# LONDON BOROUGH OF BRENT LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY





April 2009



# **Proposed Submission**

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# An Overview of Brent's LDF

### Background

The Secretary of State for Communities and Local Government (CLG) permitted the council to withdraw its *November 2007 Core Strategy* to allow the submission of a revised strategy that would better reflect revised guidance for preparing Local Development Frameworks (LDF) contained in Planning Policy Statement 12 (PPS12). It is also hoped that a new version would meet the criticism of the November 2007 draft Core Strategy by the Inspector allocated by the Secretary of State to examine it. The Core Strategy was subsequently revised to include more detail about how the proposed regeneration of specific parts of the borough, particularly the growth areas would be delivered. This revised document was then sent out as a pre-Submission version for informal public consultation in August 2008.

As a result of this consultation exercise, and the production of a number of other planning reports, the council has produced this proposed submission version of the Core Strategy for formal publication and consultation. Post-consultation, the council's intention is to re-submit this DPD to the Secretary of State for Examination in Public later in 2009. The period available to make representations is from 26th May - 6th July 2009.

### What is a Local Development Framework?

The Local Development Framework (LDF) arises from the *Planning and Compulsory Purchase Act 2004.* It is a series of individual documents known as *'local development documents'* which will cumulatively form Brent's Spatial Planning Strategy. As such, the LDF will ultimately replace Brent's Unitary Development Plan 2004, although, until the range of Development Plan Documents which the council wishes to produce are adopted, certain policies within Brent's UDP (2004) will continue to be used. A list of policies in the UDP(2004) which are superseded by the Core Strategy can be found at Appendix 2. 'Superseded UDP Policies'.

As illustrated in figure 1, the LDF will comprise specific 'Development Plan Documents' (DPDs), of which the *Core Strategy* is one. It is noteworthy that additional guidance about specific issues in planning will be written in the form of *Supplementary Planning Documents (SPDs)* which will continue on from, or can replace the existing adopted Supplementary Planning Guidance (SPG).

When adopted, Brent's LDF, together with the London Plan, will form the statutory Development Plan for the Borough, guiding change to 2026 and beyond.

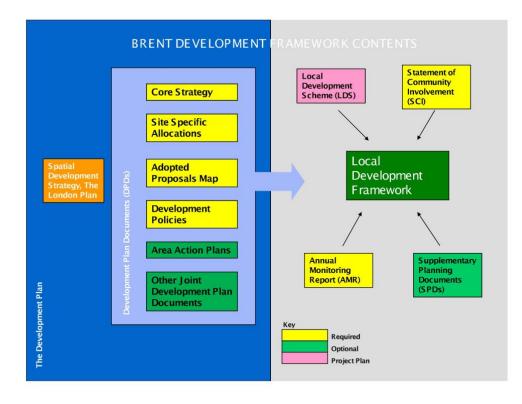


Figure 1 : Documents that form the Local Development Framework

### Purpose of the Core Strategy

The Core Strategy sets out a *Spatial Vision*, *objectives* and *key policies* for the development of Brent up to 2026. It is a 15 year *spatial planning strategy* guided by sustainable development principles and is subject to a Sustainability Appraisal (SA).

The Core Strategy must be in general conformity with National and Regional planning policy. It should perform the role of the spatial expression of the sustainable community strategy.

As such, Brent's Core Strategy takes a holistic approach to the delivery of a sustainable borough.

### How is Brent's Core Strategy structured?

Figure 2 illustrates the structure that Brent's Core Strategy document takes.

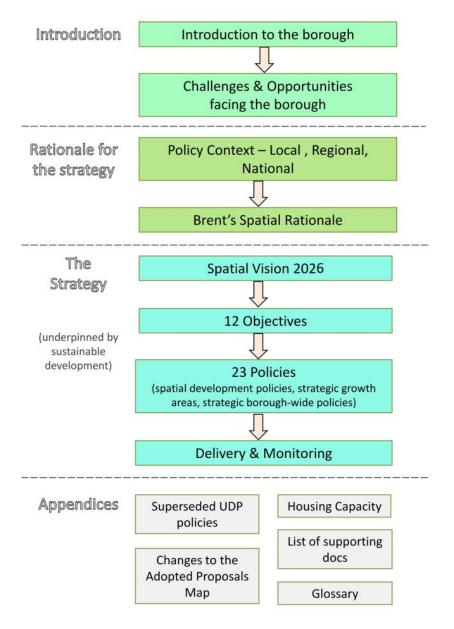


Figure 2 : Document Structure

In the **introduction**, the Core Strategy sets out the *context* in which this spatial strategy is set i.e. Brent's demography, socio-economic background and environmental matters. The next section sets out the **rationale** for Brent's spatial strategy which explains why and how the strategy was conceived.

The document then sets out the council's Spatial Strategy, explaining the policies which the council has brought forward in order to **deliver** it's **Spatial Vision** and how Brent's progress in delivering this vision will be assessed.

# 1. Introduction to Brent

### **General Background**

#### Geography

1.1 Brent covers an area of 4325 hectares, - almost 17 square miles, between inner and outer North West London. It extends from Burnt Oak, Kenton and Kingsbury in the North, to Harlesden, Queens Park and Kilburn in the South. The North Circular Road divides the less densely populated northern part of the borough from the south. Brent is bordered by the London Borough of Barnet to the east, Harrow to the north and Ealing to the west. It has small boundaries with the inner London boroughs of Hammersmith and Fulham, Kensington and Chelsea, Westminster and Camden in the south. The metropolitan centres of Harrow and Ealing, together with Brent Cross regional shopping centre (all of which are outside of the borough) currently meet many of the shopping and leisure demands of a large number of Brent residents.

**1.2** The Borough is famous for being the home of Wembley Stadium, which was rebuilt and then reopened in 2007. Consequently, Wembley now has its own 'brand' with the new stadium forming the centrepiece of a *new* 

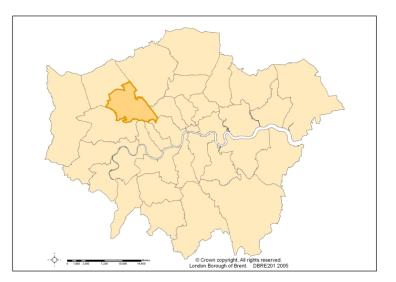


Figure 3 : Location of Brent within London. Source: West London Sub-Region, London Plan 2004

*Wembley*; comprising major regeneration initiatives and ventures. Already known for its sporting and music venues, Wembley will develop further into a major regional, national and international destination with a range of major retail and leisure attractions whilst delivering significant employment benefits for the local community.

#### Planning & Development History

**1.3** The south of the borough was substantially developed between 1890 and 1910. This saw the addition of terraced houses for workers in industry and services, as well as a small number of estates of larger houses around Kilburn. In more recent times, Brent has again been the focus of substantial change. Much housing renewal has been achieved both through concerted public action and through piecemeal improvements in the private sector, often associated with conversions. It is the proximity of inner Brent to Central London that has contributed to these latter pressures for change.

**1.4** Substantial development in the north of the borough occurred in the 1920's and 1930's, in step with the outward expansion of London, accompanied by the growth of rail and underground services in the capital. This development, essentially of residential suburban nature and characteristically low density, survives today. In recent years, however, increased demand for housing has brought with it pressure for higher density redevelopment in these areas of lower density, both in Brent and across the rest of London.

#### Population

**1.5** Overall, Brent's population is relatively young with almost a quarter of its residents aged 19 years or under. The 2001 Census recorded a residential population of 263,454, whilst the GLA has recently estimated that Brent's population had increased to 278,500 in 2006 (Mid Year Estimates). However, the Council's own study, undertaken in 2007 by Professor Mayhew<sup>50</sup> concluded that Brent's actual population figure was at least 289,100.

**1.7** Black and Ethnic Minorities collectively constitute the majority of Brent's population at 55%. Over 120 languages are spoken in Brent and the Borough has been officially recognised as the '*most ethnically diverse local authority area in the country*<sup>52</sup>. Nearly 8% of its population are classified as refugees or asylum seekers, and in 2007 Brent had the second highest number of new National Insurance registrations in the country at 15,600<sup>53</sup>.



Picture 1 : View of Wembley

Stadium from Barnhill Open Space

Challenges & Opportunities

The fortunes of all parts of the borough depend now, as much as ever, on the prosperity of London as a whole. This section presents the existing context for spatial planning within the borough.

### **Economic Performance & Regeneration**

**1.8** Brent's economic base, especially its town centres, main office locations and manufacturing sector, have shown decline and rationalisation over a number of years. The borough's town centres, although continuing to provide a local service, have become a less attractive location for major retailers after the opening of Brent Cross in the 1970's. This trend has continued in recent years as other rival attractions have developed. Consequently, residents generally travel out of the borough to shop for their comparison goods, often along heavily congested roads. Brent's major centres, notably Wembley, have declined significantly in recent years, from their once eminent place within London's town centre hierarchy.

**1.9** Up until the 1990's, Brent was home to a number of firms' headquarters, particularly in Wembley and adjacent to the North Circular Road. Most of these firms have now left the borough and the buildings which they occupied have either been converted for other uses, provide office space for smaller or local businesses or are vacant. However, Brent does possess a healthy enterprise culture and the borough is ranked 52nd nationally<sup>51</sup> by local futures in its State of the Boroughs report, 2007.

**1.10** Elsewhere in the borough, for example, Alperton, on the margins of Park Royal, the industrial stock is generally poor quality, inadequately serviced and of low value despite these areas being well connected to the strategic road network. Large scale commercial redevelopment of this land is required to meet the operational needs of modern industrial users and to sustain local employment needs. At the same time the council's *Employment Land Demand study*<sup>24 25</sup> shows that there will be an opportunity to release some more marginal employment land for mixed use development.

**1.11** Additionally, a general industrial shift from making products to moving them around has led to an erosion of skills and employment density. In particular, a decline in the manufacturing sector, coupled with a poorer than average growth in service sector jobs, has meant that Brent's employment levels have stagnated over recent years. The London Plan 2008 predicts a continual long term decline in industrial employment, which reinforces the need for Brent to release some of its industrial sites for re-development.

#### The Challenges are to:

- maintain sufficient employment land to meet future needs whilst releasing the least well located land for alternative uses
- create employment through development that helps address local unemployment
- meet Brent's shopping needs locally within the borough by improving major town centres and maintaining other town centres
- improve the quality of the industrial stock and improve the environment of industrial areas to ensure long term occupation of stock that helps maintain jobs

### Social Infrastructure & People's Needs

**1.12** Brent has a young and richly diverse population that can help improve the borough's economic activity and productivity and express its inherent cultural strengths through the delivery of high quality places of character and identity. However, this diversity also gives rise to specific needs such as accommodating larger households and providing a wider range of community and cultural facilities.

**1.13** Whilst many of Brent's residents are affluent, parts of the borough continue to suffer high levels of social and economic disadvantage. Nationally, Brent is ranked 53<sup>rd</sup> out of 354 areas in the Indices of Multiple Deprivation (IMD) 2007 (1=most deprived, 354=least deprived)<sup>54</sup>. This is a drop of 28 places from 2004, moving Brent from being within the 25% most deprived local authorities in the country to be within the 15% most deprived<sup>54</sup>. The neighbourhoods experiencing the highest levels of deprivation are largely located in the south of Brent. However, this situation is changing with

Picture 2 : Celebrating diversity

high levels of deprivation now seen in pockets of the north of the borough. Indeed, 19 out of Brent's 21 neighbourhoods have become more deprived<sup>54</sup>. The specific reasons for this rise in deprivation are not fully known, but the most deprived residents also have the lowest income levels, highest unemployment levels, poor and overcrowded housing and the worst health outcomes<sup>23</sup>.

**1.14** In terms of alleviating this deprivation, a number of regeneration programmes are underway within the borough. For example, Harlesden/Stonebridge and St. Raphaels/Brentfield will receive regeneration funding as part of the Government's Priority Community Areas<sup>55</sup>.

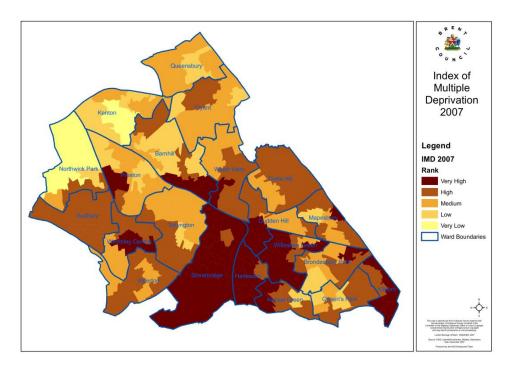


Figure 4 : Index of Multiple Deprivation (IMD) 2007.

**1.15** In terms of education, the borough does record an above-average share of pupils achieving five or more GCSEs at grades  $A^*$  to  $C^{51}$ . However, primary and secondary school place provision is reaching capacity with some schools already full<sup>20</sup> and with a projected population growth, school expansion is urgently required. Although a number of existing schools have been expanded to help accommodate current shortages, new school sites, especially in the south of the borough, are essential.

**1.16** Regardless of the borough's good GCSE attainment, Brent in fact has a low 'skills' profile for working-age residents. Over one third of the working-age population falls into the 'skills poverty' category(below NVQ Level 2), with only a small share into the high-skills' category (NVQ Level 4 or above) relative to the national average<sup>23</sup>. As such there is a need to provide further education for the working-age residents to help uplift to the economic base of the borough. With a reported

10,100 working age people in Brent unemployed, higher than for London as a whole<sup>6</sup>, the Council is keen for new commercial developments to accommodate local employment schemes and strategies to improve Brent's skills base. It is noteworthy that the borough has been successful in securing apprenticeships as part of its S106 Contributions for some developments<sup>6</sup>.

**1.17** Healthcare provision in the form of doctors' surgeries is under provided in some parts of the borough. Whilst many of the borough's existing GPs are single practices in which the doctor is approaching retirement age, there has been a successful recruitment of new GPs into the area<sup>23</sup>. Nevertheless, a move towards a pattern of healthcare supply, that allows a better spatial provision of GP services with multiple GP spaces, is required. Healthcare premises that can combine health professions to not only accommodate GP services, but a wide range of medical services such as dental care practises or spaces for visiting specialist clinics and consultants',would better meet the needs of a growing and diverse population. However, financial difficulties experienced by the Brent Primary Care Trust (PCT) has created problems in strategic spatial planning for healthcare in the borough particularly that of GPs provision.

The Challenges are to:

- ensure new school places are provided when needed and to identify a suitable site for accommodating a new secondary school in the south of the borough;
- provide health care facilities that will meet needs whilst having the capacity to expand for growth generated by new developments;
- provide new economic opportunities through training and pathways into work that can be accessed locally to ensure success and sustainable job access;
- ensure that the provision of social infrastructure is constantly monitored and assessed to meet the needs of our diverse community whilst absorbing growth.

### **Housing Needs**

**1.18** The London Plan 2008 housing capacity targets require Brent to provide 11,200 new homes from 2007/08 to 2016/17, yet Brent's Housing Register (as of 2008) lists 22,653 households in need of accommodation. This is a reflection of the specific needs of Brent's population; the need for larger family accommodation for reasons of overcrowding and the problems of homelessness. As such, Brent currently has the 3rd highest household size in England, the 2nd highest overcrowding level in London and the highest number of homeless families within temporary accommodation in London. Therefore a better *range* of housing is also essential.

**1.19** The council must facilitate the delivery of more homes, in particular affordable and family sized homes, in the context of providing mixed and balanced communities. This is to avoid large scale single tenure housing typified by the poor quality estates it is currently regenerating, including Chalkhill, Stonebridge and South Kilburn. More housing regeneration is planned with attention turning to the Barham Park estate.

**1.20** There are also real concerns with a large proportion of the 1930's suburban private housing stock which is in a poor state of repair, particularly housing along major vehicular routes. Large numbers of homes along the North Circular Road (NCR) not only suffer from community severance but also from poor air quality, in fact, residents living around the NCR have been shown to suffer from particularly high levels of respiratory infections<sup>23</sup>

The Challenges are to:

- exceed the London Plan Target of providing 11,200 new homes by 2016/2017 comprising more affordable and more family housing, in the context of development that is mixed in use and mixed in tenure;
- regenerate existing housing stock in Brent that is considered poor in quality;
- address the negative impacts experienced by people living along and adjacent to the North Circular Road, including pollution and community severance.

### **Transport Infrastructure**

**1.21** Overall Brent is well connected<sup>51</sup> with good transport links including more rail and underground stations than any other borough in London, with many bus routes which serve town centres within and outside of the borough. Nonetheless, these good public transport links do not explain the problem of traffic on Brent's roads which has seen an 8% volume increase from 1997 to 2008<sup>6</sup>. Car ownership and car use within the borough has continued to increase, which perhaps reflects an issue of poor usability and quality of Brent's public transport provision, and the good access to orbital and radial roads, especially the Strategic Road Network.

**1.22** Strategic transport improvements delivered by national and regional government are generally focused elsewhere in London and therefore there will be relatively limited scope to achieve significant public transport investment, such as new rail services. Consequently, the Council has concentrated on improving it's key stations in terms of comfort, safety and capacity along with the interchanges with bus services around and between them.

**1.23** Whilst capacity improvements have been made to three local stations in Wembley (Wembley Park, Wembley Central and Wembley Stadium), much investment is still needed to improve other stations and their respective interchanges with other modes, but particularly to improve service frequency. In order to stimulate the necessary regeneration, as well as provide for the demand created by new development, it is important that public transport services are of a good quality and are able to meet the needs not only of residents, but of visitors and those working in the borough. Therefore, bus routes that adequately serve orbital routes should also be improved. Furthermore, accessibility to these transport links should be combined with safe walking and cycling routes in order to enhance the usability of Brent's transport infrastructure and its sustainability.

**1.24** In addition to these common transport modes, Brent also has the Grand Union Canal which can be promoted as a means of passing freight through and to the Park Royal area. This can also be combined with walking and cycling routes to increase its usability by residents, visitors and those working in the borough.

#### The Challenge is to:

- encourage housing and commercial growth without increasing the reliance on private cars for journeys which originate within the borough and to promote use of Wembley's improved transport infrastructure for events at the Stadium and Arena;
- encourage new developments that will have good access to public transport;
- improve and increase safe walking and cycling routes to encourage public transport use within and to Brent;
- improve and encourage use of the canal system for freight and transport to and from the Park Royal area.

#### **Open space, Leisure and Sports**



Figure 5 : MUGA in Roe Green Park

**1.25** Currently the borough lacks open space, and many of the existing open spaces are of a low quality. A growth in population will add to these pressures, and new open space will be required on land that has an existing commercial value, therefore which is expensive to acquire and lay out. Consequently, provision of new sites or methods for acquiring open space will be necessary.

**1.26** For a borough that hosts Wembley, the country's national Stadium, the provision of indoor and outdoor sports facilities is generally poor. Improvements are needed for the provision of football pitches, tennis courts and particularly swimming pools. This under provision is reflected by the levels of sports participation and physical activity across the borough, which is amongst the lowest in London.

#### The Challenge is to:

• provide a good range of open space and sports facilities for the existing and growing population.

### Environmental Quality - built & ecological

**1.27** Climate change threatens to damage our natural and built environment. Brent must develop an approach which can accommodate a population increase without exacerbating existing localised environmental problems, such as poor air quality. It is important to secure adequate green infrastructure and deliver high design quality buildings and spaces to build a sustainable and enduring environment.

**1.28** Brent has not always achieved the best standard of design, even when development densities have been relatively modest. Typical Inner London characteristics and problems can also be seen in Brent: industrial activities operating cheek by jowl with residential uses and the problems of the re-adjustment of town centres to shifting patterns of retailing and changing populations. It is therefore important that design quality of buildings and spaces achieve a high standard, in particular with landscape improvements and enhanced biodiversity through incorporating effective urban design measures in developments, e.g tree planting, Sustainable Urban Drainage and living roofs.

**1.29** Furthermore, it is imperative for Brent to make a step change in the future use of resources (energy, water and waste) in balancing population growth and ensuring a good environmental quality. Securing on-site renewable technologies, drainage technologies to reuse and recycle water, sustainable waste facilities to recycle and recover waste, is important for all developments. This also entails the reduction of waste going to landfill and is compliant with Brent's Waste Strategy which supports DEFRA's One Planet Living Principle of "Zero Waste" initiative which the council is committed to.

#### The Challenges are to:

- ensure that all development is of a high design quality and constructed from quality materials;
- ensure that all high density developments provide quality housing and are sensitive to existing developments;
- ensure that all new developments incorporate green infrastructure to help mitigate and adapt to climate change.

#### **Development partnerships**

**1.30** In terms of planning for the future, the council must work and liaise with providers of social infrastructure, its neighbouring boroughs and developers in order to achieve the right spatial arrangement of infrastructure as the borough's population grows. Catchment areas of schools and healthcare facilities tend to cross borough boundaries, therefore working with neighbouring LPAs as well as Education Services and the PCTs is prudent. Apart from schools and some office buildings, the council has little in the way of a property portfolio and so can not exert control as a landowner. The Council therefore needs to work together with strategic development partners (as is happening at Wembley) such as house builders and Registered Social Landlords (RSLs) to bring forward regenerative development and secure appropriate infrastructure.

#### The Challenges are to:

- work with neighbouring boroughs where there is an overlap in infrastructure use;
- build strategic partnerships with developers and other agencies to bring forward beneficial development with appropriate infrastructure without having control through land ownership.

# 2. Towards Spatial Planning for Brent: formation of the Core Strategy

### **Policy Context**

### **Brent's Local Strategies**

2.1 Although Brent's Core Strategy must comply with National and Regional strategies, it is essential that this spatial document be explicitly complementary to the Borough's local strategies, in particular **Brent's Sustainable Community Strategy 2006-2010 (SCS).** At present there are five borough-wide local strategies, four of which have their own vision, values and aspirations. Pooled together these strategies provide a framework from which the Spatial Vision for this Core Strategy has evolved. In order of importance to the Local Development Framework (LDF) process, Brent's local strategies are illustrated below with an indication of where the Core Strategy will be placed:

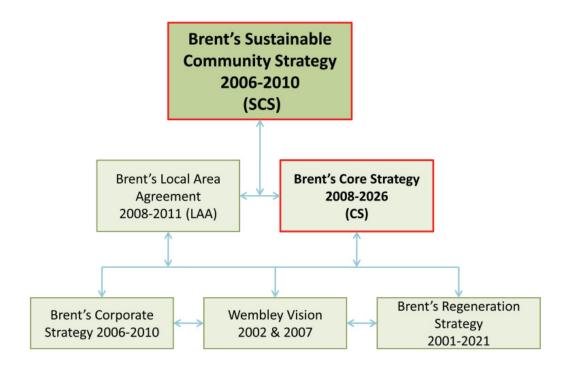


Figure 6 : Hierarchy of local strategies towards Brent's spatial direction

**2.2** The *needs, priorities* and *aspirations* presented in Brent's SCS<sup>2</sup> were sourced through local consultation coordinated by the borough's Local Strategic Partnership (LSP), known as 'Partners for Brent'. As such, the LDF process considers the SCS<sup>2</sup> as the overarching local strategy underpinning the Core Strategy. There are 3 priority themes presented in Brent's SCS<sup>2</sup> with the aim of creating a:

- A Great Place
- A Borough of Opportunity
- An Inclusive Borough

**2.3** It is around these 3 themes that Brent's *Corporate Strategy 2006-2010* and Brent's Local Area Agreements<sup>52</sup> are centred, with *Wembley's Vision 2007* and *Regeneration Strategy 2001-2021* having informed Brent's SCS prior to its inception. Further to this, with the completion and opening of Wembley Stadium in 2007 the 'Wembley Vision<sup>53</sup> was updated along with the 'Wembley Masterplan 2009' <sup>54.</sup>

**2.4** As shown in figure 8, the borough's LAA targets are important in defining critical success factors. They are the means by which government now measures and monitors Brent's overall performance as a local authority.. Therefore, Brent's Core Strategy should also address the targets of the LAA in order to achieve a holistic and local approach to planning. As such, out of Brent's 38 *LAA Priorities*, Planning has a pertinent relationship with 16 of them<sup>55</sup>. The *LAA Priorities* also illustrate the necessity for the LPA to work in closer partnership with other service providers as well as developers in order to achieve the aspirations of the SCS.

### **Regional Strategies**

2.5 Brent's Core Strategy and LDF process should conform to The London Plan, consolidated with alterations, February
 2008. At a regional level, The London Plan represents the Spatial Development Strategy for London as a capital city and provides the contextual background for which Brent is a component. In summary and in order to conform to The London Plan, Brent's Core Strategy must illustrate how it plans to:

- Accommodate substantial growth for London's economy and population whilst creating a more open and equitable society and preserving and improving Brent's heritage and environment.
- Create development which does not further encroach on green spaces i.e. allow more densely populated developments which integrate commercial and residential use classes, transport and communications infrastructure, and the promotion of local communities.
- Enhance the vitality of London's town centres as a key spatial priority, regarding them as places for a diverse range of activities and uses, including office space, housing, retail, leisure, community facilities and regeneration initiatives.
- Sustain manufacturing, wholesale distribution and other industrial activities as identified Strategic Employment Locations
- Maintain existing suburban areas; providing district, local and neighbourhood town centres which support sustainable communities. Areas around town centres are seen as most appropriate for higher density development and have the widest potential uses in accordance with their greater levels of accessibility compared with other suburban areas.
- Encourage new development that underpins the sub-region's dynamism and potential and addresses the needs of significant pockets of deprivation

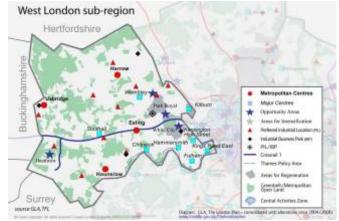


Figure 7 : West-London Sub-Region Source: The London Plan, 2008

- Coordinate transport and development: links to existing and proposed transport accessibility and capacity.
- Develop 'Opportunity Areas', 'Areas for Intensification' and 'Areas for Regeneration', focusing on those communities suffering from substantial social exclusion and deprivation.
- Assist with implementation of The London Plan, a Sub-Regional Development Framework (SRDF) produced for each of London's Sub-Regions. Relevant to Brent is the <u>West London SRDF</u>, published in May 2006.
- Connect with the London Luton Bedford Corridor as identified in The London Plan (Key Diagram) where substantial growth in housing and economic activity will require strategic coordination with the adjacent North London boroughs, Barnet and Camden.

### National Policy

**2.6** In terms of **National Policy** Brent must comply with a series of Planning Policy Statements, as well as associated circulars, ministerial statements and various strategy documents which generally deal with particular topics or issues. The important and overarching policy statement is **PPS 1**, *Delivering Sustainable Development*. This sets out a number of key principles for development to ensure that development plans and decisions made on planning applications contribute to the delivery of sustainable development. In summary the key principles are as follows:

- 1. Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles of sustainable development
- 2. Local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change
- 3. A spatial planning approach should be at the heart of planning for sustainable development
- 4. Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings
- 5. Development plans should contain clear, comprehensive and inclusive access policies in terms of both location and external physical access.
- 6. Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities.

### **Brent's Spatial Rationale**

**2.7** Brent has a number of attributes: the Wembley brand, good connectivity, industrial estates important to London and much good quality housing. However, as detailed in Section 1, there are many significant challenges within the borough that need addressing. In the plans time frame the Core Strategy cannot achieve everything it aspires to do. It will not be able to raise the quality of every town centre, modernise entire industrial stock, reduce unemployment to negligible levels, remove all deprivation or provide fully sustainable communities.

**2.8** Nevertheless, given the overarching policy context for Spatial Planning combined with Brent's local context, the following Spatial Strategy should;

- Provide new housing in specific areas of the borough that could adapt to and support growth with its necessary infrastructure
- Encompass and build upon the existing regeneration of Wembley
- Improve Brent's economic base to provide local jobs and improve its skills base
- Allow for adaptations to climate change and an improved borough environment

### Spatial Methodology: In brief

**2.9** Through a housing capacity study produced for Brent<sup>38 40</sup>, sites that could accommodate the borough's much needed new homes were identified. In terms of Spatial Planning these locations were assessed for their sustainability<sup>5</sup>. Subsequently, five areas within Brent were chosen as being the best for allocating housing growth. These were **Wembley, South Kilburn, Church End, Colindale/Burnt Oak** and **Alperton**. As part of a *Spatial Strategy*, the 5 sites were then designated as '**Growth Areas**' to guide the overall concept of the plan.

