



Brent's Local Development Framework (LDF)

Core Strategy Preferred Options



July 2006

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Contents

1. Introduction



1. Introduction

Purpose of the Core Strategy Preferred Options

This document has been produced by Brent Council as a basis for consultation on the second stage of preparing Brent's new Local Development Framework (LDF). It builds on the earlier Issues & Options consultation stage in September 2005, taking account of views expressed then in identifying a preferred approach to the future development of the Borough.

What is a Local Development Framework?

The Local Development Framework will replace Brent's Unitary Development Plan 2004. The Council is required to prepare the LDF by the Planning and Compulsory Purchase Act 2004, and it will provide a strategic planning framework for the borough, guiding change to 2016 and beyond. When adopted, Brent's LDF, together with the London Plan, will form the statutory Development Plan for the borough.

The LDF will be made up of a number of documents. This includes this Core Strategy, as well as a separate document containing more detailed Development Control policies to be used in determining planning applications and a further document identifying the preferred development options for particular sites called Site Specific Allocations. The Council is consulting on all 3 documents together. The LDF will also include more detailed guidance in the form of Supplementary Planning Documents to replace existing Supplementary Planning Guidance.

What is the Core Strategy?

The Core Strategy sets out a spatial vision, objectives and key policies for the future development of the Borough. It is guided by sustainable development principles and must therefore be subject to a sustainability appraisal, the report of which will be published for public consultation. It also meets the requirements of National planning policy and of the spatial development strategy for London, known as the London Plan. The Core Strategy reflects community aspirations as expressed in the Community Strategy and is the spatial expression of other important local strategies such as the the Borough's Regeneration Strategy, the Children and Young People's Plan and Brent PCT's Local Delivery Plan.

2. Brent Context



2. Brent Context

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

Brent is the second most ethnically diverse local authority area in the country. Among its population of 267,000, with black and minority ethnic groups comprising 55%, over 120 languages are spoken.

The south of the Borough was substantially developed between 1890 and 1910, mainly with terraced houses for workers in industry and services, but with some estates of larger houses around Kilburn. This area has been the focus of substantial change in recent years: much housing renewal has been achieved both through concerted public action and through piecemeal improvement in the private sector, often associated with conversions. Proximity of the inner part of the area to Central London has contributed to these latter pressures.

Parts of the Borough continue to suffer from high levels of social and economic disadvantage. The extent of deprivation has long been officially recognised and Brent qualifies for a number of European and National regeneration programmes. Brent contains four of the Government's Priority Community Areas eligible for regeneration funding: Harlesden, Willesden, Kilburn and Cricklewood, the major focus of such areas in West London.

In much of the inner part of Brent, as in so many other areas of Inner London that are distant from London's major parks and open spaces, there is a deficiency of the green spaces that are essential to the quality of life and to a pleasant urban environment. Other Inner London characteristics can also be seen: industrial activities operating cheek by jowl with residential uses and the problems of the re-adjustment of town centres to shifting patterns of retailing and changing populations.

The substantial development of the north of the Borough occurred in the 1920's and 1930's with the expansion outwards of London that accompanied the growth of rail and underground services in the capital. That essentially suburban nature, with its characteristically lower densities, survives today. This part of the Borough forms part of the large ring of areas of Inner London that continues to house people working in Central London and, more so today, elsewhere. As in much of suburban London, increased demand for housing in the 1990s has brought pressures for redevelopment at higher densities.

The fortunes of all parts of the Borough depend now, as much as ever, on the prosperity of London as a whole. Other parts of London provide the workplaces for a substantial proportion of Brent's residents. But Brent has its own contribution to make to London's economic well-being. In particular, it contains some 360 hectares (nearly 900 acres) of industrial estates many of which were originally developed during the expansion westwards of London's manufacturing in the inter-war period. These estates have long been seen as a strategic resource providing relatively rare opportunities

2. Brent Context

in West London to house manufacturing activities, including both emerging new industries and those traditional industries, such as in the food and printing sectors, which continue to serve the London market from a base within the capital.

The Borough is famous for being the home of the new Wembley Stadium. Wembley is now a major focus for regeneration and will not only have the finest stadium in the world, but it will also be a major regional, national and international destination with a range of major retail and leisure attractions as well as being a focus for the local community.

2. Brent Context

3. Planning Policy Context



3. Planning Policy Context

Brent's planning strategy and policies have to be in line with national and regional policy.

National Policy

National planning policy is mainly set out in a series of Planning Policy Statements, but is also contained in circulars, ministerial statements and other strategy documents. The Planning Policy statements generally deal with particular topics or issues. An important, overarching policy statement is PPS 1, Delivering Sustainable Development. This sets out a number of key principles for development to ensure that development plans, and decisions taken on planning applications, contribute to the delivery of sustainable development. In summary, the key principles are as follows:

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

Regional Policy

The Spatial Development Strategy for London, known as **The London Plan** and adopted in 2004, provides the regional planning context for Brent's Local Development Framework, and hence the Core Strategy. Along with the current UDP for Brent, it also forms part of the development plan for the Borough. Policies in Brent's LDF, which will ultimately replace the UDP, must be in general conformity with the London Plan.

The London Plan sets out a strategy to accommodate substantial growth in London's economy and population at the same time as creating a more open and equitable society and preserving and improving London's heritage and environment. It accepts that if development is to be encouraged without allowing further encroachment on green spaces, London has to become a more densely populated and densely developed city. The strategy integrates commercial and residential development, transport and communications infrastructure, and the promotion of local communities.

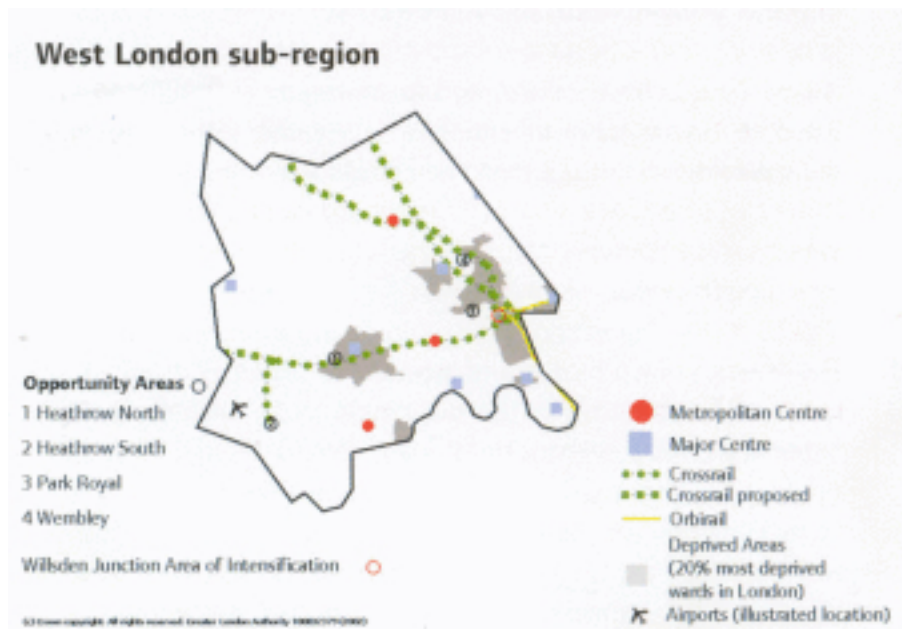
Enhancing the vitality of London's town centres is a key spatial priority of the London Plan. They are seen as key locations for a diverse range of activities and uses, including office space, housing, retail, leisure, community facilities and regeneration initiatives.

