

APPENDIX 1

A NEW PLAN FOR A BETTER BRENT: YOUR VIEWS

Your views will influence Brent's future by helping to shape the Council's new Spatial Plan which aims to ensure that new development is sustainable and located in the most suitable areas where it will most benefit the needs of Brent's residents and workers. Development is sustainable when it meets today's needs without damaging the environment, or wastefully using scarce resources, so as to not worsen the quality of life of both this and future generations.

Need For A New Plan

This new Spatial Plan, required by the Government, aims to better integrate traditional land use issues with wider social, economic and environmental concerns, providing local communities with a greater role in the planning process. It will allow a more strategic and innovative approach to reflecting the Council's and other key agencies' visions for a higher quality of life in Brent. And should help them better implement their strategies for delivering a very wide range of services and facilities.

What Must Be In the Plan?

However, before having your say on shaping Brent's future, you should be aware that the Council does not have a freehand on either the structure or contents of the new plan which must conform to strict legal requirements, so as to deliver the Government's objective of a reformed planning system able to respond more rapidly to change. For example, this new type of plan must include the words 'Local Development Framework' (LDF) in its title and have a 'folder' format to allow change to individual policy documents as required.

More importantly, Brent's new spatial plan must comply with both the Government's national planning strategy and the Mayor of London's city-wide policies in The London Plan. These restraints rule out a number of possible options for Brent's future development. For example, the Council can't decide that the Borough should not plan to provide for any sizable increase in its current population and number of homes (c 260,000 people and 105,000 homes) as this would be contrary to both the Government's fundamental objectives and the Mayor's specific strategy that Brent should make a reasonable contribution to housing London's estimated 800,000 additional residents (by 2016).

What Should Be In the Plan?

A spatial plan for Brent should recognise that change is inevitable, and may often be desirable, by seeking to manage the process of change so that it benefits as many as possible. A spatial plan will seek to control the type and location of new development so that it improves the future quality of life for residents who are badly housed, lacking job opportunities, or living and working in poor quality environments, without proper transport or satisfactory shopping and recreational

facilities. While protecting those parts of the Borough's built up areas and natural environments which offer an existing good quality of life.

This means ensuring that new built development, particularly housing, is confined to previously built areas (brownfield land) so as to avoid the loss of essential open space (greenfield land) and that the more intensive development is concentrated in areas with good public transport so as to reduce traffic congestion and pollution.

It requires careful consideration as to how to make the best and most environmentally sensitive use of Brent's land, which is our scarcest resource as Brent's 4325 hectares of land (c17 sq.miles) cannot be increased. This may require multiple uses wherever possible, e.g. shops, offices, schools and homes on the same site. It also requires recognition that Brent comprises many different areas, from inner city to suburbia, from acute deprivation to relative affluence, each with their different development, enhancement and protection needs. Its population is also one of London's most ethnically and culturally diverse, with many communities having specific needs.

Your Priorities

To help you make an informed choice as to how suitable land can be best developed, and for which purposes, and how the environment can be best protected, the Planning Service has prepared a series of short Issues and Options papers on key topics for your consideration. These Issues and Options have evolved from a detailed background study of the impact of the current Unitary Development Plan (UDP) strategy and policy successes or failure in these topic areas. This information has been published in the Draft UDP Monitoring Report, which is available on our website. Alternatively, printed copies can be provided to those without internet access.

As it essential to ensure the sustainability of future development, the Planning Service has organised an external expert study as to whether the current UDP strategy and policies promotes environmental and social sustainability. This UDP Sustainability Appraisal is also available on our website.

How To Respond

Each Issues and Options paper raises a number of questions. You don't have to reply to all of these but the more answers you provide the better the Council can identify key priorities and preferred options for new strategies and policies. You don't have to give your name and address but if you do so, this will allow us to contact you directly during the next round of consultation to finalise preferred options. If you need more information please contact the Planning Service (contact details overleaf).

STRATEGIC PLANNING OBJECTIVES AND PRIORITIES

In considering how the new plan for the Borough, i.e. the Local Development Framework or LDF, should guide and manage future development, it is important that a clear vision of what the borough should look like in five, ten or even twenty years time is formulated.

Although national Government and the Mayor of London have already set broad strategic parameters for guiding new development, there remains considerable scope for local people to determine how the Borough will develop within those, and some key decisions will have to be made about the direction in which development takes the Borough. For example, the pace of change and renewal can and should be determined locally. It can also be decided whether there should be an emphasis on conserving what already exists or on renewing older or run-down parts of the Borough.

In drawing up a new plan, account needs to be taken of existing strategies and plans which the Council has adopted, generally in consultation with the local community. The preparation of the new plan may also provide an opportunity to review existing strategies. Brent's Community Strategy, for example, sets out an idealised vision for the future of the Borough envisaging 'sustainable development' and 'a safe, green and clean environment' but it does not adequately deal with the development aspects of how that vision will be achieved. On the other hand the Council's Corporate Strategy does identify strategic priorities, such as 'supporting children and young people; promoting quality of life and the green agenda; regeneration and priority neighbourhoods; tackling crime and community safety', but does not provide a vision of the future of the Borough.

In preparing a new development plan (i.e. the LDF) there is an opportunity to review what the strategic priorities for development are and an opportunity for the local community to influence how the Borough will look in the future. There are many issues which the new LDF should address and the Council needs to know what issues the local community consider to be a priority.

Question 1. What do you think are the priorities in considering the future development of the Borough?

	Yes	No	Comments
Sustainable development (e.g. more energy efficient buildings)	<input type="checkbox"/>	<input type="checkbox"/>
Protection of the natural Environment	<input type="checkbox"/>	<input type="checkbox"/>
Conservation of existing suburban character	<input type="checkbox"/>	<input type="checkbox"/>
Regeneration of run-down areas e.g., town centres	<input type="checkbox"/>	<input type="checkbox"/>
Building new homes	<input type="checkbox"/>	<input type="checkbox"/>
Protecting Employment Areas such as Park Royal	<input type="checkbox"/>	<input type="checkbox"/>
Other comments.....		
		
		

The Scale and Pace of Regeneration in the Borough

There are clear choices to be made in the scale and pace of regenerative development wanted in the borough. While the London Plan (which the LDF must be in conformity with) has a clear aim of embracing growth, the LDF can also clearly promote and encourage change across the borough (or in certain parts of it), or it could take a more cautious approach with a greater emphasis on conservation. In the short to medium term, much regenerative development is likely to be driven by including a residential element. This may be purely residential or be mixed use, with the more profitable residential elements often cross subsidising other less profitable uses. This is more likely to make a development viable and for it to be implemented on the ground. For example, it is likely that inclusion of a significant residential component helped to bring forward major mixed use development proposals adjacent to Wembley stadium which is vital to the area's future. Limiting sites to single uses not only fails to make the best use of a precious land resource but is likely to mean that regenerative development will be slower to occur, or that development may not happen at all.

There is a choice within the broad strategy of the plan; either:

- 1.) To encourage residential led development and manage the environmental consequences and resulting pressure on facilities (notably land for schools), but reap the benefits of regenerative development (improved jobs, better shopping facilities, new and more sustainable housing stock): or
- 2.) To limit opportunities for mixed, residential led development that in turn reduces potential impacts on the borough but does not bring forward the regenerative benefits of significant new investment in the borough.

For example, at present the borough has to provide over 9000 new dwellings (between 1997 and 2016) in order to meet current London Plan housing targets. It is currently providing in excess of this (pro-rate since 1997). This is likely to add up to 19,000 residents to the borough by 2016. There is, however, capacity to build at least double this

number of dwellings. The options available are to sustain current rates of residential building, or to reduce or increase the rate. This choice goes to the heart of the need to capture the benefits of regeneration balanced against an obligation to meet the environmental consequences of such regenerative development.

Question 2. Do you think the Council should support regenerative development, with associated growth in housing developmet, or should the Council restrict such growth ?
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Location of Major Regeneration Areas

The Council has concentrated on a number of major regeneration areas such as Wembley Stadium and Town Centre area, and Regeneration housing estates, notably, Chalkhill, Church End, Stonebridge and now south Kilburn. There may be other areas that are felt to be worthy of a concerted regeneration effort. Should the Council continue to expand regenerative development around the Wembley Stadium area?. Also there may be areas in the borough that are in economic, environmental or social decline (or are showing early signs of decline) and need activity to arrest that decline.

Question 3. Are there areas in the borough where regeneration and larger scale development should be encouraged ?
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Question 4. Are there areas in the borough that are in decline that need early intervention to arrest it?
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Priority Land Uses or Themes

The new LDF could accord priorities to certain land uses. In other plans, housing (or affordable housing) for example, has been made a priority land use. Equally a priority could be employment generating activities or mixed uses. An approach that comes out of the London Plan is to promote mixed use development that secures three objectives (a 'triple win') where a site secures employment benefits (more jobs), housing and environmental improvements (to that which existed previously). This could be an alternative to stricter land use zoning in some cases.

Alternatively it may be a particular theme or objective that should be emphasised, for example, meeting sustainability objectives, providing sustainable communities or protecting assets of the borough.

Question 5. Are there any land use priorities that should be stressed within the LDF? Are there any particular themes or objectives that should be emphasised or given priority within the LDF?

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Spatial Expressions of Priorities

The broad type and scale of development and the priorities that could be accorded to particular land uses or themes have been considered. These are likely to give rise to particular spatial expressions of development across the borough. This may be, for example, a policy to concentrate development on major town centres, or on major public transport interchanges, such as designating Wembley as the growth area for the borough. Alternatively a greater spread of development opportunities could be supported. On the other hand It may be appropriate to emphasise areas that would be preserved or protected, such as suburban areas or areas worthy of conservation.

Question 6. Are there any land use priorities that lead to a particular spatial arrangement around the borough?

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A BETTER TOWNSCAPE – BY DESIGN

The built environment is the setting for all our activities within urban areas. The design quality of Brent's built environment is not just about its appearance and attractiveness. It relates to the overall 'form' of developments and their use, i.e. their layout, scale, density, accessibility, landscape, appearance and the way in which areas function through the activities within them, and the relationships this creates.

Our built-environment consists of many elements: from buildings; transport infrastructure, streets; open land and the spaces around them; to trees and other landscape features. It is the result of the collective efforts of developers, architects, planners, engineers, builders, local residents, businesses and administrators, who conceive, fund, design, plan, construct, extend, alter and manage our buildings, streets and public spaces.

The main role of the planning system is to ensure that new developments are well-designed to fit harmoniously into the existing urban fabric, while using limited natural resources efficiently, and facilitating healthy and safe living, working and recreational activities for all members of the community. These issues affect the quality of life of local people by attracting or restricting economic investment, and thus opportunities in their locality for access to jobs, facilities, services, healthy lifestyles, and enjoyment of their surroundings.

ISSUE 1: ARCHITECTURAL QUALITY & DENSITY OF NEW DEVELOPMENT



Design has increased in importance within the planning system particularly over the last 10 years. Urban design is now a recognised link between architects' focus on buildings, transport engineers focus on highways and planners' focus on managing changing uses in towns. How all these elements of the environment fit and function well together, requires learning from the mistakes of the recent past (1950s-70s) and the right kind of policies and standards to ensure more attractive, beneficial and safe places are created now and in the future.

'By Design' was the Government's key guidance document on how urban design should influence planning decisions. Other design guides on housing, improving various aspects of building, street and landscape design, have been produced by the Commission for Architecture and the Built Environment (CABE), English Partnerships, and other major public sector organisations. Government planning guidance set out in PPS1 identifies design as an important means of securing sustainable development.

The Mayor's London Plan has also introduced urban design policies for major developments in London. Brent's adopted UDP introduced a suite of new urban design policies aimed at improving the design quality and safety of buildings, their landscape and streetscape. These policies together with supplementary design guidance, has enabled

the Council to refuse developments with poor designs, therefore making developers think more carefully about how to improve the design of their schemes, and this has led to a higher quality of new architectural schemes in the Borough. Some buildings in Brent have earned a number of commendations and mentions in Civic Trust Awards as a result.

DENSITY

In order to accommodate the number of new homes and other development needed in the next 15 years, the Government's approach to sustainable development supports mostly reusing 'brownfield' sites (those which have been developed before) within urban areas, rather than building on 'greenfield' sites (protected green spaces and the countryside). This means higher residential densities in urban areas, particularly in locations such as town centres and close to transport & other facilities. The Mayor's London Plan also supports higher densities in appropriate locations across London.

What is density?