**2.10** With Wembley capable of accommodating the largest scale of growth due to its existing regeneration and land availability, it is sensible that the Spatial Strategy be anchored around this location, making use of the improved transport infrastructure for encouraging new business investment and job creation.

**2.11** Designation of these 5 growth areas gives rise to the essential requirement for appropriate infrastructure to support population growth created by new housing and other development. As such, a document titled the **Infrastructure & Investment Framework (IIF)**<sup>4</sup> was drawn up to illustrate the particular infrastructure required as growth progresses.

**2.12** In addition to the growth areas, two other key locations were identified in which significant change will be brought forward because of their strategic significance to Brent and  $\pm$ London as a whole. These areas are the North Circular Road (NCR)<sup>56</sup> and the Park Royal industrial park.

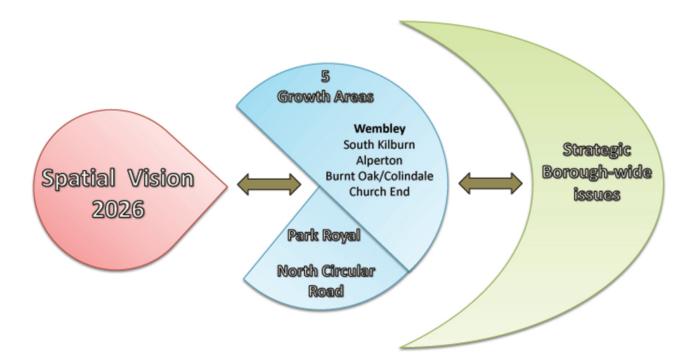


Figure 8 : Spatial Strategy Rationale

Figure 10 displays the sequential rationale for this spatial plan displaying how the Spatial Vision gave rise to this proposed plan.

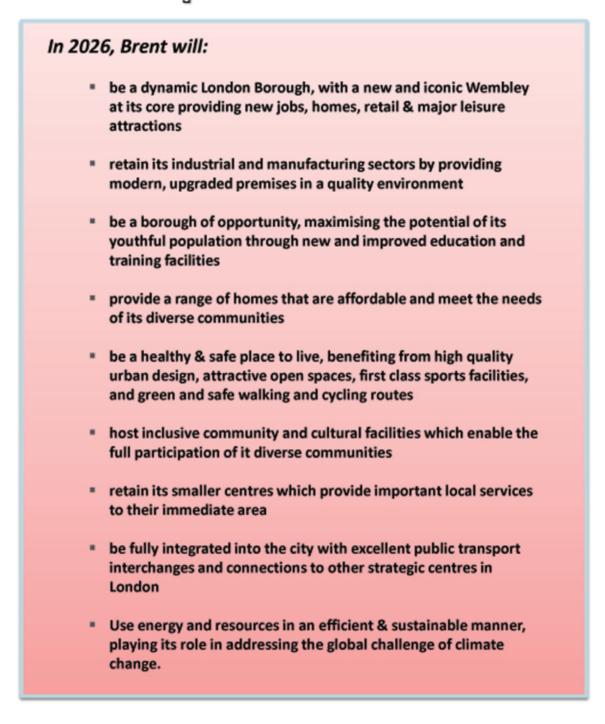
# 3. Brent's Spatial Vision & Objectives

**3.1** In developing a Spatial Vision that complements the borough's SCS<sup>2</sup>, it was essential to be mindful of the Challenges and Opportunities discussed in Section 1 and to be realistic as to how a Spatial Planning Strategy could help deliver "*a great place, a borough of opportunity and an inclusive borough*".

**3.2** As such, the following Spatial Vision directly addresses the borough's challenges to help alleviate existing social deprivation as well as building on opportunities to illustrate how the borough will be in 15 years time (2026) when this strategy has been delivered. Furthermore, this Vision also addresses the LAA Priorities<sup>55</sup>.

**3.3** Following on from the Spatial Vision are a series of **Strategic Objectives**. These express the pathways through which this Spatial Vision will be achieved and are accompanied by specific targets required for the Vision's delivery.

# Spatial Vision



### **Strategic Objectives**

Objective 1

To Promote Economic Performance & Regeneration - by

- Creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses, expanding the town centre eastwards into the Stadium area
- 10,000 new jobs within the Wembley Area over 20 years, half of which will be +created by 2017.
- Completing three large scale hotels in the Wembley area and one large regional visitor attraction.
- Increasing newly approved retail floorspace in Wembley by 25%.

#### **Objective 2**

#### To Meet Employment Needs and Aid the Regeneration of Industry and Business - by

- Working with developers and end users to offer suitable training and job placement opportunities.
- Ensuring that sufficient sites and premises are available in the borough's main commercial areas such as Park Royal and that industrial/warehousing floor-space is renewed.

#### **Objective 3**

#### To Enhance the Vitality and Viability of Town Centres - by

• Maintaining the position of town centres in the retail hierarchy, completing new retail developments in Willesden and Harlesden, and maintaining a range of local services.

#### **Objective 4**

#### To Promote the Arts and Creative Industries - by

• Increasing the supply of modern subsidised workplace developments for creative industries in the growth areas and promote new public art to support regeneration in the borough.

#### Infrastructure & People's Needs

#### **Objective 5**

#### To Meet Social Infrastructure Needs - by

- Securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.
- Constructing at least three new secondary and three new primary schools in the borough.
- Providing community facilities to meet the needs of Brent's diverse community.

#### **Objective 6**

#### To Promote Sports and other Recreational Activities - by

Placing particular emphasis on the provision of new facilities to address existing deficiencies and to meet the needs
of new population in the growth areas, creating at least one new swimming pool in the borough in the plan period and
eight new multi-use games areas.

#### Housing Needs

#### Objective 7

#### To Achieve Housing Growth and Meet Housing Needs - by

- Promoting development that is mixed in use and tenure, so that at least 11,200 additional homes are provided in the period from 2007/08 to 2016/2017, and that 85% of the borough's new housing growth is contained within 5 growth areas.
- Ensuring that at least 25% of all new homes built in the borough are family sized (3 bed or more) and 50% (approx.) are affordable.

#### Transport infrastructure

#### **Objective 8**

#### To Reduce the Need to Travel and Improve Transport Choices - by

- Completing first class retail and other facilities in Wembley that reduces the need to travel to other centres. Improving key transport interchanges at Wembley, Alperton, First Central and Queens Park.
- Promoting access by public transport, bicycle or on foot and reducing car parking standards for growth areas because of their relative accessibility.
- Reducing modal share of car trips to Wembley from 37% to 24%.
- Completing at least 5 car free schemes per annum in the plan period.

#### **Open Space & the Environment**

#### **Objective 9**

#### To Protect and Enhance Brent's Environment - by

- Preserving the borough's open spaces for recreation and biodiversity and creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision.
- Increasing the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value.
- Enhancing the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development.

#### **Objective 10**

#### To Achieve Sustainable Development, Mitigate & Adapt to Climate Change - by

- Promoting mixed use, mixed tenure development in growth areas integrating Infrastructure and housing provision.
- Reducing energy demand from current building regulation standards, particularly in growth areas and by achieving exemplar low carbon schemes and CCHP plants.
- Building at least two exemplar low carbon schemes and two district wide CHP plants by 2017

#### **Objective 11**

#### To Treat Waste as a Resource - by

 Collaborating with the other West London waste authorities, ensuring that there is an appropriate network of facilities for integrated waste management and that existing, appropriately located, facilities are protected.

### Objective 12

#### To Promote Healthy Living and Create a Safe and Secure Environment - by

- Ensuring that there is sufficient space for Primary Health Care providers, particularly to meet additional need in the growth areas.
- Ensuring development delivers transport solutions and opportunities for healthy lifestyles (such as walking and cycling).
- Embracing a design-led approach to reduce crime and the fear of crime by installing new CCTV systems and ensuring that crime levels continue to be reduced.
- Improving participation rates in sports and active recreation through the provision of better quality sporting facilities and open space.

# 4. Brent's Spatial Strategy: Delivering Sustainable Places

**4.1** Policy CP1 sets out the spatial development strategy for the borough. This is intended to set out Brent's overarching policy direction and outline the strategic priorities for development and land use. It is deliverable, realistic and is in accordance with other policies and programmes which also have influence on the nature and function of the borough's future.

**4.2** Regenerative development will predominantly be delivered in the five designated housing growth areas of which Wembley will be the primary focus of growth. The other areas are Alperton, South Kilburn, Burnt Oak/Colindale and Church End.

- **4.3** The Council initially considered a number of approaches to accommodate growth, including:
- Dispersal across all areas of the borough.
- Focusing development around all of Brent's town centres and modes of public transport.
- Centre growth only in Wembley.
- Allow growth on industrial land and redevelop former council estates in need of regeneration.
- Concentrate growth within areas that have good public transport access, that have the capacity to accommodate growth, are in need of regeneration and can deliver jobs and infrastructure.

**4.4** The council's approach is set out in the final option. It exploits a direct relationship between brownfield land, public transport and density and is considered to be the most sustainable spatial expression of growth for Brent.

**4.5** The sense of place is further enhanced by the provision of shops, services and facilities. The scale of development proposed requires forms of infrastructure including open space, schools, health centres and community facilities. Development in growth areas can create local focus points of demand for service. Monies from development can be pooled and facilities physically provided in accessible locations.

**4.6** Generally the growth areas have good access to existing forms of public transport, or there are improvements planned, such as station extensions, new bus services (orbital routes) and improvements to interchanges between public transport modes. Although certain town centres outside the growth areas may have better public transport than some of the growth areas, they do not have the opportunity or capacity to accommodate development.

**4.7** All of the growth areas are in need of regeneration, whether they comprise run down industrial estates, vacant commercial land or declining town centres and housing estates. Mixed use redevelopment of growth areas can deliver affordable workspace accommodation for businesses, new retail space, hotels and hospitality. These can all help to deliver jobs for local people. There are other parts of the borough that are also in need of regeneration, but again do not have the capacity for significant growth. Nevertheless, the Council will take opportunities to deliver regenerative change in these areas.

### Policy CP 1

#### **Spatial Development Strategy**

Brent's strategy is to concentrate housing growth in well located areas that provide opportunities for growth, creating a sustainable quality environment that will have positive economic impacts on deprived neighbourhoods that may surround them. The key diagram sets out the growth areas and illustrates the need to provide more orbital public transport links between such areas.

Wembley will deliver the majority of the borough's development and employment growth, will contain most of the borough's new retail growth and office development, and will become the primary location for new hotels enabling associated uses such as conferencing. Wembley will become a cultural focal point as the borough's main area for tourism, being the location for large scale visitor attractions

Wembley will be the preferred destination for town centre uses and other uses as illustrated above.

In the other four growth areas, South Kilburn, Colindale/Burnt Oak, Church End and Alperton, mixed use development will be encouraged in accordance with the place-making policies set out below.

This will be complemented by the protection and modernisation of Strategic and Borough Employment Areas for industrial and warehousing uses.

It is essential (both economically and sustainably) that local people benefit from new job creation and skills training. The council will seek training and placement opportunities from development to place local people in local jobs.

# Key Diagram

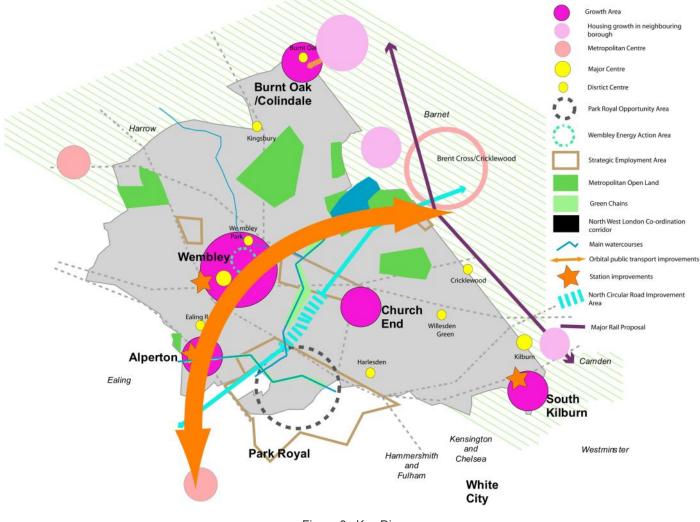


Figure 9 : Key Diagram

### **Regeneration and Growth**

### **Appropriate Level of Growth**

**4.8** The direction for the future change and regeneration of the borough also needs to accommodate population and housing growth. The issue is how much growth is appropriate and how, where and when it can be provided. The council accepts that at least 10,146 new homes (including 1,000 non self-contained homes) can be accommodated in Brent up until 2016/2017<sup>69</sup>, and will aim for a target of 50% affordable in accordance with the London Plan.

**4.9** The GLA have further estimated that a total of 1,030 vacant dwellings could be brought back into residential occupation over the same ten year period; thereby increasing the housing capacity to the target of 11,200 new homes<sup>69</sup>. This equates to an approximate increase in population of 25,000-28,000, about 10% increase on the current population.

**4.10** This is above the current population projections for the borough but is compatible with Brent's status as an 'Opportunity Borough' and with its ability to accommodate new housing. It is considered to be an acceptable level of growth, given the capacity of sites to accommodate new development and the constraints that the need for new infrastructure will impose.

**4.11** This level of proposed growth will still require an increase in provision of schools, health centres, open spaces and waste management facilities if Brent is not to 'over-heat'. In order to achieve sustainable development, and in particular to reduce the need to travel by car, population growth requires that additional jobs should be available locally. Additionally more waste will be generated and there will be an increased use of resources and pressure on the environment in general. These issues are addressed by the strategy (see particularly Policy CP 3 'Commercial Regeneration' and Policy CP 15 'Infrastructure to Support Development'). In this way the borough can benefit from the advantages that growth and associated regeneration brings, whilst ensuring that there is adequate provision of key infrastructure, both social and physical.

**4.12** Two areas of Brent are identified in the London Plan as '*Opportunity Areas*' - Park Royal and Wembley. In Park Royal there is a need to renew what had become in the 1980s a run-down industrial estate and to provide new business opportunities and jobs, although much of the more modern accommodation can now be found within the Brent part of the estate. The impetus for renewal at Wembley was provided by the decision to rebuild Wembley Stadium as the new National Stadium and the associated enhancement of the infrastructure.

**4.13** The availability of large development sites close to the Stadium means there is an opportunity for major growth and renewal. Both Wembley and Park Royal are well located to provide job opportunities, and access to other facilities for the deprived neighbourhoods nearby. Although Wembley has potential to provide significant levels of new housing, there is little opportunity in Park Royal apart from specialist key worker housing associated with the redevelopment of Central Middlesex Hospital and on the First Central site, and not least because the majority of the fabric of Park Royal is designated as a Strategic Industrial Location by the London Plan.

**4.14** Other priority areas for physical and social renewal are large housing estates built in the 1960s or 1970s where a combination of physical and social problems means that wholesale redevelopment or refurbishment is necessary. Much progress has already been made with Chalkhill Estate completed and Stonebridge estate having been substantially rebuilt and renewed. Progress has also been made at Church End and South Kilburn, where New Deal for the Community funding is promoting major regeneration. At both Church End and South Kilburn there are opportunities for additional housing and other facilities as well as replacing sub-standard accommodation. Both areas therefore, can be identified as focuses for further growth. Both areas benefit from good accessibility by public transport. Therefore, Church End and South Kilburn are identified as growth areas.

**4.15** Other areas of the borough where growth can be focused are those where there is potential to redevelop with a mix of uses. This means that sites have to be available, there has to be at least a good level of public transport accessibility and they are not areas that are worthy of protection, i.e., are a generally poor environment or townscape and are not strategic employment locations that should be retained as such. Two such areas can be identified, at Alperton and on or close to the Edgware Road at Burnt Oak/Colindale. Therefore, Alperton and Burnt Oak/Colindale area identified as *growth areas*.

### Policy CP 2

#### Population and Housing Growth

The borough will plan for sustainable population growth of 28,000 people by 2017. The provision of at least 22,000 additional homes (including 1,030 re-occupied vacant homes) will be delivered between 2007 and 2026 (including over 11,200 homes from 2007/08 to 2016/17). The borough will aim to achieve the London Plan target that 50% of new homes should be affordable. Over 85% of the new homes will be delivered in the growth areas with the following minimum targets:

	2007-2016	2017-2026
Wembley	5000	6500
Alperton	1500	100
Burnt Oak/Colindale	1400	1100
Church End	700	100
South Kilburn	1400	1000
Rest of the borough	2050	360

The council will also promote additional housing as part of mixed use development in town centres where public transport access is good.

**4.16** Apart from the areas identified above, other town centres such as Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden are suitable for housing growth by virtue of public transport provision and local shops and services but do not necessarily have the range and number of opportunities to do so. Housing Growth in Brent's larger town centres will be confined mostly to individual sites coming forward. In short, while new housing is welcomed in these town centres, scope for growth is very limited.

**4.17** The focus on growth areas does not mean, however, that other areas in need of regeneration will be neglected. For example, the Council is working up proposals for the redevelopment of the Barham Estate and it is giving consideration to regeneration ideas for the Brentfield and Stonebridge estates, notably where they interface with the North Circular Road. These and other regeneration proposals will be worked into appropriate guidance during the lifetime of the plan. Appropriate engagement with the local community will be required to help plan the future development and infrastructure/amenity improvements.

**4.18** If we are to achieve sustainable communities, expansion in the number of job opportunities must go hand in hand with population growth. These jobs must be accessible to local people if the benefits are to be felt locally and excessive commuting avoided.

**4.19** As well as seeking a range of new job opportunities, S106 agreements will be used to ensure that training is made available where this will improve the job prospects of local people. Establishing links between schools / further education establishments and local businesses/industries will also help to sustain local, social and economic well-being. In common with the rest of London, much of the new employment will be provided in the service industries such as in shops, hotels and the leisure industry as well as offices. These activities can be readily accommodated in, and directed towards, the larger town centres, particularly Wembley.

**4.20** There is also a need to encourage new manufacturing and distribution businesses to locate in the borough as well as retaining existing businesses. In order to do this, it is important to protect and promote renewal and regeneration in those employment areas that are strategically important to London by virtue of their size, accessibility to the strategic road network and to where businesses can operate without the constraint of potentially impacting on the residential environment. There

are four strategic industrial and business areas either partly or wholly within Brent. These are Park Royal, Wembley/ Neasden, Staples Corner and East Lane. With the exception of East Lane, these have good and direct access to the Strategic Road Network. Wembley Growth Area has the capacity to provide 10,000 new jobs to 2026<sup>54</sup> and Park Royal has the capacity for 11,000 jobs in the next thirty years<sup>72</sup>.

### Policy CP 3

#### **Commercial Regeneration**

Park Royal, Staples Corner, Wembley/Neasden and East Lane will be promoted as strategic industrial/ business locations where redevelopment for incompatible uses will be resisted, new sustainable development for business and industry will be encouraged, and investment in new infrastructure, such as transport improvements will be secured.

Purpose built development not ancillary to warehousing and industrial uses will be directed in the first instance to Wembley and First Central at Park Royal.

Brent will target 10,000 new jobs in the Wembley Growth Area to 2026 and contribute around 40% of (based on the proportion of the estate within the borough) the 11,000 jobs target in the whole of Park Royal over a thirty year period.

### **Overall Spatial Change Policies**

#### North West London Co-ordination Corridor

**4.21** The Wembley, South Kilburn and Burnt Oak/Colindale growth areas form part of a coordination corridor identified by the Mayor of London within The London Plan. This designation is in recognition of the level of future development that will occur along the corridor which is focused on the main arterial transport routes; the Edgware Road, A1 and M1, together with the Kings Cross / St Pancras to Luton and Euston to Milton Keynes rail lines. It is important that Brent works closely with the boroughs of Camden, Barnet and Harrow as well as the GLA and TfL, in co-ordinating development within the corridor. To this end an assessment of the implications of development has been commissioned jointly by the boroughs and the GLA under the auspices of the North London Strategic Alliance<sup>80</sup>. This builds on assessments already made in drawing up the North London Development and Investment Framework, published by the LDA in 2007 and on work being undertaken by Tfl.

#### **Policy CP 4**

#### North-West London Co-ordination Corridor

The council will work with partners at Camden, Barnet and Harrow councils and the GLA family to coordinate development in the growth areas of Wembley, Burnt Oak / Colindale and South Kilburn in context with other planned developments within the North West London Co-ordination Corridor. Opportunities to produce joint policy and regeneration guidance documents will be explored with partners.

#### Placemaking

**4.22** In identifying the primary locations for focusing growth, the council has taken account of the need to regenerate areas important to London as a whole as set out in The London Plan. These include the need for physical and social renewal locally, development opportunities presented by the availability (or potential availability) of appropriate sites and the provision of good access to public transport. It is recognised, however, that not all of the ingredients of successful places will be present in growth locations and that if cohesive, sustainable communities are to be created, the appropriate physical and social infrastructure must be provided as well. These areas must be planned and designed so that all of the elements of successful places are present, such as facilities to meet community needs as well as quality design, distinctive character and identity.

**4.23** Therefore the council has prepared the Wembley Masterplan (2009) and the South Kilburn Supplementary Planning Document (as produced in 2005 with updates due for publication in 2009). In addition, the council is preparing guidance for Alperton, Church End and Burnt Oak/Colindale. The council is keen to stress that, although these areas share characteristics in support of accommodating levels of housing growth, each area has the potential to develop a very distinct identity and sense of place derived from economic uses, public art, existing historical assets, public realm, building typologies, as well as the creation of spaces, landscaping and tree planting. Where appropriate, the council will secure these through planning obligations as development comes forward.

**4.24** Although Park Royal is not a growth area, development in this area will be mainly commercial in nature. There is also an opportunity to ensure that the Park Royal estate develops as a distinct place. A draft Opportunity Area Planning Framework has been prepared for Park Royal jointly by the 3 boroughs the include parts of Park Royal (Brent, Ealing and Hammersmith and Fulham) together with the GLA and the Park Royal Partnership.

**4.25** Supplementary Planning Documents, planning briefs and other design advice that gives detailed guidance on how the growth areas will be developed will be prepared. In addition, public realm strategies will be produced for each growth area. In preparing this guidance, regard will be given to the principles for placemaking set out in policy CP5 and existing Brent Strategies such as Brent Children and Young People's Plan, Brent Cultural Strategy, Brent Sports Facilities Improvement Strategy, Brent Parks Strategy and Brent Biodiversity Action Plan.

### Policy CP 5

#### Placemaking

In considering major development schemes, regard shall be had to the following:

- The allocation of sites for a range of uses (as set out in the Site Specific Allocations DPD), with particular support for development that is mixed in use and mixed in tenure. A vertical mixing of uses is encouraged.
- The needs of the community and the need for infrastructure, both social and physical, arising from development, such as education facilities, health provision, sports facilities, green infrastructure, public transport, walking and cycling infrastructure.
- The creation of open space (including new squares / public meeting places) or, if that is not practicable, contributions towards the significant improvement of existing open space close to the growth areas. New play areas will be required in all major housing developments.
- Brent Infrastructure and Investment Framework
- The contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration of the heritage of the area and investigate means of introducing continuity through urban design measures and the possibility of reusing and restoring buildings of merit

#### Development Density, Design Quality and Place Shaping

**4.26** Growth areas are generally well connected by Public Transport Accessibility Levels (PTALs). This does not preclude opportunities to improve public transport accessibility in growth areas. The growth areas also do not have uniformly high PTAL ratings as they are spread across wide areas. For example, parts of Alperton set around the underground station are identified as having a high PTAL and therefore can, in principle, support high density development. Very quickly however, accessibility levels fall away as the environment becomes much more suburban in character.

**4.27** Therefore in determining appropriate densities in growth areas, as a starting point the council will have proper regard for the Mayor of London's density policy<sup>81</sup> contained within the London Plan. There are a number of other factors that will be taken into account when determining the appropriate density for a site. Clearly well designed sites should benefit from high densities. Site design quality and neighbourhood design quality are both important because the Growth Areas are looking at regenerative change across sites that will form distinctive new neighbourhoods, not just on individual sites. Therefore, the contribution of buildings to the wider area is imperative in contributing to the wider public realm. This is particularly important considering that many of the growth areas will be transformed from industrial areas into mixed use neighbourhoods.

**4.28** Where public transport improvements are secured, or are planned, then a higher density related to an increase in PTALs will be appropriate. However, growth areas often have an interface with lower density suburban surroundings and this should be respected and reflected in the density of development. This interface presents opportunities to deliver family sized homes with appropriate amenity and open space standards for which there is clearly a demand. Spatially, this can help to knit new developments into the context in which they are placed. This benefits the existing communities and the new developments in creating places of quality, character and identity. To this end, the council will examine closely the expression of this interface within the design of proposals and resist inappropriate solutions.

**4.29** The council will also take into account the placemaking objectives of each growth area which may suggest a higher or lower density than set out in London Plan guidance. A key aspect in the consideration of appropriate densities is good design, and the council will make use of its newly created Design Review Panels, design guidance, architectural competitions and design protocols to ensure design quality. The council will assess schemes having regard to design guidance such as that provided by the Commission of Architecture and the Built Environment (CABE)<sup>79</sup>.

**4.30** The council has identified acceptable locations for tall buildings and where relevant these are highlighted in the growth area policies. In determining planning applications for tall buildings the council will have regard to London Plan policy 4B.9 and the joint English Heritage and CABE Guidance on Tall Buildings (2007).

### Policy CP 6

#### **Design & Density in Place Shaping**

Proper regard shall be made to the London Plan density Policy 3A.3 which supports higher densities in areas of good public transport accessibility. The council will also take into account the following criteria to ensure that a notional density figure is not the only consideration, and the quality of design, location of the site and the need to provide family housing are all important. It is important that the following factors are taken into account in determining density and requiring good design:

- Where design is of the highest or exemplary standard, higher densities will be considered
- Higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements
- The site should contribute towards wider public realm improvements commensurate with the scale of development
- Development in growth areas should take into account the suburban interface
- On appropriate sites a reasonable proportion of family housing meeting amenity/open space standards should be properly accommodated
- The council will take into account placemaking objectives in determining density levels
- Tall buildings are acceptable in identified areas of Wembley, South-Kilburn and Burnt Oak and in defined areas in Alperton and Park Royal.
- The council will use design review panels, architectural competitions, design guidance and design protocols to improve design quality; and
- Schemes will be assessed having regard to CABE's design guidance.

### **Strategic Area Policies**

#### Wembley Growth Area

**4.31** In line with the council's 2007 vision for Wembley, the planning strategy for the area aims to promote the regeneration of Wembley as a regional sports, entertainment and leisure destination, taking advantage of the opportunities presented by the Stadium development and the potential for development of sites in the surrounding area. The aim is to achieve a critical mass of visitor attractions, building on the area's current role as a major leisure and entertainment centre for London. Wembley will become an all year round visitor destination catering for a range of entertainment and leisure activities as well as Stadium and Arena events and conferences. In addition, new jobs will be available through the provision of new office accommodation in with the comprehensive development of the area. The existing town centre will also be regenerated by

allowing its expansion eastwards and by ensuring that the physical linkages to the regeneration area to the east, especially pedestrian routes, are improved. The first stage of this improved link, the new White Horse Bridge across the Chiltern line, is already in place.

**4.32** Wembley town centre's eastwards expansion is committed through existing permissions for the development of a number of sites including Copland School, land adjacent to Wembley Stadium station and the White Horse Bridge and land to the west and north of the Stadium; all as mixed use development sites. The Wembley town centre boundary, as defined in Map 3 'Wembley Growth Area, Energy Action Plan and Town Centre Boundary 'takes account of these consents, two of which are under construction. The council will also produce design guidance for the High Road sites between Chesterfield House and Wembley Triangle based upon the study of the area produced for the council in 2009<sup>82</sup>.

