and value their contribution to society?
Accessibility S8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?
	Will it improve the level of investment in key community services?
	Will it make access more affordable?
	Will it make access easier for those without access to a car?
Environmental	
Traffic EN1. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?
	Will it increase the proportion of journeys using modes other than the car?
	Will it encourage walking or cycling?
Water Quality & Resources EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?
	Will it reduce water consumption?
Air Quality EN3. To improve air quality	Will it improve air quality?
	Will it help achieve the objectives of the Air Quality Management Plan?
	Will it reduce emissions of key pollutants?
Biodiversity EN4. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency?
	Will it conserve and enhance species diversity; and in particular avoid harm to protected species?
	Will it maintain and enhance sites designated for their nature conservation interest?
	Will it maintain and enhance woodland cover and management?
	Will it encourage protection of and increase number of trees?
Landscape & Townscape EN5. To maintain and enhance the quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces?
	Will it enhance the quality of priority areas for townscape and public realm enhancements?
	Will it minimise visual intrusion and protect views?
	Will it decrease litter in urban areas and open spaces?
Historic Environment & Cultural Assets EN6. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value?
	Will it protect listed buildings?
	Will it help preserve and record archaeological features?
Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption?
	Will it lead to an increased proportion of energy needs being met from renewable sources?
	Will it reduce emissions of ozone depleting substances?
	Will it minimise the risk of flooding from rivers and watercourses to people and property?
	Will it reduce the risk of damage to property from storm events?
Waste Management EN8. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources?
	Will it reduce household waste?
	Will it increase waste recovery and recycling?

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

7. OPTIONS TO BE CONSIDERED

Options to be consider as part of the Sustainability Appraisal

7.1   One of the key requirements of SA and SEA is to consider reasonable alternatives as part of the assessment process. During the development of the DPDs, a range of options will need to be considered, assessed and debated with the local community and other stakeholders. This will be a key part of Stage B of the SA process, but the potential range of options that may be considered are introduced here to provide consultees with the opportunity to comment on the likely types of options that will be considered as the DPDs are developed.

7.2   It is likely that the types and level of detail of options will vary considerably between the three DPDs, namely:

- Core Strategy;
- suite of generic policies for the management of development; and
- site specific allocations.

7.3   However, as the DPDs are still in the early stages of production, it is not yet clear what aspects of the evolving spatial strategy and policies for Brent will sit in which DPD and what level of detail. Although, it is likely that the DPDs will cover similar topic to the adopted UDP, including:

- Built Environment
- Environmental Protection
- Planning for More and Better Housing
- Transport
- Employment
- Town Centres and Shopping
- Leisure and Tourism
- Open Space, Sport and Recreation
- Community Facilities
- Waste

7.4   The broad types of options that may be explored under each of these topics are introduced below. However, it should be noted that this will be the subject of extensive consultation as part of the DPD process and these are just possible options at this stage.

7.5   The issues and options around **built environment** could include:

- *density of new development*, with potential options associated with the locations of new development, and particularly whether tall buildings are appropriate.

- *poor townscape and public realm quality*, with potential options associated with design standards to set for new development in these areas.

- *environmental crime* (including dumping waste, fly posting, graffiti and dog fouling), with potential options associated with how to prevent crime and designing out crime.

- *sustainable construction*, with potential options associated with delivering higher sustainability standards of developments.

7.6   The issues and options around **environmental protection**, which could include:

- *noise pollution*, with potential options associated with the density of development and mix of land uses.

- *poor air quality*, with potential options associated with the areas where certain types of development may be inappropriate because of poor air quality.

- *remediation of contaminated land,* with potential options associated with the preferred sustainable approach to remediation, types of remediation and requirements for site investigations.

- *water and flood risk*, with potential options associated with the requirements for water conservation and drainage to help address or at least not exacerbate problems relating to flooding, water quality and water resources.

- *renewable energy generation,* with potential options associated with how to incorporate renewables in development schemes and the appropriate target to set.

7.7   The issues and options around **planning for more and better housing**, which could include:

- *providing more homes*, with potential options associated with how many new homes that should be provided and what targets to set.

- *location of new housing development*, with potential options associated with the proportion on brownfield / greenfield land, whether / how much employment land to release for housing, whether to focus on housing land close to public transport nodes and/or in existing centres etc.

- *new housing densities*, with potential options around different densities generally and in different locations, such as town centres and public transport nodes, more specifically.

- *affordable housing*, with potential options for the percentage of affordable housing to be provided as part of development and the threshold for the number of units per hectare that are required to deliver a proportion of affordable housing.

- *housing mix*, with options for the best approach to providing the types of new housing types required.