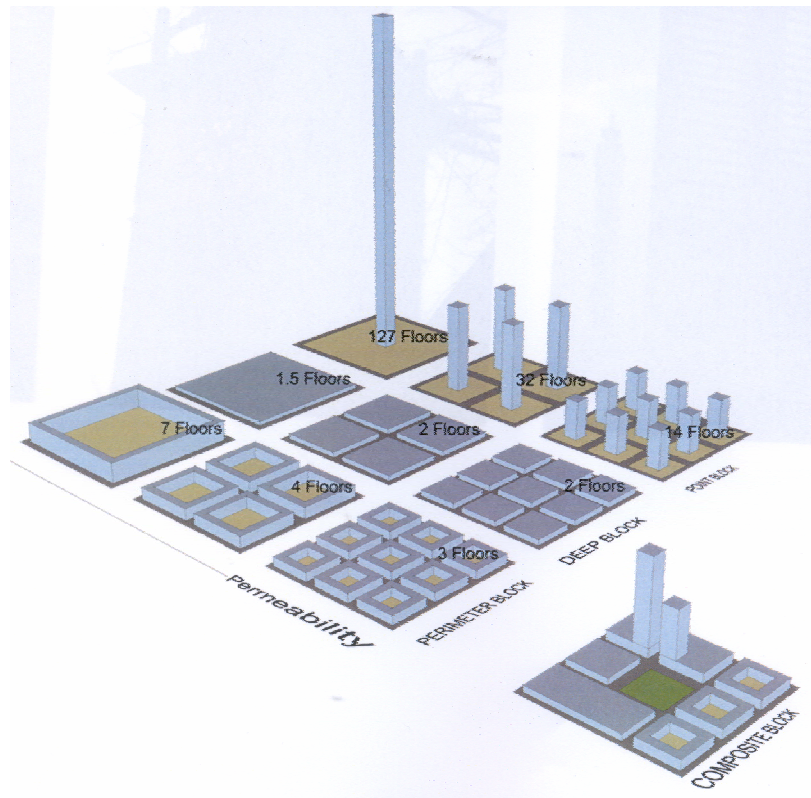
- "The amount of development on any given piece of land" (DTLR/CABE, 2001);
- Can be measured by number of people per hectare, number of dwellings per hectare, or the number of habitable rooms per hectare (hrh). hrh is equivalent to:
 - the number of kitchen/dining rooms, living rooms & bedrooms on 2 football pitches.

INTENSIVE OR HIGH DENSITY DEVELOPMENT CAN BE IN DIFFERENT FORMS:

- High Density –Tall blocks (High-rise buildings or 'skyscrapers')
- High Density –Short blocks ('groundscrapers')
- The Perimeter Block (with a central courtyard)
- Cluster Blocks
- Composite Development (mixed forms)

For example:

- 250-300 habitable rooms a hectare (hrh) = two storey terraced Victorian house
- 350 HRH = a three storey terrace /semi-detached
- 400 HRH = four storey joined blocks of flats
- 600 HRH = twenty storey (set in grounds)



The average density of many well loved Georgian, Victorian and Edwardian terraces often exceeds the limits in many UDPs & local plans. Clearly different forms of higher density are more appropriate to different areas. It cannot be a 'one-size-fits-all' situation. The UDP has earmarked The Wembley Regeneration Area as being suitable for tall buildings, as well as some public transport interchanges (above/next to key tube/rail stations). Their advantages in the right locations, with proper development control safeguards, can include; large public spaces at ground level, large balconies providing flats with space for healthy living; exciting spaces for major retailers on the ground floor, prestigious premises for businesses, high quality urban apartments, exciting and innovative architecture.

Brent's UDP approach supports the more intensive use of land through a design-led approach to achieving high density. It promotes higher densities in appropriate locations including areas of good public transport accessibility and transport interchanges, providing the design is of a standard that can ensure a good quality of life for its occupants. In deciding whether a residential development should be of higher density, the factors considered include;

1. The existing density/ form of the surrounding area (high or low)
2. Whether the site is in a Conservation area or has protected landscape features
3. If the site is in / near a town centre, has good public transport links, or is going to be 'car free' (no car parking spaces on site)
4. Whether there is good road access & the existing traffic levels
5. The proportion of children (many/few children or many/few family units)
6. If the design is of a high quality, including its elevations, scale /height, layout, relationship with adjacent sites/properties, sunlight, privacy;
7. The quality and amount of amenity space (internal and external)
8. The level of on-site management (high or low?)

Suburbs are generally low density residential areas on the edge of towns and cities having tree lined- streets, 2-3 storey detached or semi-detached residential buildings with both front and back gardens. They mainly grew along railway lines and road corridors, include some district, local and neighbourhood centres and inter-war industrial or trading estates, some of which declined and were redeveloped (or are under pressure to become) out-of-town centres.

London's suburbs will also need to contribute towards accommodating some of the future growth, by making more sustainable use of scarce land. The inner city areas have been the focus until recently, and there is a limit to their capacity. In addition, to continue increasing densities in inner areas while ignoring the suburbs would simply increase the gap between these areas. Many suburbs also have problems coping with the effects of car dependence, changing patterns of employment and shopping, and the need to reduce waste. The Mayor has produced a draft 'toolkit' to be used by planners, designers and residents or others concerned about making suburbs more sustainable through carefully managed growth that is appropriate to their particular location and circumstances.

The Mayor's strategy, which Boroughs will have to conform with, is for improvements to public transport in suburban town centres, providing alternatives to car travel, so they can better serve the retail, leisure and service needs of their areas, safeguard/increase jobs in them, and enable selective higher density and more mixed-use sustainable development around these town centres. Improvements to the energy efficiency of existing suburban dwellings will also need to occur gradually as they are refurbished, extended or converted. There is an opportunity to improve the design quality of private and public spaces these areas at the same time.

Question 1: What do you consider is the best way to accommodate the new homes needed in the suburbs and still maintain and enhance their quality?

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Question 2: Are high buildings appropriate in the borough and, if so, where? Yes/No
Comments.....

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ISSUE 2: PUBLIC REALM QUALITY & COMMUNITY SAFETY

Within many of the areas first designated by the UDP in 2000 as being of poor townscape and public realm quality, and targeted for improvements, there have been varying levels of enhancement, mainly through higher design standards being required of new development in those areas. Wembley for example, is now experiencing the redevelopment of the area around the stadium, construction of a new footbridge and square linking it with the town centre, streetscape improvements on the high road itself, and the redevelopment of Wembley Park station (with Wembley Central enhancements and redevelopment of Central Square to follow shortly). There has been a gradual improvement with new shops opening and perceptions of safety in Wembley and Kilburn, although there is still a long way to go.

A Government best practice guide has also recently been published to encourage Local Planning Authorities to better use section 215 of the Planning Act requiring owners of unsightly or derelict land and buildings to improve the condition of such property if these are blighting the local community, and a fine of up to £1,000 can result if it is not done.



The Environmental Improvement Team within Environmental Health now tackles environmental crime on private land. This covers a wide range of activities but specifically includes dumped waste, fly posting, graffiti and dog fouling on private land. The team is also responsible for Alley Gating, which is a preventive measure to minimise environmental crime to properties which front, abut or are accessed via an alley. It is a very simple crime preventative measure, which involves erecting self locking gates to the ends of alley-ways and passages that are the responsibility of the home owners who live around them. 8 alleys were gated last year with 9 scheduled for this year. In addition to reducing the levels of burglaries, other advantages include:-

- Less chance for youths to cause annoyance – e.g. graffiti, drinking in alleys or drugs;
- Reduce the likelihood of dumped or fly-tipped rubbish;
- Fewer problems of dog fouling by stray dogs.
- Safer play areas for children.
- Improving the visual amenity of the area
- Improving community spirit through a sense of ownership of the alleys.

The creation of a new warden’s service, for Brent town centres and housing estates, has also helped improve the perception of safety in these parts of the Borough. There is very good liaison between the Police and planning officers on safety aspects in the design of new developments, and the Police consider the community safety policy in Brent’s UDP a good example for other Boroughs to follow.

Question 3: What further measures do you think should be used to improve the public realm(landscape & streetscape) in areas of low quality?

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Question42: Are there any further aspects of crime prevention and safety through design of developments, that you think should be required of new development? Yes/No

Comments.....
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ISSUE 3: SUSTAINABILITY OF DEVELOPMENTS

The changing climate, increasing pollution, and diminishing natural resources are of concern in many aspects of our lives and have many causes, but the construction and operation of built environment contributes up to 50% of carbon dioxide emissions and a significant proportion of materials consumed, transportation needs and waste generated every year.

Sustainable development is therefore an area of increasing attention. The Government's new Planning Act in 2004 made sustainable development the purpose of the planning system, and the Government has focused in PPS1 on how planning can help deliver sustainable development. This together with Government guidance on the location of major developments which attract a lot of traffic, on pollution, on renewable energy, as well as on noise and flooding risk, should give the planning system more ways to ensure developments are sustainable.

In London, the Mayor's London Plan also has many policies aimed at balancing economic, social and environmental needs to ensure major developments are sustainable. These are backed up by strategies on improving London's air quality, noise, waste reduction, biodiversity and energy performance, with a recent draft guide on sustainable design & construction now available for public consultation. Brent's adopted UDP, 2004 translates these approaches to the local level with policies to help developers consider more of these issues in their proposals and provide clear standards on how planning applications will be decided by taking them into account.

This image shows the 20 South Kilburn Demonstration Homes now being built - one of the block's most unique features will be its 'green' or 'living' roof which will be covered with a dense mat of growing plants. Besides adding visually to the look of the building, a green roof insulates, increases the life of the roof, saves on drainage charges by soaking up rain, creates an ecological habitat, and helps filter out local dust and pollution (South Kilburn is in an area of poor air quality).



Another advantage of seeking higher sustainability standards is that Brent is now becoming an attractive location to green developers who perceive that innovative measures will be sympathetically considered where they bring benefits to the quality of life for local people. Having such best practice local examples will then make it easier to get other developers to raise their standards.

Climate change is increasingly becoming a major development issue internationally, nationally, and

regionally. The seriousness of possible effects on our survival and quality of life in the coming decades, means that more also needs to be done at the local level to ensure that as new development and the upgrading of existing development occurs, we do as much as

possible to ensure they contribute towards a more stable climate and meeting our future needs, as well as those of our children and grandchildren.

In Brent, sustainability criteria are being applied to major developments. The Council's sustainable development Checklist submitted with such planning applications has been a key tool for ensuring major new developments make a positive contribution to measures which counteract the effects of Climate Change and lead to a more sustainable future. This approach concentrates on major applications partly because of the sheer volume of other (small & householder) applications.

A Householder's Guide to Sustainable design & Construction, and a summary leaflet has been produced, which is available on Brent's website, on request, and in selected DIY stores, but it is still only a voluntary guide for residents to consider (if they wish) in their alterations, conversions and extensions. Although each householder application is small in scale, the cumulative effect of these and other small development is considerable, (up to a quarter of the built environment in Brent is renewed in some way over a 10 year period). Major developments each have a bigger impact, but together, account for only a relatively small amount of the development taking place throughout the Borough (there are nearly 4,000 planning applications decided each year, and only 75-90 are major or significant applications). It may thus be reasonable for smaller and householder applications to also be expected to include sustainability measures, although in some cases, this may result in extra cost for the householder in the short term, there are also likely to be medium to long term savings. Some measures are of low/no cost while others even save money upfront.

Question 5. Should the Sustainable design & construction policy be strengthened for major developments? For example, by requiring specific targets (e.g. on waste reduction) to be met through their design Yes /No

Comments:.....
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Question 6. Should householder proposals such as extensions, lofts conversions be required do this in a sustainable way? Yes/No

Comments:.....
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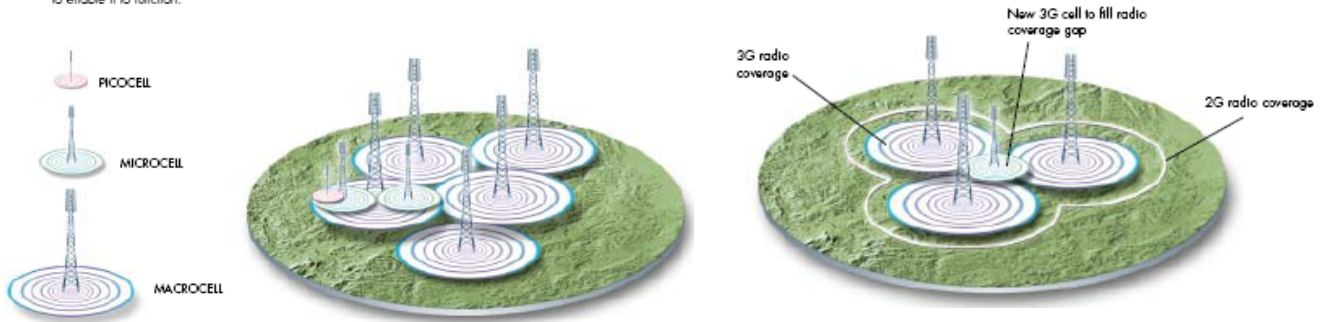
ISSUE 4: TELECOMMUNICATIONS

Government policy on telecommunications equipment is set out in PPG8, 2001. It is based on the findings of the Stewart Report (which advised a precautionary approach) and emphasises the importance of good design in relation to telecommunications development. The Government's policy is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum.

A voluntary Code of Practice was agreed in 2002 with the phone operators for ensuring better communications on applications, with Local Authorities and local people through a hierarchy of consultation procedures. Planning control over installation of satellite (TV) antennas and terrestrial (telephone) antennas have also been relaxed, following the increased miniaturisation of these with technology improvements, and the permitted development rights allowances in the GPDO have been amended accordingly.