**4.33** The council's key spatial objectives include revitalising town centres and securing regenerative development in Wembley which is strategically important to London as a whole.

**4.34** Wembley is the main shopping destination within Brent. However, it is clear that a relatively low proportion of shoppers do their main shopping in Wembley<sup>42 44</sup>. Brent's centres do not operate in isolation but are influenced and affected by neighbouring retail locations such as Brent Cross, which is a regional shopping centre. Harrow and Ealing are neighbouring Metropolitan centres which will continue also to attract some of the retail expenditure of Brent's residents and the recently opened shopping destination Westfield, and London's principal shopping destination West End, will also attract shoppers from the borough.



Picture 3 : Wembley High Road

**4.35** All these centres will compete with Wembley for shoppers and Wembley will need to secure representation from multiple retailers. It is thus proposed that Wembley becomes Brent's pre-eminent centre for the following reasons:

- To secure its Major centre status, and attract regenerative investment to ensure future growth.
- It is the main focus of civic function in Brent and the level of development should complement this role, particularly in view of the proposed future expansion eastwards.
- It is the only major centre wholly within the borough, and there are opportunities for expansion.

**4.36** Town centre uses are those defined in Planning Policy Statement 6 (PPS6) paragraph 1.8, including: retail, leisure, offices, and housing developments.

**4.37** The council is producing a Masterplan to consider the next phases of development in the stadium area. It is estimated that some 5,000 homes will be built by 2017 in the whole of the Wembley growth area. The Masterplan considers the subsequent development which will occur after 2017. This proposes another 10,000 jobs and at least a further 5,000 homes. New mixed use development is proposed north of Engineers Way and east of the Stadium that will provide jobs in new shops, offices, creative workspaces, hotels and other leisure uses.

**4.38** Whilst much of the area will be redeveloped, providing significant job opportunities, regard should also be had to the needs of existing businesses. Where businesses may need to relocate as a result of redevelopment then the council will assist in securing alternative sites locally.

**4.39** The Masterplan proposes linking the two retail areas of Wembley and Wembley Park. The development of this new retail street is a long term proposal and its development is contingent on creating a continuous retail link from the High Road. As this is achieved the designated town centre boundary at Engineers Way may be shifted further north. Offices and hotels are proposed around Olympic Way which will maintain its function as the processional route to the Stadium. Major new visitor attractions are proposed for the Masterplan area. The council is also working up proposals for a new civic centre with associated community facilities. The Wembley area is suitable for tall buildings, and planning guidance such as the Wembley Masterplan will identify suitable locations for buildings at, or over, 30m high.

**4.40** The continuing housing growth will be accompanied by a range of supporting facilities such as new/expanded education facilities, new health provision and space for recreation and play. There are proposals to build a new secondary school on part of the former Wembley Park Sports Ground, and Copland School is to expand on its redevelopment, which

has planning consent. The additional housing growth planned after 2017 will require additional new primary school(s) in the stadium masterplan area, in addition to the Wembley Park 'all-through' school, and require other secondary schools to be expanded. The new population will require up to six more GP's, a new publicly accessible swimming pool, a new park and series of pocket parks and a range of other community facilities<sup>56</sup>. This includes the Wembley Live! Development, a cultural hub providing space and classes for music, dance and performance. Development along the Wealdstone Brook will be expected to respect and enhance the waterside location to take advantage of amenity value, enhance biodiversity and address issues of flood risk.

**4.41** The council will continue to seek significant improvements to public transport accessibility with further improvements to Wembley Central and Wembley Stadium stations a priority, together with the improvements of orbital links, especially linking the key strategic growth and regeneration areas. New and improved services will run through the Wembley Masterplan area. This may include the introduction of FastBus, a proposed express orbital bus route linking Wembley, initially with Park Royal, but with the capability of extending eastwards to Brent Cross/Cricklewood as that development comes forward. In addition, in order to allow for comprehensive development north of the Stadium, whilst maintaining good safe pedestrian north-south movement, it is important to provide an improved east - west road link, including for buses.

**4.42** Until the Core Strategy is adopted the council will produce guidance such as the Wembley Masterplan SPD and the Missing Link design guide for the High Road. Ultimately, it is the council's intention to review and consolidate guidance produced in the Wembley growth area into an Area Action Plan. The Wembley Area will provide most of Brent's housing growth post 2017.

**4.43** As Wembley is transformed, it will become the economic engine for Brent. It will be an exciting, diverse, and sustainable high density urban place, exploiting its excellent public transport and links to the City and the West End. Building upon its international brand for sport with Wembley Stadium at its heart, a thriving city quarter will be developed, generating a new identity for the borough. Wembley will become a destination in itself, not a place to travel through.

**4.44** A comprehensive range of leisure and commercial facilities will be delivered. Wembley will have a modern, service based economy comprising retail, sport, offices, conference facilities, hotels, leisure, tourism and visitor attractors, creative industries and a regenerated industrial estate, supported by training and skills development such as Brentin2work.

**4.45** The existing Wembley town centre will be supported through opportunities for new retail development which will service local needs, as well as hotels, street markets, family housing and a direct physical link to the new boulevard.

**4.46** Building upon improvements made to Wembley Stadium, Wembley Park and Wembley Central stations, a number of bus routes will penetrate the area, providing further connectivity while pedestrian and cycle movement will be promoted along a series of shared surfaces supported by the highest quality of public realm.

**4.47** Wembley presents one of the largest regeneration opportunities in Europe with more than 60ha of land ripe for development over 30 years or more. There are opportunities for over 1,000 new dwellings on brownfield land, including affordable family homes.

### Policy CP 7

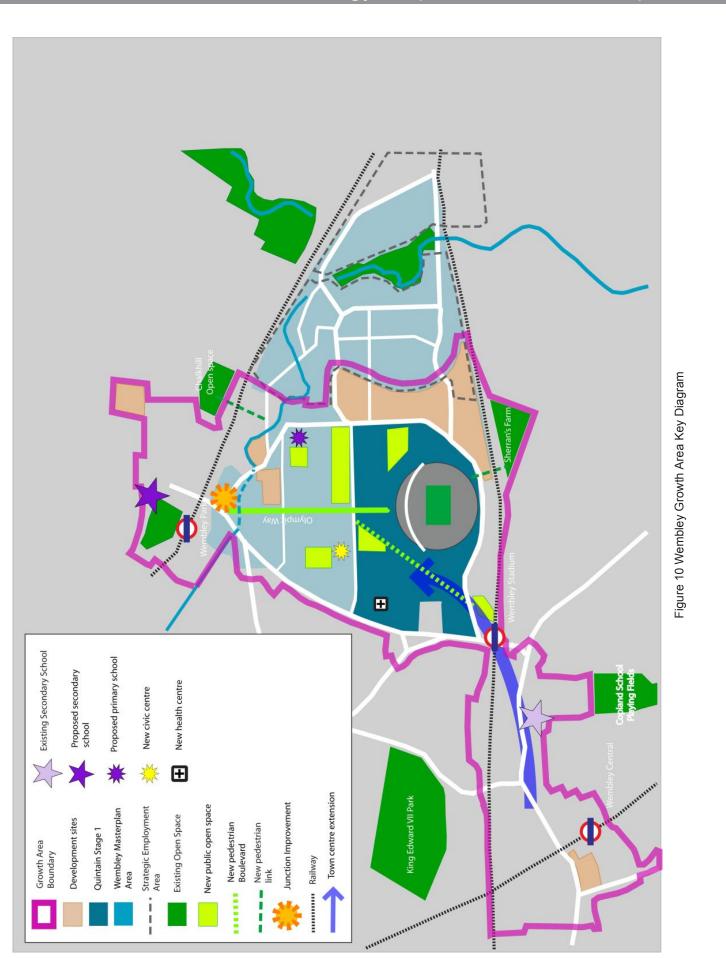
#### Wembley Growth Area

Wembley will drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating 10,000 new jobs across a range of sectors including retail, offices, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as a Strategic Cultural Area for London. Around 70 hectares of land around the Wembley National Stadium and Wembley town centre will be redeveloped for at least 11,500 new homes to 2026, supported by infrastructure identified within the Infrastructure and Investment Framework. This will include:

- New road connections
- Junction improvements
- 2 new 2 form of entry primary schools
- A new combined primary (2 form of entry ) and secondary school (6 form of entry) on the Wembley Park site
- Extensions to existing local schools

- Nursery places
- At least 2.4 hectares of new public open space comprising of a new park (1.2ha min) and 3 pocket parks/squares (0.4ha each)
- Improvements to the quality and accessibility of existing open spaces
- A new community swimming pool
- A new civic centre
- Indoor and outdoor sports facilities
- Play areas
- A minimum of 1000 trees
- New health facilities with space for 17 GPs and 13 new dentists
- District-wide Combined Cooling, Heat and Power as set out in Policy CP17
- New multi use community facilities

As identified in Map 3 'Wembley Growth Area, Energy Action Plan and Town Centre Boundary ', Wembley town centre will be extended eastwards to facilitate a further 30,000 sq m net of new retail floorspace in addition to that already granted planning consent.



31

#### Alperton Growth Area

**4.48** Alperton is situated within the south west of Brent, set within the wider environs of Park Royal. Physically, Alperton consists of 1930s suburban residential streets and cul-de-sacs and run- down industrial estates sitting uneasily side by side. Nonetheless, Alperton does have a number of assets: a 1.6km stretch of the Grand Union Canal, good public transport and the unique Ealing Road town centre.

**4.49** The Grand Union Canal provides an attractive environment for waterside regeneration that will re-model the character of Alperton from declining industrial estates to a series of compact, intimate and connected developments that directly address the canal. With low carbon homes and mixed uses placed along the canal's extensive south facing frontage for maximum passive solar gain, a highly sustainable development can emerge.

**4.50** Land use conflicts between suburban residential areas and low value industrial operations will be relieved. The traditional industrial employment activities will be moved east to the Northfields Industrial Estate and accommodated in modern, intensified premises with improved access to the North Circular Road. New economic activity will be introduced in the form of studios and workspaces for creative industries and third sector operations, such as charities and artists, while bars, restaurants and cafes will locate along the canal.

**4.51** The environment and the heritage of the Canal will be the heart of the new community, providing amenity and connectivity. A series of public squares will be introduced along the waterside connected by a series of crossings – all delivered within a consistent and high quality public realm supported by the introduction and enhancement of areas of biodiversity and an extensive programme of tree planting. Connections will support pedestrians and cyclists, and improve access for new and existing communities to public transport interchanges, including the Alperton and Stonebridge Park stations.

**4.52** Guidance for Alperton growth area will be produced in the form of a Masterplan Supplementary Planning Document. The document will establish principles for development including uses, physical and social infrastructure, the relationship of development with the canal and phasing and delivery.

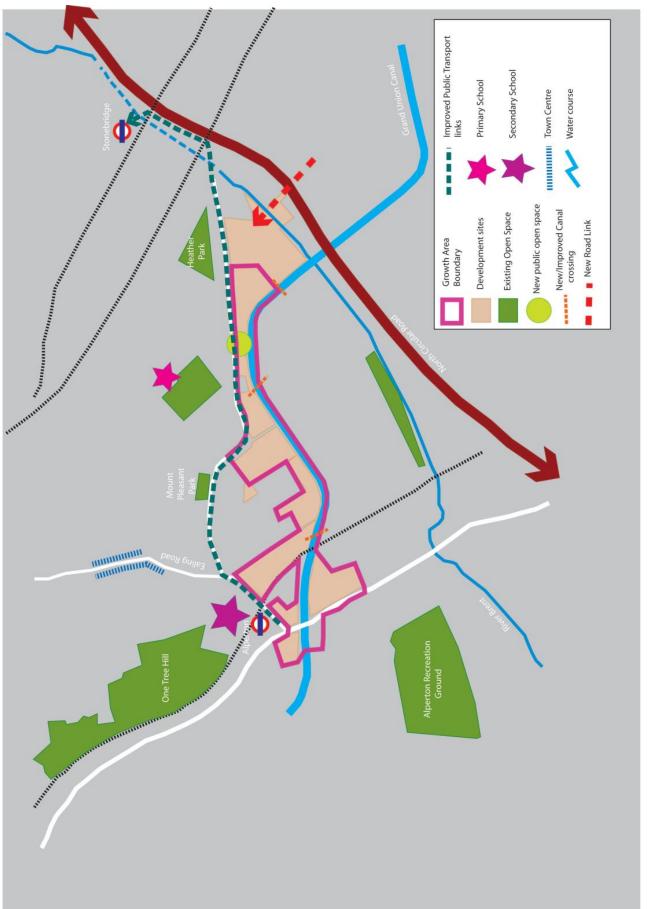
### Policy CP 8

#### **Alperton Growth Area**

Alperton is promoted for mixed use regeneration along the Grand Union Canal. The council will facilitate a shift in character towards a compact and sustainable waterside community. Alperton will become an enterprise hub, with a new supply of modern light industrial units, studios and managed workspaces for creative industries, local business and artists to reinvigorate the local economy. 11.5 hectares of land along the canal is promoted for at least 1,600 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including:

- A new 2 form of entry primary school
- A redeveloped Alperton Community School providing a further form of entry at Secondary level
- New nursery facilities
- New health facilities including space for 2 GPs and 2 dentists
- A new 1 hectare public open space
- Improvements to the quality and accessibility of existing public open spaces
- 3 x 0.2ha (minimum) public squares and pocket parks along the canal and linking improved pedestrian and cycling routes.
- A series of play areas within new developments and open space
- A new multi use community centre
- A minimum of 500 trees

As identified Could not find 640166, a further 31 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generic uses.



#### South Kilburn growth area

**4.53** Located in the southern most part of the borough, South Kilburn has been subject to the regenerative activities of the New Deal for Communities (NDC). The area is a mix of dense Victorian streets and 1960s housing estates set within open spaces.

**4.54** The area will experience significant and comprehensive regeneration with a series of slab and point tower blocks replaced by compact homes along the street. There will be a shift in tenure, with an increase of homes for sale to help support a sustainable urban area that is mixed in use and mixed in tenure.

**4.55** South Kilburn will be regenerated as a dense urban environment with a shift away from 1960s tower blocks set within large open areas, toward a neighbourhood with new homes, commercial and community uses set along a traditional street pattern to encourage circulation, connection and overlooking.

**4.56** Four distinctive quarters will be created: The Historic, The Village, The Urban and The Artisan<sup>58</sup>. Taking advantage of its proximity to Central London, South Kilburn will be knitted back into the surrounding neighbourhoods, with development frontages on to streets, high quality and consistent materials, horizontal design rhythms respecting the Victorian character and a complementary and cohesive public realm strategy<sup>58</sup>.

**4.57** The council adopted a Masterplan Supplementary Planning Document for South Kilburn in 2005, and is now updating this Masterplan to reflect a revised approach to delivery.

### Policy CP 9

#### South Kilburn Growth Area

South Kilburn will experience substantial transformation. The area is promoted for regenerative development using the highest standards of urban design to physically improve the area and change the perception to a busy, thriving, safe and secure section of urban London. The council will facilitate a shift from the housing estates of the 1960s and 1970s to a compact district set around the traditional street pattern with a substantial increase in the proportion of owner occupied households. A series of commercial uses and community facilities will be delivered, including indoor and outdoor recreation uses and new and improved open and public spaces. Around 48 hectares of land is promoted for the delivery of at least 2,400 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including

- A new 3 form of entry primary school
- Queens Park secondary school to be extended by 2 forms of entry
- New nursery school places
- A healthy living centre with space for 9 GPs and other health services
- 4 new pocket parks of at least 0.2ha each
- Improvements to existing open spaces
- A series of play spaces
- Multi use games area
- 3 multi purpose community centres
- Replacement Albert Road Day centre
- 2 new youth centres
- A new sports hall on Brent land for St Augustine's School
- A minimum of 200 trees



#### **Church End Growth Area**

**4.58** Church End is located to the south east of Wembley, south of the North Circular Road. The area consists of light industrial estates, a declining centre and large, predominantly socially rented, housing estates. Church End also has a number of assets – a thriving market, green space and St Mary's Church.

**4.59** Set around a new outdoor market square and a revitalised shopping street, Church End will become a busy, safe and secure village centre for families. The design of new developments will emphasise the benefits of natural surveillance and 'eyes on the street'. The council will plan for a more balanced mix of dwellings to deliver a place that is mixed in use and mixed in tenure with a particular focus on family housing and owner occupation.

**4.60** The local economy will be re-energised by a permanent location for the market in the heart of the area as well as new shops and services. New subsidised light industrial units will be delivered for small and medium sized enterprises and a new arts based community centre will provide out-reach, education and training to raise skills.

**4.61** Building upon improvements to the road network, access to public transport interchanges will be improved including being made safer, offering connections to other local town centres, and Wembley beyond. New open spaces and play areas will be delivered to create safe and secure outdoor places for leisure and recreation.

**4.62** A growth area strategy is planned for Church End that will provide guidance on phasing and delivery of development and infrastructure, building upon the extant permissions within the area and recently completed development.

### Policy CP 10

#### **Church End Growth Area**

Church End is promoted for mixed use regeneration set around the economic revitalisation of the local centre and an outdoor market square, using the highest standards of urban design to physically improve the area and change the perception to a busy, thriving, safe and secure village with new family sized homes. Affordable premises for local businesses and an educational outreach centre will help to support business start ups and skills development. New open spaces and outdoor recreation facilities will be supported by high quality landscaping, tree planting and public realm strategy to soften the impact of vehicular movement and improve conditions for pedestrians and cyclists. Connectivity with Wembley and beyond will be improved with safe routes to local interchanges. Around 8 hectares of brownfield land is promoted for around 800 new homes to 2026, supported by social and physical infrastructure identified within the Infrastructure Investment Framework, including:

- Extensions to existing local primary and secondary schools
- A new 2ha park and Multi Use Games Area
- A minimum of 200 trees
- A range of new play facilities within new developments and on open spaces
- A new health centre in the heart of the area with space for a further GP and space for 1 new dentist
- A new arts based community centre providing education and training to local people of all ages

A further 6.5 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generic uses.

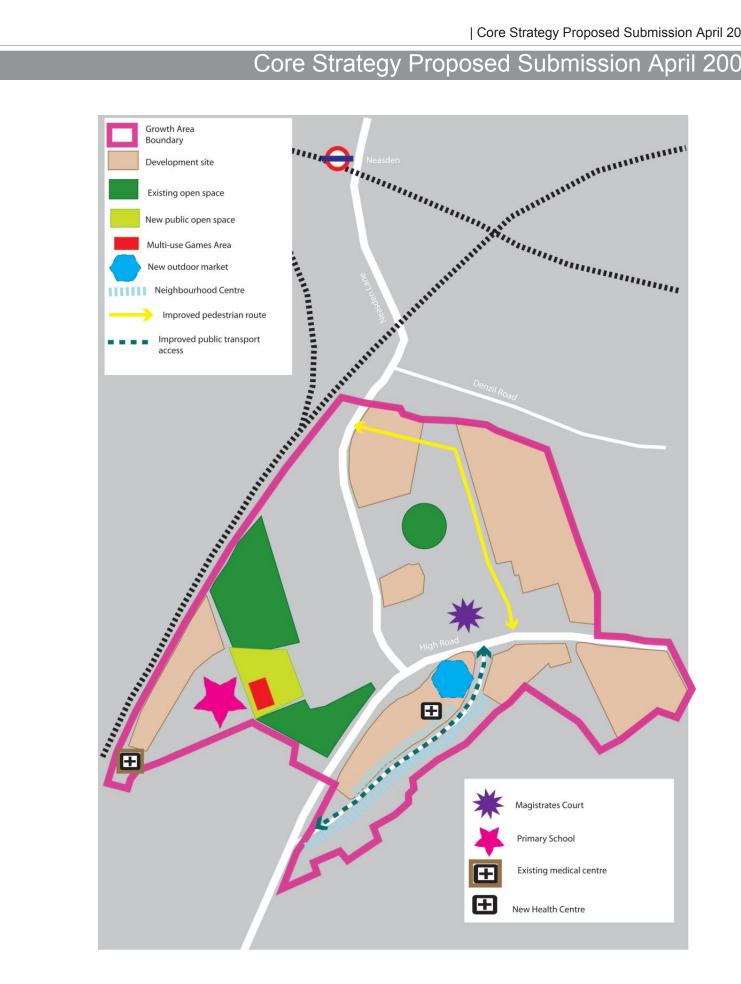


Figure 12 Church End Growth Area

#### Burnt Oak/Colindale Growth Area

**4.63** Burnt Oak/Colindale is located at the far north eastern part of the borough along the Edgware Road, the boundary shared with Barnet Council. Due to the existing set back from the road edge, the width of the Edgware Road currently gives a poor sense of enclosure and the overall impression is of a bleak place that cars and buses travel through and past. The area is characterised by retail warehouses and car showrooms set along the A5 corridor within large impermeable blocks. In contrast set back from the Edgware Road the character is suburban with large gardens, detached and semi-detached houses and cul-de-sacs. Over the borough boundary, Barnet have plans for around 10,000 new homes within Colindale.

**4.64** Burnt Oak/Colindale is promoted as a gateway location along the historically important Edgware Road that travels south all the way to Marble Arch. Along the road frontage, a series of appropriate tall buildings expressed through exemplar design are promoted. Set back, the character will turn to a more human scale with town houses along a traditional street pattern to break down the urban grain, create new public squares and spaces and provide street frontages for local shops, services and community facilities along a north-south axis. Development will create a legible sense of place and identity that is self contained and generates the critical mass of a vital urban area.

**4.65** Burnt Oak/Colindale will be a well connected area with new linkages east and west to connect to large public open spaces and public transport interchanges such as Colindale underground station. New bus services and increased frequency will be introduced to support this. The environment along the Edgware Road will be softened with high quality landscaping and public realm and extensive tree planting. The new north-south axis will be predominantly for pedestrians and cyclists by creating an environment that is more human in scale with a good sense of enclosure.

**4.66** The Edgware Road is an administrative boundary with the London Borough of Barnet, who are planning for significant growth around the Colindale area. Both are part of the North West London Co-ordination Corridor (See Policy CP 4 'North-West London Co-ordination Corridor'). Brent and Barnet officers meet regularly to understand the implications of growth either side of the Edgware Road. While Barnet are preparing an Area Action Plan to cover a wider area, Brent Council propose to prepare more detailed guidance for the sites within Brent. However, there are clearly opportunities to prepare joint policy guidance documents to consider issues such as transport, energy and sustainability, urban design and the provision of infrastructure.

### Policy CP 11

#### Burnt Oak/Colindale Growth Area

The Burnt Oak/Colindale area is promoted for mixed use regeneration along the axis of the Edgware Road. While tall buildings are acceptable in appropriate places along the Edgware Road, the council will facilitate a shift in character and use towards a traditional street pattern supporting pedestrian movement, street frontages and public spaces and squares. New economic activity will be created in the form of ground floor commercial frontage (including retail, where compliant with the sequential approach). New connections will be created in the form of improved access to local stations and the creation of effective interchanges with new buses. 14.65 hectares of land is promoted for at least 2,500 new homes to 2026, supported by infrastructure identified within the Infrastructure Investment Framework, including:

- A new 2 form of entry primary school
- Extensions to a secondary school to provide a further 1 form of entry to 6th form
- New nursery places
- New health services including space for 3 GPs and 3 dentists
- A series of 3 new public open spaces and squares of at least 0.2ha each
- Improvements to the quality and accessibility of existing local open spaces
- A series of play areas within new developments and open space
- Indoor and outdoor sports facilities, including contributions towards a new community swimming pool serving the local area
- New bus services to provide interchanges with local rail and underground stations
- Multi-use community centre
- A minimum of 200 new trees planted

9 hectares of land at will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generic uses.

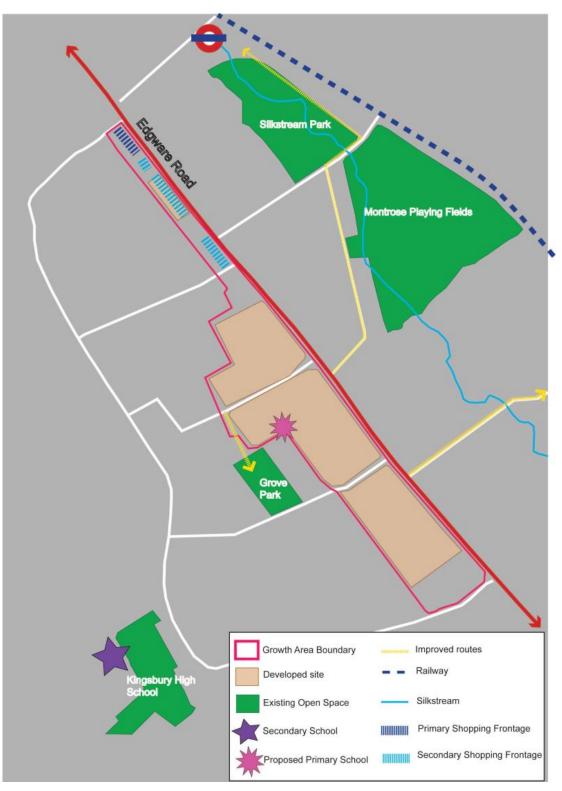


Figure 13 Burnt Oak/Colindale Growth Area

**4.67** As well as the five main growth areas there are two areas that are particularly important in terms of Regeneration and Environmental improvement and these are Park Royal and the North Circular Road.

#### Park Royal

**4.68** Park Royal is one of Western Europe's largest industrial estates and the principal industrial area in West London. It covers 700 hectares across Brent, Ealing and Hammersmith & Fulham. Approximately 40% of its area is within Brent. It is identified in the London Plan as an Opportunity Area with a target to accommodate 11,000 new jobs over the next 20 years. It will remain a Strategic Employment Location, exploiting its potential to meet modern logistics and waste management requirements, making good use of its access to Heathrow and the West End, strategic road and rail connections and seeking to develop its potential for water freight. It is a key area for the location of new waste management facilities to help meet West London's needs. Within the Brent part of Park Royal new housing development is not considered to be appropriate apart from key worker housing associated with Central Middlesex Hospital and new housing on part of the First Central site on the edge of the area.

**4.69** Park Royal is promoted by the Park Royal Partnership, made up of the 3 boroughs and business members and supported by the GLA and LDA. A draft Opportunity Area Planning Framework has been prepared by the GLA with input from the boroughs and the Partnership. When finalised, the Framework will provide guidance on the development of Park Royal and will ultimately, it is intended, form the basis of a joint Area Action Plan. Key local objectives for the area set out in the Framework are:

- 1. Protect and maintain Park Royal as the largest industrial employment location in London
- 2. Increase employment opportunities to contribute to the 11,000 London Plan jobs target through business growth and inward investment
- 3. Improve access to Park Royal at the four Gateways and secure successful redevelopment of major sites in these areas to deliver employment-led growth
- 4. Create a 'Heart' for Park Royal (i.e., centre meeting needs of visitors and workers) that is accessible, has a sense of place and an improved public realm, and provides amenities to support existing and new businesses.
- 5. Deliver housing where it can enable other benefits including affordable housing
- 6. Make public realm improvements including 10,000 trees for Park Royal

#### Policy CP 12

#### Park Royal

The council will work with the boroughs of Ealing and Hammersmith & Fulham, the GLA and the Park Royal Partnership to secure the 'opportunity area' objectives for Park Royal. The council will plan for:

- The development or redevelopment of 50 hectares of land for employment uses between 2007 2017.
- 4,400 new jobs created 2007 2017.
- Development contributing to 'Heart of Park Royal' implemented.
- Significant public transport improvements in relation to First Central secured.
- The introduction of improved orbital public transfer links to Wembley.
- New restaurants, bars, cafes to support the business area.
- 4,000 trees as Brent's contribution towards 10,000 trees in Park Royal as a whole.
- New children's nursery
- Expansion of existing primary school
- 1 new GP surgery

Development proposals should be in accordance with general policy for Strategic Industrial Locations apart from at Central Middlesex hospital where key worker housing and uses appropriate to a local centre meeting the needs of workers and visitors will be acceptable, First Central development, where enabling residential development will be acceptable where it helps to deliver significant public transport improvements, and parts of the Northfields Industrial Estate, in order to secure industrial and commercial regeneration.