3. Planning Policy Context

Suburban areas are considered to have an important part to play in the future development of London. District, local and neighbourhood town centres should be supported and enhanced. Maintaining and enhancing a range of employment uses in suburban areas is important to support sustainable communities. Areas around town centres are seen as most appropriate for higher density development and a greater mix of uses in accordance with their greater levels of accessibility relative to other suburban areas.

Manufacturing, wholesale distribution and a number of other industrial activities rely on the planning system to sustain adequate development capacity to meet their needs. The main concentrations of this capacity are identified as Strategic Employment Locations.

There is a need to coordinate transport and development: spatial policies cannot be considered in isolation from their links to existing and proposed transport accessibility and capacity.



West London Sub-Region

Within the overall planning framework, specific areas have been identified as Opportunity Areas, Areas for Intensification and Areas for Regeneration. It is within these areas that regenerative development should be focused to meet the needs of those communities suffering from substantial social exclusion and deprivation. Significant parts of Brent have been identified as Areas for Regeneration. The Opportunity Areas of Wembley and Park Royal and the Willesden Junction Area for Intensification are particularly well located to meet the needs of Brent's

deprived communities. The Opportunity Areas include major brownfield sites and places with potential for significant increases in density. Development in these areas should be geared to the use of public transport. Areas for Intensification have significant potential for more intensive use – and for more varied use – than at present where they are well served by public transport.

New development will be aimed at exploiting the sub-region's dynamism and potential and addressing the needs of significant pockets of deprivation, especially in inner areas such as Park Royal. Wembley is recognised as having major potential as a nationally and internationally significant sports, leisure and business location.

3. Planning Policy Context

To assist with implementation of the London Plan, a Sub-Regional Development Framework (SRDF) has been produced for each of London's Sub-Regions. Relevant to Brent is the West London SRDF, published in ???? 2006.

4. A Spatial Vision for Brent



4. A Spatial Vision for Brent

The LDF as a spatial plan should provide the spatial expression of all the relevant strategies that will have an influence on the future development of the Borough. In taking account of the various relevant strategies it is useful to gain a sense of the visions of the Borough that underpin them before a spatial vision can be adopted.

COMMUNITY STRATEGY

The Core Strategy should set out a spatial vision of what the Borough will be like in 10 year's time. It is important that this reflects the Community Strategy which is a combined statement of the needs and priorities of local people. Brent's Community strategy, drawn up by 'Partners for Brent', the Local Strategic Partnership in the Borough, sets out a vision for the Borough as follows:

"Brent will be a prosperous and lively borough, full of opportunity and welcoming to all. A place that will thrive for generations to come, whose future will be determined by local people."

Below this overarching vision the Community Strategy sets out some further aspirations which are relevant to the drawing up of a spatial vision for Brent. These are:

"Brent will be a great place to live in and to visit. It will be safe, clean, green and lively. Local people will be confident that our streets and open spaces are safe places to be and that our green spaces and leisure facilities will be worth visiting. Residents will care for their surroundings, appreciate where they live and enjoy what Brent has to offer."

"Brent will be a prosperous, healthy place where there are opportunities for all. A place where income and employment levels will be higher than the London average, where businesses thrive and where residents will enjoy good health and be able to make healthy choices."

CORPORATE STRATEGY

(Not yet available)- to be added after May local elections

REGENERATION STRATEGY

Brent has also produced a Regeneration Strategy which has the following vision at its core:

"The vision is of a Brent fully integrated into the city – a single urban borough which makes a full and positive contribution to the London economy. Brent's communities will enjoy a high quality of life and will be fully able to participate in society."

The borough will have a reputation for high quality services focussed on tackling and preventing social exclusion. Unemployment will be below the London average, and everybody will have access to high quality education, health provision and affordable homes. The areas where currently deprivation is most concentrated will be physically, socially and economically reconnected with London as a whole. Brent will provide a home of choice for its diverse populations and businesses."

At the core of Brent will be a landmark international development at Wembley, providing a source of pride, identity, wealth and aspiration for the borough as a whole."

4. A Spatial Vision for Brent

VISION FOR WEMBLEY

At the core of regeneration and growth in Brent is Wembley. Because of the significance of Wembley, not just to Brent but to London as a whole, in 2002 the Council adopted a vision, endorsed by the Mayor of London, of what it wished to see from regeneration at Wembley. The vision set out a number of core principles for regeneration which can be encapsulated in the following statement.

“By 2020, Wembley will be a national and international destination, a key contributor to the London economy and the vibrant heart of the London Borough of Brent.”

SPATIAL VISION FOR 2016

Brent is a dynamic and sustainable area fully integrated into the City. Its diverse communities are prosperous, healthy and safe, living in a high quality environment and benefiting from a range of affordable homes and community facilities. Its commercial centres, with the iconic Wembley at the heart, are easily accessed by residents and visitors alike, providing a good range of shops, leisure facilities and jobs.

OBJECTIVES

In order to achieve the vision outlined above, a number of key objectives have been identified. These are:

- 1. Achieving Sustainable Development;** through prioritising locations, land-uses and mixed-use development with particular regard to parking and public transport to aid the creation of a sustainable and inclusive future for Brent residents, businesses, workers and visitors focusing on the importance of social cohesion.
- 2. Encourage Sustainable Development Practices;** through design, construction and demolition with particular regard given to energy, water and waste efficiency as well as minimising potential effects on climate change.
- 3. Reducing the Need to Travel;** through placing emphasis on meeting needs locally and the promotion and improvement of walking, cycling and public transport.
- 4. Protecting and Enhancing the Natural and Built Heritage and Environment of the Borough;** by respecting and enriching the special character of the Borough.
- 5. Meeting Housing Needs;** secure housing at the locations and of the size, density and tenure needed to meet Borough and Regional needs as appropriate.
- 6. Meeting the Impacts of Housing Development;** secure provision / contributions to satisfy the needs arising from new housing development; including education, health facilities, open space and play space.

4. A Spatial Vision for Brent

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

8. Regenerating Areas Important to London as a Whole; securing regenerative development in locations such as Wembley, Park Royal, South Kilburn and Willesden Junction where the benefits will be felt both within and beyond the Borough boundary.

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

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

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

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

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

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

5. A Spatial Strategy for Brent



5. A Spatial Strategy for Brent

KEY PRINCIPLES FOR DEVELOPMENT

Flowing from the objectives for development set out above, there are a number of principles that will underpin the spatial strategy for the Borough as set out in policy SS1 below.

CS SS1 Key Principles For Development

The key principles which underpin the spatial strategy for Brent are:

- Focusing higher density development in five key growth areas, especially in the main growth area of Wembley.
- Change will be considered on a local area basis, thus facilitating comprehensive planning and provision of infrastructure to ensure that growth is sustainable.
- Alongside growth will be the improvement of transport nodes, mainly stations and bus/rail interchanges, improvement of travel corridors around and linking growth areas with particular emphasis on the improvement of bus services.
- Controlling development in other areas, for example in maintaining quality suburbs and protecting open space. Any development in these locations will be at significantly lower densities than in the growth areas
- Promoting improvements in town centres, strategic industrial areas and on housing estates in need of regeneration.
- Development in the key growth areas will be required to be mixed-use and also have a mix of housing size and tenures.
- All development should be sustainable so as to help combat climate change through, for example, sustainable construction methods
- Significant improvement in urban design quality and improvement in the quality of the public realm

REGENERATION AND GROWTH

As highlighted above Brent contains some significant pockets of deprivation and run-down areas. A fundamental objective of the development plan, therefore, is to tackle social exclusion and to regenerate the run-down parts of the Borough so that not only is the environment and infrastructure enhanced, but an economic uplift is achieved through inward investment which benefits the whole community. In particular, regeneration should meet the needs of our deprived neighbourhoods by providing the much-needed affordable homes, jobs and shopping, leisure and community facilities. The key driver of regeneration, because of the increase in land values associated with it, is residential development. The London Plan has accepted that population growth in London is inevitable and that significant new house building is necessary to accommodate this. There is also a Government imperative to achieve a significant increase in house building in areas of need. Brent's strategy is to harness growth to help achieve its regeneration objectives.