The phenomenal take up of mobile phones in the UK (46 million people by 2002) has been a key driver for improved services and coverage. In line with Brent's adopted UDP policy which encourages site-sharing to minimise the proliferation of telecommunications equipment, there has been an intensification of telecommunications masts in existing locations on buildings and structures. The introduction of the third generation (3G) mobile services has also led to some new locations being used, including ground-based masts and the need for additional base stations to ensure greater phone coverage with smaller cells (See explanatory images below from ODPM Code of Practice).

1 Mobile radio telecommunications work on the basis of a series of cells. Each cell requires a radio base station to enable it to function.



Although the location of mobile phone masts and base stations is an issue of concern for many residents, there are no alternative local options (that can be upheld on appeal) to the Government's national planning stance on telecommunications. This is concerned primarily with the aesthetic impact that mobile phone base stations and masts have on the character of the built environment, provided operators demonstrate their equipment and installation meets the established ICNIRP public exposure safety guidelines.

Beyond a precautionary approach by discouraging siting of equipment in very close proximity to schools and hospitals, the Local Planning Authority is not able to successfully refuse to allow such development purely on health grounds elsewhere in the Borough.

2 The base stations are linked together via dish antenna links or occasionally a land line. Mobile switching centres (telephone exchanges) enable the calls to be transferred to their final destination.



The Government's emphasis is on using smaller-scaled equipment where possible, and concealing, disguising or camouflaging new installations to reduce their visual impact. Sensitive users of nearby/adjacent buildings such as nurseries, playgroups, playgrounds and hospitals are however, acknowledged to require higher levels/intensive methods of public consultation, and these are set out in the Code of Practice.

Question 7: Are there types of locations where telecommunications masts & base stations might be better accommodated? Yes/No Comments:

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ENVIRONMENTAL PROTECTION

Environmental Protection is concerned with safeguarding the availability and quality of specific environmental features and resources, such as air, water and land, as well as the generation of energy. These can impact upon the quality of life of local people, and contribute towards achieving regional, national and international objectives for minimising pollution and Climate Change.

Although the remit and main powers for protecting and enhancing watercourses, and prosecuting polluters (amongst other issues) rests primarily with the Environment Agency, the Borough has a complementary, but important role to play at the local level. The Council's Environmental Health unit has specific obligations under the Environment Act 1995, and the Pollution Prevention & Control Act 1999.

The main role of planning is to ensure that there is sufficient control of potentially polluting industries and that they are located in the right places to minimise their effects. Planning should also promote conservation of resources such as water, the remediation and development of contaminated land, improvements to air quality, as well as the take up of appropriate renewable energy in development.

ISSUE 1: NOISE

The key driver for improvements has come from the EC Environmental Noise Directive 2002/49/EC. As a result, the London Road Traffic Noise Map was produced Sept. 2004 as a part of a National Noise Mapping programme.

Emerging requirements from this and the Mayor's Ambient Noise Strategy will include the need to produce Noise Action Plans.

Revisions to Approved document E in the Building Regulations, which deals with noise, came into effect last year. However, while these are still minimum standards, they require conversions to undergo onsite testing of sound insulation levels, or new-build schemes can supply robust details (to a higher standard, allowing for poor workmanship) and get a certificate upon checking by Building Control officers. There are technical challenges in achieving high levels of sound insulation onsite, which may limit the densities of housing and mixed uses that can be achieved at reasonable cost to maintain quality of life standards.

Defra & the GLA are also leading the production of Londonwide construction noise standards.

In terms of operational controls, since 31 March 2004, local authorities have also had new powers to issue Fixed Penalty Notices to those found responsible for domestic night-time noise offences. The Noise Act Circular 2004, provides Defra's interpretation of the new legislation.

Noise is one of the fastest rising forms of pollution within the urban area, and has a serious effect on the quality of life of many residents in the Borough. Members have reported that it is the single most common source of the complaints made by their constituents.

Brent's Monitoring Report 2005 shows the 1999 baseline level of Noise complaints in relation to building density – Note the relatively low complaints from the ongoing work at high density Chalkhill estate.

By 2001, the Noise situation showed the occurrence of complaints from new locations in the north of the Borough, and increases in some hotspots in the south, such as South Kilburn. The GIS map in the Monitoring Report shows the Noise situation in 2003 – again with new complaints in the north and significant increases in the south (Willesden, Kilburn, Harlesden/Kensal Green).

These have implications for noise and vibration levels in terms of the intensity of activities, the condition/sound insulation levels of existing buildings, and the greater mix of uses that policy should permit.

Question 1. Should the density of new development be limited where this is likely to result in noise problems? Yes/ No

Comments.....

ISSUE 2: AIR QUALITY

Brent’s approach to improving air quality is to follow the approach recommended by Government of first monitoring sources of pollutants, then modelling dispersion of pollutants and identifying where national pollution objective levels will be breached, and then declaring Air Quality Management Areas (AQMAs) in these locations.



In following the Government’s approach to meeting Air Quality objectives the Borough has identified and declared parts of the borough AQMAs.

Brent AQMAs:

- The entire area south of the North Circular Road due to the number of times target levels have been breached and because of the presence of many schools and other sensitive sites.
- All main Corridors north of the North Circular Road including all schools and hospitals along the North Circular Road, Bridgewater Road, Ealing Road, Harrow, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Avenue, Forty Lane and East Lane.

Brent’s Action Plan analysis confirmed that Brent would exceed objectives for Nitrogen Dioxide (NO₂) and Fine Particles (PM₁₀) by 2005

Adopted UDP Policies EP3 and EP4 deal with air quality issues. It is also included in UDP Policy BE12 and addressed, within Supplementary Planning Guidance (SPG19) on Sustainable Design Construction & Pollution Control, which gives developers detailed information on a range of measures to reduce the impact of their schemes on poor air quality.

The threshold for applying the Sustainability Checklist in Brent's guidance for new development (SPG12) also awards additional points for applications which take on board measures to help improve air quality, particularly in AQMAs.

A joint Draft Supplementary Planning Document (SPD) on Air Quality has now been produced for the West London Boroughs, in order to develop a coherent approach across the sub region. This will also need to be tailored to specifically meet Brent's needs. It proposes for instance:

- The need to address air quality problems in areas adjacent to AQMA's, and not just those sites within them.
- Transport impact assessments provided by developers need to be tied into air quality assessments and not dealt with separately as currently occurs. Traffic data included in these assessments should also look at predicted traffic movement by Transport for London (TfL) and the London Atmospheric Emissions Inventory by the GLA.
- Where sensitive receptors (homes, schools, healthcare developments) are proposed in AQMAs, a package of measures will be needed to ensure the effect of poor air quality is minimised
- That S106 payments on Air Quality should be sought for developments in or adjacent to AQMAs, where they perform poorly on the sustainability Checklist, are unable to implement sufficient mitigation measures in order to help implement the Air Quality Action Plan.

An emissions database has been commissioned for Wembley, Harlesden and the Brentfield Rd junction with the North Circular Road. It is being produced by the London Research laboratory and should be available in Summer 2005.

<p>Question 2. Are there any areas where you consider may be inappropriate for development because of poor air quality?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

ISSUE 3: CONTAMINATED LAND

Government policy, as set out in Circular 02/2000, comprises the following main elements:

- A) Prevention of new contamination;
- B) Dealing with legacy of contaminated land to ensure sustainable development, the Government's objectives with respect to contaminated land are:
 - *To Identify and remove unacceptable risks to human health and the environment;*
 - *To seek to bring damaged land back into beneficial use; and*
 - *To seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable."*
- C) The 'Suitable for Use' Approach, consisting of three parts:
 - *"ensuring that land is suitable for its current use ...;*
 - *ensuring that land is made suitable for any new use, as planning permission is given for that use... ;*

- *limiting requirements for remediation to the work necessary to prevent unacceptable risks to human health or the environment in relation to the current use or future use of the land for which planning permission is being sought...*

The Circular goes on to state that:

“... limiting remediation costs to what is needed to avoid unacceptable risks will mean that we will be able to recycle more previously developed land than would otherwise be the case, increasing our ability to make beneficial use of the land.”

The Government has since updated its National Planning Policy guidance on Pollution (PPS23) with further details given in a supplementary annex document. The term, ‘Land affected by Contamination’ is used to distinguish the context and scope of planning control.

A Contaminated Land Inspection Strategy was published by the Council in 2002, which is being implemented, in part through desktop research leading to the establishment of a GIS-linked database of land likely to be affected by contamination. A limited programme of remediation of known sites is proposed although, due to scarce resources, the Council is trying to pursue the ‘Polluter Pays’ principle where previous polluting owners can be identified. Mostly however, the burden for remediation of contaminated land is likely to fall on prospective developers.

The Contaminated Land Database (CLD) contains a list of sites recommended under Part 2 of the Act. One issue relates to sites which come forward for development for which, although there are no records of previous contaminating uses, there is likely to have been contamination from unsuitable fill material for made up ground. In these cases, only an intrusive site investigation can confirm the type, level and spread of contaminants. In such instances, the Council is considering requiring such investigations before determining outline planning applications, to ensure the likely issues are known, and appropriate remediation and monitoring conditions can be attached to any consent.

In terms of remediation, although the preferred sustainable approach is to adopt in-situ methods, increasing development pressures and time issues may mean that off-site treatment may be necessary with cleaned material (which requires validation) then being returned to the site prior to development commencing. The Environment Agency is currently looking at the feasibility of different combinations of remediation methods to address this issue and should be publishing its findings shortly. It appears likely however, that developers will be required to allow a lead-in time of at least 6-8 weeks for remediation.

The types of remediation also present issues. On-site encapsulation (tanking and covering with hardstanding) for example, can be the fastest and cheapest option but depends on the nature of contamination, and the sensitivity of the proposed development (whether for housing, education, open spaces, health, etc.) ecological impact. It needs ongoing monitoring and management by independent UKAS accredited consultants. This would need to be assessed on a case by case basis, secured by a S106 planning agreement, and can add to ongoing operational costs for developers.

Question 3. Should developers be required at outline planning stage, to fund the cost of detailed site investigations, where there were no previous industrial uses, but the site might be contaminated?

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ISSUE 4: WATER & FLOOD RISK

The increasing threat from Climate Change is being addressed through a range of planning and other measures. Government planning policy (PPG25) sets out a precautionary approach using a risk-based sequential test for 3 types of zones (little/no risk, low/medium risk, and high risk) with appropriate planning responses for each.



Water is a precious resource and, as the demand for water grows, it becomes increasingly important for us all to use water more wisely. Brent is in the Thames Water region which has one of the UK's highest demand rates and fastest rate of increase in demand as population grows and water use habits change. Although the sewerage system is designed to collect and treat biodegradable wastes, problems occur when some non-biodegradable materials (such as disposable nappies and fats) enter the system. These can result in domestic

sewer flooding and lead to untreated sewage spilling into rivers and streams.

Environment Agency maps showing areas at risk from flooding by watercourses rather than that which may be caused by factors derived from under-capacity in areas south of the borough with Victorian single storm/foul sewers. Already many properties are regularly flooded during heavy rain, mainly due to inadequate capacity and other operational problems. Cross contamination, where increasing volumes of stormwater is joining the foulwater system which doesn't have the capacity and can sometimes overflow, is now recognised as a major problem. Storm water into foul water sewers in the north of the borough has been known to cause back-ups and overflow into gardens. This invasion of raw sewage into property represents both a horrendous experience and a significant health hazard. Misconnections, particularly in conversions and extensions, are also causing pollution of watercourses.

The protection of floodplains and other open spaces which absorb excess rainfall, and directing development away from high risk areas, are important aspects of the planning response to these issues.

There are 2 different flooding issues: Stormwater flooding and Sewerage flooding. Brent has flood hotspot areas which derive from actual incidents rather than theoretic potential as above, and these areas usually have different causes to the above. The issue is aggravated by concreting / paving gardens, patios, extensions and driveways. The issue of surface water run-off from roofs, hard landscaped areas, roads and car parks, in existing and new developments away from risk areas, is one that is now gaining in significance, particularly as the upgrading of storm water drainage infrastructure has not always kept pace with the rate of development. Thames Water are also requiring attenuation tanks to be provided by developers on new large development schemes.

The measures sought from development to minimise the potential for flooding and its effects include green roofs, rainwater harvesting and Sustainable Urban Drainage (SUDS)

methods, although some SUDS are not appropriate in Brent and parts of London due to the clay soil in many parts.

Question 4. In view of the particular flooding problems in parts of Brent, should water quality and conservation be given greater priority in considering new development and conversions in these areas?

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ISSUE 5: ENERGY

The Government has issued new Guidance on Renewables in PPS22. PPS1: *Delivering Sustainable Development* also highlights, as one of its key principles, the requirement for planning policies to address climate change by, amongst other measures, promoting the development of renewable energy resources.



The Mayor of London has also published a London-wide Energy Strategy along with renewable energy toolkits and guides for planners, developers, housing associations. The Mayor will shortly announce the designation of the first 6 Energy Action Areas (EAAs) across London, and the Wembley Regeneration Area may be one of them.