Development Proposals should be in accordance with the Park Royal Opportunity Area Planning Framework, to which regard will be had in determining planning applications. Tall buildings will be suitable at Central Middlesex Hospital and First Central sites.

#### North Circular Road Regeneration Area

**4.70** The North Circular Road (NCR) is one of the main arteries of the borough and the only road classified as a GLA Road. It is a route of strategic importance and most of the traffic along it, including a high proportion of heavy goods vehicles, passes through the Borough rather than travelling to or from locations within it. A direct consequence of the volume of traffic, which often leads to congestion, at peak times especially, is the high level of air pollution on or adjacent to the road and the level of noise. The road is also a major barrier to movement, particularly on foot, from one side to the other.

**4.71** At various places along its length there are sensitive uses, particularly housing which often accesses directly onto the road. The residents in these properties have to suffer from the major problems associated with the road. As well as air pollution, which can lead to respiratory problems, there are also the problems associated with the constant noise and road safety problems for those that have direct access onto the road. There is no prospect in the short term of reducing the volume of traffic along the NCR because of its strategic importance and with major development proposed at various points along it, particularly at Wembley and Brent Cross/ Cricklewood, it is likely that traffic will continue to increase, although every effort will be made to manage demand and reduce reliance on the car for development in the borough. Because of lack of space adjacent to the NCR and the fact that properties have direct access, it is not possible to erect a barrier to limit the levels of pollution. In these circumstances the best option is to relocate the housing into an acceptable environment and to landscape the area adjacent to the road. This would not only improve environmental conditions and safety of residents but would also enhance the image of the borough.

### Policy CP 13

#### North Circular Road Regeneration Area

In order to respond to the poor, and worsening, living conditions along the North Circular Road and to enhance the image of the borough, the council will:

- Bring forward proposals that remove the houses most affected by noise and air pollution, with priority to those on the St Raphael's Estate facing the NCR while ensuring no net loss of homes;.
- Use developments such as at Unisys/Bridge Park and Wembley Point to offer new focal points that also assist in providing alternative homes;
- Use small infill sites on the St Raphael's Estate to relocate some homes;
- Work with TfL to improve junctions, notably at Brentfield Road
- Create cycle paths and environmental barriers/open space on the dwellings removed; and
- Bring forward more detailed area plans to identify areas of change.

### **Plan Delivery and Infrastructure**

#### **Delivery of Growth**

**4.72** The level of growth proposed is a challenge to deliver, especially within the current economic climate. However, the period over which growth is proposed will probably experience two or three further economic cycles. This is no time to draw back from planning, more an opportunity to ensure that we create sustainable places that are mixed in use, mixed in tenure and are supported by infrastructure. In addition, the council will support development for which there is market demand and resources to deliver: for example, by prioritising the affordable element of developments and supporting development of hotel, leisure and hospitality uses.

**4.73** To facilitate delivery, the council is currently preparing planning guidance for growth areas, such as the Wembley Masterplan, and a revised document for South Kilburn. Further documents are in the pipeline for Alperton, Burnt Oak/Colindale and Church End, while sub-regional guidance is being prepared for Park Royal. The intention is to properly consider the capacity of sites in advance and provide certainty for developers and encourage long term planning to respond as economic conditions improve.

**4.74** Dedicated project teams actively engage with landowners and developers to negotiate development proposals through the planning process. This includes regular meetings, advice and guidance, and bringing together departments within the council to provide clear messages on design, housing and affordable housing, planning obligations, transport, landscape and more. This is formalised through a regular Major Cases Forum, and more recently, Planning Performance Agreements.

**4.75** The council will also be flexible in terms of revised proposals where delivery is a strong possibility. There may be instances where a lower proportion of affordable housing may be acceptable if a proposal entails the delivery of infrastructure for which there is an identified need. It is also possible to balance potentially lower proportions of affordable housing on some sites with a much higher proportion on others where developers take advantage of available grant finance from the Homes and Communities Agency.

**4.76** In terms of more direct involvement of the council in development, assets such as housing estates and civic offices will be considered for intensification and regeneration in the long term, including exploring opportunities to facilitate residential development. For example, the council is exploring ways to act as a developer or secure a joint venture partner to develop its own portfolio, such as at Stonebridge, South Kilburn and Bridge Park. The council believes its record on delivery on large scale regeneration projects and its flexible approach will find support from the new Homes and Community Agency (HCA).

**4.77** Furthermore, there may be instances where the council itself can acquire land by negotiated purchase, while Compulsory Purchase Powers can be used to unlock complex land issues and blockages in development.

#### Delivery of Infrastructure

**4.78** Clearly housing growth needs to be matched by the timely delivery of infrastructure, from roads, sewers and trees to schools, doctors and parks. These items are essential to create high quality places that people will choose to live in, as well as ensure that communities can be sustained by the essential services and facilities that they need. Therefore, it is in the interests of the development industry, council and Government to ensure that they are provided.

**4.79** To accompany the Core Strategy, the council has prepared the Infrastructure and Investment Framework that details the what, how, when and where forms of infrastructure will be required. Clearly the onus is on development itself to deliver a substantial proportion of infrastructure, whether it is physically part of buildings and places, or through s106 planning obligations and the Community Infrastructure Levy moving forward.

**4.80** As economic cycles proceed however, there will be uncertainties as to whether housing will be delivered by the development industry. Even if development does occur, there is a risk that poor returns threaten the ability of planning obligations to meet the costs required to deliver infrastructure.

**4.81** In these times, and in any case, the council will continue to explore and exploit further opportunities to secure funds to enable delivery. For example, it has secured £7m Growth Area Funding from the Government to support housing delivery, through the delivery of infrastructure. A housing Private Finance Initiative has been secured to deliver over 200 housing units in its first phase and up to 400 more in its second phase.

**4.82** The council continues to bid for funds through Primary Capital Programme and the Building Schools for the Future initiative to rebuild, improve and grow its primary and secondary schools, while the Playbuilder scheme will facilitate much needed improvements to play spaces in the borough's open spaces.

**4.83** The Infrastructure Investment Framework shows that there are some forms of infrastructure that can be delivered well ahead of development, such as some school capacity, library space and play and open space improvements. There will be other items, however, that the council will need to ensure are delivered in a timely fashion as development happens on the ground. What is important is that, in the short and medium term, as much certainty as possible is applied to delivery while, in the longer term, development proposals and funding bids can be properly prepared, considered and monitored.

### **Infrastructure to Support Development**

**4.84** If sustainable growth is to be achieved in the borough, it is vitally important that the necessary supporting infrastructure is adequate, particularly in terms of its capacity to meet future demands upon it. Vital infrastructure includes transport facilities, especially of public transport, utilities such as water supply, sustainable energy, drainage, sewerage and waste management, and community infrastructure such as schools, health provision and leisure / recreation facilities.

**4.85** In order to ensure an adequate level of provision of transport or community infrastructure, it may be necessary to achieve a critical mass of development in order to support, for example, a new health centre. Few single development schemes are brought forward which in themselves can provide the infrastructure, such as a new school, to meet the demand. Generally, development proposals are piecemeal and smaller in scale than would generate the demand for forms of infrastructure on their own. It is only cumulatively, when put together with other schemes, that a critical mass can be reached. Provision of adequate infrastructure can only be achieved in a planned way by identifying sites where there is some certainty that new development will come forward, estimating what the infrastructure requirements are, identifying how and where this will be provided, and ensuring that development contributes an appropriate amount to the costs of provision through section 106 agreements or other mechanisms. The council will bid for government funding and will also use its own main funding to meet the costs of such provision. The council has produced an Infrastructure and Investment Framework that sets out the major infrastructure needs of the growth areas and also other areas in the borough that require social and transport infrastructure to support growth. This framework gives an indication of the global infrastructure costs of development, the possible funding sources and gives an indication of priorities in terms of infrastructure spend.

### **Transport Infrastructure**



Picture 5 Transport Infrastructure

**4.86** The council recognises that there is likely to be limited funding for significant strategic public transport improvements in the borough. Most of the proposals in the Core Strategy will need to ensure that major trip generating activity is provided in areas most accessible by public transport, in particular at Brent's main transport interchanges, town centres and Opportunity / Growth Areas. Development will also be supported where there is sufficient transport infrastructure to cope with potential increased demand and where development will secure local improvements to public transport, walking and cycling facilities. Station improvements, including interchange improvements, are proposed for Wembley Central, Wembley Stadium, Park Royal (First Central) and Queens Park stations.

**4.87** One of the key areas that must be addressed is orbital public transport linking the main Opportunity Areas and growth locations such as Wembley to Brent Cross/Cricklewood, Park Royal and Ealing. Future public transport improvements in Brent should provide new and improved links from Barnet and Ealing into Wembley as shown on the Key Diagram. Consequently, as indicated above, Brent, together with Ealing Council and Park Royal Partnership, are promoting service improvements to orbital bus services between Wembley and North Acton. This will enable more sustainable travel between Wembley and Park Royal, rather than reliance on the private car. It will require infrastructure works in certain locations to provide a dedicated route, in particular the ability to turn round close to Wembley Park station.

**4.88** Development proposals will not be progressed in advance of necessary transport infrastructure, particularly within the Burnt Oak/Colindale area because of its proximity to the Strategic Road Network (SRN).London Plan policy 3C.1 requires that development is integrated with transport, and it will be necessary for applicants to undertake transport assessments for major developments to assess their impact in accordance with London Plan policy 3C.2. Assessments of the transport impact of proposed development schemes should be considered cumulatively, including pooling of contributions within major growth areas to help mitigate impacts. Further investigation into the joint TfL, London Borough of Brent, and London Borough of Barnet study of the A5 corridor will ensure that future development will not progress at a faster rate than the necessary transport infrastructure improvements.

**4.89** Car parking provision will be based upon public transport accessibility and proximity to town centres, therefore there will be fewer spaces per dwelling and per commercial floorspace in the growth areas than outside them. In all growth areas except South Kilburn, a significant proportion of floorspace in mixed development schemes will be in employment uses to encourage the co-location of residential and work uses. Maximum car parking standards and standards for cycle parking will be applied in line with policies 3C.23, 3C.24 and Appendix 4 of the London Plan 2008.

### Policy CP 14

#### **Public Transport Improvements**

The key interchanges of Wembley Central, Wembley Stadium and Queens Park will be improved and a new interchange at First Central, Park Royal will be provided.

The council will promote improvements to orbital public transport routes which link the strategic centres in North West London and the Growth Areas (as shown on the key diagram), making use of contributions from development where appropriate. Improved links from Wembley towards Brent Cross and Ealing (via Park Royal) will be sought. Improvements in the distribution of buses through the Wembley area will be a priority.

#### **Social Infrastructure**

#### Education

**4.90** Schools in Brent are already under pressure with a shortage of school places at both secondary and primary level. Clearly population growth will put further pressure on schools and additional demand may be placed upon the further and higher education sectors as well. The council has calculated that it will need, as a result of population growth, 16 forms of entry at secondary school level<sup>4</sup>. In order to meet needs arising from new housing development, and in response to the largest population growth being in the Wembley area, the council in the first instance will secure a new school at Wembley Park. In addition Queens Park School, Alperton and John Kelly Schools are to be rebuilt or expanded using Academy and Building Schools for the Future (BSF) funding<sup>4</sup>. Preston Manor and Claremont have been expanded by a form of entry and consideration is being given to expansion at Wembley High. To date, school expansion at secondary level has taken place mostly north of the North Circular Road because future population growth is concentrated in, for example, Wembley and Burnt Oak/Colindale, and those schools have more opportunity to expand. In the medium to long term the council would want to provide new schools at secondary level in the south of the borough. It will continue to look for school sites, but provision will be dependent on suitable sites coming forward. More detailed planning requirements for these are included in the Site Specific Allocations DPD.



Picture 6 Park Lane Primary School **4.91** The council will also secure new primary schools. The council's Primary Capital Programme 2008 sets out a need for 8 forms of entry by 2010. Such is the urgent need that a number of primary schools have currently expanded by one form of entry. In the longer term new primary school provision in the form of new expanded schools will be provided in South Kilburn and Stonebridge (Stonebridge and Our Lady of Lourdes schools funded through housing development), Colindale (currently through the Oriental City development) and at Wembley Park (as part of the all-through school proposal). A number of other primary schools will be expanded by one form of entry in the rest of the borough. In the longer term, population growth, particularly in Wembley will require a further new primary school. Funding will be provided from planning obligations related to the Wembley development<sup>4</sup>.

#### Health

**4.92** A growing population requires expanded health care facilities. Currently Brent is well served by two large hospitals that serve the sub-region. It is anticipated that these, and the local treatment centre in Wembley, will meet tertiary health care needs for Brent's growing population. Proposals are set out in the SSA DPD and elsewhere to allow for change on these key sites. In terms of Primary

care, the council will require, through planning obligations, sufficient affordable floorspace to accommodate at least one new GP for every 1,500 people, as well as making up the current shortfall in provision<sup>4</sup>. In view of the lack of PCT resources for such premises, provision will need to be at a cost and in a location that will be supported by Brent's PCT. A site for a new Health Centre has been identified in Wembley, and all the other growth areas need expanded or new GP facilities. Because the amount of floorspace required for health is not significant in relation to the scale of overall floorspace in growth areas, it is not necessary to identify all the particular sites within the Core Strategy or the Site Specific Allocations. The council will bring forward more detailed proposals in Area Action Plans or planning briefs as appropriate. Each of the growth areas will require at least one additional GP focused health facility<sup>4</sup>.

#### **Open Space and Sport**

**4.93** The borough is deficient in open space and this position will worsen with new development. Existing open space will be more intensively used by a growing population. Although existing open space will be protected from development, the council recognises the difficulties in creating new open space and, where the creation of sufficient new open space is not practicable, will look to secure contributions to improve existing open spaces. It will, however, require a new public open space at Wembley as part of the development of the northern part of the regeneration area, as well as the provision of public squares and smaller open spaces<sup>4</sup>. In the Alperton growth area it will concentrate on creating smaller open spaces at the canalside. In Church End, planning obligations have been secured to lay out a new park. In Colindale, Grove Park will be improved and in South Kilburn the Carlton Vale open space will be improved and expanded by making use of planning obligations. The council will produce an Open Space Strategy which includes these new and improved public open spaces.

**4.94** The council will secure new play facilities in all major developments and contributions to improve new open space in and around all of the growth areas.

**4.95** A new sports centre/pool will be provided in the north east of the borough as a priority to meet current deficiencies<sup>4</sup>. This will be situated in or around Roe Green Park and supported by contributions from the Colindale Growth area. A further centre/pool will be sought in Wembley. The council will redevelop Bridge Park Sports Centre and bring forward plans to redevelop Vale Farm sports centre .

**4.96** The council will enhance the Wealdstone Brook in the Wembley area by developing amenity open space and improving biodiversity.

#### **Community Facilities**



**4.97** The multi-cultural nature of Brent's existing, and likely new communities, generates an extra need for community, social and religious facilities. The planning framework can only assist in meeting part of this need, but it will seek provision of at least one major, multi-purpose community building within each growth area and secure this through planning obligations<sup>4</sup>. It will support the further provision of community facilities by identifying sites that private groups could secure to meet their community and social needs.

Picture 7 Shri Swaminarayan Mandir, Neasden

#### **Emergency Services**

**4.98** In planning for a significant increase in housing and therefore population, it is important that the requirements of the Emergency Services, i.e. Police, Fire and Ambulance service are taken into account. Additional accommodation has been secured for the Metropolitan Police in phase 1 of the Wembley City development as part of the existing outline permission. The council will continue to liaise with the Emergency Services to ensure that their detailed needs are taken into account when detailed area-based guidance is produced and when major proposals are brought forward.

#### **Utilities Infrastructure**

**4.99** Within the growth areas, there is sufficient capacity in terms of main undertakers supply as long as developers assist in reducing energy and water use as set out in this plan. The growth areas will be prone to problems of localised storm flooding unless sustainable drainage measures and run off attenuation measures are carried out. However, it will have to be demonstrated that capacity exists, or can be provided, ahead of the occupation of development.

**4.100** The overall scale of growth (housing, associated social infrastructure and commercial) will also significantly increase the level of carbon emissions in the Borough, and could affect Brent's ability to meet its mitigation obligations unless firm measures are established. Policy CP19 sets out the higher sustainability standards (implying minimum reduction in energy & water use) sought in the growth areas to minimise their impact. In terms of adaptation for instance, likely intensification of the heat island effect and the associated need for cooling also needs to be addressed. The 'Brent Sustainable Energy Infrastructure – Wembley Feasibility Study', 2008, estimates the likely emissions in Growth Areas, particularly Wembley, proposing strategic energy infrastructure to further offset these, including decentralised heat and cooling networks, the delivery principles of which can be applied to other growth areas (Policy CP19).

### Policy CP 15

#### Infrastructure to Support Development

The council has set out, in an Infrastructure and Investment Framework, the infrastructure requirements necessary to support new development in the growth areas, and will indicate where and when this will be provided. It will also set out the scale of funding necessary to achieve this and the possible sources of funding available from a range of agencies, including the council, as well as from development.

Before granting planning permission for large-scale development, the council will have to be satisfied that the infrastructure requirements arising from the scheme will be met by the time it is needed. Contributions will be sought from development giving rise to the need for new infrastructure.

The council will also bid for infrastructure funding from Government and other sources, such as the Community Infrastructure Fund. The council will review its position after this Core Strategy is adopted and progress its infrastructure work into proposals for the Community Infrastructure Levy.

# 5. Strategic Borough-wide Policies

**5.1** So far, the Core Strategy has considered areas of the borough where it intends to focus growth and regenerative change in largely mixed use, mixed tenure development. While this is the focus of the spatial strategy it is not the whole strategy. The areas of growth have to be complemented by areas in which the council wishes to preserve either established neighbourhoods of character, open space of value or land for industrial uses, as well as maintaining town centres and protecting and enhancing important cultural and community uses that reflect the borough's diversity. Growth in the growth areas can only be achieved if policies for protection of other uses are in place. The Core Strategy must ensure that national and regional planning policy is applied at the local level and that, for example, there is a local expression of policies. The aim of such policies is to maintain and improve local environmental quality, (including protecting the natural and historic environment and ensuring that new development is of a design that makes a positive contribution to the environment), protect and promote employment opportunities, ensure a good level of access to a range of shops and other facilities and ensure that there is sufficient land available to process the community's waste. Above all, policies must play a positive role in promoting sustainable development, as well as responding to Climate Change in particular.

### **Town Centres and Shopping**

#### **Maintaining Existing Town Centres**



**5.2** The council will protect and enhance the vitality and viability of existing town centres in Brent by concentrating efforts for rejuvenation, through promoting environmental improvements and ensuring good accessibility for the whole community.

#### Network and Hierarchy of Brent's Town Centres

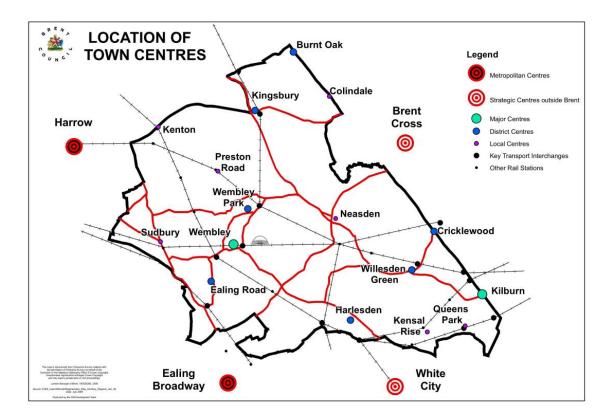
Picture 8 Kilburn High Road 5.3 Town centres are categorised in a hierarchy according to their functions and roles which take account of size, extent of catchment area and the range of shops and facilities provided. Brent's town centres have been re-categorised and divided into four categories according to their characteristics, the designations set out in the London Plan 2008 and the local strategies of neighbouring boroughs for centres that have shared boundaries. Town Centres which share boundaries with neighbouring London Boroughs are indicated by an asterisk (\*). There will be close liaison with neighbouring Boroughs to ensure compatibility of policies and proposals for the centres as a whole.

- **5.4** The town centre categories in Brent are:
- Major Town Centres within London;

- District Centres;
- Local Centres.

**5.5** Neighbourhood centre is the fourth centre category in the hierarchy. Centres falling in this category have small catchment areas and usually provide services to the immediately surrounding population. Town centres are dynamic and will continue to evolve so that their relative positions in the hierarchy can change over time. The hierarchy of centres within Brent has been monitored regularly. Recent surveys<sup>59 42 43</sup> have observed some positive changes in the characteristics of Wembley Park, Preston Road and Neasden town centres acknowledging a need to review their positions in the hierarchy. These three town centres have therefore been elevated from the category of Other District Centre in the UDP 2004 to District Centre.

Major Town Centres	District Centres	Local Centres
Wembley Kilburn	*Burnt Oak Harlesden *Cricklewood Willesden Green Ealing Road Wembley Park Kingsbury Preston Road Neasden	*Colindale *Kenton Queens Park Kensal Rise Sudbury



Map 1 Location of Town Centres

#### **Retail Need and Capacity**

**5.6** Due to the urgent need to improve the provision of shops and key services in accessible locations for local communities, the Brent Retail Need and Capacity Study (Feb 2006, as updated Nov. 2008) has recommended the likely borough-wide growth in demand for shopping floorspace up to 2015. The study revealed that there are significant requirements for new floorspace, particularly for comparison goods (non-food). It is estimated that there is scope, after taking account of existing commitments, for 27,000 sq m gross of comparison floorspace (with an overall 3% increased market share scenario) and 10,500 sq m gross of convenience floorspace (based on a static market share prediction) by 2016 and for a further 90,000 sq m gross of comparison and 19,500 sq m of convenience floorspace by 2026. This should be allocated according to:

1. National guidance and London Plan policies, including the sequential approach to site selection and impacts on existing centres;



Picture 9 Ealing Road, Jewellery

- 2. Brent's town centre hierarchy;
- 3. The results of the Brent health-check, household and shopper surveys included in the Retail Need & Capacity Study 2006, as updated November 2008.

**5.7** Since the council is promoting Wembley as the main shopping destination, and given the availability of sites within Wembley and the adjoining area to the east, it is likely that Wembley will be in a position to accommodate a major share of the identified floorspace.

**5.8** A number of town centre opportunity sites have also been identified to help meet future retail needs. These town centre opportunity sites, as listed in the Site Specific Allocations DPD, comprise existing outmoded property within, or on the edge of Brent's existing town centres that the council aims to regenerate through new development or redevelopment.

#### Location of New Development

**5.9** Given that the main aims of the council's policy are to improve shopping and other facilities and ensure that they are accessible to all sections of the community, including those without access to a car. It is important that major developments should be directed to those locations, i.e. town centres, which are most accessible to a choice of transport modes, particularly walking, cycling and public transport. This way, shoppers are enabled to make multi- purpose journeys to centres where shopping facilities and other services are conveniently located together thus reducing the need to make additional journeys. This is particularly important for those without access to a car such as the elderly and those with caring responsibilities.

**5.10** New retail investment is vital if Brent's declining centres are to be regenerated and thus continue to be important foci for their local communities. It is important that new development effectively contributes to the improvement and regeneration of town centres and helps to secure the strategy of promoting Wembley as the pre-eminent centre in the borough whilst maintaining the vitality and viability of other centres. Major retail developments would provide the town centres with a considerable boost, increasing their attractiveness to shoppers and bringing infrastructure improvements in the form of better servicing, car parking and road improvements. These considerations also apply to other key town centre uses which generate high numbers of visitors such as leisure and entertainment facilities.



**5.11** In order to promote major development in town centres, the sequential approach, set out in Government policy, and other criteria on need, flexible formats, and the impact on the vitality and viability of town centres, will be applied when considering the location of new retail and other major developments such as cinemas. This approach will also implement the aspiration to rejuvenate the Borough's town centre without undermining business growth.

Picture 10 The Salusbury, Queens Park

### Policy CP 16

#### Town Centres and the Sequential Approach to Development

In identifying potential sites, and in considering proposals for new retail and other town centre uses in Brent, the following sequential order of centres will be applied:

Wembley Kilburn District Centres Local Centres Neighbourhood Centres Out-of-centre locations

Wembley town centre is designated as the principal centre within the Borough. The council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development. Major new retail or leisure development will only be permitted in other town centres and then edge-of-centre locations, if it can be demonstrated that no sequentially preferable sites are available in, then on the edge of, Wembley town centre.

Outside of Wembley, the council will continue to support proposals that maintain the position of town centres in the retail hierarchy. Town centre opportunity sites have been identified within, or on the edge of, some existing town centres in Brent. These opportunity sites are usually outmoded premises or sites currently under utilised with redevelopment potential to help meet Brent's future retail needs. Regeneration of these opportunity sites will be sought with the aim of revitalising the vitality and viability of the centres where they are located.

### **Protection and Conservation**

**5.12** As well as areas where growth and change can be focused and encouraged, there are also extensive parts of the Borough that need to be protected and conserved, especially the suburban character. This relates largely to the character of particular built areas, such as the Borough's 22 designated conservation areas and Brent's natural areas and open spaces. Policies detailing the conservation areas and other distinctive residential areas that will be protected and the criteria that will be used to protect key suburban neighbourhoods are set out in detail in saved policies of the UDP 2004. Further detailed guidance on how new development should fit in within existing neighbourhoods will be provided in detailed SPD. The Mayor of London has announced his intention to curtail the development of back gardens for residential development and the council supports this proposed policy change where development erodes the character of suburban Brent.

**5.13** Protecting and conserving Brent's local character also includes local historical assets which will be protected in accordance with London Plan policies 4B.11 to 4B.13.

### Policy CP 17

### Protecting and Enhancing the Suburban Character of Brent

The distinctive suburban character of Brent will be protected from inappropriate development. Outside of the main town centres, and away from corner plots on main road frontages, the council will bring forward design guidance that limits development which would erode the character of suburban housing. Development of garden space and infilling of plots with out-of-scale buildings that do not respect the settings of the existing dwellings will not be acceptable.

The council supports emerging London Plan policy to limit the inappropriate development of back gardens that erode the character of suburban areas.

### Protecting and Enhancing Open Space, Sports and Biodiversity



Picture 11 Roundwood Park

**5.14** Open Space comprises areas in both public and private ownership including areas of open land, open water and waterways. This is further defined in government planning guidance as set out in *PPG17 Planning for Open Space, Sport and Recreation (2002)*, and also in the London Plan (2008). Particularly important open spaces in Brent reflect London Plan designations and are defined as areas of Metropolitan Open Land, Green Chains and the Blue Ribbon Network for their open character and linking of strategic open space. Sites of Special Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation are recognised for their importance to species and wildlife habitats. While strategic open spaces are protected in the London Plan (policies 3D.10, 3D11, 3D.14, 4C.1 and 4C.3), local open space is crucially important to the borough as many areas are deficient, according to the local indicator of 400m walking distance to

public open space of 2ha or more, and therefore also need of protection.

**5.15** Even though open space forms an important element of the urban environment, it is often faced with strong development pressure due to its attractive development potential over brownfield sites and demand for other priority uses. Pre-1998, approximately 48ha of open space (mainly sports grounds and allotments) were lost to other uses and Brent is now deficient in many different types of open space, with an uneven distribution throughout the borough<sup>58</sup>. A further indication of Brent's deficiencies in open space is provided by Sport England's Active People Survey 2005-06, which highlights Brent as having one of the worst participation rates in sport and physical exercise in England. The council will therefore protect all open space from inappropriate development.

**5.16** Inappropriate development, which is considered to be any development harmful to the use or purpose as open space, will be opposed unless very special circumstances apply and where benefits far outweigh its loss. Development which is ancillary to the main use of the site as open space, or is an essential facility for outdoor sport and recreation, cemeteries, or other uses, which preserve open space is generally considered appropriate.