5. A Spatial Strategy for Brent

Just as London is a dynamic place so too is Brent. There is substantial evidence that Brent's population is not only dynamic and changing quickly but also, compared to national or London-wide characteristics, is relatively young and growing. For example, Brent's secondary schools are full and there is a need to expand provision to cater for growing demand. The pressures to accommodate population growth, to meet the changing characteristics of the local population such as more, smaller households and to meet housing shortages that already exist mean that more and more homes are needed. There is also a need for a better range of housing to reflect specific local needs, including the 3rd highest household size in England and the 2nd highest overcrowding level in London. The strategy for the future development of the Borough, therefore, must be to accommodate growth. The issue is how much growth is appropriate and how, and where, it can be provided for. The Council has concluded that up to about 10,000 new homes can be accommodated in the Borough up until 2017. In adding 1,000 currently vacant dwellings which it is estimated can be brought back into use, the borough's housing capacity target of 11,200 new homes, identified in the London Plan, is reached. This equates to an approximate increase in population of 25,000-28,000.

At the same time, large areas of the Borough can be regarded as an asset because of the quality of the environment or because of their particular local characteristics that are worthy of preservation, be they valued open spaces, attractive residential areas or important commercial locations. In initial consultation on the new plan, local residents expressed a clear view that they valued much about their local areas and wished to see this preserved or enhanced. As well as accommodating growth and the change associated with it, it is also important that those parts of the Borough that are valued are protected from over-development or unnecessary change. The strategy, therefore, should focus growth where it is most appropriate and where it can be more readily accommodated.

Growth can also be harnessed to achieve the regeneration of run-down areas and support economic renewal, providing jobs as well as new facilities such as shops, leisure and community provision. By requiring a mix of uses alongside housing on sites and in locations which are very accessible then new sustainable communities can be created where the schools, health centres, leisure facilities and shops are provided as well as homes.

APPROPRIATE LEVEL OF GROWTH

As stated above, the appropriate level of population growth for the Borough up to 2017 has been judged to be 25,000-28,000. This would take the Borough population up to about 300,000. This is above the current population projections for the Borough but is compatible with Brent's status as an 'Opportunity Borough' and with its ability to accommodate new housing. It is considered to be an acceptable level of growth, given the capacity of sites to accommodate new development and the constraints that the need for new infrastructure will impose. This level of proposed growth will still require an increase in provision at schools and health centres as well as improved public transport facilities if it is not to result in 'over-heating', i.e where schools and health facilities are unable to cope with demand and a lack of good public transport leads to greater car use and increasing congestion on the roads. In this way the borough can benefit from the advantages that growth and associated regeneration brings, whilst ensuring that there is an adequate provision of key infrastructure, both social and physical.

5. A Spatial Strategy for Brent

CS SS2 Population And Housing Growth

The Borough will plan for a population growth of up to 28,000 people by 2017. The borough will seek the development of over 10,000 additional homes between 2007 and 2017 of which 50% should be affordable.

KEY LOCATIONS FOR REGENERATION AND GROWTH

Two areas of Brent are identified in the London Plan as Opportunity Areas. These are Park Royal and the Wembley regeneration area, where the impetus for regeneration is mainly commercial renewal. In Park Royal there is a need to renew, what had become in the 1980s a run-down industrial estate, to provide new business opportunities and jobs. The impetus for renewal at Wembley was provided by the decision to rebuild Wembley Stadium as the new National Stadium and the associated enhancement of the infrastructure. The availability of large development sites close to the stadium means there is an opportunity for major growth and renewal. Both Wembley and Park Royal are well located to provide job opportunities, and access to other facilities, for the deprived neighbourhoods nearby. Although Wembley has potential to provide significant levels of new housing, there is little opportunity in Park Royal apart from specialist key worker housing associated with the redevelopment of Central Middlesex Hospital.

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

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

Apart from the areas identified above, the only other locations where significant population growth can be accommodated are within, or on the edge of, the larger town centres such as Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden.