Brent UDP Policies EP14 & BE12 also seek and encourage renewable energy installations or their inclusion within development.

There are a few renewable energy installations in Brent, although none of these were as a result of a requirement of the planning system. Clearly, in view of national and regional policy guidance, much more needs to be done now through the planning system to secure a much higher level of incorporation of renewables in new development (at the early stages when it is more cost-effective) in order to meet targets, and ensure Brent makes its contribution to London’s renewable future.

Although current Brent planning guidance in SPG19 provides developers with guidance on the technologies available, there is now a need to support its implementation by adopting a specific policy target for use of renewables in development schemes, as already done in Boroughs such as Merton, Croydon and others.

All planning officers and Members have now all received renewables training, and further general training will be provided, which should help improve confidence in negotiating on schemes.

Question 5: Is meeting 10% of energy demand through renewables onsite, a reasonable target to include within a new energy policy?

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PLANNING FOR MORE AND BETTER HOUSING

Housing is the most important land use development priority in Brent as it impacts on so many aspects of the Borough's economy, environment and overall quality of life. Too many Brent residents and workers are inadequately housed owing to their inability to find and afford accommodation suitable for their needs because demand for housing far outstrips supply. Others are forced to make long commuting journeys causing traffic congestion and environmental pollution. High housing costs create work force recruitment and retention difficulties, particularly in key service sectors, like education, health and transport. Poor housing conditions generate health and educational under achievement problems affecting residents opportunities and quality of life.

Brent's housing problems cannot be seen in isolation as the Borough is an integral part of the greater London market which requires at least 35,400 additional homes a year but is currently providing less than 25,000. Competition arising from the shortage of suitable housing in Brent has resulted in the tripling of its average home price in the last ten years, the highest increase in London. It has also led to the Council having to provide temporary accommodation for 4,500 'homeless households', many of them housed outside Brent because of the shortage of rental family accommodation.

PLANNING FOR BRENT'S HOUSING NEEDS

Providing high quality, affordable, homes that meet the full range of size and tenure needs, in socially inclusive communities; through enabling the maximum sustainable possible number of new and refurbished homes; without sacrificing environmental quality, nor endangering the land and premises required to provide essential open space, and opportunities for working, shopping and leisure, will be a key objective for Brent's new spatial plan.

Achieving this objective will require devising land use strategies and planning policies which can satisfactorily respond to the following key issues:

ISSUE 1: PROVIDING MORE HOMES

As Brent's current housing stock of 105,000 homes is clearly insufficient to meet its current residents' accommodation needs, the new Plan should make provision for substantially more homes, as the annual new housing level represents less than one percent of this total. Otherwise, house prices will become even more unaffordable, compelling more residents to live in overcrowded accommodation, or 'priced out' of Brent to the disadvantage of the Borough's economy.

Not to plan for further homes is not a realistic option as this would be contrary to the Government's 'Sustainable Communities' strategy which requires Brent to make the best use of all suitable land to provide the maximum number of new homes. It would be difficult to argue that Brent has little further housing capacity as the Government has recently designated Brent as a Housing Opportunity Borough (one of only four in London). While not identifying enough suitable sites for new housing would make it much more difficult for the Council to resist speculative housing proposals on sites which are needed to maintain opportunities for employment, community and open space uses.

Furthermore, the Mayor of London has set a specific target in The London Plan for Brent to provide a minimum of 13,510 additional homes between 1997-2016, a target which is likely to be significantly increased when it is reviewed next year. Although this is a challenging objective, the Borough has been able to meet its London Plan target for the period 1997-2003 with an additional 6,278 homes built, converted or brought back into use.

How Many New Homes Should Be Provided

Question 1. Should the Council plan for the minimum number of homes required by The London Plan target? Yes/No

Comments.....
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Question 2. Should the Council encourage the maximum number of new homes consistent with maintaining sustainable communities and the quality of the environment? Yes/No

Comments.....
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PLANNING FOR BRENT’S HOUSING NEEDS

Providing high quality, affordable, homes that meet the full range of size and tenure needs, in socially inclusive communities, through enabling the maximum sustainable possible number of new and refurbished homes, that meet the challenges posed by climatic change; without sacrificing environmental quality; nor endangering the land and premises required to provide essential open space, and opportunities for working, shopping and leisure, will be a key objective for Brent’s new spatial plan.

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Comments.....

Question 2. Should the Council encourage the maximum number of new homes consistent with maintaining sustainable communities and the quality of the environment? Yes/No
Comments.....

ISSUE 2: LOCATION OF NEW HOMES

The Council considers that Brent can provide substantially more housing without the loss of open space, or damaging the Borough’s environment and quality of life, particularly as the Government’s and Mayor’s emphasis on ensuring the sustainability of new housing means that the Council now has greater planning powers to ensure that new housing is better located, designed and built than much of the Borough’s housing stock. This makes it possible to prevent the reoccurrence of the problems that resulted from the poorly planned intensive housing developments of the 1950’s – 1970’s period which many people associate, mistakenly, with higher density housing.

Higher density housing does not necessarily mean ‘high rise’, tower block type housing, which in fact was often built at densities lower than the traditional 19th century terraced streets. Density is simply a measurement of how many homes are built on a specific area of land, normally a hectare. Different sites have different maximum sustainable density potential, according to a number of variable factors, particularly distance from good public transport links. Brent was one of the first boroughs in London to specifically assess the potential housing capacity of individual sites, so that the number and type of housing built is the most suitable for that particular location. In some locations, the best use of the site is for a combination of commercial, retail and housing uses (mixed use). The large housing schemes which will transform the area near Wembley Stadium have been made possible by this strategy.

Other areas in Brent which may be particularly suitable for higher density housing include town centres, where new housing can also assist the retention and provision of new shops and leisure facilities, and near railway and underground stations. Sites no longer needed to provide employment uses may often be suitable for housing development with a wide

range of densities. Some suburban locations may also offer opportunities for more intensive housing development, although still at a lower density than many other areas. New housing can also be the key to the regeneration of deprived areas through the creation of more socially mixed communities and improved shopping and leisure opportunities.

Preferred Location for Housing Development

Question 3. The most suitable area(s) in Brent for higher density housing schemes are?

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Question 4. The most suitable area(s) in Brent for lower density housing schemes are?

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Question 5. Which areas in Brent would generally benefit from new housing, not necessarily higher density?

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ISSUE 3: AFFORDABLE HOMES

Brent has relatively high house prices but its residents have relatively low incomes, £6,000 lower than the London average. More affordable housing should be a key Brent planning priority. Brent’s UDP, in line with The London Plan, seeks to ensure that 50% of new homes should be affordable. Although Brent actually met this target by providing 2,648 additional affordable homes between 1997-2003, this was still far less than the annual requirement for 3,386 affordable homes identified in the Brent Housing Needs Study (2004). As this affordable housing need represents more than three times Brent’s total recent annual new homes output, there is a need both to consider increasing the affordable housing requirement and ensuring that the affordable housing provided better meets Brent’s priority needs.

Proposed Government changes may permit Brent to require affordable housing on sites lower than the current UDP’s 15 dwellings capacity threshold and to seek more than 50% affordable housing on suitable sites. However, it may be necessary to consider a lower requirement for smaller sites. as affordable housing requirements must consider the viability or practicality of such provision.

While these proposals could substantially increase the total amount of affordable homes, it is equally important to ensure that the right type of affordable homes are provided. Brent’s current affordable housing strategy, in line with The London Plan, requires that affordable housing should be provided ‘on site’. And that 70% of new affordable housing should be ‘social rental’, as only 32% of the Borough’s residents with priority housing needs could afford the various ‘intermediate’ types of affordable housing, such as ‘shared ownership’ (part purchase/part rent). As intermediate housing usually means small homes, particularly flats, most families with children who cannot afford to buy or rent market housing are dependent on social rental.

Unfortunately, it is becoming increasingly difficult to provide social rental larger family homes. Firstly, because many of the sites most capable of intensive housing development, particularly flats above shops and other commercial uses, are the least suitable for accommodating families with children. And secondly, this problem is further compounded by the Government’s funding regime, which emphasises the number of new affordable

homes, rather than the appropriate type, and fails to properly appreciate the extra costs involved in building new social rental family housing with the necessary amenities. It may therefore be necessary for the new Plan to better emphasise the required type, rather than the number of affordable homes, and to require developers to provide on other sites, or fund the purchase of existing, larger homes which cannot reasonably be provided on the main site.

Affordable Housing

**Question 6. Should affordable housing be required on sites lower than 15 homes? Yes/No
If so, what, if any, affordable housing threshold size should apply?**

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**Question 7. Should more than 50% affordable housing be required on larger sites? Yes/No
If so, what should be the affordable housing requirement?**

.....

Preferred Type of Affordable Housing

**Question 8. Should Planning policy emphasise the number or type of affordable housing?
Yes/No
Comments.....**

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Question 9. Which should be prioritised, social rental or intermediate housing?

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ISSUE 4: FAMILY HOUSING

Ensuring sufficient family housing provision is a particular concern in a Borough with the second highest household size in London and where 23% are living in overcrowded accommodation, one of the highest levels in Britain. This problem is exacerbated by the fact that Brent is not providing sufficient new family housing, particularly for larger households. As almost 75% of the self contained homes provided between 1997 - 2003 were one/two bedroom houses and flats; mostly flats which accounted for nearly 75% of self contained homes.

This means very long waiting lists for social rental tenants needing larger family accommodation. And increased prices for families needing to buy larger homes as many of these are 'under -occupied' by those who can afford more space than their household size requires. A substantial proportion of dwellings with two or more bedrooms have also been purchased in recent years by investors to rent to non-child households.

As already noticed, the low proportion of new larger family homes is, partly, the consequence of intensive housing development in areas, such as town centres and near railway stations, which do not afford a 'child friendly environment', in terms of play opportunities and other amenities. Redressing this imbalance may require that family housing should be prioritised in other areas, less suitable for intensive housing

development. And it may also be necessary to ensure that current family sized houses are not lost through conversion schemes, or changes of use to other forms of housing, which do not re-provide a comparable family size flat or maisonette.

Developers also seem to be taking advantage of the restrictive UDP definition of a family home, as only comprising two bedrooms, and the complementary weak 'dwelling mix' requirement, to provide mostly smaller homes. It may therefore be necessary to either redefine a family unit as comprising three bedrooms, or require the dwelling mix to include a specified proportion of large family sized homes in suitable developments. Such a strategy would have to be sufficiently flexible to recognise that family housing is 'land hungry', has significant educational and other infrastructural requirements, and may not be suitable on the upper floors in more intensive housing developments.

Family Housing

Question 10. Should more family homes be provided? Yes/ No
Comments.....

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Question 11. What should be the minimum number of bedrooms in a family home?

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ISSUE 5: OTHER HOUSING NEEDS

Providing housing suitable for people with mobility disabilities has traditionally been a planning problem owing to the Government's insistence, until recently, that this was not a proper planning issue. However, The London Plan requires that all new housing should be constructed to 'mobility housing standards', with level access and downstairs toilet etc, to enable use from childhood to old age. While this could provide housing suitable for about half of the wheelchair users, there is still an estimated requirement for 1,252 new wheelchair accessible homes. Satisfying this unmet need will require a new policy requirement, in accordance with The London Plan's requirement that 10% of new housing should be wheelchair accessible/adaptable. But it may only be possible to require wheelchair accessible homes in larger housing schemes, ideally on the ground floor.

Wheelchair Accessible Housing

Question 12. Should there be a specific wheelchair housing policy requirement on larger sites?

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An aging population will mean an increased need for Special Needs Housing, such as sheltered accommodation and nursing homes etc. Much of the current provision has been provided through the conversion and replacement of large family homes. Further provision in this important sector will, however, have to balance the needs for such accommodation against the loss of family housing. Accommodation specifically designed for predominantly elderly users can also overstress the existing health and social services facilities in some areas, to the level where it may be necessary to consider restricting or confining further

provision, in or to specific locations, and better ensure that they essentially satisfy Brent's pressing needs.

How and Where to Provide Special Needs Housing

Question 13. Should this housing type be provided at the expense of existing family homes?

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Question 14. Should this housing type be restricted to particular areas?

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TRANSPORT

The LDF will have a significant role in applying transport policy locally. However, the role of planning is limited to what can be achieved on the development of land and cannot, for example, have a direct impact on people's decisions on whether and how they will travel. It can however have an indirect effect in that when making decisions on development proposals the effects on transport networks needs to be taken into account and any adverse effects, such as an increase in traffic congestion, can be mitigated. Planning can also indirectly affect people's choice of transport modes by, for example, promoting development of new shopping facilities, or other uses that generate significant numbers of trips, in town centres where public transport access is good and by restricting development in out-of-town locations which are likely to be accessible only by car.