**5.17** As well as protecting existing open space there is a need to maintain and enhance its quality. Two of Brent's parks, Roundwood Park and Gladstone Park, have been awarded the Green Flag Award and whilst not all of Brent's parks are eligible for the Green Flag Award, it is the aim of the council to maintain all of the borough parks to Green Flag standard. Resources for these improvements will come from the council's capital programme as well as external sources, for example the council recently attained over £1 million from the Department of Children, Schools & Families as part of the Playbuilder programme to improve local playgrounds. Brent's waterways, including the River Brent, Wealdstone Brook, Grand Union Canal and Welsh Harp Reservoir, also play an important role in Brent's overall open space provision by providing amenity, opportunities for recreation and improved biodiversity. In assessing proposals which effect Brent's waterways,



Picture 12 Fryent Country Park

the council will regard the aims and objectives of the Blue Ribbon Network established in London Plan policies 4C.1-4C.5, 4C.10, 4C.11 and 4C.22.

**5.18** Paddington Cemetery and Roundwood Park are recognised in English Heritage's register of historic parks and gardens and any improvements to these parks will have regard to their historical character.

**5.19** Where development places additional pressure on local open spaces, S106 contributions will be sought for their improvement so that good quality open spaces are available to the borough's new and existing populations.

**5.20** Some open spaces, such as sports pitches, have fallen into decline and neglect, and it is recognised that these require better investment and management to bring them back into good use. The council has developed a strategy for improving sports facilities which includes pitches, courts and other forms of outdoor sports<sup>12</sup>. Alongside the council's capital programme and S106 monies from development, resources for the improvement of sports facilities will also, where appropriate, come from working with sports national governing bodies such as the Football Association. In addition, the Building Schools for Future Investment programme will also improve school sports facilities which will be promoted for wider community use.

Providing good public access to areas of open space will help increase activity and raise awareness and appreciation 5.21 of nature. The Metropolitan Walk Network (Capital Ring) links areas of public open space while promoting walking as a recreational activity. Where there are limited opportunities to increase the provision of open space, alongside improving the quality of existing provision, improvements to access will be sought to address areas of open space deficiency.



Picture 13 Welsh Harp (Brent Reservoir)

5.22 In addition to protecting and enhancing open space, there is a need to promote and enhance biodiversity throughout the borough, particularly habitats of important nature conservation value and species listed within the Mayor's Biodiversity Strategy and the local Biodiversity Action Plan (BAP). Protecting habitats and recognising important species is significant to the future survival of biodiversity within the urban environment. Enhancing new areas of open space for biodiversity should also be considered through good landscaping and design, particularly in areas that are deficient in Nature Conservation (i.e. >1km from Sites of Accessible Metropolitan or Borough (Grade 1) Nature Conservation Importance) with preference given to the use of native species. London Plan policy 3D.14 requires boroughs to have regard for nature conservation and biodiversity as well as give strong protection to Sites of Metropolitan Importance for Nature Conservation. As the

Although Wembley Stadium is the home to national and international football, on

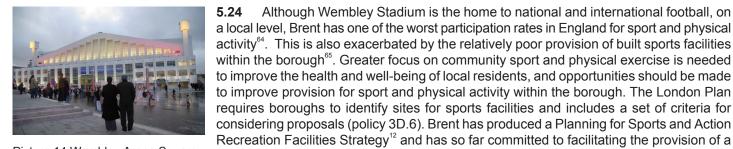
swimming pool and associated indoor sports use to serve the north of the Borough,

recognising that in the longer term a fourth community pool will be required to serve a

borough's environment is substantially developed, the Brent BAP identifies the built environment as a key opportunity for wildlife habitat creation and measures to increase green infrastructure within development such as tree planting, living roofs, and vertical planting will be promoted.

5.23 New areas of open space should be promoted for the benefit, enjoyment, health and wellbeing of Brent's residents, visitors and wildlife. They should also be promoted as part of the measures needed to counteract climate change (see CP19). Where development would result in additional pressure on existing public open space, particularly where public open space is not easily accessible to a proposed development by foot, cycling or public transport, on-site provision or contributions towards new or improved public open space, nature conservation and play facilities will be required. Usable on-site amenity space will also be required within new residential developments. This will help increase the quality of life for people living and working in the area, balanced with the enhancement of habitats and biodiversity within our urban environment.

#### **Promoting Sport**



Picture 14 Wembley Arena Square, **Engineers Way** 

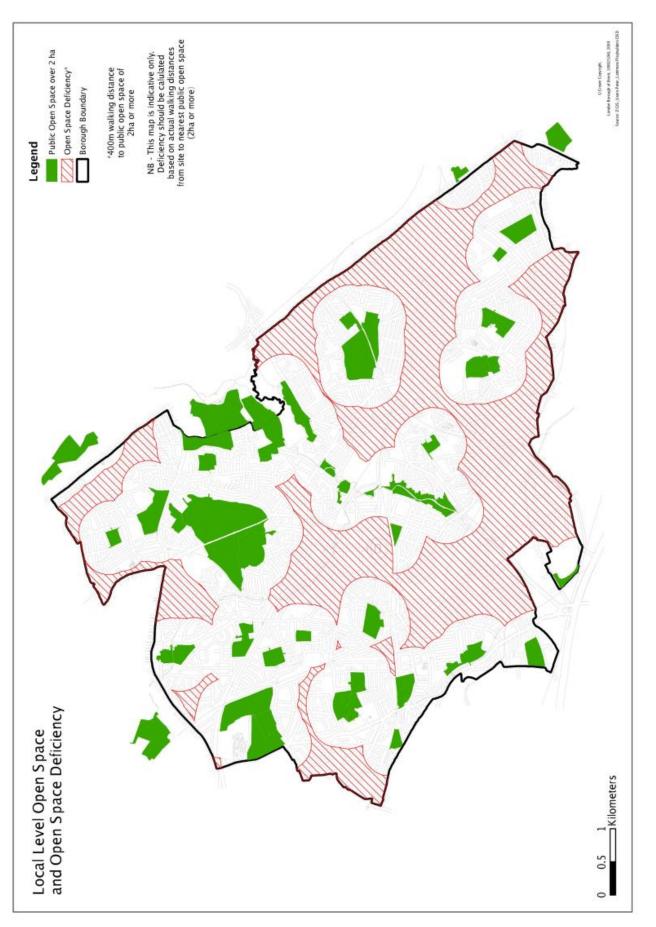
borough of Brent's expanding size.

### **Policy CP 18**

#### Protection and Enhancement of Open Space, Sports and Biodiversity

Open space (including waterways) of local value will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well being of Brent's residents, visitors and wildlife. Support will be given to the enhancement and management of open space for recreational, sporting and amenity use and the improvement of both open space and the built environment for biodiversity and nature conservation. New or improved provision (including improved access) will be sought in areas of deficiency and where additional pressure on open space and outdoor play facilities would be created. This includes new parks in Church End and Wembley and improvements to existing open spaces in Alperton, South Kilburn and Burnt Oak/Colindale growth areas.

Priorities for sports facilities improvements have been identified in the council's Sports Facilities Improvement Strategy. Initially, a site for a new third community swimming pool will be identified to serve the north of the borough. Contributions will be sought from development to help provide these facilities. The council will seek a site for a fourth pool thereafter to meet population expansion.



Map 2 Local Public Open Space Deficiency

## Tackling Climate Change and Achieving Sustainable Development

#### **Tackling Climate Change**

**5.25** The potential impact of climate change on the global environment and our economic, social and environmental wellbeing is now well documented. Particular UK and regional targets have been set out in reducing carbon emission to tackle climate change.

- The target set at Kyoto for the UK is to cut greenhouse gas emissions to 12.5% below 1990 levels over the period 2008- 2012.
- The UK Government has set a target of cutting CO2 emissions to 20% below 1990 levels by 2010, 26% by 2020 and a minimum of 80% reduction (on 2000 level) by 2050<sup>68</sup>.
- The Mayor of London has set minimum carbon reduction targets (on 1990 level) of 15% by 2010, 20% by 2015, 25% by 2020 and 30% by 2025 (London Plan Policy 4A.2).

**5.26** There are also UK targets to generate 10% of electricity from renewables by 2010 (15% CHP by 2010) and 20% from renewables by 2020<sup>69</sup>. A Climate Change Supplement was added to Planning Policy Statement 1 (PPS1), and a national 'Code for Sustainable Homes' which sets sustainability levels (by rating the performance of homes, with a trajectory for future improvements to the Building Regulations) has been introduced.

**5.27** These are very challenging targets and require changes in the way we all live and are of particular relevance to planning the way we use land. The planning process in Brent has a significant role to play in addressing and mitigating the potential impacts at a local scale through promoting sustainable development. To assist in the achievement of these targets Brent will seek to mitigate the effect of climate change locally to reduce carbon dioxide emissions by 25% by 2020 from 1990 baseline<sup>70</sup>.

**5.28** The council will take a holistic approach to mitigate and adapt to climate change through use of green infrastructure developments and will seek to ensure the security of supplies from key services such as water, by promoting water efficiency and maximising water recycling in new developments. The measures set out in this section will also contribute towards the green agenda sought in Brent's 2006-2010 Community Strategy. Developers should consult "Adapting to Climate Change: a checklist for development" published by the GLA in 2005 for detailed information on adaptation measures that can be incorporated into developments. These measures together with the policies seeking to reduce the dependence on car travel, promoting the use of alternative fuels for transport and climate proofing all policies and developments will go some way to adapt to the changing climate.

**5.29** The council is producing a Climate Change Strategy which will contain mitigation and adaptation measures to reduce its impact on Brent. Climate change adaptation and reducing CO<sup>-</sup> emissions are priorities of Brent's Local Area Agreement and will be measured by National Indicators 185 and 188. Policies contained throughout the LDF seek to fulfil these objectives. The council's own 'Climate Change Strategy' will take a Borough-wide view of requirements to meet its strategic mitigation obligations by linking carbon reductions from the council's own corporate operations, and from local community/business/other partnership initiatives, with reductions from ongoing development activity in Brent.



Picture 15 Car Pollution and CO2 Emissions **5.30** Working towards the carbon reduction targets set out above, the council seeks to mitigate the effects of climate change locally to reduce carbon dioxide emissions in developments in line with the Mayor of London's targets established in the London Plan. The aim is to build 'Zero-Emissions Development' (ZED) homes as standard from 2016. A high standard of sustainable design and construction (at least Level 3 on Code for Sustainable Homes (CSH) or equivalent BREEAM rating) will be sought on major development proposals throughout the borough to achieve sustainability and mitigate climate change. This level of environmental performance is sought as a minimum so as to ensure development does not degrade the environment of existing communities, and also in recognition that much of the borough suffers from existing localised environmental problems which should not be exacerbated by development. These environmental problems include poor air quality (over half of the borough is designated as an Air Quality

Management Area), extensive land contamination, significant numbers of homes and businesses at risk of flooding, and water shortage – the borough falls within an area of serious water stress. High levels of energy efficiency in new developments will also contribute to meeting the council's target of reducing fuel poverty<sup>71</sup>.

**5.31** Code Level 3 exceeds current building regulations and encompasses a wider spectrum of environmental performance measures. This has been the required level of performance for all affordable housing receiving public funding since the launch of the CSH in 2007. The Code Level and/or BREEAM performance will form part of the S106 agreement to ensure the required performance level throughout the lifetime of the development and will be verified by a post construction performance certificate. Major applications will be required to submit an accompanying sustainability checklist to demonstrate how the expected level of performance will be achieved.

**5.32** In recognition of the cumulative impacts and opportunities within the Housing Growth Areas, higher Code levels (minimum of level 4) will be sought for major schemes, subject to scheme feasibility. A higher CSH level will also be sought in the Wembley Energy Action Area (EAA). This is a geographical area defined by the council together with the London Energy Partnership (LEP) in recognition of the opportunities that arise from the scale of development and opportunities to retrofit existing properties. Appendix 1 shows the current extent of this area as well as a proposed extension to it. In these areas, where planning applications are brought forward or proposals are either piecemeal or phased over time, the overall scale and cumulative impact of the final development will determine the sustainability standard / code level sought.

**5.33** The London Plan requires each council in London to designate a site for a ZED and the Mayor of London has included a number of policies (4A.1 - 4A.11) that address climate change and related sustainability issues in developments. In addition, the Mayor's recent 'Climate Change Action Plan' sets out further initiatives for London to meet its targets. In order to kick-start 'Low-Carbon' & 'Zero-Emissions Developments' (or ZEDs) in Brent, the following 2 sites have been designated within the Site Specific Allocations DPD. The council considers that specific site characteristics make these suitable for low/zero carbon development:

- Alpine House, Honeypot Lane;
- Abbey Estate, Beresford Avenue, Alperton.

#### **Climate Change Adaptation**

**5.34** Measures to cope with some more frequent weather events which may result from climate change, e.g. heat waves, drought, storms and flooding, will need to be built into new developments. Of particular relevance to Brent is the increased risk of flooding associated with climate change, with certain parts of the borough prone to potential problems of flash flooding. Brent has produced a Strategic Flood Risk Assessment (SFRA) for the borough, which details areas of flood risk (from rivers, surface water, ground water, sewer, canal and reservoir flooding) and this should be referred to when considering building in the borough. The SFRA has also informed the production of LDF documents, including the allocation of sites which have been subject to the sequential test and, where relevant, the exception test. In accordance with Government and London Plan policy 4A.13, flood risk assessments will be required for applications in flood risk zones 2 and 3 (as identified by the Environment Agency and in Brent's SFRA, whichever is most up to date) and a FRA is required for all development proposals over 1Ha. The council intends to produce further planning guidance to assist developments in flood risk areas within Brent which will be based on the findings of the SFRA. Surface water flooding is also a problem that all new development will be expected to address by implementing appropriate Sustainable Urban Drainage Systems (SUDs) to reduce the risk of rainwater overflow.

**5.35** Brent has a significant amount of historic industrial land that could be contaminated. The council is working towards the remediation of contaminated land and has produced a Contaminated Land Inspection Strategy (2001). The south of the borough suffers from poorer air quality, and has therefore been declared an Air Quality Management Area by the council along with corridors along major roads. The council is working towards meeting National Air Quality Strategy targets and has produced an Air Quality Action Plan (2005-2010). Policies 4A.14 - 4A.20 of the London Plan aim to prevent and mitigate any significant potential pollution impacts arising from development in terms of air quality, noise, vibration and on water quality and supply.

### Policy CP 19

### Brent Strategic Climate Mitigation and Adaptation Measures

All development should contribute towards achieving sustainable development, including climate change mitigation and adaptation.

Major proposals (10 or more dwellings and 1,000m<sup>2</sup> or more floorspace) and proposals for sensitive uses (education, health and housing) in Air Quality Management Areas, should submit a Sustainability Statement demonstrating, at the design stage, how sustainable design and construction measures are used to mitigate and adapt to climate change over the intended lifetime of a development. This includes the application of the London Plan energy hierarchy and meeting or exceeding the London Plan targets.

In all areas a minimum rating of Code Level 3 should be achieved. For non-residential, a rating of BREEAM 'Excellent' is expected, or the equivalent on any 'Code for Sustainable Commercial Schemes' (when forthcoming).

Within the Wembley Energy Action Area (EAA) and in the Housing Growth Areas, major schemes are currently required to achieve a minimum Level 4 rating (in relation to the Code for Sustainable Homes). In particular, proposals will be expected (relative to their scale) to connect to, provide or contribute towards decentralised energy networks (heating and cooling) and renewables infrastructure in key Growth Areas of the Borough notably Wembley.

### **Dealing with Waste**



**5.36** The council is under pressure to manage its own waste in a more sustainable manner, not only because of the arising waste (Brent collected a total of 111,000 tonnes of municipal waste in 2007/08<sup>6</sup>) but because of the increasing financial burden of sending waste to landfill. Although Brent has an allowance set by the Government for the amount of waste that can go to landfill under the Landfill Allowance Trading Scheme (LATS), this allowance will decrease each year until 2020 and covers all waste arising from the borough<sup>73 74 75 76</sup>. In addition, landfill capacity is reaching its limits so there is a need to consider alternative ways of handling waste, which is also on the Mayor of London's agenda to tackle climate change.

Picture 16 Glass Recylcing Bins

**5.37** The council will make sure that the development of waste facilities is compliant with national guidance set out in Planning Policy Statement 10 (PPS10) and the London Plan policies 4A.3, 4A.21, 4A.22, 4A.23. Development should take account of the Mayor's waste apportionment figure for Brent and contributes to the delivery of the Mayor's and the borough's Municipal Waste Management Strategy.

**5.38** London Plan policy 4A.22 requires boroughs to safeguard existing waste management sites and policy 4A.23 includes criteria for identifying new waste sites. This policy will be applied in Brent unless the impact from continuing waste operations is considered to be unacceptable and/or alternative sites can be secured. Requirements in terms of the number and type of waste management facilities have been established London-wide by the Mayor, but boroughs are expected to identify specific sites in their own areas to meet the need. It is estimated that by 2015 Brent will generate 381,000 tonnes of municipal, commercial and industrial waste<sup>77</sup> and the Mayor of London's waste apportionment figure for Brent is 377,000 tonnes per annum<sup>78</sup>.

**5.39** The council must implement the Waste Hierarchy as set out in the London Plan policy 4A.21 and ensure that new waste management facilities take account of the hierarchy in the order of waste minimisation, reuse and recycling of waste where feasible, and waste recovery. London Plan policy 3A.4 requires the waste hierarchy to be applied in developments with regards to the use of materials, designs and plans (see also Policy CP19 Sustainable Design & Construction - Mitigation & Adaptation).

**5.40** Developers, traders and householders are therefore expected to play their part in reducing the overall waste arising, and ensure that all waste is managed toward the upper end of the Waste Hierarchy. Waste must be seen as a resource with disposal being considered only as the last option.

**5.41** Brent is working with other West London boroughs in partnership, known as the West London Waste Planning steering group which includes Brent, Ealing, Harrow, Hillingdon, and Richmond upon Thames, to develop a planning framework for waste developments that will be a Joint Waste Development Plan Document (DPD). The forthcoming West London Waste Plan (WLWP) will be in line with the national and regional waste strategies, waste projections and apportionment figures for the boroughs in the London Plan, to facilitate new, redeveloped or existing waste management facilities within West London.

### Maintaining Employment outside of Growth Areas

**5.42** So far the Core Strategy has set out how Wembley will become the main driver in economic development and employment growth for the next 10 years and beyond and also, how the other growth areas will be regenerated with a mix of commercial and housing development. This section looks at the strategy for maintaining and growing jobs and prosperity in the boroughs industrial areas and its town centres, and how it will continue to secure retail, office, and industrial and warehousing jobs in the borough. The main economic trends in the retail, industrial and office sectors are set out below as well as growing sectors such as culture, sport and tourism.

#### Industrial and Warehousing Land Strategy



Picture 17 Diageo Building, Royal Park

**5.43** The process of volume manufacturing of goods has declined markedly within Brent, with many large scale factories disappearing while warehousing and distribution centres are increasing in both number and size. Parts of the large estates, especially Wembley and Staples Corner suffer from outdated premises and infrastructure. All of the borough's large estates also suffer from traffic congestion which affects business performance and makes them less attractive to inward investment.

**5.44** The 2006 Brent Employment Land Demand Study concluded that there is declining demand for factory space, strong and growing demand for storage and distribution space and demand for premises for small and medium enterprises and for business start ups. Overall, the study found that any release of land to other uses should be 'limited'. This approach has

subsequently been confirmed by the GLA's Industrial Capacity Supplementary Planning Guidance note. An update of the study in 2008, confirms that overall there will be continuing demand for industrial/warehousing floor space in Brent. The council, therefore, identifies land for industrial employment based operations, generally falling within the B use classes, and will strongly protect these from the encroachment of higher value uses.

**5.45** The Core Strategy will continue to safeguard both Strategic and Borough Employment Areas for the protection of land for industrial employment, typically falling within B use classes. The 2005 Use Classes Order defines business 'B' uses as follows:

- B1(a): Offices other than in a use within Class A2 (Financial and Professional Services)
- B1(b): Research and Development Laboratories, Studios
- B1(c): Light Industry
- B2: General Industry (Other than Classified as in B1)
- B8: Storage or Distribution Centres Wholesale Warehouses, Distribution Centres and Repositories
- Closely related or appropriate Sui generic uses may also be considered for these locations, having regard for operational factors and the level and type of employment generated.

**5.46** Strategic Employment Areas (SEAs) and Borough Employment Areas (BEAs) are concentrations of industrial and warehousing uses. Protection policies give landowners and industrial users confidence to continue to invest in new plant and buildings knowing that such land will be protected from higher value uses and that their businesses, which are often 24 hour or noisy, will not suffer complaint from residential and other development nearby.

**5.47** Strategic Employment Areas are the local expression of Strategic Industrial Locations designated by the Mayor of London within the London Plan and are recognised as being of strategic importance to London's economy. Indicative boundaries of Strategic Industrial Locations are included within the West London Sub-Regional Development Framework. As an exception to the policy of protecting SEAs for employment uses, small scale service or shopping facilities meeting the needs of businesses and employees are generally appropriate.

**5.48** Within the London Plan, the Strategic Industrial Locations are further identified as being either Industrial Business Parks or Preferred Industrial Locations, reflecting the environmental conditions of the operations located there.

**5.49** Borough Employment Areas (referred to as Locally Significant Industrial Sites within the London Plan) are those areas that, in addition to Strategic Employment Areas, are considered to be locally significant to Brent's economy and should be designated for protection. Occupancy within these areas is generally similar to that within Strategic Employment Areas, but is also more varied, and may include quasi office or trade uses.

**5.50** The Industrial Land Demand Study 2008 calculated the amount of strategic industrial and warehousing land the borough needs to meet demand in the plan period - this is 327 Ha. The council will continue to protect industrial and warehousing Land for which there is a demand.

**5.51** The council's 2008 study shows those sites that the council proposes to release for mixed development, and the study justifies those releases. This is within the context of relatively high and growing demand for industrial land and, therefore, the limited release of industrial land in the West Sub Region as set out in the Mayor's Industrial Capacity SPG of 2007.

5.52	The following designated employment areas are identified on the proposals map:
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Employment area location	Brent LDF designation	London Plan designation
Alperton	Borough Employment Area	Locally significant employment site
Brentfield Road	Borough Employment Area	Locally significant employment site
Church End	Borough Employment Area	Locally significant employment site
Colindale	Borough Employment Area	Locally significant employment site
Cricklewood	Borough Employment Area	Locally significant employment site
Honeypot Lane	Borough Employment Area	Locally significant employment site
Kingsbury	Borough Employment Area	Locally significant employment site
Neasden Lane	Borough Employment Area	Locally significant employment site
Park Royal	Strategic Employment Area	<ul> <li>Strategic Industrial Location</li> <li>Part Preferred Industrial Location</li> <li>Part Industrial Business Park</li> </ul>
Staples Corner	Strategic Employment Area	Strategic Industrial Location <ul> <li>Preferred Industrial Location</li> </ul>
Wembley	Strategic Employment Area	Strategic Industrial Location <ul> <li>Preferred Industrial Location</li> </ul>
East Lane	Strategic Employment Area	Strategic Industrial Location <ul> <li>Preferred Industrial Location</li> </ul>

**5.53** It is not enough to protect industrial land that remains in physical and aesthetic decline, has a disparate and indeterminate environment, vacant and derelict units, where there are problems for vehicle movement, and where fly-tipping and vandalism is attracted. Proposals for the regeneration of Strategic and Borough Employment Areas will be supported where this will secure the status of the location as an industrial employment area by delivering new floor space and significant environmental improvements. In particular, proposals should demonstrate improvements to transport and pedestrian accessibility, the appearance of buildings and land parcels and the public realm.

**5.54** Proposals will be encouraged to achieve high standards of design, particularly with regard to encouraging a more intensive use of land through, for example, stacking or shared service yards. The council will use its planning and CPO powers to assist in the assembly of sites in order to bring forward new industrial and warehousing premises that meet modern standards with good access and servicing arrangements.

**5.55** Outside of the hierarchy of Strategic Employment Areas and Borough Employment Areas are a number of pockets of land that are more "local" in nature and are generally embedded within the residential fabric of the borough. These areas perform a different function to both Strategic or Borough Employment Areas as they usually entail a more intensive use of land, may present localised environmental issues, generate local employment opportunities across the borough and provide workspace for new and emerging enterprise. These are referred to as Local Employment Areas and are not afforded the same level of protection as Strategic or Borough Employment Areas. Policy relating to development within these Local Employment Areas is saved in the UDP 2004 (policy EMP9).

#### Offices

**5.56** Brent's Employment Land Demand Studies of 2006 and 2008, and the GLA's Office Policy Overview publications, suggest that suburban outer London can recapture elements of the prime office market due to its proximity to commuter areas (i.e. workforce), relatively lower land values and good public transport accessibility to the City. The London Office Policy Overview 2007 predicted that, in the Borough, jobs within the Financial and Business Services sector would increase by almost 10,000 to 2026.

**5.57** Although modifications may be made to the scheme, the First Central office park development at Park Royal should progress through the plan period, while the completion of Wembley Stadium and surrounding development activity is likely to boost the office market locally. In addition, the continued and projected growth of the 'third sector', or social enterprise, will generate demand for office space, generally below the grade A market.

**5.58** The council encourages office developments within the borough, but is concerned that the impact of high density employment with associated trip generation and local shopping and facilities requirements are mitigated. Apart from office development ancillary to industrial and warehouse uses, this means that the council requires that, generally, office development is located within the borough's town centres, and the Wembley Regeneration Area and First Central in Park Royal.

#### Skills

**5.59** The impact of structural economic change has been reflected by the Government's response to education policy and skills training. The Government is keen that Britain's workforce is flexible and can adapt to the challenges presented by further globalisation.

**5.60** So that Brent residents can benefit from investment and new job opportunities, it is important that the skills profile of the local labour force meet new requirements presented by the opportunities created. There is a balance to be achieved between increasing the overall level of employment and addressing the disproportionate representation of Brent residents within administrative, sales and elementary occupations. Although it is desirable to plan for growth, and to expect that local employment growth will benefit local people, it is not sustainable in the long term for the local labour force to only be able to fill new jobs that tend to require lower skills. Therefore, it is also necessary that the strategy ensures that sufficient school places are delivered and the general level of educational attainment is raised so that local people have access to the full range of jobs provided locally.



Picture 18 The French Croissant Company Ltd

**5.61** Spatial factors dictate that some economic sectors are more prevalent in the borough, and employment growth is expected to continue in retail, hospitality logistics and distribution, for example <sup>24 25</sup>. Using planning obligations, the council will seek to ensure that skills, training and, ultimately, employment opportunities from major development, will benefit local people by working together with partners such as Brentin2work. In addition, the council will encourage links between prospective employers and local schools and colleges so that the social and economic benefits to the borough and its residents are sustained in the long term.

### Policy CP 20

#### **Strategic and Borough Employment Areas**

The council will protect Strategic Employment Areas designated for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generic uses that are closely related, having regard for the provisions of Preferred Industrial Locations and Industrial Business Parks (SILs) within the London Plan. The council will protect Borough Employment Areas for the same range of uses as SEA's.

B1 office space is acceptable in SEAs and BEAs where it is ancillary to other industrial and warehousing uses and any necessary transport infrastructure required to support development is properly assessed and provided in time for occupation. Purpose-built offices are promoted in town centres and the Wembley Regeneration Area and are acceptable otherwise where proposals fulfil the requirements of the sequential approach, such as the First Central site in Park Royal.

The regeneration of Strategic and Borough Employment Areas is supported where proposals will not undermine the employment land hierarchy. Redevelopment will be expected to :

- Maximise opportunities to move freight by non-road means (such as water and rail) and minimise the impact of industrial and employment use on the road network.
- Provide opportunities for skills training, and employment for local people.
- Provide new employment floor space that is fit for modern usage for a range of B use classes including business parks, 'starter' and 'move on' units for small and medium enterprises, and studios for artists and cultural and creative industries.
- Intensify land use, including the efficient movement and use of loading and delivery areas.
- Deliver significant environmental improvements in terms of the public realm and landscaping of employment areas and industrial estates; and
- Minimise and mitigate any input from development upon surrounding land uses.