5. A Spatial Strategy for Brent

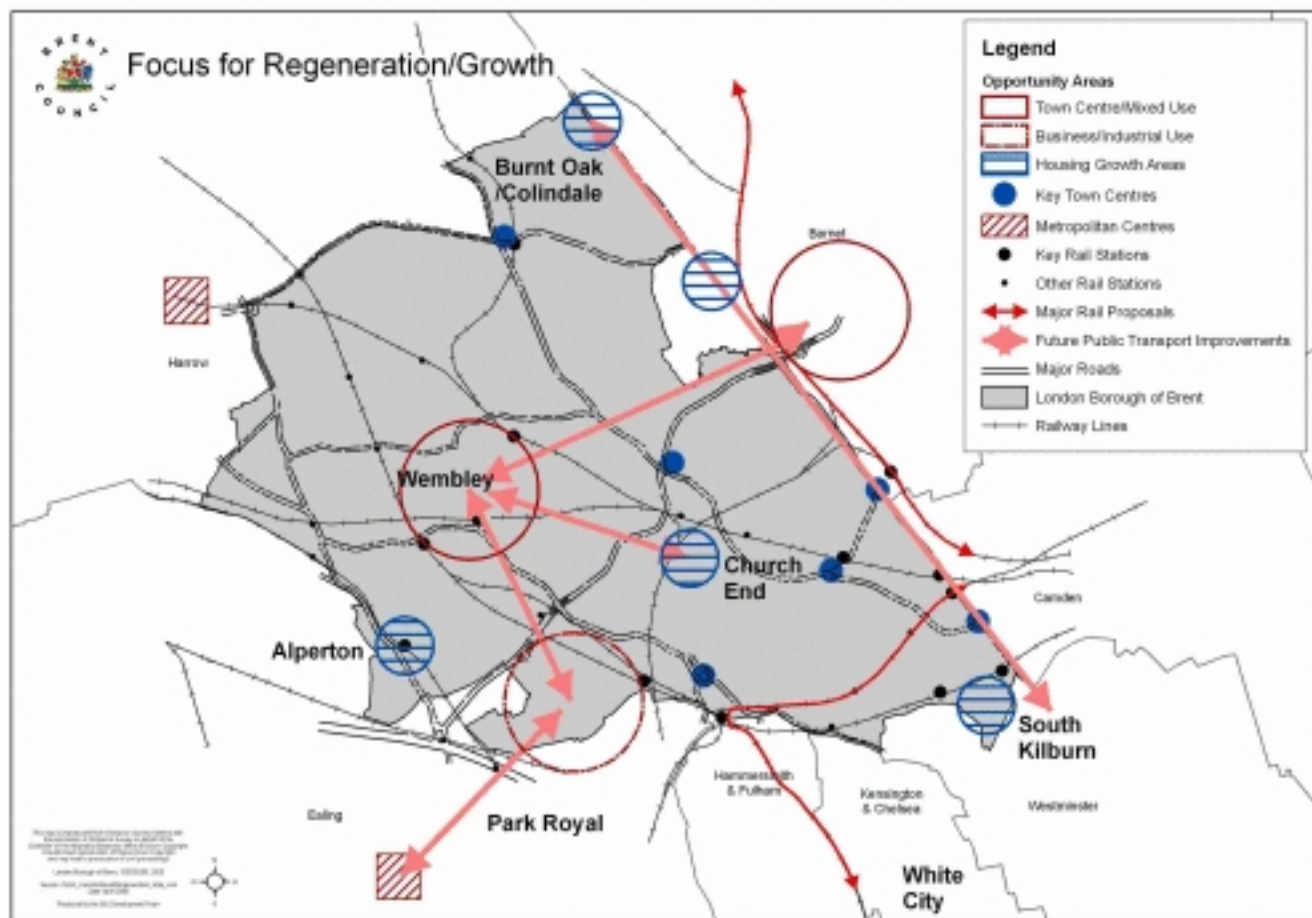
CS SS3 Focus for Growth

The focus for population growth, and therefore significant new housing development, in the Borough will be the Wembley Opportunity Area and the regeneration areas of South Kilburn, Church End, Alperton and Burnt Oak/Colindale.

In addition the larger town centres, i.e. Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden will also be appropriate locations for higher density housing as part of mixed use development schemes.

If we are to have sustainable communities, hand in hand with population growth there must also be a growth in job opportunities. These must also be local and accessible if excessive commuting into central London and elsewhere is to be avoided. In common with the rest of London, much of the new employment will be provided in the service industries such as in shops, hotels and the leisure industry as well as offices. These activities can be readily accommodated in, and should be directed towards, the larger town centres, and other accessible locations such as designated business parks. However, there is also a need to encourage new manufacturing and distribution businesses to locate in the borough as well as retaining existing. In order to do this it is important to protect and promote renewal and regeneration in those employment areas that are strategically important to London by virtue of their size, access to the strategic road network and where businesses can operate freely away from the constraints of potentially impacting on the residential environment. There are three strategic industrial and business areas either partly or wholly within Brent, all with good access to the North Circular Road, namely Park Royal, Wembley/Neasden and Staples Corner.

5. A Spatial Strategy for Brent



CS SS4 Commercial Regeneration

Park Royal*, Staples Corner and Wembley/Neasden will be promoted as strategic industrial/business locations where redevelopment for incompatible uses will be resisted, new development for business and industry will be encouraged and investment in new infrastructure focused. In addition mixed use development, including employment generating uses, will be promoted in town centres and in the Wembley regeneration area.

* A development framework is being prepared jointly with Ealing and Hammersmith & Fulham to guide and promote the regeneration of Park Royal. In the longer term a joint Area Action Plan will be prepared.

5. A Spatial Strategy for Brent

DESTINATION WEMBLEY

In line with the Council's vision for Wembley, the planning strategy for the area aims to promote the regeneration of Wembley as a regional sports, entertainment and leisure destination, taking advantage of the opportunities presented by the Stadium development and the potential for development of sites in the surrounding area. The aim is to achieve a critical mass of visitor attractions, building on the area's current role as a major leisure and entertainment centre for London. The intention is that Wembley will become an all year round visitor destination catering for a range of entertainment and leisure activities as well as Stadium and Arena events and conferences. The existing town centre will also be regenerated by allowing its expansion eastwards and by ensuring that linkages to the regeneration area to the east are improved. The first stage of this improved link, the new White Horse Bridge across the Chiltern line, is already in place.

CS SS5 Wembley as a Focus for Growth

Wembley is the main focus for growth and will be developed as a new sustainable community where the stadium will be complemented by regeneration of the area as a regional sport, entertainment and leisure destination including new shops, hotels and community facilities as well as 5,000 new homes. This will be supported by new infrastructure.

INFRASTRUCTURE TO SUPPORT DEVELOPMENT

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

In order to ensure an adequate level of provision of transport or community infrastructure, it may be necessary to achieve a critical mass of development in order to support, for example, a new health centre. Few single development schemes are brought forward which in themselves can provide the infrastructure, such as a new school, to meet the demand. Generally development is smaller scale and piecemeal so that it is only cumulatively, when put together with other schemes, that a critical mass can be reached. Provision of adequate infrastructure can only be achieved in a planned way by identifying sites where there is some certainty that new housing will come forward, estimating what the infrastructure requirements are, identifying how and where this will be provided and ensuring that development contributes an appropriate amount to the costs of provision through section 106 agreements or other mechanisms. Other sources of funding will also be sought to meet the costs of such provision.

5. A Spatial Strategy for Brent

CS SS6 Infrastructure to Support Development

The likely level of additional housing and its location will be assessed and the Council will plan accordingly for the provision of supporting infrastructure, identifying sites for new facilities where appropriate. Before granting planning permission for large-scale residential development, the Council will have to be satisfied that the infrastructural requirements arising from the scheme will be met. Contributions will be sought from development giving rise to the need for new infrastructure.

SUSTAINABLE COMMUNITIES

Achieving sustainable development is an important objective for the borough. It is fundamental to international obligations as well as being central to all aspects of national and regional policy. Some of the issues that Brent faces in terms of tackling sustainable development are: addressing climate change, protecting biodiversity and open spaces, dealing with waste, and reducing consumption of non-renewable resources. It is important that planning policies for Brent address these issues in a way that is consistent with both Government guidance and the London Plan.

CS SS7 Sustainable Communities

Planning policies will ensure that development is sustainable by:

- optimising the use of previously developed land and vacant or underused buildings
- requiring a high quality of design to facilitate higher density development
- ensuring that development occurs in locations that are currently, or are planned to be, accessible by public transport, walking and cycling
- ensuring that development takes account of the capacity of existing or planned infrastructure, including public transport, utilities and community infrastructure, such as schools, health, community facilities, open space and leisure.
- taking account of to the physical constraints on the development of land, including, for example, flood risk
- ensuring that no significant harmful impacts occur to the environment, to peoples health or to cultural assets or that such impacts are acceptably mitigated
- minimising the use of energy and water, minimising waste and use of the right materials

5. A Spatial Strategy for Brent

LOCAL BENEFITS

In promoting regeneration through growth there must be significant tangible benefits for the local community, and it is important that new development enhances the environment locally rather than having an adverse impact, through, for example, public realm improvements. Development should be aimed at enhancing the quality of life for all of Brent's diverse communities.

CS SS8 Meeting Local Community Needs

The needs of both existing and new communities should be met by development. The Council will carry out appraisals of the key growth areas to ascertain local community needs. Such needs will be met either directly or cumulatively by securing contributions from individual schemes. This could include improvements to the public realm, community facilities, new sports provision, public open space, training, child care facilities, etc.

PROTECTION AND CONSERVATION

As well as areas where growth and change can be focused and encouraged, there are also extensive parts of the Borough that need to be protected and conserved. This is not to say that change is inappropriate but that where the character of particular areas is valued then this should be retained and enhanced if possible. This is particularly important for the borough's 22 designated conservation areas. Because open space is generally limited in the borough, and extensive parts of the Borough have not got even reasonable access to public open space, there should also be a presumption against any development of open space.

CS SS9 Protecting the Built and Natural Environment

The quality and character of the borough's built and natural environment will be protected and enhanced, and there will be a presumption against development on the Borough's open spaces.