ISSUE 1: TRAFFIC GROWTH AND CONGESTION

The main problem is that of the growth in the amount of traffic and the consequential effects on the environment. Not only does this increase traffic congestion, causing frustration and delay as well as harming the local economy, but it also harms the environment in other ways. It increases air pollution, with various impacts on health, and also contributes to climate change through the emission of green-house gases. These concerns are reflected in Government planning guidance and the White Paper on Integrated Transport in 1998. The White Paper aims to encourage people to reduce car usage in favour of more environmentally-friendly modes through measures such as better land-use planning and greater parking restrictions as well as better investment in public transport.

The problem of traffic growth is one of the main areas being tackled by the Mayor of London through his own Transport Strategy and his guidance to boroughs on the preparation of borough Local Implementation Plans (LIP). Brent is preparing its own LIP and the LDF should be co-ordinated with this. The target in the mayor's strategy for Brent and other outer boroughs is to "noticeably reduce the growth in traffic that would occurif present trends were to continue".

Many Brent residents suffer from the harmful impacts of growing traffic levels although 37% of Brent households do not own or have access to a car. Many of the problems are caused by traffic travelling through the Borough rather than commencing or ending journeys within it. The advantage of non-car modes in reducing the environmental impact of travel is demonstrated below.

Environmental Impact of Different Modes of Motorised Transport

	<u>Energy</u>	<u>Pollution</u> -Particulates	<u>Noise</u> Decibels
	(Index v. Bus=1)		
Car	2.3	1.5	3.8
Bus	1.0	1.0	1.0
Tube	1.4	0.2	<0.001

Source: LT (1995) and AEA Technology (1994) - data applies to London, adjusted for patronage.

Question 1. What do you think are the best ways of reducing the impact of traffic on the residents of Brent?	Yes	No	Comments
<i>Making new trip-generating development accessible</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Restricting available parking</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Increasing funding for non-car modes</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>More space for pedestrians</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>More bus-priority measures</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Increase road space</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Provide parking for everyone who wants it</i>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 2: PARKING

Whilst encouraging people to use public transport, cycle or walk is important in reversing the trend of growing traffic levels, other more direct means can be used to reduce car usage. The ease of finding a parking space at the end of a journey is one of the most influential factors in a person's decision whether or not to use a car. By restricting the availability of parking it is possible to directly influence people's choice of mode of travel.

Government policy for parking provided on new development is to apply maximum standards so as to use parking as a means of restraint on car use. This approach is also reflected in the Mayor's London Plan, where maximum parking standards are set out as a range depending upon location and the level of public transport access. Boroughs are asked, when applying the standards at a local level, to take account of the level of public transport accessibility in the area in which a development proposal is located.

Brent's current parking standards set out in the UDP 2004. These apply different standards to different types of use and take only limited account of public transport accessibility levels and not for all use types. They are, however, maximum standards and

are a means for restraining car usage and should not therefore be exceeded. A recent survey of the implementation of the standards for new housing developments, introduced in 1998, found that there was little evidence of any problems in their implementation and residents were generally satisfied with the amount of parking that was being provided on new housing schemes.

Question 2. Do you think that current parking standards are appropriate or do you think that these should be changed? Should they:			
	Yes	No	Comments
Allow less parking therefore further restrain car use?	<input type="checkbox"/>	<input type="checkbox"/>
Be based on public transport accessibility?	<input type="checkbox"/>	<input type="checkbox"/>
Allow for more parking in areas where regeneration is a priority?	<input type="checkbox"/>	<input type="checkbox"/>
Allow for car-free residential development where there are controlled parking zones?	<input type="checkbox"/>	<input type="checkbox"/>
Allow higher levels of parking?	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>
Any other comments.....		

ISSUE 3: PUBLIC TRANSPORT

Brent benefits from a relatively good public transport network including rail, tube and buses. However, there are problems associated with reliability and frequency of service. With the dropping of major schemes such as Crossrail, there are no major new infrastructural proposals in the pipeline apart from station improvements associated with the regeneration of the Wembley area, especially the new National Stadium. In order to implement major public transport improvements there is a reliance on funding from national government or TfL. However, the Council can get funding for more modest public transport improvements through a requirement for developers to enter into section 106 agreements to implement measures that are made necessary by the development proposal. The sorts of schemes that can be implemented to improve the efficiency of public transport are, for example, implementing more bus priority measures and introducing real-time displays, etc. rates of usage show that after a number of years of declining passenger numbers on buses in London, there have been significant rises in recent years.

Question 3. How do you think that public transport services can be realistically improved? Should the Council treat public transport improvements as a higher priority than highway improvements?
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ISSUE 4: WALKING AND CYCLING

It is important to encourage more people to walk for short journeys rather than use their car, not only to reduce congestion but also to improve the general health of the population. Although walking already accounts for a third of journeys in London, this can be substantially increased as over 20% of journeys of less than 500 metres are made by car. It is important, therefore that new development is located where walking is a viable form of access and that funds are invested in promoting pedestrian routes such as that proposed to link the new Stadium with Wembley town centre.

Cycling is also a viable alternative means of transport for many local journeys. Improving facilities for cyclists can encourage more people to cycle rather than using their car. The London Cycle Network is intended to provide over 2000 km of safe, signed cycle routes. Cycle parking facilities can also be increased at railway and tube stations, in town centres, and at schools, hospitals and leisure facilities.

Question 5. When funding is obtained through section 106 agreements to be made available for non-car modes, should this be spent as a priority on:-			
	Yes	No	Comments
Promoting walking?	<input type="checkbox"/>	<input type="checkbox"/>
Promoting cycling and improving cycling facilities?	<input type="checkbox"/>	<input type="checkbox"/>
Public Transport?	<input type="checkbox"/>	<input type="checkbox"/>
		
		
		

EMPLOYMENT

One of the objectives of planning policy is to maintain and protect employment opportunities. This not only helps ensure that jobs are plentiful and varied locally, but it also helps promote a strong and diverse local economy with the benefits this brings to the community in terms of increasing prosperity. Current policies towards industry, business and warehousing developments aim to make the Borough an attractive place for workers and employers alike and to widen access among Borough residents to job opportunities in the Borough. Policies also aim to encourage regeneration of the borough's main employment areas both to benefit existing businesses but also to attract new employment in the industrial, business and office sectors by ensuring that a wide range of different types of premises are available..

Although the primary aim of planning policies is to ensure that development opportunities exist for business and industry, and that existing businesses are protected from the impact of pressures for higher value development, it is important to recognise that employment is provided by a range of activities and that there is less reliance upon the traditional sources of employment in the Borough's industrial estates as was the case 20 or so years ago. Most employment is now provided by the service sector which means that major regenerative development such as that taking place at Wembley is vitally important to the future prosperity of the Borough.

Brent has a variety of industrial areas ranging in size and importance from the largest estates with strategic significance, e.g. Park Royal, other areas which make a major contribution to employment provision and the local economy but which may not be as well placed strategically, down to small sites whose importance is in providing local employment opportunities. These areas are categorised as either Strategic or Borough Employment areas or Local Employment Sites. There are major differences between the North and particularly the South-West of the Borough which have major sites, and the South-East which has scattered smaller sites in residential areas. The current framework is designed to take account and manage the issues arising from this.

ISSUE 1. PROTECTION OF STRATEGIC AND BOROUGH EMPLOYMENT AREAS

Of the areas that are best suited to retention in industrial use, four of them have significance to London as a whole and are recognised in Strategic Planning Guidance for London as Preferred Industrial Locations and / or Business Parks. These are;

- Park Royal (including Beresford and Abbeydale Estates, and the part of Hythe Road area in Brent);
- Wembley Stadium / Neasden;
- Staples Corner; and
- East Lane.

In addition a number of other areas are also considered well suited to retention in industrial use because they are cohesive areas which benefit from good, direct access from main roads and are generally capable of accommodating industrial uses, including bad-neighbour uses, without significant adverse impact on residential amenity. These are called Borough Employment Areas. There are 7 in total such as Honeypot Lane, Church End and Kingsbury.

The aim of Council policy to protect such areas from the incursion of other land uses such as retailing has been successful and there has been only a small increase in vacancy

levels in recent years. However, there is major pressure on land because of a need for new housing and the community infrastructure needed to support the new population new housing will bring.

Current national government policy for employment land is set out in Planning Policy Guidance note 4 *Industrial and Commercial Development and Small Firms* (November 1992). This states that the core consideration is to ensure that the development needs of commerce and industry are met, and reconciled with demands for other forms of development and with the protection of the environment.

London-wide policy provided by the London Plan aims to make London a more prosperous city with strong and diverse economic growth through, for example, creating incentives and opportunities to stimulate the supply of suitable floorspace in the right locations. It promotes the release of employment land that is no longer needed in its current use for new uses.

Question 1. Strategic and Borough Employment Areas (SEAs and BEAs)			
	Yes	No	Comments
Should the protection of existing employment areas be continued?	<input type="checkbox"/>	<input type="checkbox"/>
Should this level of protection be extended to other areas?	<input type="checkbox"/>	<input type="checkbox"/>
Should policy continue to strongly resist housing development in SEAs and BEAs?	<input type="checkbox"/>	<input type="checkbox"/>
Should more mixed use development be permitted in SEAs and BEAs?	<input type="checkbox"/>	<input type="checkbox"/>
Are there any parts of SEAs BEAs that should no longer be protected for employment use? If so where?	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 2. LOCAL EMPLOYMENT SITES (LESSs)

Whilst the Strategic and Borough Employment Areas are the focus for major industrial activities, many other locations throughout the Borough are in industrial and other forms of employment use (called Local Employment Sites). Such sites are generally not as well located in terms of access to the strategic road network and some sites are in primarily residential areas. Nevertheless, they do provide valuable local employment and, where they do not cause environmental problems alternative use is not generally allowed under current policy unless it can be demonstrated that there is no demand for the site for employment use.

Over the years a number of local sites have been developed for other purposes and they have been a particularly valuable source of new housing sites. However, they are also a valuable source of local employment and often provide jobs at a higher density than the

strategic employment locations. As the number of such sites remaining in employment use diminishes then they become a less available source of new housing land.

Question 2. Local Employment Sites (LESSs)			
	Yes	No	Comments
Should the loss of all LESSs to alternative use be permitted?	<input type="checkbox"/>	<input type="checkbox"/>
Should the loss be permitted as an exception only for affordable housing?	<input type="checkbox"/>	<input type="checkbox"/>
Should occupied LESSs be protected for employment use?	<input type="checkbox"/>	<input type="checkbox"/>
Should mixed use development be permitted in LESSs?	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 3. OFFICES

Although certain business uses, such as light industry or research and development, are acceptable in certain easily-accessible parts of employment areas, the Council currently limits the development of purpose-built offices to town centres. This is a requirement of Government policy, set out in Planning Policy Statement 6 on Town Centres and Retail Development, which applies a sequential approach to the development of offices. This means that only if sites are not available in or on the edge of town centres will the development of offices outside town centres be permitted. Although current policy in Brent also allows for the development of major offices in the Wembley Stadium area and parts of Park Royal, the reality has been that there is very little demand in the Borough for major new offices and in recent years a number of large office buildings have been converted for other uses such as educational use or hotels.

Question 3. Office Development.			
	Yes	No	Comments
Should major office development only be permitted in town centres	<input type="checkbox"/>	<input type="checkbox"/>
Should office development also be allowed on designated business parks such as in Park Royal?	<input type="checkbox"/>	<input type="checkbox"/>
Should major offices be allowed throughout SEAs and BEAs?	<input type="checkbox"/>	<input type="checkbox"/>
Should vacant office buildings be converted to other uses, including housing?	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 4. WORK-LIVE SCHEMES

A recent phenomenon in Brent has been the development of a number of work-live schemes in the Borough. Work live developments in Brent tend to be speculative, often deriving from the site specific requirement to develop employment rather than residential

schemes, with relatively little end user consideration. This has led to subsequent claims that they cannot market their work-live units, and thus requests for a change to pure residential use, by developers who have failed to appreciate that work-live is essentially a niche market sector which must be properly targeted.

Question 4. Work- Live Development.			
	Yes	No	Comments
Should Work-Live schemes be permitted within SEAs or BEAs?	<input type="checkbox"/>	<input type="checkbox"/>
Should Work-Live schemes be permitted within LESSs?	<input type="checkbox"/>	<input type="checkbox"/>
Should a high ratio of work to live floorspace (e.g. 70%) be applied?	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 5. MIXED USE

Mixed use in this context refers to the introduction of non industrial uses into industrial areas. This can be either as part of a comprehensive redevelopment scheme or through the intensification of existing areas. Mixed use can provide many opportunities but also presents conflicts. It is essentially concerned with maximising land opportunities where there will be no overall loss of employment provision, therefore it would be important for the net employment floorspace to be retained. Mixed use may be most attractive in areas of high public transport accessibility. The uses to be mixed would need to be carefully considered for their compatibility and a detailed design-led approach will be often necessary. Careful spatial segregation of some uses will still be necessary.