#### Freight

**5.62** The economy of Brent, as with that of London as a whole, is dependent upon an efficient distribution system for goods and services. Policy 3C.25 of the London Plan requires boroughs to ensure that suitable facilities are available to enable the transfer of freight to rail or water through the protection of existing sites and the provision of new sites. In Brent the 4 sites that should be protected are:-

- Willesden F Sidings
- Wembley Sidings
- Neasden Stone Terminal
- Neasden Drury Way

### **Planning for More and Better Housing**



Picture 19 Chalkhill Estate Regeneration

London Housing Strategy.

**5.63** Brent's current housing stock of approximately 108,000 houses and flats is clearly insufficient to meet its residents needs as almost a fifth of the corough's 111,000 households (18.4%) are registered on the council's statutory Housing Register, the third largest in London, as requiring accommodation that better meets their needs, such as larger and more affordable homes. 3,345 of the borough's 23,220 registered households (as of Nov 2008) are living in temporary accommodation; some have had to be placed in short-term leased accommodation outside Brent because of the borough's shortage of family sized homes. Therefore, the Core Strategy needs to provide a substantially higher number of homes, particularly affordable and family-sized accommodation, to help deliver the objectives of the Brent Community Strategy and the council's Housing Strategy, in accordance with national planning and housing strategies, the London Plan and the

**5.64** As most of the Core Strategy's housing objectives can be satisfactorily delivered through the employment of the relevant London Plan policies, in accordance with the November 2008 Joint GOL /GLA Note as endorsed by the Planning Inspectorate, the GLA and the Government Office<sup>83</sup>, it is considered necessary to only propose one 'locally distinctive' housing policy, to ensure a better balanced new housing provision, in addition to the very specific travellers' site policy required by Circular 1/2006.

#### **Brent's Housing Capacity**

**5.65** Brent has been designated by the Government as a Housing Opportunity Borough on account of its potential capacity to provide substantially more homes. The Mayor of London undertook in 2004, with the assistance of the council, a detailed London Housing Capacity Study which concluded that Brent has the capacity to provide an additional minimum of 9,146 new self contained homes (flats and houses) and 1,000 new non-self contained homes (houses in multiple occupation and hostels, etc.) in the period between 2007 - 2017, using only previously developed (brownfield) sites and existing buildings. This study also estimated that Brent should be able to bring back into residential use 1,030 vacant homes during this period.

**5.66** The London Housing Capacity Study estimates have informed the London Plan target of 11,200 additional homes in Brent between 2007/08 – 2016/17 (as elaborated in London Plan Policies 3A.1, 3A.2, Table 3A.1 & Annex 10) which has been incorporated as a minimum target, which the council seeks to significantly exceed, in the Core Strategy Policy CP 1.

**5.67** Brent has current planning consents for 7,718 additional homes (9,890 gross), not yet started/completed (as of 1/4/2008). Over 90% of which would be provided on sites with more than 10 homes. An estimated further 14,000 homes could be provided on other sites (currently without residential consents), mostly identified in the LDF Sites Specific Allocations DPD; although, a considerable part of this potential housing capacity is unlikely to be implemented until the period 2017/18 - 2025/26.

**5.68** Most of this identified housing capacity is heavily concentrated within the LDF Housing Growth Areas of Wembley, Alperton, Burnt Oak/Colindale, Church End and South Kilburn, which collectively account for 85% of the residential consents pipeline and 84% of the Site Specific Allocations' potential housing capacity.

**5.69** Brent's potential housing capacity and the envisaged implementation time periods are further detailed in the Housing Capacity Annex, which includes the Brent Housing Trajectory. This Annex also refers to the further housing capacity that may emerge from the London Strategic Land Availability Assessment (2009), which will inform the proposed revision of the London Plan, together with information from the London Strategic Housing Market Assessment (2009) will further elaborate this London wide study by providing more local information.

#### Maintaining and Providing a Balanced Housing Stock



**5.70** Brent's very diverse population means that it has a corresponding need for a wide range of accommodation sizes and types, which has not been satisfactorily addressed by many housing developments. Maintaining and providing a balanced housing stock is a key Core Strategy housing objective.

**5.71** Ensuring sufficient family housing provision is a key objective of the draft London Housing Strategy (Nov 2008) and is a particular need in a Borough where the 2001 Census recorded the third highest household size in England and Wales and identified that the highest population growth between 1991-2001 had been in the five or more persons households sector. Contrary to national trends, the average Brent household size has increased from 2.6 to 2.7 persons in the last six years, with a significant growth in the six persons plus households sector and a substantial fall in single person occupancy (2007 demographic study undertaken by Professor Mayhew).

Picture 20 Church End

**5.72** Brent's housing stock is inadequate to satisfactorily accommodate the Borough's disproportionately larger households. The 2001 Census recorded that Brent's average household accommodation size of 4.6 rooms was one of the lowest in London and inferred that no more than half of Brent's homes (s/c) had more than two bedrooms; resulting in 30% of Brent residents living in 'overcrowded homes', the second highest level in London.

**5.73** This historical shortage of family-sized accommodation has been exacerbated by a pronounced new housing development trend for small units that has resulted in over 75% of the housing completions between 1997- 2007 providing 1/2 bedroom units. This is a disproportionate provision which is unlikely to be changed without ameliorative policy action, as 80% of the current residential consents pipeline would provide no larger than two bedroom homes. Brent has also lost irreplaceable larger family accommodation through housing conversion, demolition and redevelopment schemes, which all too often have failed to replace the lost family-sized units even where the site and the replacement built form would have permitted this.

**5.74** These housing development and household composition trends, therefore, indicate the need to define family-sized accommodation as a 'self contained dwelling capable of providing at least three bedrooms on sites with a capacity to provide ten or more homes and in house conversion schemes'. Family accommodation would not be required on sites where it is not possible to provide a satisfactory environment for young children, particularly due to a lack of external amenity space, or where there is a strong justification for accommodating households without children, such as Sheltered Housing for older persons, key workers and students.

**5.75** Many of the potential housing sites, identified in the Site Specific Allocations, particularly those most suitable for mixed use, higher density, medium – high rise flats above commercial and retail ground floor units, are unlikely to be able to provide a 'child friendly environment' for substantial young children populations. Therefore, it is very important that those sites which are capable of accommodating young children properly contribute to the Borough's pressing family housing needs.

**5.76** A substantial number of Brent residents have mobility problems and, therefore, are likely to require accommodation that is designed and constructed so as to be easily accessible either on foot or by lift. Brent has a particular shortage of housing suitable for people using wheelchairs. London Plan Policy 3A.5 requires that these mobility housing needs should be addressed through ensuring that all new homes are designed and constructed to Lifetime Homes Standards and that 10% should be wheelchair accessible/easily adaptable. Wheelchair accessible housing should, where possible, be provided on the ground floor. The council will ensure that Policy 3A.5 is applied to all relevant proposals.

**5.77** Policy CP21 seeks to make locally appropriate provision for Brent's wide range of specific and special housing needs, as required by London Plan Policies 3A.5 & 3A.13, including family homes, sheltered housing for older persons, non self contained accommodation, such as hostels for households without children (including key workers and students), housing providing support (including 'extra care accommodation for older persons') and residential care homes.

### Policy CP 21

#### A Balanced Housing Stock

The Plan seeks to maintain and provide a balanced housing stock in Brent in support of Policy CP2 by protecting existing accommodation that meets known needs and by ensuring that new housing appropriately contributes towards the wide range of borough household needs including:

- An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) on suitable sites providing 10 or more homes and in house subdivision/conversion schemes.
- Non-self contained accommodation to meet identified needs
- Care and support accommodation to enable people to live independently
- Residential care homes which meet a known need in the Borough

#### **Nomadic Peoples**

**5.78** Some Brent residents, and others seeking to live in the borough, have accommodation needs that cannot be satisfied through the provision of additional conventional housing as they have historical cultural preferences for a 'nomadic lifestyle'. Nomadic Peoples encompass a wide range of distinct ethnic and cultural groups, who have a common, ethno-culturally derived need for sites to accommodate their caravans and mobile homes.

**5.79** In Brent, the primary historical occupiers of nomadic sites have been semi-permanent Irish Travellers. However, consideration must also be given to the potential accommodation needs and preferences of Scottish Travellers, English and Welsh Gypsies, Travelling Showpeople and the more recent Roma (from Eastern & Southern Europe) and Sinti (from Central Europe) arrivals.

**5.80** As most of the Irish Travellers who have historically settled in Brent lack the resources to purchase their own sites due to low incomes, disproportionately high unemployment and low skill levels, their accommodation needs can effectively be regarded as a specialist type of 'affordable housing' provided with the assistance of public sector funding, as on the council's Lynton Close site, which currently has 45 mobile homes /caravans accommodating a total of 140 persons, including multi-generational and extended families.

**5.81** 'The London Gypsy & Traveller Accommodation Needs Assessment' (GLA, 2008) has identified that Brent may require up to a further 24 pitches by 2017 to meet projected further requirements. A considerable proportion of these may arise from Irish Travellers, and possibly Roma, currently living in conventional housing, often temporary accommodation, who have a "proven psychological aversion" to 'bricks and mortar housing' as defined in the 'Gypsy and Travellers Accommodation Assessments: Guidance '(CLG, 2007).

**5.82** The proposed revision of the London Plan will set specific borough targets for sites and pitches, in accordance with the requirements of Circular 1/2006 'Planning For Gypsy and Traveller Caravan Sites' (CLG, 2006), which will be addressed in a subsequent Development Plan Document. This proposed DPD may be further informed by a potential sub –regional (West London) accommodation strategy which would better reconcile current provision, projected future needs and potential capacities in a manner similar to the wider London Housing Capacity Study (2005) and the current London Strategic Land Availability Assessment.

**5.83** Circular 1/2006 and London Plan Policy 3A.14 require that this Core Strategy should have a specific policy to protect existing authorised sites and set out the criteria for the determination of any application for additional sites. Such sites should promote the development of socially inclusive local communities in accordance with PPS 3. A key consideration in determining the specific suitability of the potential site(s) will be the prospective residents' ancillary requirements for space and facilities to undertake the range of employment and entrepreneurial activities often associated with or resorted to by Travellers, Gypsies, Roma and Sinti. This range of mixed use activities effectively requires a site(s) capable of satisfactorily accommodating a 'low rise, low density work-live development. Travelling Showpeople are likely to require proportionately larger sites owing to their greater equipment storage needs.

### Policy CP 22

#### **Sites For Nomadic Peoples**

A). The existing Lynton Close Travellers Site will be protected for its current use

B). Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Showpeople should:

- Meet a need for such accommodation which is not being met in the Borough or elsewhere in London, whilst avoiding an over-concentration of such facilities in Brent in comparison to other boroughs.
- Be located on a site and in an area both environmentally acceptable for residential occupation and where the
  prospective occupiers require suitable for the undertaking of employment and entrepreneurial activities without
  detriment to adjacent occupiers' amenities.
- Have acceptable road and pedestrian access and be accessible to local services and public transport.
- Be suitably landscaped, with appropriate boundary treatment.

**5.84** Although those who wish to live or stay on 'houseboats' do not have the same legal rights to sites as Nomadic Peoples, the council recognises that it may be necessary to make appropriate provision in a DPD / SPD or Action Area Plan for residential moorings, either for permanent accommodation or to facilitate visitors, on the Grant Union Canal (Regent's Branch) subject to British Waterways Board support.

#### Affordable Housing

1.



**5.85** Brent residents suffer from both relatively low incomes and relatively high housing market prices and rents. Their average annual salary of £25,407 is only 70% of the London average, making Brent the third lowest earned income borough (ASHE, 2007), so that Brent's 'young first time buyers' had the highest mortgage payments to incomes ratio in England and Wales (Woolwich, 2007).

**5.86** The extent of Brent's affordable housing problems, relative to other London boroughs, has been graphically documented in Professor Steve Wilcox's 'Can't Supply, Can't Buy: The Affordability Of Private Housing in Great Britain (Hometrack ,2008) :

Picture 21 Johnson Rd, Stonebridge

Brent's average house price/average earnings ratio of 7.18 is the 6th highest in London.

- 2. 76.6% of Brent 's younger working households (20 -39 yrs) are unable to afford the borough's lowest price market sale housing. This is the 5th highest in London.
- 3. At 27%, Brent has the highest level of younger working households requiring rental Housing Benefit in London.
- 4. Private rents in Brent at 38.2 % of earnings, is the 6th highest in London.

**5.87** Brent would need at lest 3,386 new affordable homes each year<sup>36</sup> to accommodate the needs of its households who cannot afford market purchase or rental; which is equivalent to almost four times its total London Plan annual target of 915 homes. The scale of the affordable housing challenge facing Brent can be seen from the fact that only a total of 791 new homes were completed in 2007/08.

**5.88** Although affordable housing completions in 2007/08 represented 58% of this total, many of these homes were the legacy of estate regeneration projects now nearing their end. The facts that only 35% of the total residential consents pipeline would provide affordable homes, and that this proportion dramatically slipped to only 17% in the 2007/08 approvals, are a better indicator of the likely proportional affordable housing output in the next few years than the historical trends might otherwise indicate.

**5.89** However, it should be possible to increase the number of new affordable homes provided in private sector developments by employing a ten unit site threshold, instead of the previous UDP 15 unit threshold. The council will, therefore, apply London Plan Policy 3A.11, to sites with a capacity to provide 10 or more homes. The Examination in Public of the London Plan concluded that the expectation that all sites in London with a capacity for 10 or more homes should contribute to the overall strategic objective that 50% of London's new housing should be affordable was a robust policy assumption applicable to all boroughs.

**5.90** The specific implementation of this policy will be dependent upon a 'viability test' as to what would represent the 'maximum reasonable' affordable housing provision on a particular site, in accordance with London Plan Policy 3A.10. There is a clear presumption that affordable housing should normally be provided on-site, unless off- site provision, and exceptionally a commuted payment would provide affordable housing that better meets the borough's needs. Similarly, specific justification of any proposed loss of existing affordable housing would be required, for example, to implement a wider housing regeneration objective or provide an essential community facility such as a doctors surgery.

**5.91** The London Plan Policy 3A.9 sets a strategic objective that new affordable housing should generally be provided in a 70%:30% social rental and intermediate housing (such as new build home-buy, equity purchase and sub-market rental) ratio. A similar ratio is recommended for the West London sub region<sup>66</sup>.

**5.92** Although the Mayor of London is proposing to change the London Plan social rental/intermediate housing ratio to 60:40<sup>67</sup>, the current ratio accords well with the Brent Housing Needs Survey finding that only 32% of those in priority housing need could afford intermediate housing, mostly only for the smaller (1/2 bed) units. However, specific site constraints which preclude significant family housing development or specific funding requirements, such as Key Worker housing programmes, or sites where it is necessary to ensure a more socially balanced community such as in a housing regeneration programme, may require a different affordable housing tenure ratio in specific Brent housing schemes.

**5.93** Policy CP 21 recognises the difficulty of providing satisfactory family-sized accommodation on many of Brent's potential new housing sites and the corollary expectation of ensuring such provision on those sites which can provide the requisite amenities. Similarly, the provision of new affordable housing on sites suitable for family accommodation should recognise that the Mayor of London, who is effectively responsible for the allocation of public sector funding for new affordable housing, has prioritised 'more affordable, family-sized homes'. Setting the objective, in the Draft London Housing Strategy (November 2008), includes an objective that 42% and 16% of social rental and intermediate homes, respectively, should have at least three bedrooms. Brent has a particular need for larger family affordable housing, particularly for social rental, as the Brent Housing Needs Survey 2004 indicated that 43% of the affordable housing requirement is for 3/4 bedrooms.

**5.94** The council will expect that affordable housing providers, particularly for social rental, will actively assist initiatives to promote training and employment which would enable residents to improve their socio–economic position so that they might have access to other tenurial opportunities; thereby 'freeing up' scarce accommodation for more pressing needs.

### **Protecting Community and Cultural Facilities**



**5.95** Community and cultural facilities add value and support to community participation and development. Brent residents demonstrate pride in their cultural diversity, showing support for local events such as the Respect Festival, the St Patrick's Day Parade and the Diwali Festival where local talent in music, dance and culture can be performed. Therefore, the borough is keen to protect these facilities to engender community cohesion and civic pride. Nevertheless, it is recognised that opportunities for new community facilities are generally limited as they are unable to compete financially, on equal terms, with the higher land value uses such as commercial, residential or mixed use developments.

Picture 22 Tricycle Theatre, Kilburn High Rd

**5.96** When a new community and/or cultural facility is required, it should be accessible for local communities as well as visitors, and be a place where cultural diversity can be

explored and enjoyed. Furthermore, to build on existing opportunities, proposed developments which have a significant impact, and those directly related to the culture, leisure and tourism industry, will be required to contribute towards enhancing public realm through the promotion of public art, cultural diversity, and provision of additional visitor facilities where appropriate.

**5.97** In order to deal with the many needs of a local population, it is prudent to secure community and cultural facilities that have a combined or multi-functional role. For example, Children's Centres can provide pre-school education and childcare for working parents during the day; whilst in the evenings and weekends provide spaces for adult education, evening classes, community gatherings and spaces for hosting local talent events. The council's Infrastructure and Investment Framework has calculated that new community facilities at a rate as indicated in policy CP 23.



Picture 23 Fawood Children's Centre, Stonebridge.

### Policy CP 23

#### Protection of existing and provision of new Community and Cultural Facilities

In order to ensure that the continuing needs of Brent's diverse community are met, existing community and cultural facilities, that support community participation and development will be protected, or their loss mitigated where necessary.

New multi-functional community facilities (excluding schools, health facilities) should be provided at a rate of 370m2 per 1000 new population.

# 6. Delivery and Monitoring

#### Monitoring and Implementation

**6.1** How will Brent achieve its strategy when it has very limited land and other resources? The Core Strategy is predicated on working with private sector land owners and developers and encouraging development to come forward. This will be achieved by forming partnerships with key developers such as Government agencies, neighbouring boroughs, Registered Social Landlords and Strategic Development Partners, as is happening in Wembley. It will be by producing clear guidance in a variety of forms delivering certainty as to what the council's policies and expectations are. The council will continue to work with Government, regional bodies and other agencies to argue for and seek resources.

**6.2** The borough has been successful in tapping into various funding regimes such as the City Challenge, Private Finance Initiatives, Single Regeneration Budget, the National Lottery, New Deal for Communities, Growth Area Funding, the Primary Capital Programme and Building Schools for the Future to assist in bringing forward improvements to homes, schools and infrastructure. The council will continue to actively bid for available funds to support projects that will help to deliver an improved Brent.

**6.3** In addition, the council can also affect positive change by injecting certainty into the property market through the preparation of various levels of planning guidance. For example, the Core Strategy is accompanied by a series of Site Specific Proposals that will be supported by Growth Area Strategies and, in time, Area Action Plans. In Wembley, the council is preparing a detailed masterplan to help guide development for the next 30 years.

In the industrial areas outside of Wembley ownership is fragmented and will require the council to use masterplanning exercises to demonstrate the advantages of amalgamating land to landowners and developers. Furthermore, the council will exercise its Compulsory Purchase Powers to meet key land acquisition objectives.

**6.4** Fundamental to the production of the Core Strategy is a need to ensure that it is delivered. In order to assess progress in delivering the strategy, it is necessary to monitor development in the borough against the objectives set out in the strategy. This requires that targets are established and that progress against these targets is measured on a regular basis, primarily through the Annual Monitoring Report (AMR).

**6.5** Of course there is no certainty that progress will be made in accordance with the targets and timetable for the whole strategy. The strategy is largely reliant upon the private sector to deliver the housing and commercial development which will regenerate parts of the borough and provide the predicted growth. The public sector, including Brent PCT, Central Government and the council itself will be mainly responsible for delivery of infrastructure to support development. However, progress is susceptible to factors such as changes in the health of the national or global economy or to a political change of direction. In these circumstances it will be necessary to adjust the implementation of policy to take account of any changes. For example, it is possible that progress in the development of new housing could be either in excess of, or below, the target set. In either of these circumstances it may be necessary to adjust the timing of delivery of infrastructure, such as new school accommodation, to align it more closely with when need arises. In this way the council can continue to ensure that there is an integrated approach where economic growth, housing development and infrastructure provision go hand in hand to create sustainable communities.

**6.6** The council's Infrastructure and Investment Framework (IIF) sets out the requirements as a result of the LDF's Growth and Regeneration Strategies and the priorities for the council. It contains what is required and an idea of potential funding sources. This will be updated annually as a result of monitoring and assist implementation. The council will consider how its Infrastructure and Investment Framework, and its standard charging S106 model, can be adapted to form a Community Infrastructure Levy, to be introduced by the Government currently. The council would wish to adopt this Core Strategy in the first instance and then review its position.

**6.7** Other Development Plan Documents will also assist in the delivery of the strategy, particularly the Site Specific Allocations DPD which accompanies the Core Strategy. This provides detailed guidance for the development of key sites and gives an indication of the likely phasing of development. In addition, the council will promote delivery of the strategy and facilitate development by producing additional area-based guidance in the form of development frameworks, masterplans, and individual site planning briefs. These will generally be brought forward as Supplementary Planning Documents. So far such guidance exists for part of the Wembley Area, for South Kilburn and for the Queen's Park Station site. Guidance is

currently being prepared for a further part of the Wembley Growth Area and for Park Royal (by the Mayor of London jointly with Brent, Ealing and Hammersmith & Fulham). It is intended that further guidance will be produced for the Alperton, Burnt Oak/Colindale and Church End Growth Areas as well as for the North Circular Road Regeneration Areas.

#### **Monitoring Performance**

**6.8** Monitoring is an essential part of the continuous planning process. A set of key indicators and targets have been developed for each Strategic Objective so that the effectiveness of policies in achieving the objectives can be assessed. This also includes monitoring the effectiveness of London Plan policy where its implementation contributes towards the achievement of an objective, and it is referred to in supporting text. Where objectives are not being met, appropriate action may be taken which can adjust the outcome or, in some circumstances, a review of policy may be necessary. The Core Strategy's targets have been summarised in the tables below, highlighting the relationship between each of the strategic objectives, policies, indicators and targets. The indicators are divided into Core Output Indicators, which local planning authorities are required to report on in their Annual Monitoring Reports, and Local Output Indicators which Brent Council considers it is important to monitor locally. Measures from the core and local indicators set out below will be included in the Annual Monitoring Report.

#### **Economic Performance and Regeneration**

#### STRATEGIC OBJECTIVE 1

Creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses (expanding the town centre eastwards into the Stadium area).

Core Policies: CP1, CP2, CP3, CP4, CP5, CP6, CP7, CP8, CP9, CP10, CP11

Delivery Agencies: Developers, Brent Council

Performance Measure	Target	Monitoring Point			
Local Indicators:					
Local employment change	5,000 new jobs in Wembley to 2017 and 10,000 new jobs within Wembley to 2026.	Net increase of 500 jobs p.a. in Wembley area <b>When:</b> Annually			
New town centre facilities	<ul> <li>Permission &amp; Completion of 3 large scale hotels in the Wembley area before 2017</li> <li>1 large regional visitor attraction before 2017</li> </ul>	End of Plan period			
Amount of new retail floorspace developed by type in Wembley	• 25% or 30,000 m2 increase (whatever is the greater) in the new retail floorspace in Wembley, on that currently existing or consented, by 2026	Percentage and amount of completed gross retail floorspace by type in Wembley When: Annually			
Ensure mixed development in Wembley Area	• Ensure that only half of all consented and completed floorspace in Wembley growth area is residential between now and 2026.	No more than 50% of floorspace consents or completions is residential in use in Wembley area When: Annually			

#### **STRATEGIC OBJECTIVE 2**

**Meeting Employment Needs and Aiding the Regeneration of Industry and Business** - by ensuring that sufficient sites and premises are available in the borough's main commercial areas such as Park Royal, and that industrial/ warehousing is renewed.

Securing Training and access to jobs- by working with developers and end users to offer suitable training and job replacement opportunities

Core Policies: CP1, CP3, CP5, CP12, CP19

Delivery Agencies: Developers, Brent Council, Greater London Authority (GLA), LDA, Park Royal Partnership

Performance Measure	Target	Monitoring Point			
Core Output Indicators:					
Amount of floorspace developed in Park Royal	To secure net increase in jobs, 120,000m2 of floorspace is required.	1200m2 annual Net increase in gross internal floorspace (m <sup>2</sup> ) for B1 & other suitable employment uses in Park Royal area to 2017. <b>When</b> : Annually			
No net loss of floorspace in other SEA's/BEA's	No Net loss of floorspace in SEA's & BEA's outside of SSA's (Park Royal has separate target).	No net loss of gross internal floorspace (m <sup>2</sup> ) for use classes B1and related uses 2007-2017 in SEA's/BEA's <b>When:</b> Annually			
Local Output Indicators:	I				
Secure job placements from new development	Secure 800 job placements p.a from 2007-17	Number of placements made by Brentin2work each year. <b>When:</b> Annually			
Brent Unemployment levels	By 2021 unemployment below London Average and in line with National rates	% of unemployment year on year. When: Annually.			
Gross Income	By 2021 less than 25% of Brent Households have an income below the London average	Average yearly gross income for Brent Residents <b>When:</b> Annually.			

#### **STRATEGIC OBJECTIVE 3**

**Enhancing the vitality and viability of Town and Local Centres** - by maintaining centres' place in the retail hierarchy and completing new retail developments in Willesden and Harlesden and maintaining a range of local services.

#### Core Policies: CP1, CP5, CP7, CP20

Delivery Agencies: Developers, Brent Council, Greater London Authority (GLA), LDA

Performance Measure	Target	Monitoring Point	
Core Output Indicators:			
Amount of completed retail, office and leisure development.	An net increase in retail, office and leisure floorspace in Brent.'s major and district town centres outside Wembley.	The completed amount of gross floorspace (sqm) for UCOs B1(a), A1, A2 and D2 should be greater than that lost through change of use/redevelopment. <b>When</b> : Annually	
Local Output Indicators			
Town Centre Vacancy rates.	No increase of vacancy rates in Primary Shopping frontage from 2007 to 2026	The amount of vacant shopfront within major and district centres primary shopping frontages. <b>When:</b> Annually	
Health of Town Centres	No reduction in inflation adjusted median rent levels in primary shopping area. No reduction in pedestrian footfall in town centres covered in 'health check'	Annual Rental survey 2 yearly health check data	

#### **STRATEGIC OBJECTIVE 4**

**Promoting the Arts and Creative Industries** - by creating at least five subsidised workplace developments for creative industries in the growth areas and a major piece of public art for each year of the plan period.

#### Core Policies: CP1, CP5, CP7, CP19

**Delivery Agencies:** Brent Council, Brent Arts Council, Brent Sports Service, Developers, Visit London, Brent Arts and Learning Service.

Performance Measure	Target	Monitoring Point	
Core Output Indicators:	Core Output Indicators:		
Net increase of leisure facilities	Completion of new cinema in Wembley	Cinema completed When: by 2012	
Subsidised workspace for creative industries	Creation of 5 facilities of at least 1000m2 each in growth areas by 2017	Permission and completion of affordable creative workspace by 2017 When: Annually	
Local Output Indicators:			
Brent's Tourism economy: Local employment in the Tourism Industry	Increase in Brent employment in Tourism Sector	% of Brent Residents employed within Tourism industry. 4% Baseline 2004 <b>When:</b> Annually.	
Provision of Public Art.	One major piece of public art either completed or secured through S106 agreement p.a.	At least one completed or secured through agreement each year to 2017. When: Annually	

#### STRATEGIC OBJECTIVE 5

**Meeting social infrastructure needs** - by securing provision arising from new education facilities, health and community facilities.

#### Core Policies: CP5, CP15, CP17, CP22

**Delivery Agencies:** Brent Council, Developers, PCT, DfES, Emergency Services, Utility Companies, other boroughs through joint working.