IMPLEMENTATION

In order to bring forward this development the Council will need to be pro-active in assembling sites and areas for development and in using the full range of its powers to effect positive, regenerative change and housing growth. It will carry out this work with a wide range of governmental, voluntary and statutory partners in close consultation with local communities.

5. A Spatial Strategy for Brent

CS SS10 Implementation

The Council will use its Compulsory Purchase Powers to assemble sites. It will also bring forward S106 standard charges to assist development, allocate sites and prepare Supplementary Planning Documents and Area Action Plans to help achieve its strategic planning aims.

5. A Spatial Strategy for Brent

Alternative options not selected

SS2 Population and Housing Growth

There is no alternative option to that of accommodating the level of growth proposed as the housing targets are set at a strategic level in the London Plan.

SS3 Focus for Growth

The alternative to focusing growth is to disperse new housing around the borough. This would be a less sustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc. It would also be more difficult to provide the necessary infrastructure to support development.

SS4 Commercial Regeneration

The Strategic Industrial locations have been identified in the London Plan and therefore must be reflected in Brent's strategy. The alternative to promoting a mix of uses in town centres is to develop as single uses and at lower densities. This approach, however, would not make the best use of town centres as accessible locations to public transport, would result in a greater need to travel and would mean an under-use of land.

SS5 Wembley as a Focus for Growth

Much of the growth in housing and commercial development at Wembley is committed already through planning consents therefore it is too late to pursue an alternative option of more dispersal of investment.

SS6 and SS8 Infrastructure to Support Development and Local Benefits

An alternative option is to allow for major new development and the associated population growth without requiring provision of supporting infrastructure on development, but to allow infrastructure provision to catch up at a later date. This could not be sustained because it would lead to insufficient school places, health facilities, etc. to meet needs and would result in increased congestion on transport systems with the consequential impact on the environment and local amenity through, for example, poorer air quality.

SS7 Sustainable Communities

There is no alternative to this approach as it is a central plank of Government policy for sustainable development.

SS9 Protecting the Built and Natural Environment

5. A Spatial Strategy for Brent

An alternative approach would be to have less protection of those open or built up areas that are valued in the borough to varying degrees. Such an approach would lead to greater loss of the borough's existing character, its open areas and its biodiversity which would substantially reduce the borough as an area in which to live or work and would be contrary to the wishes of the vast majority of the local community.

SS10 Implementation

An alternative option is to take a less pro-active approach to implementation of the strategy. This would result in a less sustainable approach as for SS6 and SS8 above.

6. Other Core Policies



6. Other Core Policies

6.1 Maintaining a Quality Environment

6.1.1 Urban Design

A Better Townscape –By Design



ACAD, Central Middlesex Hospital

Design is not just about the appearance or style of buildings. It is about how spaces are organised to achieve the best relationships and functioning of activities, and how this creates a sense of well being, commercial efficiency, community cohesion and a 'sense of place' –local identity. An individual building may achieve internationally recognised levels of *visual* harmony and elegance, but it must still relate to other buildings and the spaces in its particular location, and must serve people well. Whether the general public and local community actually use the building's interior or not, they are still affected by the way its internal layout allows interactions with the street, the quality of its landscape design, and how this contributes to the public realm.

The suite of new urban design policies, introduced in Brent's 2004 Unitary Development Plan, have enabled the Council to improve design and to refuse the worst schemes. There have been some notable successes in achieving exemplary design quality.

A Spatial Design Strategy

Although a high quality of design is expected in all parts of the Borough, limited resources mean there is a need to consolidate particular design attention on the areas where the quality of the environment is currently below the standard local community rightly expect of their area, as well as in the proposed new Growth Areas to ensure new development is designed and constructed to the highest standards. Brent's Spatial Design strategy will take a wholistic view of the requirements in these areas, and ensure appropriate development and design guidance is produced to ensure an environment Brent can be proud of.



The Green, Harrow Rd

6. Other Core Policies

CS UD1 Spatial Design Strategy

A high quality of urban design is expected in development proposals throughout the Borough. Particular regard will be had to the design of schemes within the Borough's 'Growth Areas', in 'Areas of Low Townscape or Public Realm Quality', as well as Brent's 'Transport Corridors & Gateways'.

Development proposals in these areas will be expected to:

- a. Significantly enhance the character of the local townscape and public realm within Areas of Medium-high Townscape Quality –being disciplined however, by existing building lines and the overall scale of the area.
- b. Make efficient use of sites with high levels of public transport accessibility, reflected in a sustainable intensity and mix of development –however, higher densities will depend on quality of design, and will only be permitted if the design is of an exemplary or exceptional standard;
- c. In Areas of Low Townscape or Public Realm Quality, to have an independence of form and design, creating where appropriate, new compositions and points of interest –making a positive design statement, including a creative use of space and materials; and
- d. Be consistent with any approved Development Framework for the Growth Area, and
- e. Make an on-site, or in-lieu, contribution towards implementation of key design or infrastructural measures in the Framework, commensurate with the scale of the proposed development.

The Council will produce, in collaboration with its partners, Development Frameworks for Growth Areas, Areas of Low Townscape or Public Realm Quality, and the Transport Corridors & Gateways.

A key consideration in assessing schemes will be the ability of applicants and their project team to commit to Brent's Design Protocol for delivering the required quality as set out above and in other policies below, to ensure the design standards of approved scheme are implemented.

“What Happens After Permission is Granted?”

A key factor which has impacted negatively on the delivery of higher quality design schemes on the ground, relates to the fact that the Planning system mainly interfaces with design at relatively early stages of the development procurement process.

As a result, after consent is granted, the design quality of many approved schemes often gets eroded during the detailed specification and construction stages as budgets are squeezed –and a mediocre or much poorer quality scheme is built. The public and local community are let down and have to live with the consequences. Their confidence and trust in the outcomes of planning and development is lost and is difficult to regain.

6. Other Core Policies

For these reasons, and due to the levels of projected growth that will occur in the Borough over the next decade, it is crucial for the spatial design strategy in Brent to significantly raise not only the quality of design proposals submitted, but also, to ensure that these design improvements are actually delivered on the ground.

An Integrated, Implementation-focused Approach



New Church End Housing

A stricter and more integrated approach is, therefore, being adopted – a ‘Design Protocol’ that will:

- Target the ‘Growth Areas’ and other Priority Areas, for special design attention;
- Integrate a number of existing and new mechanisms (e.g. Pre-applications, Design Statements),
- Ensure greater clarity of its expectations (e.g. through site design briefs, guidance, frameworks),
- Provide incentives for developers (e.g. higher end of intensity range for exceptional design); and
- Provide incentives for architects / designers (e.g. use by Brent of its own/partners’ Approved Lists or Competitions)
- Subject major schemes to design review before consent is granted (Review Panels)
- Require developers to commit to the specific design measures / specifications proposed (e.g. Conditions / S106)
- Condition consents to provide pre-commencement evidence that procurement methods to be used can deliver quality outcomes
- Ensure schemes are subject to a review after construction (Independent Monitoring);
- Rigorously enforce against material deviations / non-compliance which reduce design quality; and
- Be more proactive in seeking external recognition for excellent schemes (e.g. Awards)

6. Other Core Policies

CS UD2 Design Delivery Protocol

The Council will establish a Design Delivery Protocol. Significant development proposals within the Borough's Growth Areas, Areas of Low Townscape Quality, as well as Brent's Transport Corridors and Gateways, will be required to adhere to this Protocol.,

Conditions incorporating its principles and procedures will form part of any planning consent.