Question 5. Mixed Use.			
	Yes	No	Comments
Is mixed use development appropriate in SEAs or BEAs?	<input type="checkbox"/>	<input type="checkbox"/>
If so which uses should be allowed?		
Should sites be identified where mixed use is appropriate?	<input type="checkbox"/>	<input type="checkbox"/>
Are there particular parts of SEAs or BEAs where mixed use is appropriate?	<input type="checkbox"/>	<input type="checkbox"/>

TOWN CENTRES & SHOPPING

Town centres serve as a focal area within local communities. They provide the main local sources of essential food, goods and services, as well as opportunities for leisure and civic pride.

Town centres within the Borough range from Major centres such as Wembley and Kilburn, Main district centres, such as Willesden Green and Harlesden, and Other district centres such as Neasden and Queens Park to local centres and parades.

The main role of the planning system is to ensure that there is sufficient local provision of goods and services and that they are located in accessible places. Planning should promote the vitality (liveliness) and viability (economic prospects) of existing town centres, and facilitate their growth and development.

ISSUE 1: LOCATION OF DEVELOPMENTS

The Government's main approach (PPG6, 1996) has been to direct Boroughs to focus developments that attract a lot of people to locate in town centres. This applies not only to retail (shops), but also to leisure (cinemas, theatres, restaurants, etc.) major hotels and offices.

This is in order to reduce the need to travel far, reduce car dependency and its negative effects on the environment, reduce the exclusion of those without cars being unable to easily get to such facilities, promote the improvement of public transport, and ensure continued investment in town centres so their environment can be regenerated with local employment opportunities to benefit the whole community.

New Planning Policy Statement 6 (PPS6, 2005) continues this approach, but expects Boroughs to find more suitable sites in or on the edge of town centres, and gives retailers more flexibility. Elsewhere, a curb on the spread of out-of-town retail development is evident in the removal of the right to change a motor showroom to A1 retail use and the uncertainty about retail warehouse club stores has been clarified by their removal from the Use Classes Order (UCO) so will now need planning permission for change of use.

In the 10 years before 1996, 6 times more new retail development took place outside town centres (in out of centre locations) than within town centres. Since then, the balance has been shifting into, or on the edge of, town centres (in terms of food stores for instance – ASDA in Wembley Park, Sainsburys in Kenton, Somerfield & Sainsburys Local in Willesden Green, Budgens in Harlesden).

This is also reflected in the fall in vacancies within many of Brent's town centres, particularly since 1997, (helped by more leisure/service units in Wembley, Willesden Green, Kilburn and Harlesden) and the annual increases in primary shopping rents in Kilburn during the same period and Wembley (since 2001) after years of previous stagnation in rental levels. (See tables below from Colliers CRE research bulletins).

The top performing centres within London during the 12 months to May 2004 has included Wembley 3rd with a (22.2%) growth in rents behind Holloway, and Islington, while Kilburn comes in 9th place. Nationally Wembley came in 12th.

These improvements are fragile however, and could still be compromised by new or improved out-of-centre shopping provision.

Fig.9: Top Performing Centres in UK Over Past 12 Months (% Change in Prime Rents, May 2003 to May 2004)

Centre	Prime Rent Epsf		Rental Growth
	2003	2004	2003-2004
1 Holloway	75	105	40%
2= Ross on Wye	30	40	33%
2= Weybridge	45	60	33%
2= Witham	30	40	33%
5 Dawsbury	50	65	30%
6 Monmouth	35	45	29%
7 Stafford	75	95	27%
8 Banbury	95	120	26%
9= Arbroath	20	25	25%
9= Gainsborough	20	25	25%
11 Islington	130	160	23%
12= Aldershot	45	55	22%
12= Bracknell	90	110	22%
12= Loughton	45	55	22%
12= Wembley	45	55	22%

Fig.7: Top Performing Centres Over Past 12 Months (% Change in Prime Rents, May 2003 to May 2004)

Centre	Rental Growth 2003-2004	Sub-Region
1 Holloway	40.0%	Outer London
2 Islington	23.1%	Outer London
3 Wembley	22.2%	Outer London
4= Barking	16.7%	Outer London
4= Enfield	16.7%	Outer London
6 Stratford	15.8%	Outer London
7 Dagenham	14.3%	Outer London
8 Southall	13.3%	Outer London
9= Hornchurch	12.5%	Outer London
9= Kilburn	12.5%	Outer London
9= Teddington	12.5%	Outer London

Question 1. The pressure for development of extensions to existing out-of-centre superstores and retail warehouses, which could impact on the investment in, and regeneration of, town centres. Should clear size limits be set in policy? Yes/ No
Comments.....

Question 2. The threat of mezzanine and other internal floorspace additions (although this would be minimised if Government consultation on a 200msq threshold for planning permission was adopted as policy). Should policy consider removal of Permitted Development rights locally? Yes /No
Comments.....

Question 3. The pressure by superstores (more suited to Major or Main centres) to locate on edge-of-smaller district/ local centre sites leading to adverse impact on them. Should policy set clear limits for such centres? Yes/No
Comments.....

Question 4. The greater use of Compulsory Purpose Order powers to assemble sufficient/suitable sites in centres needing regeneration. Should policy specify CPOs to assemble sites? Yes/No
Comments.....

ISSUE 2: FOOD & DRINK USES

Planning permission is required for material change of use of buildings and land. However, some uses are so similar in land-use planning terms - for example, noise, traffic generation, visual appearance, and parking - that an application for planning permission to change between them might be considered too time-consuming and unproductive.

In order to reduce the number of unnecessary applications dealt with by the planning system, the Town and Country Planning Act 1990 excludes from the definition of development (and hence from planning control) any change of use where both existing and proposed uses fall within one class of the Use Classes Order (UCO). The UCO is permissive. It removes the need for planning permission between certain specified uses.

Previously restaurants, pubs and takeaways were in the same A3 class, meaning they could be changed into one of the other uses without planning permission. They have now been separated into specific use classes. Circular 3/2005 explains the new provisions. The Use Classes (Amendment) Order 2005 came into force on 21 April 2005:

- Class A3 restricted to restaurants and cafes
- New A4 Class, Drinking Establishments
- New A5 Class, Hot Food Takeaways
- Night Club use expressly excluded from the Order and planning permission will be required to convert any building into a nightclub
- Internet Cafes reclassified as A1 Shops

Public houses and bars

Most complaints from individuals and groups had raised concerns about the A3 food and drink Use Class with problems of noise, particularly from bars being the biggest cause. Another major concern was an increase in crime and anti-social behaviour. Also, the hours of operation, although subject to licensing control, affects the levels of disturbance caused.

Other environmental concerns have included difficulties in servicing of premises by refuse and cleansing vehicles, leading to an increase in the amount of rubbish on the streets. There have also been problems with noise and air quality relating to the smells and fumes from ducts and ventilation shafts in food establishments.

Fast-food takeaways

Previously, because pubs and restaurants were under the same classification, this allowed fast-food chains to buy former pubs and convert them into fast-food restaurants without the need for planning permission.

Many local residents have concerns about the loss of a local facility, which arise because pubs in peripheral locations are attractive to fast-food developers due to their large car parks, and proximity to space needed to develop a drive-through facility. Many of the premises taken up by fast-food operators to date have been ones where the pub was closed down or sold by the breweries on the basis that they are no longer viable, although this is not always the case.

Other concerns related to the impacts of fast-food takeaways with regard to traffic, in particular, noise, safety and air pollution. The car traffic generated by takeaways can be significant, with trips at unsociable hours and the disturbance associated with short term on-street parking. Environmental health provisions deal with the nuisance that can arise from cooking smells and extractor fan noise. However, the pattern of activity arising from takeaways can involve late night use and the congregation of groups of people in the vicinity, similar in some ways to pubs and clubs. But unlike these uses, there are no licensing provisions to help manage use of the premises or to place any onus on the operators to influence the behaviour of customers.

The changes to the UCO should have significant implications for local amenity in Brent and these are likely to be positive. The Council will be able to control changes of use from restaurants and cafes (which are unlikely to have an impact on local amenity) into pubs

and bars or takeaways, from which disturbance has been a major problem in certain parts of the Borough. The changes could help Brent get the right balance of businesses on the high street, boosting the evening economy.

It should enable the Council to exercise better control over the further development of potentially disruptive night time uses by clamping down on the proliferation of pubs, takeaways and nightclubs. This should limit associated noise and other disturbances caused to local amenity, thereby enhancing the quality of life for local residents in Brent.

Options include where feasible, changing existing blanket restrictions on A3 uses in primary shopping frontages, and instead, setting different ratios of shopping, leisure and service uses appropriate to particular types of centres, to help their specialisation to occur where necessary and help secure the future of otherwise marginal smaller district centres.

Question 5. Should higher proportions of restaurants, pubs and bars be encouraged in Wembley town centre for instance, to take pressure off centres such as Willesden and Neasden? Yes/No

Comments:.....
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LEISURE AND TOURISM

Leisure and tourism activities contribute to the vitality and diversity of town centres – during the day, in the evening and at night, and are important to the local economy. Activities can also improve one’s physical and mental well being by providing relaxation and pleasure time, away from the working environment.

Leisure and tourism uses include museums, art galleries, theatres, sporting and recreational facilities, snooker halls, nightclubs, cinemas, concert venues, casinos, bingo halls, gyms, swimming pools, hotels, and other tourism related facilities. Shopping and open space activities such as participation in outdoor active sport are also considered leisure pastimes but are dealt with in papers on Town Centres and Shopping, and Open Space.

Some of the main leisure and tourist facilities in Brent include the National Stadium in Wembley (under construction), Wembley Arena, the Grange Museum of Community History, the Stable Gallery Arts Centre, the Tricycle Theatre and Cinema, the Welsh Harp, the Temple at Neasden and the soon to be rebuilt Willesden Sports Centre. Wembley is identified as a London Strategic Cultural Area, and is specifically dealt with within the Wembley Regeneration Area Chapter of the Brent Unitary Development Plan 2004 and supplementary planning guidance.

ISSUE 1: LOCATION AND PROTECTION OF EXISTING LEISURE FACILITIES

Leisure and tourist activities attracting large numbers of visitors to an area are best located in town centres, where they can be supported by other complementary uses and good public transportation links. If the development cannot be accommodated within the Town Centre, edge of centre locations should be considered, with preference given to sites well connected to the centre, followed only then by out of centre sites, with preference given to sites well served by a choice of means of transport which are close to the centre and with a high likelihood of forming links with the centre.

The Mayor’s Tourism Strategy seeks to ensure that London expands as a global tourism destination and also develops a broader visitor base. This includes supporting the provision of a wide range of tourist accommodation and encouraging new tourist attractions which complement surrounding uses, especially for the regeneration and town centre renewal. The Council recognises the important role Wembley Stadium has as a major leisure and tourism attraction and the valuable contribution it will make to the wider area including the regeneration of Wembley town centre. Other leisure facilities such as a regional casino could also be a complementary use as part of this regeneration.

With increased numbers of people visiting large scale leisure and tourism venues, there is an increased need to provide visitor facilities such as extra signposting, seating, landscaping, improved pedestrian and cycling facilities, public toilets etc. Presently, contributions towards these facilities are met through proposals for large scale developments.

<p>Question 1. Do you think that Wembley is an appropriate location for providing a large scale casino? Yes/No</p> <p>Comments.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

Question 2. Is appropriate to seek contributions from large scale developments to help provide for additional visitor facilities in the area? If so, what sort of visitor facilities would you like to see implemented?

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There has sometimes been a difficulty in maintaining and creating the space for specific types of leisure use such as cinemas, theatres, visual arts and indoor sports facilities. This is because the competition from other land uses can often outbid such uses, particularly in town centres. It is the Council's current policy to resist the loss of existing leisure facilities unless their loss is compensated for.

Question 3. Do you agree that all leisure and entertainment facilities should be protected or are there instances where we should allow for their loss?

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ISSUE 2: MANAGING NIGHT TIME ACTIVITIES

A wide range of evening leisure and entertainment activities, such as cinemas, theatres, concerts, indoor sporting events, casinos and nightclubs, in addition to day time activities add to the vibrancy and enjoyment of city living. Night time events, such as a live music concerts and sporting matches, also gives rise to demand for other uses such as restaurants, bars and pubs. For these activities to remain attractive however, environments need to be clean, well lit, safe and easily accessible by night time transport. Activities operating very late at night or in the early hours of the morning, particularly those which involve alcohol consumption can increase the range of nuisances that impact on people living, working or sleeping in the vicinity of the premises.

In order to help manage night time activities the Mayor of London has suggested the establishment of Entertainment Management Zones. These are geographically defined areas where a forum of agencies work together to tackle issues associated with the evening and night-time economy. These can be designated in areas where there is a concentration of entertainment activities or in locations where growth of entertainment uses is planned. The designation of Entertainment Management Zones will help protect local communities from adverse impacts of these activities.

Question 4. Do you think that night time activities should be located close together within a designated Entertainment Management Zone where impacts on residential amenity can be tightly controlled, or should they be allowed to locate through-out the borough?

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Question 5. How else do you think the Council could manage the provision of night-time leisure and entertainment uses?