- *family homes,* with potential options associated with the level of provision of family homes and their minimum number of bedrooms to meet needs of large households and to redress the high proportion of small unit completions.

- *other housing needs,* with potential options associated with delivering suitable housing for people with mobility disabilities and how and where to special needs housing.

7.8   The issues and options around **transport**, which could include:

- *reducing traffic and congestion*, with options associated with reducing the impact of traffic on residents and levels of off-street car parking for new development and employment land, for example.

- *public transport,* with options associated with improving public transport reliability and frequency of service and the priority compared with highway improvements.

- *walking and cycling,* with options associated with the priority for spending funding received through planning consents e.g. promoting walking, promoting cycling and improving cycling facilities and public transport.

7.9   The issues and options around **employment**, which could include:

- *protection of employment site*, with options associated with whether strategic, borough and local employments sites designated by the council should be protected, whether and under what circumstances housing development may be allowed and whether mixed use development may be allowed, for example.

- *office development,* with options associated with the location where office development will be permitted, including town centres and employment areas, and whether conversion of vacant office buildings should be permitted.

- *work-live and mixed use development,* with options associated with where and under what circumstances work-live and mixed use developments should be allowed.

- *vacant employment land*, with options associated with areas considered to be long-term vacant and surplus.

7.10   The issues and options around **town centres and shopping**, which could include:

- *location of developments*, with options associated with out-of-centre superstores and retail warehouses and where they may be permitted and whether there should be a size limit.

- *future retail growth*, with options associated with the level of growth in floorspace in the Borough.

- *town centre uses*, with options associated with whether to diversify town centre uses or not.

- *food and drink uses and future of small shopping centres and parades*, with options associated with whether to diversify shopping uses and whether there should be a minimum number of retail units and a maximum number of eating or drinking establishments and higher proportions of food and drink uses in certain locations to relieve pressure on others.

7.11 The issues and options around **leisure and tourism** which could include:

- *location and management of leisure and tourist activities* with options associated with the type and scale that is appropriate to town centres, whether leisure and entertainment facilities should be protected and specially whether Wembley is an appropriate location for a large scale casino.

- *managing night time activities*, with options associated with whether to concentrate or disperse night time activities.

- *public art*, with options associated with securing contributions for public art from development.

- *indoor sport facilities*, with options associated with whether additional facilities are needed and if so where in the Borough.

- *visitor accommodation*, with options associated with the provision, scale and location of visitor accommodation and whether staff accommodation should also be provided.

7.12 The issues and options around **open space, sport and recreation**, which could include:

- *protecting and promoting open space and biodiversity*, with options around protecting existing open space and ways to enhance open space in areas of deficiency.

- *Metropolitan Open Land (MOL),* with options associated with whether to protect existing MOL.

- *waterways, canals and adjoining land,* with options associated with protecting and improving their habitat and amenity value.

- *public open space and children's play areas,* with options associated with seeking and delivering the provision of new or extended public open space from new developments, particularly in areas of deficiency.

- *allotments,* with options associated with their protection and whether some flexibility in allowing development should be permitted.

- *sport and recreation grounds and playing fields,* with options associated with protecting these areas and whether they should be protected from other open space uses.

- *burial grounds,* with options associated with whether more provision of burial space is needed, the re-use of existing cemeteries and allowing areas of public open space to go to burial space.

7.13   The issues and options around **community facilities**, which could include:

- *location and type of community facilities*, with options associated with how to protect existing facilities, whether and where to encourage more accessible and improved community facilities to those who need them and whether they should have priority over other uses.

- *meeting education needs,* with options associated with potential locations for new secondary schools and the protection of existing sites.

- *child care and health care facilities,* with options associated with whether they should be located in residential areas and if so where in residential areas.

7.14   The issues and options around *waste*, which could include:

- *waste planning in West London*, with options associated with planning for waste management at the West London rather than the Borough level.

- *ways for reducing waste and minimising waste disposal impacts*, with options associated with how to minimise waste and maximise household and construction recycling.

- *waste management facilities*, with options associated with where and what type of waste management facilities are needed.

> *Question 8:*
> *Consultees are requested to comment on the types of options that may be considered as part of the SA of the DPDs and whether they are appropriate.*

8. NEXT STEPS

8.1 The key next steps of the SA will involve:

- Consideration of the responses to the consultation on the Scoping Report.

- Developing the evidence base as necessary for each DPD.

- Testing the DPD objectives against the SA objectives and against each other.

- Working with the council to generate strategic options and appraising the options.

- Assessment of the preferred options, as presented in the draft DPDs, and make recommendations for improvement.

- Preparing the final SA Report(s).

- Issuing the SA Report(s), along with the draft DPDs, for formal consultation.