Performance Measure	Target	Monitoring Point	
Local Output Indicators:	Local Output Indicators:		
Provision of new or extended community facilities	Provide new community facilities at a rate of 370m2 per 1000 new population created by new housing development	New or extended floorspace that meets rate of population growth <b>When:</b> Annually	
Provide New schools for increased population	Approval for & construction of three new primary schools and three new secondary schools by 2017	No new schools with permission for redevelopment and completed or under construction by 2017. <b>When:</b> Annually	
Annual S106 financial contributions secured for social infrastructure	Provisions/ contributions are secured for S106 standard Charge as a minimum on all developments to 2017	Secured full S106 financial contributions via standard charge on all developments <b>When:</b> Annually	
Health Facilities-facilities to meet GP service needs as set out in IIF	To meet target for GP facilities related to population growth needs	Secure floorspace for 1 GP per 1500 new population. When: Annually	

#### **STRATEGIC OBJECTIVE 6**

**Promoting Sports and other Recreational Activities** - by placing particular emphasis on the provision of new facilities to address existing deficiencies and to meet the needs of new population in the growth areas, creating at least one new swimming pool in the borough in the plan period and eight new multi-use games areas (MUGAs).

Core Policies: CP5, CP17, CP22

Delivery Agencies: Brent Council, Developers, RSLs, GLA, Sport England, National Sports Governing Bodies

Performance Measure	Target	Monitoring Point
Local Output Indicators:		
Secure new community swimming pools for the borough.	Complete and open one new community swimming pool in the borough by 2017.	Swimming pool completion When: Annually
Provision of new Multi-use games areas	Complete 8 more MUGA's and 1 full-size floodlit synthetic turf pitch in or near to growth areas.	No. of MUGAs / STP completed. When: Annually
Increase level of Health & fitness facilities	Complete the equivalent of 3, '80 station' Health & fitness centres by 2017	Health & fitness centres completed. When: Annually

#### Housing Needs

#### **STRATEGIC OBJECTIVE 7**

Achieving housing growth and meeting needs - by promoting development that is mixed in use and tenure, so that at least 11,200 additional homes are provided in the period to 2016/-2017 and 85% of the borough's new housing growth is contained within 5 Growth Areas. To ensure that at least 25% of all new homes built in the borough are family sized (3 bed or more) and 50% (approx.) are affordable.

Core Policies: CP1, CP2, CP5, CP6, CP7 – CP12, CP21

Delivery Agencies: Brent Council, Developers, House-builders, Registered Social Landlords

Performance Measure	Target	Monitoring Point
Core Output Indicators:		
Total additional homes.	Minimum of 11,200 homes (9150 self contained) supplied 2007/8 -2016/17	No. of homes completed in borough When: Annually
No. of homes completed in defined growth areas.	Minimum of 85% completed are in growth area 2007/8 – 2016/17	No.of completed units. When: Annually
No. of affordable units.	Minimum of 4,575 or 50% completions; 2007/8 - 2016/17	No. of completed units. When: Annually
Brownfield Land.	95%	Proportion of new homes completed on brownfield sites. When: Annually
Ensure reasonable proportion of family homes	That 25% of all self contained homes are 3 bed or larger.	No. of new family homes completed per annum When: Annually
Local Output Indicators:		
Wheelchair adaptable	10% of 10 units +	No. of completed new homes that are wheelchair adaptable <b>When</b> : Annually
Existing housing loss, inc affordable.	No loss	Housing units lost on completed new development. When: Annually
Lifetime homes.	100%	No. of completed new homes built to lifetime home standards.

	When: Annually

#### Transport Infrastructure

#### **STRATEGIC OBJECTIVE 8**

**Reducing the Need to Travel and Improved Transport Choices** – by completing first class retail and other facilities in Wembley that reduces the need to travel to other centres. Improving key transport interchanges of Wembley, Alperton, First Central and Queen's Park. Access by public transport and by cycle or on foot will be promoted and there will be reduced car parking standards for growth areas because of their relative accessibility.

Core Policies: CP1, CP2, CP3, CP4, CP5, CP6, CP7, CP12, CP13, CP14

Performance Measure	Target	Monitoring Point
Core Output Indicators:		
Commercial uses complying with car-parking standards	All completions of non-residential developments (Use Classes A, B, and D) comply with the Council's car parking standards.	Number of developments (completions) within Use Classes A, B, and D which comply with car parking standards. <b>When:</b> Annually
Local Output Indicators:		
Proportion of trips made by public transport	Reducing proportion of car trips as a result of Wembley development below 37% baseline by a minimum of 10%	MVA model calculates modal share if no intervention of 37% car use. Re-run model to calculate change
		When: 3-5 years
Amount of contributions pooled within opportunity and growth areas to aid improving and/or developing transport infrastructure.	Ensure appropriate pooling of contributions which will mitigate the cumulative impacts of development within an area.	Number of pooling schemes within growth and opportunity areas - plus implementation i.e. transport improvements /projects.
		When: Annually
Secure contributions towards interchange improvements.	Secure major improvements (over £1m) in Queen's Park, First Central, Wembley Stadium, Wembley Central and Alperton stations by 2017.	Record Planning Obligations and direct works that secure improvements. When: Annually

#### **Open Space and Environment**

#### **STRATEGIC OBJECTIVE 9**

**Protecting and Enhancing Brent's Environment -** by preserving the borough's open spaces for recreation and biodiversity and creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision. To increase the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value. Enhance the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development. To protect the borough's built heritage.

#### Core Policies: CP5,CP6, CP7-CP13, CP16, CP17

Delivery Agencies: Brent Council, Greater London Authority (GLA), Environment Agency, Developers.

Performance Measure	Target	Monitoring Point		
Core Output Indicators:				
Protection of all Open Space of value.	No net loss of open space to alternative uses.	Amount of open space lost to alternative uses.		
		When: Annually		
Protection of areas designated for intrinsic environmental value including sites of national or regional/sub-regional significance.	No net loss of areas of wildlife and nature conservation importance.	No net loss of land of nature conservation value on designated sites (SSSI, local nature reserves, Sites of more than local Importance for Nature Conservation). When: Annually		
Local Output Indicators:				
Provision for new or extended Public Open Space.	To meet open space targets in growth areas	Measure new open spaces created and laid out as a result		
Open Space.	Wembley -2.4ha	of development.		
	Alperton 1.6ha	When: Annually		
	S Kilburn 0.8ha			
	Burt Oak 0.6ha			
	Church End -2ha.			
Improvement of existing Public Open Space	To increase the no. of parks maintained to Green Flag award standard from a baseline of two.	Measure no. of parks awarded Green Flag status		
		When: Annually		
Improvement of existing and provision for new areas of nature conservation.	Enhance and increase nature conservation areas. Reduce area of wildlife deficiency.	Monies negotiated through S106 agreements for application sites in areas of		

		deficiency, where monies have been spent and extent of areas of wildlife deficiency. When: Annually
New Tree Planting for new neighbourhoods	To meet tree planting targets in growth area set out in IIF, by 2017	Count of new trees planted in growth areas
	Wembley 1000	When: Annually
	Park royal 4000	
	Alperton 500	
	Church End, Burnt Oak,	
	S Kilburn 200	
Provision for new or improved Children's Play Areas.	Meet standards on children's play as set out in Infrastructure & Investment Framework	Measure number of compliant schemes. When: Annually

#### **STRATEGIC OBJECTIVE 10**

Achieving Sustainable Development including mitigating and adapting to climate change - By promoting mixed use, mixed tenure development in growth areas integrating infrastructure and housing provision, reducing energy demand in the growth areas from current building regulation standards and by achieving exemplar low carbon schemes and CCHP plants.

Core Policies: CP1 - CP3, CP5, CP7 – CP12, CP15, CP18

Delivery Agencies: Brent Council, Greater London Authority (GLA), PCT

Performance Measure	Target	Monitoring Point	
Core Output Indicators:			
Percentage of applications approved contrary to Environment Agency advice on Flood risk.	0%	Applications approved contrary to EA advice When: Annually	
Local Output Indicators (see also t	ransport indicators):	1	
Installation of Sustainable Urban Drainage systems in new development	All major developments should secure SUDs or apply water retention or harvesting measures	Applications which include SUD measures. When: Annually	
Development apply GLA's energy hierarchy and secure high levels of renewables in Growth Areas	All major developments should submit energy and feasibility assessment and apply Mayor's energy hierarchy. Major development to achieve 20% carbon reduction through renewable energy requirements or secure carbon offset payment	Number of applications includes energy and feasibility assessments. All Large schemes over 100 units to secure onsite renewable energy generation - by type and energy generated (where available - as GLA hierarchy). <b>When</b> : ongoing (by 2010)	
Secure district wide CCHP in Wembley Area	Complete one district wide heating system by 2017	To meet GLA energy hierarchy on very large regeneration schemes. When: Annually	
Ensure that new floorspace in Wembley is mixed in use.	That at least 50% of all new permitted floorspace is non-residential by 2017	Record floorspace of approved applications in Wembley Growth Areas. When: Annually	
Low carbon housing developments.	At least two exemplar low carbon housing schemes by 2017.	Completion of low carbon housing development. When: by 2017	

#### STRATEGIC OBJECTIVE 11

**Treating Waste as a Resource** - by collaborating with the other West London waste authorities, ensuring that there is an appropriate network of facilities for integrated waste management and that existing, appropriately located, facilities are protected.

Core Policies: CP5, CP17, CP18		
Delivery Agencies: Developers, Brent Council, Greater London Authority (GLA), West Waste, other West London Boroughs		
Performance Measure	Target	Monitoring Point
Core Output Indicators:		
Production of secondary / recycled aggregates.	A minimum 10% of inputs for key standard components coming from recovered sources.	Number of schemes involving demolition and redevelopment which apply the ICE Demolition Protocol. <b>When</b> : Annually
Local Output Indicators:		-
Safeguard existing waste facilities and secure land for new waste operations		Planning approvals p.a. <b>When:</b> Annually
Waste stream: recycled or composted.	Over 30% of household waste by 2010 and over 33% by 2015.	Amount of municipal waste recycled or composted. When: Annually

#### STRATEGIC OBJECTIVE 12

**Promoting Healthy Living, including Creating a Safe and Secure Environment** - by ensuring that there is sufficient space for Primary Health Care providers, particularly to meet the additional need in the growth areas. Ensuring development delivers transport solutions and opportunities for healthy lifestyles, embracing a design-led approach to reduce crime and the fear of crime by installing new CCTV systems and ensuring and ensuring that crime levels continue to be reduced.

#### Core Policies: CP5 – CP15, CP17

Delivery Agencies: Brent Council, PCT, Emergency Services, TfL, Sport England

Performance Measure	Target	Monitoring Point					
Local Output Indicators:							
Amount of new space for health service provision.	Floorspace for 1 new GP for every 1500 additional population between 2007-2017.	New GP surgeries are completed to meet population need <b>When:</b> Annually					
Secure by Design accreditation.	All large schemes over 100 units achieve Secure by Design accreditation between 2007 and 2017.	Accredited planning applications. When: Annually					
Provision of new or extended community facilities.	Community facilities provide at 370m2 per 1000 new population between 2007 and 2017	Measure floorspace of new facilities in growth areas against new population (at 2.5 persons per dwelling ) When: Annually					
Protection of existing community facilities.	No net loss of community facilities unless compensation provided.	No. of applications approved resulting in the net loss of a community facility for which no compensation made through planning obligation or other agreement. When: Annually					

## **Appendix 1. Housing Capacity**

This Annex details Brent's potential housing capacity to meet and significantly exceed the London Plan and Core Strategy housing target of 11,200 additional homes (minimum of 10,150 new self contained dwellings and non-self contained homes and 1.030 vacant homes reoccupied) between 2007/08 - 2016/17.

PPS3, as elaborated by the Strategic Housing Land Availability Assessments Practice Guidance, requires the council to identify sites and premises suitable for housing development on the following phased basis :

- Specific deliverable and ready to develop sites for the first five years of the plan
- Specific developable sites for years 6 -10
- Indicate potential growth for years 11-15, at least on a broad locational basis.

Although PPS3 considers that this identified housing capacity will normally be derived from the Local Planning Authority's own Strategic Housing Land Availability Assessment (SHLAA), the council, together with the other London boroughs, has been advised by the Government Office of London (GOL) not to undertake its own SHLAA as this should be undertaken on a regional basis (i.e.) a London wide study undertaken by the GLA. Brent will actively assist the preparation of the 2009 London Strategic Housing Land Availability Assessment, which will inform the proposed revision of the London Plan.

The council has set out the borough's most recent housing completions, the current identified housing capacity and its projected implementation time table, in accordance with PPS3, in the Brent Housing Trajectory, Additional Homes 2007/08-2017 +. which will be updated, at least, annually and published in the Brent Annual Monitoring Report. The Trajectory identifies the following potential capacity sources in order of their robustness and size :

<u>Consents</u> for residential development (including mixed), in progress or not yet started for a total of 7,718 additional homes (including 612 non-self contained) as of 1/4/08; filtered to discount any significant multiple consents so as to avoid 'double counting'.

<u>LDF Proposals</u>, derived from the LDF Site Specific Allocations, which could provide an estimated c ?,000 additional homes (s/c) units after filtering those Allocations with residential consents.

Estate Redevelopment Programs, an estimated additional 1,878 units could be provided from regeneration projects on the South Kilburn, Barham Park and Church End Estates.

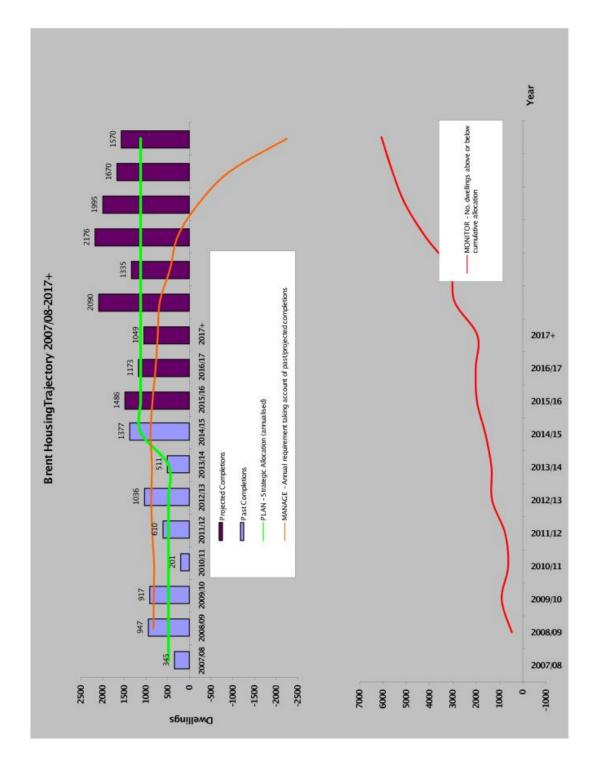
<u>Other Possible Sites</u>, derived from a study of large sites and premises which may become available for housing development after 2017.

<u>Small Sites</u>, sites of insufficient spatial size to warrant designation as specific LDF proposals. The projected annual 216 homes (s/c) for the period 2007/08 onwards is derived from the London Housing Capacity Study's extrapolation of historical small site completions (under 0.5 ha), which has been incorporated into the London Plan's annual target of 915 additional dwellings.

<u>Vacant Homes</u>, the London Plan annual target of 1,120 additional homes assumes that at least 103 vacant homes will be reoccupied annually.

The Trajectory's Projected Completions, (i.e) the implementation of the identified capacity, has been primarily calibrated on the basis of the individual scheme size, including phasing where appropriate, and the latest available information on prospective developer's intentions.

As it would not be practical to show in the Trajectory the extent to which this housing capacity is very concentrated in the specific designated Housing Growth Areas, this information is separately presented in the following Potential Housing In Brent 2007 -2017 + By Growth Areas tables. These tables detail the housing capacity of sites identified in the LDF Sites Specific Allocations together with other longer term potential housing opportunities. Some information is included which was not available when the Trajectory was prepared.



Picture 25 Brent Housing Trajectory 2007/08 to 2017+

#### Potential Housing in Brent 2007 - 2017+ by Growth Area

The following tables illustrate the indicative capacity of: sites allocated in the SSA DPD; sites with planning permission and sites where planning officers have indicated that the principle housing development on the site may be acceptable. The indicative figures do not bind the council to give planning permission for that number of units as they are intended to give an approximate idea of the appropriate number of units only. Actual number of units will depend on a variety of factors and constraints.

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Ap ref SSA	ref Address	Capacity	Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+
1 1	Dadoos	83	Yes	2009-10	1	83	5		8	8
2 1	183 Ealing Road	37	yes	2009-10		37				
3 1	Atlip Road site	185	yes	2009-12		85	100		-	
4 36	Abbey Estate	322	No	2009-12		200	122			
5 43	Abbey Manufacturing Estate	100	No	2011-14			50	50		
6 32	Northfields Industrial Estate	170	No	2009-12		70	100		8	8
7 44	Sunleigh Road	200	No	2011-14			100	100	13	
8 106	Minavil House	80	No	2009-10		80				
9 21	Alperton Lane, Atlantic House	50	No	2015-16				2.1	50	
10 46	Carlyon Rd, Ealing Rd, Public House & B&Q	400	No	2011-14			200	200		
11	Chequers Public House	32	Yes	2007-08	32		8		14	5
					32	555	672	350	50	0

#### **Burnt Oak/ Colindale**

**Church End** 

Map ref	SSA ref	Address	Capacity	Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+
12	85	Colindale Retail Park, (Wickes) Capitol Way, NW9 0EQ	200	No	2011-12			200			
13		MFI, 355 Edgware Road, NW9 6TH	200	No	2017+						200
14	104	Sarena House, Grove Park, NW9 0EB	73	No	2011-12			73			
15	23	Morrisons, Westmorland Road, NW9	300	No	2017+						300
16	25	Oriental City, NW9 0JJ	520	yes	2007-12		200	220	100	)	
17	59	Theoco, 5-13 Burnt Oak Broadway	53	Yes	2009-10		53				
18		Allied Carpets, Burnt Oak Broadway		Yes	2009-10		73				
19	part 85	Mercedes, 403 Edgware Road, NW9 0HX	115	No	2017+						115
20	39	Alpine House, Honeypot Lane	120	No	2009-10	2	120		4	2	2
21		Roberts Court, Stag Lane, NW9	40	Yes	2007-08	40					

40 446 493 100 subtotal 1694

615

0

Map ref	SSA ref	Address	Capacity	Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+
22	27a	Asiatic Carpets, 430 High Road, Neasden, NW10	261	No	2007-10						26
23	27b	Church End - Ebony Court	60	No	2007-10		60				
24	27a	Church End - car park site (local centre site)	120	No	2007-10		120				
25	27c	Church End - White Hart	61	Yes	2007-08	61					
26		Extra private housing at Church End	178	Yes	2007-08	178					
27	116	Ball Games Court, Dudden Hill Lane	10	No	2009-10	1	10				
28	33	Mayo Road Open space	59	Yes	2007-08	59					
29	114	Homebase, Church End	50	No	2012-14			1	0 4	0	

subtotal

lap ref	SSA ref	Address	Capacity	Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+	
						298	190	10	4	0	261	79
	Kilburn											1000
ap ref	SSA ref	Address	Capacity	Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+	
30		South Kilburn	1500	No	2009-19		200	200	20	30	0 600	
31	61	Oueens Park Station Car Park	270	No	2011-12			270				
32	15	117-119 Malvern Road	58	Yes	2007-08	58		1		3	1	
33		75 Kilburn Lane, W10	37	Yes	2007-08	37						
15.20		Open space & play area, Granville	2005		1 1 1 2 2 3 1 1 4 3 1 K							
34		Rd	130	Yes	2007-10	60	70					
1220		Canterbury House, Canterbury		12								
35	100	Road.	50	No	2009-10		50					
36		Chamberlayne/Bannister Road	44	Subj to S106	2007-08	44						
		enamberia (ne) bannoter rioda	1.1.1	1000] 10 0100	12007 00							subto
						199	320	470	20	300	600	20
							520					20
embl	ey											
an mat	CCA ant	Address	Capacity	Demaission	Dariad	2007.00	2009-10	2011 12	2013-14	2015 16	2017	
	SSA ref	Address		Permission	Period	2007-08		2011-12	2015-14	2015-16	2017+	
37	113	Wembley Point	100	No	2009-10		100					
38	UDP WEM28d	Central Square, Wembley, HA9	223	Yes	2009-12		100	123				
39	101	Shubette, Karma, Albion & Apex	400	No	2009-12							
22	101	House, Olympic Way, HA9 0NS	400	NO	2009-12			200	20	00		
40	UDP WEM28c	Wembley Market High Road, HA0	28	No	2011-12			28				
41		Land Adjacent Wembley Stadium Part 1, HA9 0ND	1862	Y/O	2007-12		300			36	2 600	
		Land Adjacent Wembley Stadium										
42		Part 2, HA9 OND	1864	Y/O	2013-16			300	30	66	4 600	
43	28	Wembley West End	300	No	2011-14	1		150		50		
44	20	Elm Road, Wembley HA9	127	Yes	2007-08	127		100				
45		Copland School	451	Yes	2009-12		150	150	15	1		
46	37	North End Road	110	No	2009-12	3	110			11	5	
		Eastern Lands (incl Kelaty House),				-						
47	102	Wembley	500	No	2017+						500	
48		Marks & Spencers	45	yes	2007-8	45	1	2	8	3	500	
49		32-34 Brook Avenue	40	Subj to S106	2009-10	15	40					
50	12	Brent Town Hall	200	No	2016-17	-	10			10	0 100	
51	49	Barnhill Road Garages	9	Yes	2008-09	4	5			10	100	
52	83	614 High Road (adj Church)	20	No	2009-10	-	20		-	-		
53		5&7 Chalkhill Road, Wembley	11	Yes	2003-10	11	20			1		
54		Prestige Cars, 159 Harrow Road	14	Yes	2007-08	14		-	-	-		
55		Chalkhill Health Centre, HA9	42	Yes	2007-08	42		1	-	-	-	
		Land n/t Wembley Stadium Station				42				2		
56		(Triangle)	481	Yes	2010-14		100	200	11	18		
57		Choithram House (Natco), Lancelot Road, HAO 2bg	107	Yes	2007-08	107						
						350	925	1451	121	9 112	5 1800	subto 68
						550	520	1451			1000	00
ther s		Address		Permission	Period	2007-08	2009-10	2011-12	2013-14	2015-16	2017+	

Figure 14 SSA Indicative Capacity

# **Appendix 2. Superseded UDP Policies**

Core Strategy Policy	Explanation	Supersedes UDP policy		
Brent's Spatial Strategy -				
CP 1 - Spatial Development Strategy	This sets out the spatial strategy, outlining where growth is to be focussed.	Part 1 STR 1 Protection of Strategic and Borough Employment areas and priority alternative land uses. Part 2 EMP4 – Access to Employment Opportunities		
Growth Through Regeneration				
CP 2 - Housing Growth	Sets out the appropriate level of growth across the borough, including the number of new homes and proportion of affordable housing sought.	None		
<b>CP 3</b> - Commercial Regeneration	Promotes the regeneration of industrial	Part 1		
	estates for business and industry and sets a target for new employment.	<ul> <li>STR 24 - Meeting Employment Needs and Regenerating Industry and Business</li> <li>STR 26 – Regeneration of Business or Technology Parks</li> <li>Part 2</li> <li>EMP 15 – Location of B1 Business Development</li> </ul>		
<b>Overall Spatial Change Policies</b>				
<b>CP 4</b> - North West London Co-ordination Corridor	Commits the council to working with partners to co-ordinate development, especially infrastructure provision across borough boundaries in the Co-ordination Corridor	None		
CP 5 - Place Making	Sets out requirements for place making when major development schemes are considered	None		
<b>CP 6</b> - Design and Density in Place Shaping	Sets out the requirements for appropriate design and density levels for development	None		
Strategic Area Policies				

CP 7 - Wembley Growth Area	Policy details the level of growth, future role and appropriate development in Wembley, including the key infrastructure requirements to meet the needs of growth.	<ul> <li>Part 1</li> <li>STR 26 – Regenerating Wembley</li> <li>STR 27 – Regeneration of Wembley as a regional sport, entertainment and leisure destination.</li> <li>STR 32 – National Stadium Policy Area as location for new visitor and hotel facilities.</li> <li>Part 2</li> <li>WEM 1 – Regeneration of Wembley</li> </ul>
CP 8 - Alperton growth Area	Policy details the level of growth, future role and appropriate development in Alperton, including the key infrastructure requirements to meet the needs of growth.	None
<b>CP 9</b> - South Kilburn Growth area	Policy details the level of growth, future role and appropriate development in South Kilburn, including the key infrastructure requirements to meet the needs of growth.	None
<b>CP 10</b> - Church End Growth area	Policy details the level of growth, future role and appropriate development in Church End, including the key infrastructure requirements to meet the needs of growth.	None
<b>CP 11</b> - Burnt Oak / Colindale Growth area	Policy details the level of growth, future role and appropriate development in Burnt Oak/Colindale, including the key infrastructure requirements to meet the needs of growth.	None
CP 12 - Park Royal	Policy details how the opportunity area will develop including setting out what infrastructure is necessary to support development.	None
<b>CP 13</b> - North Circular Road Improvement Area	Policy sets out the council's intentions for bringing forward environmental improvements	None
Infrastructure to Support Development	t	
<b>CP 14</b> – Public Transport Improvements	The policy identifies where public transport improvements will be implemented and promoted	None
<b>CP 15</b> - Infrastructure to Support Development	Policy requires that the infrastructure requirements of new development are met.	Part 1 STR 19 (part of (d) ) – New Housing Development

Town Centres and Shopping		
<b>CP 16</b> - Town Centres and the Sequential Approach to Development	The policy sets out the sequential order of centres for new retail and other town centre uses and establishes Wembley as the principal centre in the borough for these uses	<ul> <li>Part 1</li> <li>STR2 – Application of Sequential Approach</li> <li>Part 2</li> <li>SH1 – Network of Town Centres &amp; District Centres</li> <li>WEM3 – Location of Large Scale Retail, Leisure and Entertainment Uses</li> <li>SH4 – Local Centres</li> <li>SH5 – Out of Centre Retail Developments</li> </ul>
Protection and Conservation		
<b>CP 17</b> - Protecting and Enhancing the Local Character of Brent	The policy balances the regeneration & growth agenda promoted in the Core Strategy, to ensure existing assets (e.g. heritage buildings and conservation areas) are protected and enhanced.	Part 1 STR11 – Protecting & Enhancing the Environment STR16 – Protecting & Enhancing the Environment STR17– Protecting & Enhancing the Environment
Protecting and Enhancing Open Space	e, Sports and Biodiversity	
CP 18 - Protection and Enhancement of Open Space, Sports and Biodiversity	Policy protects all open space from inappropriate development. Promotes enhancements to open space, sports and biodiversity, particularly in areas of deficiency and where additional pressure on open space will be created.	Part 1 STR 33 – Protection of Strategic Open Space (MOL and Green Chains) STR 34 – Protection of Sports Facilities. STR 35 – Promoting improvements to public open space and sports facilities, particularly in areas of deficiency. Part 2 OS4 – Areas of Open Character OS6- Public Open Space

Tackling Climate Change and Achievin         CP 19 – Brent Strategic Climate         Mitigation Measures	Policy highlights need for new development to embody or contribute to climate mitigation	OS7 – Provision of Public Open Space OS8 – Protection of Sports Grounds OS11- Urban Greenspace OS22 - Allotments None
Maintaining Employment outside of Gr	objectives, especially in growth areas.	
CP 20 - Strategic and Borough Employment Areas	The policy safeguards Strategic and Borough Employment Areas for appropriate uses and identifies those uses which are considered appropriately located within them. It also establishes the preferred location for offices	Part 1STR 1 – Prioritising Locations and Land Uses to Achieve Sustainable DevelopmentSTR 23 – Meeting Employment Needs and Regenerating Industry and BusinessSTR 24 - Meeting Employment Needs and Regenerating Industry and BusinessSTR 26 - Meeting Employment Needs and Regenerating Industry and BusinessSTR 26 - Meeting Employment Needs and Regenerating Industry and BusinessSTR 28 - Regenerating Areas Important to London as a WholePart 2EMP 4 – Access to Employment OpportunitiesEMP5 – Designation of Strategic Employment AreasEMP 7 – Borough Employment AreasEMP8 – Protection of Strategic and Borough Employment AreasEMP 11 – Regeneration of Employment AreasEMP 12 – Public realm enhancement in Employment

		<b>EMP 15</b> – Location of B1 Business Development
Planning for More and Better Housing		
CP 21 – A Balanced Housing Stock	This Policy seeks to maintain and provide a balanced dwelling stock to accommodate the wide range of Brent households by : Ensuring appropriate dwellings range & mix; Defining family accommodation as units capable of providing 3 or more bedrooms; 100% Lifetime Homes; 10% Wheelchair Accessible; Appropriate non –self contained accommodation; Care & Support Housing.	Part 1 STR 19 – Residential Amenity STR 21 – Major Estate Regeneration Areas Part 2 H7 – Major Estate Regeneration Areas H8 – Resisting Loss Of Houisng H9 –Dwelling Mix H10 – Containment Of Dwellings H18 – Flat Conversions , Dwelling Mix H23 – Supported Housing H25 – Sheltered Housing
<b>CP 22</b> – Sites for Nomadic People	Sets out criteria for identifying and considering proposals for new sites for nomadic peoples.	H27 – Hostel Accommodation H28 – Gypsy /Travellers Sites
Protecting Community and Cultural Fa	cilities	
<b>CP 23</b> – Protection of Existing and Provision of New Community & Cultural Facilities	Policy encourages new accessible community and cultural facilities and protects existing facilities. Sets a standard for the provision of new community facilities.	<ul> <li>Part 1</li> <li>STR 31 – Protection of Arts, Culture and Entertainment facilities, new facilities located according to the sequential approach.</li> <li>STR 37 – Permits accessible community facilities and resists net loss of existing community facilities.</li> <li>STR 38 – Major regeneration proposals to include proper provision for community facilities.</li> <li>Part 2</li> </ul>

<b>TEA 3</b> – Protection of Existing ACE Facilities
<b>CF3</b> – Protection of Community Facilities
<b>CF5</b> – Community Facilities in Large Scale Developments

## Appendix 3. Glossary

#### Affordable Housing

Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.