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ISSUE 3: PUBLIC ART

Over the last 10 years £615,000 of public art contributions has been secured for the improvement of public realm in the Borough. Good public art can help create interesting and attractive environments, stimulate community involvement and engender civic pride. Given the lack of public art in Brent, the provision of art or artistic features should be considered as a matter of good planning practice. Contributions to date have been put towards a variety of schemes such as the ‘Seed Clock’ sculpture alongside the River Brent and ‘Man Catching a Star’ sculpture next to the Wembley Park tube station.

Question 6. Should public art contributions continue to be secured through large scale developments?

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ISSUE 4: INDOOR SPORTS FACILITIES

Indoor sports facilities in the borough are provided by the public, voluntary and commercial sector. These can include uses such as snooker clubs, indoor cricket and tennis centres, and health and fitness clubs. The Council currently has indoor facilities at North Wembley (Vale Farm Sports Centre), Kilburn (Charteris Sports Centre), Willesden (Willesden Sports Centre – under construction) and Stonebridge (Bridge Park Community Centre). In the commercial sector the National Stadium in Wembley is the most notable, however community use of this facility is likely to be very limited.

According to the Strategy for Sport and Physical Activity in Brent 2004-2009, some of the key findings preventing people from participating in sport include poor access, lack of awareness about existing sporting opportunities, lack of affordable sports and recreation facilities for the borough youth, and poor quality of changing accommodation at the council owned leisure facilities.

Question 7. Do you think that there are sufficient indoor sports facilities available or should further facilities be developed and, if so, whereabouts in the borough?

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ISSUE 5: VISITOR ACCOMMODATION

The Mayor’s Tourism Strategy seeks to accommodate an additional 36,000 hotel bedrooms by 2016 and to improve the quality, variety and distribution of visitor accommodation and facilities. To this end, Wembley will be a highly desirable location for hotel and visitor accommodation outside of the city centre, being a major opportunity area for leisure and tourism uses, with good public transport access.

Over the last 10 years, Brent has approved 29 hotel schemes in the Borough with a theoretical gain of 2181 hotel rooms (916 have been built to date). This suggests that Brent is already a suitable overspill location for central London visitors, and with Wembley Stadium due be completed for Spring next year, it will increasingly be seen as an attractive destination in its own right.

In view of the labour market constraints facing the hotel industry and the wider need for affordable housing in London, the Mayor has directed local authorities to seek agreements to provide staff accommodation as part of hotel development and re-development and encourage better training for staff to improve the attractiveness of employment in the sector.

Question 8. As Wembley becomes more popular as a major tourist attraction, demand for hotel bed spaces are likely to rise. Should large scale visitor accommodation be restricted to town centres, edge of centre and the Wembley Regeneration Area, and a more flexible approach given to smaller scale visitor accommodation?

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Question 9. Should the Council require the provision of staff accommodation as part of hotel development and re-development?

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OPEN SPACE AND BIODIVERSITY

Open space, sport and recreation helps improve peoples physical and mental well being and adds to an attractive, clean and safe place for people to live and work. It also provides much needed areas for biodiversity and wildlife habitats to establish within our built environment.

Open Spaces within the Borough include green spaces such as parks, allotments, natural habitats, recreation grounds, playing fields, burial grounds, woodlands, farmland, amenity space and children’s play areas. Of particular significance is Fryent Country Park (103 ha) and the Brent Reservoir (102ha, of which approximately 50ha are in Brent) which are the two largest wildlife sites in the Borough. The Grand Union Canal (12ha in Brent) is also worthy of note providing a valuable habitat for fish, waterbirds, aquatic plants and invertebrates.

The main role of the planning system is to ensure that there is sufficient provision for open spaces and that they are located in the right places. As far as practicable, it is also important to ensure that they are of high quality, attractive to users and are well managed and maintained.

ISSUE 1: PROTECTION OF OPEN SPACE

In the past, urban pressure for priority land uses such as residential housing and employment has resulted in a substantial loss of undeveloped open land, highlighting a need for greater protection and preservation of our open space areas. One of the main issues concerning the Borough is whether there is adequate protection for all types of open space and whether there are defined areas where some development may be appropriate.

Question 1. Competing land uses and pressure for urban development remains a significant threat to natural habitats and species. Do you consider that the following open space areas are being reasonably protected?

	Yes	No	Comments
Metropolitan Open Land	<input type="checkbox"/>	<input type="checkbox"/>
Public Open Space	<input type="checkbox"/>	<input type="checkbox"/>
Allotments	<input type="checkbox"/>	<input type="checkbox"/>
Sports and Recreation Grounds	<input type="checkbox"/>	<input type="checkbox"/>
School Playing Fields	<input type="checkbox"/>	<input type="checkbox"/>
Burial Grounds	<input type="checkbox"/>	<input type="checkbox"/>
Waterways	<input type="checkbox"/>	<input type="checkbox"/>
Other comments.....		
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ISSUE 2: WILDLIFE AND BIODIVERSITY

Biodiversity is a word used to describe all living things, from the largest species down to the smallest micro-organisms. Changes made to the natural environment have threatened natural habitats for plants and animals, resulting in the loss and extinction of some species and habitats. Now that more people have become aware of the valuable contribution biodiversity has within our urban environment, there is a clear focus on the need to conserve, enhance and restore biological and geological diversity.

Currently a study of all areas of wildlife conservation value is being undertaken by the Greater London Authority in an Open Space and Habitat Survey. This will update existing information and will identify any further sites worthy of Wildlife and Nature Conservation.

**Question 2. Should all areas of wildlife conservation value be protected? Yes/ No
Are there any local areas which you think are worthy of protection for Wildlife and Nature Conservation?**

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ISSUE 3: METROPOLITAN OPEN LAND

The designation of Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces within the built environment. These sites are the most important for biodiversity because they contain the best examples of London’s habitats and wildlife. These sites can vary in size and in function and should be of strategic or regional significance, for example by serving a wide catchment area or drawing visitors from several boroughs. Metropolitan open land offers the highest protection from all inappropriate development and secures their sole use for public open space in the future.

Areas that are currently designated and protected as MOL in the Borough are:

- Fryent Country Park, including Barn Hill open space and adjoining sports ground (part of the former LT sports ground at Old Kenton Land and Kingsbury Green Primary School playing fields) and allotments at Old Kenton Lane
- Welsh Harp, Silver Jubilee Park and Neasden Recreation Ground
- Northwick Park including the Ducker Pond
- Alperton Cemetery; and
- Gladstone Park

Green Chains, which consist of footpaths and areas that link open spaces together, are also important to London’s open space network. In Brent these follow rivers and canals, linking into green spaces in adjoining boroughs. To be consistent with the London Plan the existing green chains, being the open land adjoining the River Brent and the Grand Union Canal, should be explored as possible designations of Metropolitan Open Land.

Question 3. Are there other areas than those stated which you think should be included as Metropolitan Open Land or are there areas currently identified as MOL which should not be?

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ISSUE 4: WATERWAYS, CANALS AND ADJOINING LAND

In Brent, very few people are aware that rivers and streams were once prominent features in our landscape, or even that the Borough is named after the River Brent. Now great stretches of these rivers have been tailored by urban development, many of which have been diverted and channelled underground. Parts of these waterways still remain open, however many have been modified, are poorly accessible by the public and are often highly polluted.

The London Plan sets out policies for the Blue Ribbon Network. This includes all waterways and tributaries extended to by the River Thames, and particularly as it relates in the borough to the Welsh Harp, River Brent and Grand Union Canal. The Mayor’s Plan aims to protect biodiversity, enhance natural landscapes, increase sport and leisure uses and to improve access along the Blue Ribbon Network for recreational use. It also seeks to ensure that rivers, brooks and streams of all sizes are protected and measures are taken to improve their habitat and amenity value.

Question 4. Do you think that more emphasis should be placed on protecting our rivers, brooks and streams from development? How do you think this could be achieved? Should there be a general policy protecting natural watercourses from development with the exception of leisure, access and ancillary uses?

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ISSUE 5: PUBLIC OPEN SPACE AND CHILDREN’S PLAY AREAS

Brent is a highly developed urban area with a considerable overall deficiency in public open space. Presently 37% of Brent homes are located more than 400m from a park of over 2ha. Some of Brent’s parks and open spaces have been poorly maintained in the past and are in need of improvement. Given the lack of quality public open space and poor distribution it is important to protect local open spaces which help to maintain and improve the environmental quality of the Borough.

The Council currently requires that for new developments within areas of open space deficiency, provision is made for new or extended public open space (including provision for maintenance). In many cases this is impractical to do so, due to the built up nature of our urban environment and the difficulty in creating or identifying new public open space. In order to compensate for this, a financial contribution is often agreed towards improving existing areas of public open space and securing new or extended areas for public open space. This is known as a planning obligation.

Question 5. In areas of deficiency the Council currently seeks provision for new or extended public open space from new development proposals. If this provision cannot be appropriately met, do you think that a planning obligation should be sought from new development? Do you think this is the most appropriate means of acquiring and improving access to public open space? Do you think this should apply to all developments or only in certain circumstances?

Planning obligation appropriate? Yes/ No

Comments.....

If appropriate these should apply to:	Yes	No
All developments within areas of open space deficiency	<input type="checkbox"/>	<input type="checkbox"/>
Mixed use developments within areas of open space deficiency	<input type="checkbox"/>	<input type="checkbox"/>
New residential developments of 10 or more units within areas of open space deficiency	<input type="checkbox"/>	<input type="checkbox"/>
All new residential developments within areas of open space deficiency	<input type="checkbox"/>	<input type="checkbox"/>
Residential developments which are unable to meet on site amenity standards	<input type="checkbox"/>	<input type="checkbox"/>
Other.....		

Planning obligations are also sought for areas which are deficient in children’s play space, as measured against the National Playing Fields Association standards (NPFA). The NPFA recommend that pre-school children’s play areas should be located within 150m of family dwellings and 400m for junior play areas. These should be accessible without having to cross main roads.

New housing developments over 15 units (or over 0.5 ha) and larger scale mixed use developments, are expected to provide children’s play areas to NPFA standards and where they are not met, contributions are sought to allow provision to be made within the vicinity or in a deficiency area. Arrangements for their long term maintenance are also sought and development of existing play areas are only considered where they are re-provided within the development site or at a more appropriate location.

Question 6. At present, the Council has a policy that requires all new residential developments of 15 units or more and large-scale mixed developments to provide children’s play spaces within their development proposal. Where this may not be practical, a planning obligation is sought. Do you agree with this approach, or do you think that changes to this policy should be made?

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ISSUE 6: ALLOTMENTS

Allotments are a valuable resource for growing food in an urban environment, as well as providing places for communities to meet and interact, encourage physical activity among all ages and abilities, and improve natural habitats and biodiversity. There are currently 23 allotment sites within the Borough with the maximum distance of 2.6km for any resident to gain access to an allotment. This falls short of the national standards for allotment provision which sets a maximum distance of 0.8km or less from home to allotment plot.

The Council seeks to protect allotments from any further development unless they are surplus to requirements, extensively disused, and consideration is given to other open space functions that the allotment site may perform. In addition for the loss of the allotment site a planning obligation is sought for the upgrading of other allotment sites, provision of replacement open space, or some other form of relevant compensatory provision.

In the late 1990s, three allotment sites were identified by the Council as surplus to requirements, the former allotments at 2 Bridge Road and Gibbons Road, allotments at Elthorne Way, and allotments to the rear of 96-112 Harrowdene Road. These have subsequently received approval for affordable housing, and have brought in substantial funds for the improvement of remaining allotments in the borough, with most of the larger allotments now upgraded.

Question 7. Do you think that allotment space should be protected for open space uses, or should we allow some flexibility in allowing development of these areas?

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Question 8. Currently planning obligations are applicable to developments within areas of open space deficiency, child play space deficiency and the loss of allotments. In future should there be one standard planning obligation fee payable for all new developments that contributes to all open space areas in the Borough? If so, how do you think this should be defined?

Applicable to:	Yes	No	Comments
All new developments (including commercial development) <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All new developments only in deficient areas <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mixed use developments <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mixed use developments in deficient areas <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All residential developments <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All residential developments in deficient areas <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All residential developments of 10 units or more <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All residential developments of 10 units of more in deficient areas <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other.....	<input type="checkbox"/>	<input type="checkbox"/>
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ISSUE 7: SPORTS & RECREATION GROUNDS AND PLAYING FIELDS

The Brent Playing Pitch Survey, undertaken on behalf of the Council in 2003 in conjunction with Sport England, showed a deficit in sports pitches in all major pitch sports: soccer, rugby, cricket and hockey. The survey also highlighted Brent as being significantly below the National Playing Fields Association (NPFA) standards on pitch provision.

The Council currently seeks the protection of all sports grounds (both private and public) and playing fields (including school playing fields) only allowing development where the site is not in an area of local open space deficiency and where the development does not lead to sports provision loss, unless the loss is compensated for by provision of equivalent or better facilities suitably located elsewhere in the borough.

Question 9. Do you think that development of playing fields can be allowed where there is no longer demand and they are in areas not deficient in playing pitch provision? Yes/No Should they be protected for other open space uses? Yes/ No

Comments.....
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ISSUE 8: DUAL USE OF OPEN SPACE AND SPORTS FACILITIES

Some school playing fields and other facilities lend themselves to be used by the general public for passive recreation such as walking, sitting out, etc, but can include the dual use of a wider range of facilities. According to the Brent Playing Pitch Strategy just over a third of schools who have playing pitches make their facilities available to community sports clubs.