Significant developments are those on sites of 0.3 hectare or more; 1,000 sqm floorspace or more, 10 or more residential units, sites likely to have a significant impact on the public realm, major new regeneration projects and sites affecting the setting of listed buildings.

Key elements of the Design Protocol methodology will include:

- a. A pre-application matrix showing how due account is taken of contextual issues & officer advice;
- b. The submission with applications of a comprehensive Design Statement (based upon a format and contents set out in SPG4 and any revisions) clearly setting out the scheme in its context, the design rationale / principles, a schedule of specific design measures integral to the scheme, and the main specifications / their selection criteria,
- c. The use of reputable and/or appropriately skilled architects or designers from a Council or CABI Approved Listing of those who have produced quality work within Brent; or from the RIBA Client Service's recommendation based on the Council's quality criteria;
- d. Agreement to facilitate subjecting the scheme to a Design Review Panel;
- e. Conditions based on the Design Statement, and requiring submission prior to commencement, of detailed specifications for Council approval, demonstrating that approved design quality standards will be met; and
- f. Ensuring an appropriate procurement strategy is put in place for cascading design quality requirements through the project and construction teams; and
- g. Submission of an Independent Post-construction Quality Report, as a basis for enforcement action to be taken in the event of non-compliance with approved design standards.

6. Other Core Policies

Alternative options not selected:

CS UD1 Spatial Design Strategy

The alternative to this policy approach is to continue the current disparate policies dealing separately with the 'Areas of Low Townscape Quality'; the 'Transport Corridors & Gateways' and other priority areas.

The current approach has had some positive effect in terms of negotiating for design improvements in proposals within these areas, but this has been ad-hoc and limited in scope. It has not been effective in securing contributions for infrastructure improvements.

In view of the growth areas being proposed, continuing with the existing approach therefore means the full potential for achieving significantly higher design standards and public realm quality is unlikely to be realised.

CS UD2 Design Delivery Protocol

The alternative to introducing a delivery methodology (protocol) is NOT to have one. It means continuing with the existing situation of outcomes on the ground, which do not always reflect the quality that was initially intended.

The local community would be unlikely to be confident about the Council's ability to ensure the quality townscape and public realm needed to help contribute to raising their quality of life, and enjoyment of their locality.

The opportunity to use the proposed growth which is inevitable, to help regenerate areas in the borough, would be lost.

6.1.2 Towards a Sustainable Brent, 2020

The Climate is Changing - 'Future-Proofing' Our Borough



BedZed

6. Other Core Policies

The Council will lead by example, through assessing the climate change adaptation requirements of the Borough, developing a strategy for meeting them through ongoing development, and integrating these with its own Carbon Management Implementation Plan with further measures such as:

- purchase of green electricity, use of energy efficient vehicle fleets, installation of renewably powered street furniture, increase energy efficiency, use of renewables and CHP in its own buildings;
- establish a source of alternative clean fuels for its service vehicle fleet, including refueling / recharging infrastructure around the borough; and
- help provide where feasible, through public sector buildings, an anchorage heat load for community heating networks

CS SD1 Climate Adaptation Infrastructure

A 'wholistic' approach will be adopted towards developing Brent's Climate Adaptation infrastructure. The Council will produce in collaboration with its partners, a 'Climate Adaptation & Carbon Management' Strategy during the Plan-period.

This will take a Boroughwide view of embedded energy generation requirements to ensure security of supplies, particularly for key services, and the need to co-ordinate the incremental provision of these, along with a 'sustainable urban drainage' and 'sustainable waste management' infrastructure from ongoing development activity in Brent (See CS ENV1).

A key development and regeneration consideration will be the ability of design proposals to enable future connectivity between related sustainable infrastructure systems within the Borough.

National & Regional Targets: UK & London 20% Carbon emissions reduction by (on 1990 level) by 2010 & 60% reduction (on 2000 level) by 2050

1. UK to generate 10% of electricity from renewable energy sources by 2010.
2. UK to generate 20% renewables electricity and pursue policies to achieve this by 2020.
3. 15% CHP by 2010



Sunslates

6. Other Core Policies



BedZed Windcows

Specific London Targets - The Mayor's Energy Strategy estimated the level of renewable technologies needed across London. When divided between the London Boroughs, these amounted to a minimum for each Borough of:

- 213 domestic photovoltaic systems
- 7.5 PV installations on public and commercial buildings
- 15 small wind generators on public/private sector buildings
- 760 domestic solar water heating schemes,
- 61 solar water heating schemes at swimming pools,
- anaerobic digestion plants with energy recovery; and
- Biomass-fuelled combined heat and power plants

Small scale (micro-generation) projects provide a limited but valuable contribution to outputs of renewable energy and meeting energy needs:

Objectives to meet obligations / targets include;

- Set targets, consistent with London's, for local generation of renewable energy
- Other measures to meet Brent's contribution to minimum power generation target from renewable energy
- Eradicate 'fuel-poverty' in Brent by 2018
- Mainstream sustainability in the Borough through planning powers, Low-carbon regeneration and working with schools to reduce Carbon emissions
- Create a level playing field for businesses / developers
- Stimulate sustainability sector & local employment opportunities

6. Other Core Policies

CS SD2 Sustainable Design & Construction

All development is expected to contribute towards achieving sustainable development and climate change mitigation in Brent. Particular regard to climate adaptation measures (See CP ENV1) will be expected of proposals, in and adjacent to, flood-risk areas (defined on Proposals Map / Env. Agency) and in the Borough's Growth Areas.

A 'Sustainability & Climate Adaptation' Strategy is required for new development, extensions and refurbishment proposals. This should demonstrate that all the following objectives (relevant to the nature and scale of the proposal) have been adequately addressed at the design stage:

- Energy Efficiency & Renewables;
- Water Management & Sustainable Drainage;
- Sustainable Materials;
- Landscape & Biodiversity;
- Sustainable Demolition & Construction;
- Operational Waste Management;
- Pollution Control.

The strategy should include an appraisal of the proposal using the Brent/London Checklist, and/or an alternative, recognised methodology. Major schemes are expected to achieve 'Excellent' on these assessments unless extenuating circumstances make this unfeasible. Other schemes will be expected to achieve a minimum (equivalent) rating of 'Very Good'.

Implementation

: SPG19, Sustainability Checklist, Guidance to be provided on format and contents of Submitted Sustainability Strategies. S106 Benefits sought, Monitoring Regime, etc.

6. Other Core Policies

Alternative options not selected:

CS SD1 Climate Adaptation Infrastructure

The alternative to this policy is not to have a Borough strategy. This is not a viable option for two reasons; firstly because each local authority is expected to put in place preparedness measures to deal with climate change contingencies. Secondly, the Council cannot reasonably expect developers to demonstrate adaptation measures in their development proposals, while failing to set an example in its own operations. In addition, there are potential synergies and economies in taking a strategic approach to these issues -ensuring that opportunities from ongoing development are harnessed along with the Council's own efforts to provide an integrated strategy to enable Brent prepare effectively for the challenges ahead.

CS SD2 Sustainable Design & Construction

There is no viable alternative to this policy approach. The Planning & Compulsory Purchase Act 2004 and Government planning guidance in PPS1 have defined the purpose of the planning system as being to deliver sustainable development. The London Plan has existing policies on this issue, and is proposing alterations for more detailed policies, and Brent's LDF policies must be in conformity with the London Plan. It is also reasonable to combine sustainable development and climate change adaptation requirements as they are related and there are some solutions common to both.