#### Amenity Space

External amenity space comprising gardens (private and communal), roof terraces and balconies should normally have some sunlight, and should normally be directly accessible from a room other than a bedroom. The ground level amenity space should be mainly grassed and landscaped. For family housing and category 1 elderly person's accommodation, amenity space should mainly be provided in the form of gardens (in the latter case wheelchair accessible planting bays should be provided).

#### Areas of Intensification

Areas designated in the London Plan as having significant potential for increase in residential, employment and other uses through development of sites at higher densities with more mixed and intensive use.

#### Black and Minority Ethnic Groups (BME)

This term is specifically used by the Census to globally aggregate and distinguish groups on a racial basis from those classified as white. However, this white category includes Census enumerated communities in Brent, such as the Irish, who regard themselves as constituting a distinct ethnic minority. Other population sectors, such as Kurdish and Orthodox Jewish, who are not specifically enumerated by the Census, may also have distinct cultural characteristics, effectively similar to ethnic minorities. Such groups are therefore encompassed in the term 'ethno-cultural' as used in this Plan.

#### **Blue Ribbon Network**

Mayor's spatial policy which includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes. It includes culverted (or covered over) parts of rivers, canals or streams.

#### Brownfield Sites (See also previously developed land)

Previously developed urban land. Government strategy is to maximise new development on Brownfield sites.

#### **Commercial Development**

New building for warehousing and storage; the term may also include shopping and office development.

#### **Conservation Area**

An area of special architectural or historic interest identified by the Local Planning Authority under the Planning (Listed Buildings & Conservation Areas) Act 1990. There is a statutory duty to preserve or enhance the character or appearance of such areas.

Buildings in such areas are protected from unauthorised demolition in part or in full, and trees may not be felled or pruned without 14 days notice.

#### **Culture, Sport and Tourism Activities**

These relate mainly to visual and performing arts, music, drama, creative activity, heritage, leisure, sport, recreation and tourism. 'Culture' can also mean customs, behaviour and beliefs, and these too can be expressed through cultural activities. Facilities can include museums, art galleries, theatres, sports and recreational halls, snooker halls, nightclubs, cinemas, concert venues, casinos, bingo halls, swimming pools, conference centres, hotels, visitor information centres, and other tourism related facilities.

#### **Deficiency Area**

Area which is beyond a reasonable distance from a facility such as a shop, park or community centre.

#### Density (Housing)

The number of dwellings per net residential area, normally measured in Habitable rooms per hectare but sometimes by dwelling per hectare.

#### **Design Statement**

A statement which indicates the design principles upon which a proposal is to be based. It can be made at a pre-planning application stage by a developer or to be submitted in support of a planning application.

#### **Design Review Panel**

This panel will comprise of council members, officers and stakeholder representations, such as CABE. The panel will appraise the design quality of applications.

#### **District Centres**

District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non- retail services, such as banks, building societies and restaurants, as well as local public faculties such as a library.

#### **Development Plan**

It sets out the objectives, policies for development in an area. Prior to the commencement of the Planning Compulsory and Purchase Act 2004, London boroughs were required to prepare a Unitary Development Plan for their areas under the Town and Country Planning Act 1990. The London Plan now forms part of Brent's Development Plan.

#### Dwelling

A building or any part of a building that forms a separate and self- contained set of premises designed to be occupied by a single family or household. (definition derived from "The Census 1981 Definitions Great Britain" - Office of Population Censuses and Surveys, 1981).

#### Family Housing

A self- contained dwelling that is capable of providing 3 or more bedrooms.

#### Gateways

Gateways are the main points of entry into the Borough for visitors, creating a first impression of Brent.

#### **Green Chains**

These are areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way- marked paths and other pedestrian and cycle routes.

#### Household

One person living alone or a family of up to six or persons living at the same address with common housekeeping or sharing a common living or sitting room.

#### **Housing Opportunity Borough**

Brent has been designated by the Government as one of four London Boroughs with significant potential housing capacity.

#### Key Diagram

The diagrammatic interpretation of the spatial strategy as set out in the Core Strategy. (As distinct from a Structure Plan Key Diagram prepared to explain its policy content).

#### **Key Growth Areas**

Areas where developments will be harnessed to help achieving the regeneration objectives.

#### **Key Worker Housing**

A key worker for the purpose of eligibility for affordable housing provision in this Plan is defined as a person employed in directly delivering a vital service, such as health, education, police and transport etc, that the local planning and housing authority deems is essential for the maintenance of a sustainable community. Some Government funded key worker housing programmes employ a narrower eligibility definition.

#### **Lifetime Homes**

Ordinary homes designed to provide accessible and convenient homes for a large segment of the population from young children to frail older people and those with temporary or permanent physical or sensory impairments. Lifetime Homes have 16 design features that ensure the home will be flexible enough to meet the existing and changing needs of most households, as set out in the Joseph Rowntree Foundation report 'Meeting Part M and Designing Lifetime Homes'.

#### Listed Building

A building of special architectural or historic interest included on a statutory list compiled by the DCMS. Planning Permission is required for the demolition or alteration of such a building.

#### **Local Centres**

Local centres include a range of small shops of local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub- post office and a pharmacy. Other facilities could include a hot- food takeaway and launderette.

#### Local Nature Reserves

Derived from National Parks & Access to Countryside Act 1949. They are places with wildlife or geological features that are of special interest locally. They also offer people special opportunities to study or learn about nature or simply to enjoy it.

#### London Bus Priority Network (LBPN)

An 860km bus network covering the main bus services, including priority and service improvements, which seeks to improve total journey quality, and is delivered by a partnership of agencies.

#### **Major Retail Development**

Development for retail use which provides for more than a purely local service such as a superstore (over 2,500 sq metres)

#### **Major Town Centres**

They are the principal centres in a local authority's areas which function as important service centres, providing a range of facilities and services for extensive catchment areas.

#### Metropolitan Open Land (MOL)

MOL are strategically important open spaces to London. It performs 3 valuable functions: 1) to provide a clear break in the urban fabric and contribute to the green character of London; to serve the needs of Londoners outside their local area; and 3) contains a feature or landscape of national or regional significance. MOL is afforded the same level of protection as the Green Belt and the London Plan stresses that there should be a presumption against development in these areas.

#### **Neighbourhood Centres**

Small parades of shops of purely neighbourhood significance.

#### **New Deal for Communities**

A Government initiative that supports the intensive regeneration schemes that deal with problems such as poor educational attainment and poor job prospects in a small number of deprived local authorities.

#### **Non-Retail Use**

Use within shopping centres that are not within Use Class A1.

#### **Open Space**

Open space is land, airspace, or a body of water or a combination of these elements which is relatively free of buildings and/or surface infrastructure. It can be both public or private and is further defined in PPG17 Planning for Open Space and Recreation and London Plan definition of the Blue Ribbon Network. The broad range of open spaces that may be of public value include: parks and gardens; natural and semi-natural urban greenspace; green corridors; outdoor sports facilities; amenity greenspace; provision for children and teenagers; allotments, community gardens, and city farms; cemeteries and churchyards; accessible countryside in the urban fringe areas; and civic spaces, including civic and market squares, and other hard surfaced areas designed for pedestrians. There is a general presumption against the loss of open space, and it will therefore be protected from inappropriate development. Inappropriate development in this context is defined to be any development harmful to the use or purpose as open space.

#### **Opportunity Areas**

Areas designated in the London Plan as offering opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5000 job and/ or 2500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

#### Planning Obligation (see also S106)

A legal undertaking entered into in connection with a planning permission under Section 106 of the Town and Country Planning Act 1990. Such obligations may restrict development or use of land; require operations or activities to be carried out in, on, under or over the land; require the land to be used in any specified way; or require payments to be made to the planning authority either in a single sum or periodically. Planning obligations may be created by agreement or by unilateral undertakings on the part of the developer/ owner of the land.

#### Planning Permission

Formal approval given by a local planning authority for Development requiring planning permission, usually valid for three years for a full permission or three years for an outline permission in which details are reserved for subsequent approval.

#### Play Space

A dedicated safe area for children and young person's to play New housing developments with family sized accommodation should provide external communal children play space, either through new provision or enhancement of existing facilities as appropriate in relation to the scale of the family sized accommodation.

#### Previously Developed Land (See Brownfield Land)

Previously-developed land is a site which is or was occupied by a permanent structure (excluding agricultural and forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development and excludes land and buildings that have been used for agricultural or forestry purposes and land in built-up areas which has not been developed previously (e.g. parks, recreation grounds, and allotments - even though these areas may contain certain urban features such as paths, pavilions and other buildings).

#### **Public Realm**

Public realm is the space between and within buildings that are publicly accessible, including streets, squares, forecourts, parks and open spaces.

#### Public Transport Accessibility Levels (PTALs)

PTALs, as adopted by TfL, indicate public transport accessibility represented on a map. They assist boroughs in assessing appropriate parking provision. The PTAL score ranges from 1 (very poor) to 6 (excellent).

#### Section 106

The section of the Town and Country Planning Act 1990 that provides for the creation of 'Planning Obligations' (defined above).

#### Sequential Approach

National planning policy set out in the Planning Policy Statement 6: Planning for Town Centres to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

#### Sites of Importance for Nature Conservation

A series of sites identified by the Greater London Authority and Brent Council that represent the best wildlife habitats and nature conservation sites in the borough. Sites are classified into Sites of Metropolitan, Borough (Grade I and II) and Local Importance for Nature Conservation.

#### **Spatial Development Strategy**

Term used for both the Regional Spatial Strategy (RSS), The London Plan, and the boroughs Local Development Frameworks.

#### **Spatial Strategy**

The LDF Core Strategy sets out the strategy and development objectives for an area.

#### **Spatial Vision**

A brief statement as to how an area will be changed at the end of a plan period.

#### Strategic Cultural Area

An area with internationally important cultural institutions, which are also major tourist attractions.

#### Strategic Employment Area

Coherent areas of land within the main industrial estates which are, in terms of environment, road access, location, parking and operating conditions, well suited for retention in industrial use.

#### Supplementary Planning Document (SPD)

Guidance additional and supplementary to the Local Development Framework on how to implement its policies, similar to the former Supplementary Planning Guidance for the UDP.

#### **Sustainable Communities**

Places where people want to live and work, now and in the future.

#### Sustainable Development

Development which meets the needs of the present without compromising the ability of future generations to meet their own needs and aspirations.

#### Sustainable Urban Drainage System (SUDS)

SUDS is an alternative approach to conventional urban drainage which have been developed to cope with drainage water in an environmentally sate way. SUDS can reduce pressure on the existing drainage systems, prevent or reduce the likelihood of flooding and may also help clean up pollutants in run-off.

#### **Transport Nodes**

Major transport interchanges, where people can easily transfer from one mode of transport to another. i.e. where buses, mainline rail services, and tube lines meet.

#### Transport Plans (Sometime called Green or Commuter Plan)

A document submitted as part of a transport impact assessment setting down proposed measures by the developer to deliver sustainable transport objectives, including: measures for reducing car usage (particularly single occupancy journeys) & promoting and securing increased use of walking, cycling and public transport.

#### Use Classes Order

The Town & Country Planning (Use Classes) Order 1987 lists 13 classes of use. A change from one use to another use within the same Class does not constitute development and consequently does not require planning permission.

#### Warehouse (retail)

A single level retail store selling non-food goods direct to the public on the premises, usually occupying a purpose built structure with associated car parking, or an existing converted warehouse or industrial building.

#### Waste Hierarchy

The order of the most desirable waste management options, in which the prevention and reduction of waste are prioritised, then the reuse and recycling options and lastly the optimisation of its final disposal. The concept is described by the "3Rs" – Reduce, Reuse, Recover – followed by unavoidable disposal.

#### LIST OF ABBREVIATIONS

BME Black and Minority Ethnis groups	MERA Major Estate Regeneration Area
<b>CABE</b> Commission for Architecture and the Built Environment	MOL Metropolitan Open Land
CHP Combined Heat & Powe	PCT Primary Trust Care
CO2 Carbon Dioxide	POS Public Open Space
CSH Code For Sustainable Homes	
DPD Development Plan Document	PPS Planning Policy Statement
<b>DEFRA</b> Department of Environment, Food and Rural Affairs	PV Photovoltaic
EA Environment Agency	RIBA Royal Institution of British
	Architects
FRA Flood Risk Assessment	<b>S106</b> Section 106
GCSE General Certificate of Secondary Education	SEL Strategic Employment Location
GLA Greater London Authority	SPD Supplementary Planning Document
GDP Gross Domestic Product	SPG Supplementary Planning Guidance
IEA Industrial Employment Area	SRDF Sub Regional Development
	Framework
LATS Landfill Allowance Trading Scheme	SSA Site Specific Allocation
LDA London Development Agency	SUDS Sustainable Urban Drainage
	System
LDF Local Development Framework	UDP Unitary Development Plan
LPA Local Planning Authority	WLWA West London Waste Authority
LSP Local Strategic Partnership	
	1

## Appendix 4. List of supporting documents

#### List of LDF Supporting Documents

#### Local Strategies and other background documents

Numbers 1-58 are local strategies; other docs are 58 onwards:

- 1. A Regeneration Strategy for Brent 2001 2021
- 2. Brent's Community Strategy 2006-2010

- 3. Brent's Corporate Strategy 2006 2010
- 4. Brent Infrastructure and Investment Framework, November 2008
- 5. Growth Strategy Background Paper Why chose our growth areas, November 2008
- 6. Annual Monitoring Reports (AMRs) for 2000/04, 2004/05, 2005/06, 2006/07, 2007/08
- 7. Sustainability Appraisal of Brent's adopted Unitary Development Plan (2004) final report, January 2005
- 8. Brent Habitats Regulations Assessment of the Core Strategy, October 2007
- 9. Brent Equalities Impact Assessment, November 2008
- 10. Brent Biodiversity Action Plan, July 2007
- 11. Brent Biodiversity Action Plan 2001
- 12. Planning for Sports & Active Recreation Facilities Strategy 2008-2021
- 13. A Strategy for Brent Parks 2004-2009
- 14. Brent Play Strategy 2005-2008
- 15. Brent Playing Pitch Strategy 2003 2008 final report, May 2004
- 16. A Strategy for Sport and Physical Activity in Brent 2004 2009
- 17. School Organisation Plan 2005-2010, April 2006
- 18. Site Appraisal for a Second City Academy, March 2005, Brent Council
- 19. Brent Early Years Strategy taking stock, November 2006
- 20. A Strategy for the Development of Primary and Secondary Schools options for delivering additional school places, report from the Director of Children and Families, Executive 13 November 2006
- 21. Brent Children and Young People's Plan 2006 2009
- 22. Brent Primary Care Trust's Local Delivery Plan 2005/06 2007/08
- 23. Brent Joint Strategic Needs Assessment 2008
- 24. Brent Employment Land Demand Study, August 2006, URS
- 25. Brent Employment Land Demand Study, Updated, December 2008, URS
- 26. Brent Carbon Management Strategy and Implementation Plan 2006-2011
- 27. Brent Air Quality Action Plan 2005-2010
- 28. Brent Noise Policy Environmental Health, May 2004
- 29. Brent Contaminated Land Inspection Strategy
- 30. Contaminated Land Inspection Strategy, review 2005/2006
- 31. Contaminated Land Inspection Strategy, updated January 2007
- 32. Contaminated Land Inspection Strategy, revised risk prioritisation May 2007
- 33. Brent Urban Quality Survey 1999
- 34. Brent Strategic Flood Risk Assessment (SFRA) Level One, December 2007, Jacobs
- 35. Brent Strategic Flood Risk Assessment (SFRA) Level Two and PPS25 Sequential Test Report, December 2007
- 36. Brent 2003 Housing Needs Survey, June 2004, Fordham Research Ltd
- 37. Brent 2003 Private Sector Stock Condition Survey, June 2004, Fordham Research Ltd
- 38. Brent Housing Strategy Statement 2005 'The housing opportunity borough of choice', December 2005
- 39. Private Sector Housing Strategy 2005-2010
- 40. Potential Housing Capacity, updated February 2008
- 41. Maps illustrate Brent's housing cumulative growth in time, updated February 2008
- 42. Brent Retail Need and Capacity Study Update, December 2008, Roger Tym and Partners
- 43. Brent Retail Need and Capacity Study, February 2006, Roger Tym and Partners
- 44. Brent Household Shoppers Survey 2003, extracted borough-wide and Wembley profiles
- 45. Brent Local Implementation Plan 2007 2011, extract chapter five
- 46. Brent Waste Strategy
- 47. West London Waste Plan Issues and Options Report
- 48. West London Waste Plan Evidence Base
- 49. Children and Young People's Plan (2006-2009), published April 2006
- 50. Brent Population Estimation, Household Composition and Change' Mayhew Associates, 2007
- 51. The State of the borough; an economic, social and environmental profile of Brent, Dec 07
- 52. Local Area Agreement Story of Place, 2008
- 53. Wembley from Vision to Reality, June 2007

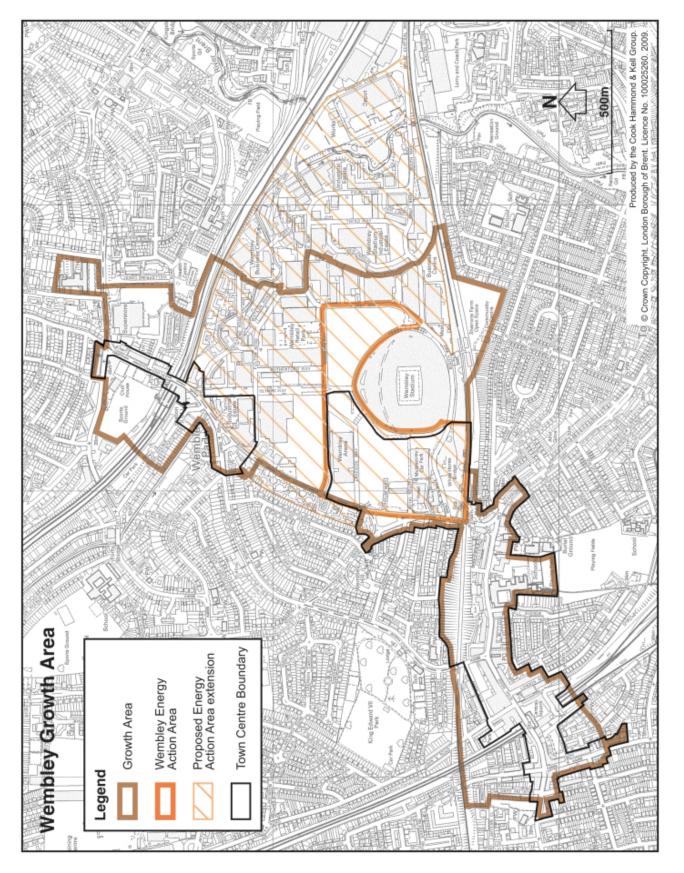
- 54. Wembley Masterplan SPD
- 55. Brent Local Area Agreement priorities 2008-2011
- 56. A New Image for the North Circular, 2008
- 57. South Kilburn SPD 2005; updated version to be published 2009
- 58. Brent Open Space Report: PPG17 Assessment
- 59. Town Centre Land use Survey 2007
- 60. Office of National Statistics, 2006
- 61. National Insurance Registrations, DMAG Update, 2006-7
- 62. Indices of Multiple Deprivation 2004 and 2007
- 63. Neighbourhood Renewal Unit 2009
- 64. Sport England's Active People Survey 2005-6
- 65. Sport England's Active Places Power 2007
- 66. West London Affordable Housing Requirement 2006/08
- 67. Planning for A Better London, Mayor of London, July 2008
- 68. Climate Change Act, 2008
- 69. EU Renewable Energy Directive, 2007
- 70. Policy 4A.2, The London Plan, 2008
- 71. Brent Fuel Poverty Strategy, 2005
- 72. Policy 5F.2, The London Plan 2008
- 73. EU Landfill Directive (1999/31/EC)
- 74. Landfill (England and Wales) Regulations 2002
- 75. Waste and Emission Trading Act 2003
- 76. A Beginners Guide to Landfill Allowance Trading Scheme, DEFRA
- 77. Table 4A.3, London Plan, 2008
- 78. Table 4A.6, London Plan, 2008
- 79. Moving Towards Excellence in Urban Design & Conservation, CABE, 2002
- 80. North West London to Luton Corridor Prospectus for Sustainable Co-ordinated Growth, Jan 2009
- 81. Policy 3A.3, London Plan, 2008
- 82. The Missing Link Study, Urhahn Urban Design, 2005
- 83. Joint Advice Note: Use of London Plan Policy for Development Control and Development Plan Purposes the Mayor of London/ GLA and Government Office for London (as endorsed by the Planning Inspectorate), 2008.

### Appendix 5. Changes to the adopted Proposals Map

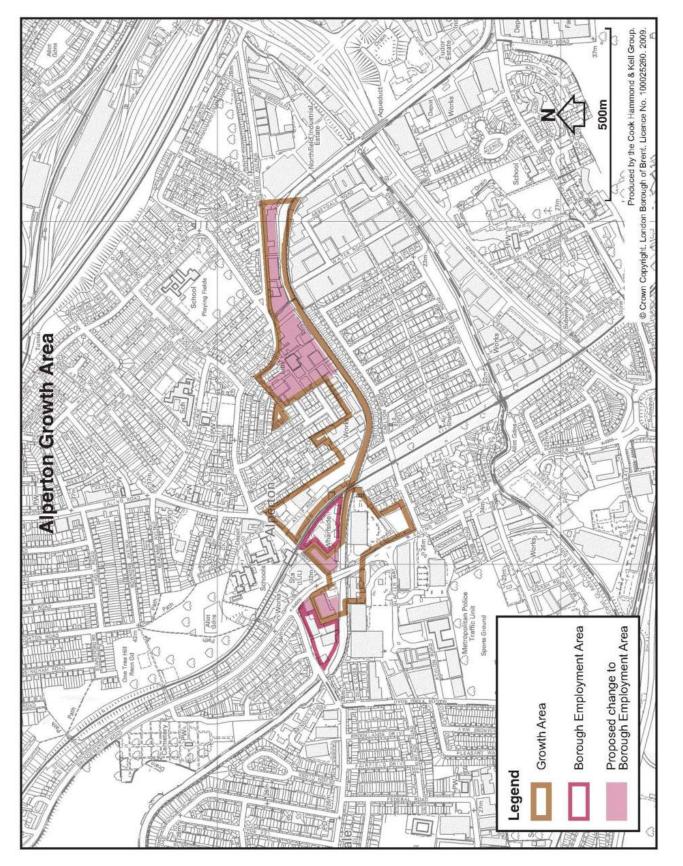
**5.0.1** The current adopted proposals map accompanies the UDP 2004. The proposed Core Strategy will make a number of changes to the adopted proposals map and these changes are detailed below. The changes relate to the following designations:

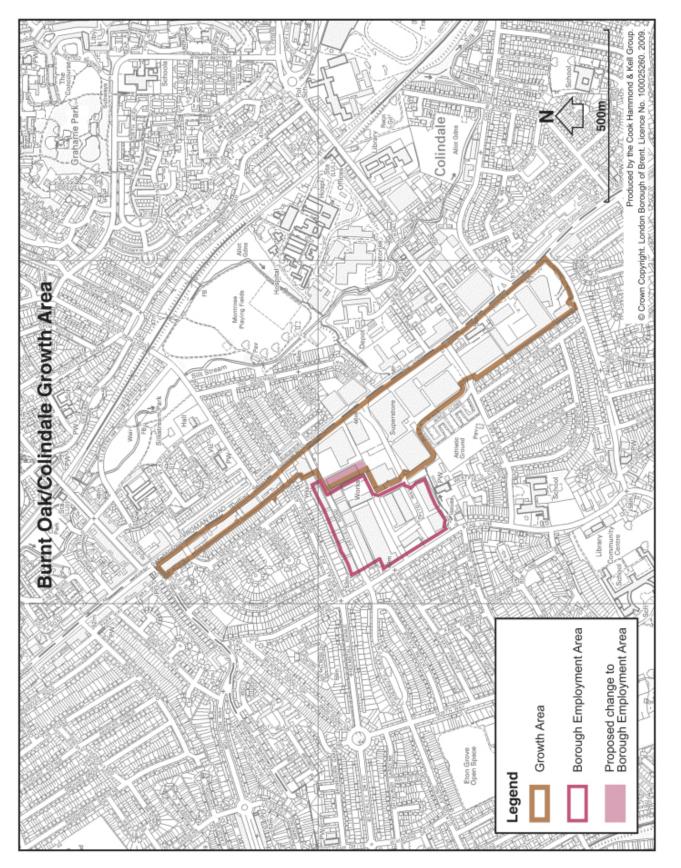
- 1. Growth Area boundaries (NEW designation)
- 2. Wembley Town Centre boundary (NEW designation)
- 3. Wembley Energy Action Area (NEW designation)
- 4. Wembley Energy Action Area Extension (NEW designation)
- 5. Borough Employment Areas (REVISED designation)

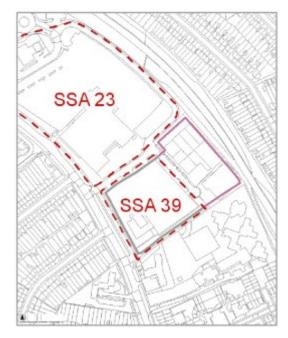
**5.0.2** Once the Core Strategy is adopted a revised proposals map will be published incorporating these changes and unchanged designations from the 2004 UDP proposals map.



Map 3 Wembley Growth Area, Energy Action Plan and Town Centre Boundary







Picture 26 Proposed change to Borough Employment Area - SSA17 Alpine House, Honeypot Lane