Alternately many schools in Brent are without their own playing fields and use could be made of public open space and facilities. This is extremely pertinent for any new school sites that may be sought in the future.

As there is a shortage of lettable quality pitches for all sports with many of the Council managed pitches being over-used, and poor access generally to sports and recreational facilities, it is the Council’s view that dual use of open space and sports facilities should be encouraged.

Question 10. Do you agree that dual use of open space and sports facilities should be encouraged? How do you think that future planning policy can help achieve this?

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ISSUE 9: BURIAL GROUNDS

Cemeteries and burial grounds are often overlooked as valuable areas for public open space and recreation. However many of the existing cemeteries have important historic, wildlife and passive recreational value, providing peaceful areas away from busy streets and natural habitats for different plant and animal species. Such examples in the borough include Alperton Cemetery, Paddington Cemetery and Willesden New Cemetery.

While existing cemeteries provide open space and biodiversity value there is concern over the limited burial space available, with Brent cemeteries estimated to be full within the next 10 years. Council’s main cemetery is located outside of the Borough at Carpenders Park near Watford. Better use of space could be made through the re-use of existing graves, which is a vision endorsed by the Mayor of London. This would enable the Borough to meet future needs while restoring old cemeteries, particularly those that have been left derelict and subject to vandalism, and making them more attractive for passive recreational use.

Question 11. Do you think that more burial space should be sought within Brent? If so, do you agree that the Council should support the re-use of existing cemeteries or should we be allowing areas of public open space to go towards burial space?

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COMMUNITY FACILITIES

Community facilities provide essential facilities and services for the Borough's growing and very ethnically diverse population. Brent is one of two London Boroughs where Black and Minority Ethnic groups represent a greater proportion of the population than White Ethnic groups and where over 130 different languages are spoken in Brent Schools. Other borough trends show that South Kilburn, St Raphaels/Brentfield, Stonebridge, Harlesden and Church End neighbourhoods are in the top 10% most deprived in the UK and Brent has a relatively young population with nearly 25% of the population under 19 years of age and 19% between 20-29 years old.

Community facilities are wide ranging and encompass health facilities such as health centres, doctor's surgeries, and hospitals; educational facilities, such as schools and colleges; social facilities such as community halls, libraries, places of worship, crèche/nurseries, and youth clubs; and emergency services, such as police stations, ambulance services, and fire stations. Planning policy encourages the establishment of community facilities to meet the needs of the people living in Brent.

ISSUE 1: PROVISION FOR COMMUNITY FACILITIES

One of the existing key planning objectives is to encourage access to community facilities for the whole of the community. Importantly, sufficient facilities should be located within easy reach of those who need them. Preferably this means locating community facilities within town/local centres and places within easy reach of good public transport and by walking or cycling. These also need to be fully accessible to the elderly, people with disabilities, and people with young children.

As well as appropriately locating new facilities, there is a need to safeguard existing facilities from other land uses and encourage the provision of new facilities. Competing land uses such as housing or commercial uses, often make it difficult for community facilities to establish. Current policy protects existing community facilities as well as requires provision for new community facilities to be located within very large scale residential or mixed use schemes as part of the development (such as health care clinics, or nurseries).

Question 1. Are there sufficient community facilities in the Borough? Do you think that Community Facilities should be a priority land use? Yes/ No. Is it appropriate to require provision for Community Facilities within large scale developments?

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Question 2.

Should all community facilities be protected or should there be more flexibility given for alternative uses?

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ISSUE 2: MEETING EDUCATION NEEDS

Brent Council has a duty to provide sufficient school places for all its school age population within the Borough boundary. In January 2003 there were 34,662 children attending Brent schools, with this number set to increase due to a growing population, rising popularity of

Brent Schools, and a London target for 13,510 additional new homes in Brent between 1997 and 2016. Already many schools within Brent are near, at, or over capacity, and there is growing demand to make provision for new schools, expansion of existing schools and placement of temporary classrooms. The Borough has recently been recognized as one of two London Education Authorities (LEA) projected to face major school place provision deficiency by 2008, as identified by the Department for Education and Skills (DfES).

It is recognised that Brent will require at least one new secondary school and possibly new primary schools in the near future, and there is need to ensure these are sited in appropriate locations and that any adverse impact on traffic safety and residential amenity is minimised. Current policy prevents the development within school grounds for non-educational use where it would result in those sites falling below DfES standards and, outside of those areas, encourages the permission of complementary uses and the dual use of these facilities.

Question 3. There is growing pressure for additional school places in the Borough, particularly at secondary school level. Are there any sites within the Borough which you think would be a good location for a new school?

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Question 4. Do you think that enough protection is given to existing school sites, or do you think that a flexible approach for alternative uses should be taken?

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In order to meet rising school rolls, contributions to education provision (called planning obligations) are sought where new housing development would worsen or create a shortage of school places. Currently this applies to developments of 10 or more units (or 0.3+ha irrespective of the number of units) that contain two or more bedrooms. This is required to help part fund the one-off capital costs for providing new permanent and temporary classroom space at nursery, primary and secondary school level.

A common complaint from developers of larger scale developments is the combined cost of planning obligations for education, affordable housing, transport and open space provision as this reduces their economic gain and can jeopardise the development from going ahead. This is a problem as a balance has to be met where the Council encourages major developments and regeneration of sites, as well as ensures that there are enough school places to meet the needs of its future residents.

Question 5. To what extent should education facilities be funded by housing developments? How high do you rate Education compared to provision for Affordable Housing, Open Space and other community facilities such as Healthcare?

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ISSUE 3: CHILD CARE FACILITIES

Day nurseries, creches and other child care facilities provide important services for the growth and social development of young children. Their provision also allows opportunities for parents and other child carers to undertake employment, further education or other activities. As a result the provision of child care facilities are encouraged, although the Council is aware that problems can arise if facilities are inappropriately located. Residential areas are particularly sensitive due to potential impacts of noise and traffic generation. However, locating within residential areas means that facilities can be within walking distance of home or en-route to work.

Question 6. Should child care facilities be allowed to locate in residential areas? Yes/ No Where within residential areas do you think that it is appropriate to allow for child care facilities?

	Yes	No
Where neighbourhood amenity is maintained	<input type="checkbox"/>	<input type="checkbox"/>
Large buildings	<input type="checkbox"/>	<input type="checkbox"/>
Detached (stand alone) buildings only	<input type="checkbox"/>	<input type="checkbox"/>
All new major residential developments	<input type="checkbox"/>	<input type="checkbox"/>
Places with sufficient outdoor space	<input type="checkbox"/>	<input type="checkbox"/>
Places with safe transport access	<input type="checkbox"/>	<input type="checkbox"/>
Other.....		
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ISSUE 4: HEALTH CARE FACILITIES

Brent residents have disproportionately high chronic disease levels, higher infant mortality and lower life expectancy rates than the London average, particularly in the South of Brent (Brent Primary Care Trust Public Health Report 2002/3). This has led to the Government designating a large part of the Borough as a Health Action Zone. The need to access health care facilities is vitally important and this includes hospitals, doctor and dental surgeries, optometrists, alternative medical practices, pharmacies and other health and medical services.

Provision for health facilities should be made in partnership with the Brent teaching Primary Care Trust (tPCT) and other health care providers. The Brent tPCT's general strategy is to reorganise smaller GP practices and encourage larger multi-practice clinics which are capable of providing a wider range of health and social care services. Ideally these should be purpose built to modern standards in easily accessible locations such as in town centres. Liaison with the tPCT will be needed to identify appropriate sites as well as identify areas of deficiency. At present group practice facilities are promoted in major new housing/ mixed use developments, however there is no specific obligation to provide additional funding for health care facilities through all new developments.

In areas less well serviced and where there are no reasonable opportunities for shared group practices, there may be a need to convert residential properties into primary health

care facilities (e.g. doctors, dentists etc). In residential areas these have the potential to cause traffic problems and be a disturbance to neighbours.

Question 7.

**Should small-scale health care facilities be able to locate in residential areas? Yes /No
Where within residential areas do you think these could be located?**

	Yes	No
Where neighbourhood amenity is maintained	<input type="checkbox"/>	<input type="checkbox"/>
Existing buildings with large floor areas	<input type="checkbox"/>	<input type="checkbox"/>
Detached buildings separated from residential neighbours	<input type="checkbox"/>	<input type="checkbox"/>
All new major residential developments	<input type="checkbox"/>	<input type="checkbox"/>
Places with safe transport access	<input type="checkbox"/>	<input type="checkbox"/>
Areas where there is a shortage of facilities	<input type="checkbox"/>	<input type="checkbox"/>
Where shared group practices are not a practical or desired option	<input type="checkbox"/>	<input type="checkbox"/>
Other.....		
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Question 8. How high do you rate the need for additional health facilities? Do you think we should specifically seek funding from housing developments to help provide for these?

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ISSUE 5: DESIGNATION OF CENTRAL MIDDLESEX AND NORTHWICK PARK HOSPITAL

Presently land surrounding Central Middlesex Hospital and Northwick Park Hospital is designated for hospital and higher/further education (and their supporting uses). This secures the provision for these facilities for the future, while concentrating similar uses together and reducing the need to travel.

So far, these zones have successfully been protected for healthcare and further education use, although there may now be an opportunity to include a wider a range of uses. Other uses which are currently permitted within these areas include ancillary housing/hostel accommodation (e.g. nurses hostel, key worker housing, student hostels); associated supported housing (housing for disabled, nursing homes); and associated sporting facilities and ancillary retail facilities for workers and visitors to the institutions.

Question 9.

Areas surrounding Central Middlesex and Northwick Park hospitals are currently designated for healthcare and further education use. Should other uses also be considered? If so what other uses do you think may be appropriate?

	Yes	No	Comments
Community facilities	<input type="checkbox"/>	<input type="checkbox"/>
All education facilities	<input type="checkbox"/>	<input type="checkbox"/>
Large retail shops	<input type="checkbox"/>	<input type="checkbox"/>
Housing	<input type="checkbox"/>	<input type="checkbox"/>
Motels	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

ISSUE 6: PLACES OF WORSHIP

Brent has one of the most culturally diverse populations in Britain and this is reflected in its residents' religious affiliations: 48% Christian, 17% Hindu, and 12% Muslim (Census 2001). Although there are many general community buildings, meeting rooms and religious buildings in Brent, the great diversity of cultural, ethnic and religious groups within the Borough means there is a shortage of adequate premises, particularly for the newer religious congregations. While churches and chapels have traditionally been the main place of worship, changing needs should take into account other cultures that worship at temples, synagogues and mosques. New purpose built places of worship, notably the Swaminarayan Temple in Brentfield Road, have been created in recent years.

Question 101. Is there a need to find sites for more religious facilities and where do you think that these are best located? Are there any specific sites where you think a religious facility could be located?

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ISSUE 7: CREMATORIUM FACILITIES

While there is an identified lack of supply for burial space within the borough, a relatively high proportion of people are cremated (approximately 70-72% of Londoners). However there are currently no crematorium facilities within the borough itself, and while Brent is reasonably well serviced by those in neighbouring boroughs, e.g. Kensal Green, Hendon and Ruislip, the issue has been raised that crematoria more suited to meeting religious and cultural needs should be sought within the borough (eg Hindu). There are constraints on available locations however as these should be at least 91 metres from residential property and 46 metres from a road.

Question 11. Do you think that Brent needs a crematorium facility in the Borough? If a crematorium were to be sited within the borough, given the constraints, where do you think one could be located?

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WASTE

More sustainable means of dealing with waste have to be introduced to reduce the current amounts that are being sent to landfill from London. The Government have already emphasised the importance of addressing, as a priority, the need for new facilities for waste management. Draft Government planning policy states that planning policies should:

- address waste as a resource and look to disposal as the last option, albeit one which must be adequately catered for;
- enable sufficient and timely provision of waste management facilities to meet the needs of local communities;
- help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- ensure waste is disposed of as near as possible to its place of production

Sites will have to be identified for waste management purposes within the local area. Careful consideration will have to be given to the location of these given the potential for environmental impacts from waste management activities. There is likely to be a need for a range of sites both in terms of size and the types of waste they will be managing, such as construction, commercial or municipal waste.

Requirements in terms of the number and type of waste management facilities will be established London-wide by the Mayor, but Boroughs are expected to identify specific sites in their own areas to meet the need. However, because dealing with waste is best planned at a wider than individual borough level, it is proposed that the planning be done jointly with other West London boroughs.

Question 1. Options for Waste Management Facilities			
	Yes	No	Comments
<i>Do you think that waste is best planned for at West London, rather than borough level?</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Do you favour more frequent, smaller facilities than currently provided?</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Are there already too many waste management facilities in parts of the borough?</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Should there be more local civic amenity sites for the disposal of domestic waste?</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Should waste management continue at the Twyford Tip site?</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Any other comments</i>		