6.1.3 Environmental Protection

The land, air and water in the borough are vital assets and important natural resources which should be preserved and enhanced to achieve an attractive and healthy borough for everyone. Planning plays an important role in the protection of the environment through guiding development to locations that will not harm the environment or local amenity, preventing potentially polluting development or requiring mitigation measures to minimise any possible negative environmental impacts. The following section sets out our core planning policies which aim to protect the environment of Brent and work towards reducing the potential impacts of climate change locally. The policies focus on air quality, noise, contaminated land, amenity, water quality, flooding and energy generation, other sections of the plan deal with the protection of open spaces and biodiversity in general.

Climate Change

The potential impact of climate change on the global environment and our economic, social and environmental well being is now well documented. The target set at Kyoto for the UK is to cut greenhouse gas emissions to 12.5% below 1990 levels over the period 2008- 2012. Further to this, the Government has set a target of cutting CO2 emissions to 20% below 1990 levels by 2010. These are very challenging targets, and require changes in the way we all live and of particular

6. Other Core Policies

relevance to planning, the way we use land. The planning process has a significant role to play in addressing and mitigating the potential impacts at a local scale through promoting sustainable development.

Flood risk is an increasingly important issue associated with climate change and its consequences. Sea levels are predicted to rise and local climate conditions are expected to change potentially increasing the flood risk of susceptible areas. In urban areas such as Brent, the risk of flooding is exacerbated by the increase in hard surfaces in recent decades, through concreting /paving gardens, patios, extensions and driveways of individual homes, which cumulatively increase surface run-off in the water system and reduce the amount of land which is able to absorb water. Policy DC ENV6 addresses this issue and seeks to mitigate the potential future risks of climate change and flooding through the control of development in flood risk areas.



Brent River Park

The efficient use of energy and the promotion of renewable energy are also vital climate change adaptation measures and will help to meet the Governments renewable energy and carbon emissions targets. Policy DC ENV 7 promotes the use of renewable energy in the borough and restricts other methods of energy generation to locations where there is a demonstrable need.

These measures together with the policies seeking to reduce the dependence on car travel, promoting the use of alternative fuels for transport and climate proofing all policies and developments will go some way to adapt to the changing climate. Policies in this section, the sustainable development section and the transport section all seek to address these issues specifically, and throughout the whole plan policies seek to

CP ENV1 Climate Change

The Council will expect development to take account of the potential impacts of climate change in any new development through mitigation measure such as:

- minimising flood risk; and
- seeking to reduce emissions from new development and refurbishments.

and, through adaptation measures such as:

- promoting renewable energy;
- seeking to reduce dependence upon car travel;
- promoting the use of alternative fuels for transport; and
- climate proofing all policies and developments.

6. Other Core Policies

Environmental Protection

Development in the borough both individually and cumulatively has environmental implications in terms of resource depletion and possible direct or indirect pollution such as impacts upon air quality or increased surface water run-off which increases the risk of flooding.



Paragraph 2 of PPS23 –states that ‘any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to impacts on health is capable of being a material planning consideration, in so far as it may arise from or may affect any land use’. The role of planning is complementary to that of the Environment Agency and also the Environmental Health Department within Brent Council, whom have the power to protect and enhance water courses, to prosecute polluters and promote nature conservation and recreation.

The following core policy CP ENV 2 and complementary development control policies DC ENV 1-7 aim to prevent and mitigate any significant potential pollution impacts arising from development in terms of air quality, noise & vibration, smell, light, dust and visual pollution, land contamination and on water quality. Flooding is also covered in this section at policy DC ENV 6 as it is a significant risk to the environment of the borough. The Council will encourage pre-application discussions where it is considered that any of the issues listed above may become a problem arising from the proposals.

CP ENV2 Protecting the Environment

The council will seek to protect the environment and amenity of the borough through:

- i) using its powers to prevent potentially polluting development arising from or affecting any land use;
- ii) encouraging development that has a positive impact on the environment; and
- iii) encouraging development that uses resources sustainably.

Development Control policies DC ENV 1-7 seek to achieve these aims. Developments will be expected to meet the requirements of these policies.

6. Other Core Policies

Alternative options not selected:

CP ENV1 Climate Change

An alternative to mitigating and adapting to climate change would be to allow commercial judgement and innovation to govern any climate change mitigation measures or adaptation in development. This strategy would mean that Government guidance would be relied upon, which is quite detailed on some issues. However, experience suggests that commercial forces alone will not address climate change, and Government guidance advises the inclusion of policies on climate change at the local level.

CP ENV 2 Protecting the Environment

An alternative option for the protection of the environment could be to develop a more prescriptive policy. This was not considered appropriate at this level, as development control policies, and supporting SPDs will provide the detailed level of guidance.

6.1.4 Dealing with Waste

More sustainable means of dealing with waste have to be introduced to reduce the current amounts that are being sent to landfill. The Government have emphasised the importance of addressing, as a priority, the need for new facilities for waste management. Waste should be seen as a resource with disposal being considered only as the last option, and there is a need to ensure that waste is disposed of as near as possible to its place of production.



Requirements in terms of the number and type of waste management facilities have been established London-wide by the Mayor, but boroughs are expected to identify specific sites in their own areas to meet the need. It is estimated that by 2015 Brent will generate 394,000 tonnes of municipal, commercial and industrial waste, 7% more than in 2005. 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.

CP W1 Waste Management Facilities

The Council will have regard to the forecast waste arisings identified in the London Plan for the borough and the West London sub-region, and will work with the other boroughs that comprise the West London Waste Management authority to identify sites, and to develop policies for the consideration of applications, for waste management facilities.

6. Other Core Policies

Alternative Options - not selected

CP W1 Waste management Facilities

An alternative option is for the borough to plan for waste management facilities on its own. Given that Brent is a member of the West London Waste management consortium which jointly decides how the constituent boroughs waste will be dealt with then it is sensible and appropriate to plan for facilities jointly.

6.2 Meeting Housing Needs

Planning for More and Better Housing

Introduction

As Brent's current housing stock of 105,000 homes is clearly insufficient to meet its residents needs; over 4,300 households are in temporary accommodation; over 18,000 are registered on the Council's Housing Waiting List as needing more suitable and more affordable homes; and Brent has the second highest level of housing overcrowding in London. The new Plan needs to provide for substantially more new homes in Brent, in accordance with both Government strategy and the London Plan. And ensure that these new homes better meet residents needs, particularly for affordable and family sized accommodation.

The Plan must ensure that all new housing is developed sustainably (ie) without causing harm to the environment and existing amenities, and is able to respond to future occupiers changing needs. This will require that the new housing is built on 'brownfield land' (land already developed) and designed and constructed so as to minimise the use of scarce resources, such as water and energy, provide a good residential environment and cope with future climatic change.



Chalkhill Estate Regeneration

The following four core housing policies cover the crucial areas of housing capacity, sustainable housing development, a balanced housing stock and affordable housing provision. Collectively, they will enable Brent to provide more housing that better meets its residents very diverse accommodation needs. New housing that will comply with the requirements of the London Plan, which is part of Brent 's statutory development plan.

6. Other Core Policies

Brent's Housing Capacity

Brent has been designated by the Government as a Housing Opportunity Borough on account of its potential capacity to provide substantially more homes. The Mayor of London undertook in 2004, with the assistance of Brent Planning Officers, a detailed Housing Capacity Study which determined that Brent has the capacity to provide an additional minimum of 9,150 self contained homes in the period between 2007 - 2017, using only previously developed (brownfield) sites and existing buildings (ie) without developing on existing open space and green field sites. .

Although, 9150 additional homes appears to be a high target, it should be seen in the context that it will represent less than a one per cent annual increase in the current housing stock. And that planning consents, for schemes involving more than 10 homes, have already been granted for 6,774 homes (equivalent to 74% of this target); the vast majority of which will not have been completed before the start of the 2007 target monitoring period. Furthermore, a further 1,500 homes are to be provided through the approved regeneration strategy for South Kilburn.

The Mayor's Housing Capacity Study also estimated that Brent had the potential capacity to provide a further 1000 non –self contained homes and should be able to bring back into residential use 1000 vacant homes. The 1000 non self contained homes target was derived by the Mayor from historical development trends, mostly for hospital staff and student housing schemes; which may or may not be replicated to such an extent in the future. And the 1000 vacancies target stem from Brent's relatively high number of private homes (1,820) which have been vacant for more than six months. However, the reoccupation of such vacancies is a matter largely outside the control of the Planning system.

The Mayor has recently recognised (Proposed Alterations to the London Plan), that these non self contained and vacant targets should be separately monitored from the self contained target; inferring that Brent would not be expected to produce more than 9,150 self contained additional homes simply to compensate for not attaining the non self contained and vacant targets.

The Mayor has also supported Brent's Housing Opportunity Borough stance that the implementation of Brent's potential housing capacity is very dependent on the provision of any necessary enhanced or new physical (eg, roads and transport) and social (eg, schools and health centres) infrastructure.



New Housing Old Kenton Lane

6. Other Core Policies

CP H1 Housing Provision

The Plan seeks to increase the supply of housing to meet identified Borough needs by :

a) Enabling the sustainable provision of an additional minimum of 9,146 self contained, and 1030 non self contained, homes through new build, conversion, estate regeneration and change of use schemes on brownfield (previously developed land) sites between 2007 and 2017, in accordance with the London Plan Proposed Alterations (as informed by the London Housing Capacity Study 2004).

b) Preventing any net loss of housing unless it is required to meet a regeneration objective or the provision of an essential community facility.

Attaining these additional housing targets will be dependent on the timely provision of any environmental, physical and social infrastructural enhancement required to prevent unacceptable overstress on existing provision and amenities. Developers will be expected to make an appropriate contribution to the provision of required environmental, physical and social infrastructure .

The Council will regularly monitor the provision of new housing consents and completions in the Brent Annual Monitoring Report.

Sustainable Housing Development

Ensuring sustainable housing development in Brent requires maximising the number of new homes on all sites suitable for new housing without causing harm to the existing local environment and townscape and the amenities enjoyed by existing occupiers. Concentrating new housing development in areas with good public transport links will reduce the environmental problems caused by traffic generated pollution and congestion.

Although, new housing is a major user of materials, energy and water. There is no reason why it cannot be designed and constructed so as to minimise the use of scarce materials and non renewable resources. It is very feasible to design and build new housing that will consume much less energy and water than older housing. Larger housing developments with their inherent 'economies of scale' offer enhanced opportunities to employ the most sustainable design and construction techniques, such as solar and photo voltaic panels for energy production and 'grey water' and sustainable urban drainage (SUDS) recycling systems.

Sustainable housing development also requires ensuring that new homes are of sufficient internal size, with enough external amenity space, to provide a reasonable quality of accommodation and amenity provision for their intended occupiers.

6. Other Core Policies

CP H2 Sustainable Housing Development

The Plan seeks to ensure to ensure that all new housing is located, designed and constructed so as to :

- a) Maximise the opportunities the site affords
- b) Complement and enhance the local environment / townscape
- c) Promote travel efficiency
- d) Minimise the use of non renewable resources
- e) Maximise energy and water conservation
- f) Provide a safe and attractive environment for both new and existing occupiers

Maintaining And Providing A Balanced Housing Stock

Brent's very diverse population means that it has a corresponding need for a wide range of accommodation sizes and types.

Ensuring sufficient family housing provision is a particular need in a Borough with the second highest household size in London and where 23% of the households are living in overcrowded accommodation. This problem is exacerbated by the fact that Brent is not providing sufficient new family housing, particularly for larger households, as over 75% of the housing completions between 1997-2004 have been 1/2 bedroom units.

Brent has also lost irreplaceable larger family accommodation through conversion and housing demolition and redevelopment.

These housing development trends therefore indicate the need to reconsider the

6. Other Core Policies



current UDP definition of family accommodation, as comprising a minimum of two bedrooms, in favour of accommodation capable of providing at least three bedrooms on sites providing ten or more homes and in house conversions schemes. Family accommodation would not be required on sites where it not possible to provide a reasonable environment for young children.

Many Brent residents have mobility problems and require accommodation that is designed and constructed so as to be easily accessible either on foot or by lift. Brent has a particular

shortage of housing suitable for those confined to wheelchairs. The London Plan requires that these mobility housing needs should be addressed through ensuring that all new homes are designed and constructed to Mobility Housing Standards and that 10% should be wheelchair accessible.

In addition to this range of self contained accommodation, the new Plan also has to make provision for those requiring non self contained accommodation, such as hostels for households without children and housing providing care and support, such as nursing homes.

CP H3 A Balanced Housing Stock

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

- a) An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) .
- b) Housing designed and constructed to meet 'lifetime homes standards'; 10% of ground floor units and those with lift access should be designed and constructed to wheelchair accessible/adaptable standards.
- c) Non-self accommodation to meet identified needs
- d) Care and support accommodation for those unable to live independently

Affordable Housing

As Brent has relatively high house prices but its residents have relatively low incomes (£6,000 lower than the London average), the Borough needs at least 3,386 new affordable homes each year (Brent Housing Needs Survey 2004). Although it will never be realistically possible to provide

6. Other Core Policies

new affordable homes on anything approaching this scale, it should be possible to substantially increase the number of new affordable homes (249 in 2004/5), and hence better achieve the 50% affordable housing target, by reducing the current 15 homes site threshold to 10 units. This proposal would be in accordance with both the London Plan and evolving Government strategy.

The London Plan also requires that new affordable housing should be provided in a 70%: 30% social rental housing and intermediate housing (such as shared ownership) ratio. This also accords with the Brent Housing Needs Survey finding that only 32% of those in priority housing need could afford intermediate housing and mostly only for the smaller (1/2 bed units).



Family Housing, Old Kenton Lane

CP H4 Affordable Housing Provision

The Plan seeks to increase the Borough's stock of affordable housing by :

- a) Protecting existing affordable housing unless it is required to meet a regeneration objective or provide an essential community facility
- b) Ensuring that new housing in suitable schemes on sites with a capacity of ten or more dwellings makes the maximum reasonable contribution towards the Borough's target of 50% affordable new housing provision.

6. Other Core Policies

Alternative options not selected:

CP H1 Housing Provision

Only potentially feasible option would be a higher housing target, as lower or 'stand still' targets would not be in conformity with the London Plan, or generally accord with Government strategy. However, a significantly increased housing target may not be environmentally or infrastructurally sustainable. A significantly higher target would require substantial loss of employment sites and/or significant Greenfield housing development, involving the loss of open space amenity areas. Not requiring developers contributions to enable the necessary physical, social and environmental infrastructural enhancements would place an unreasonable new provision burden on existing residents and occupiers.

CP H2 Sustainable Housing Development

Ignoring sustainability issues would be contrary to the above strategies. More detailed sustainability implementation requirements may be deemed unduly prescriptive.

CP H3 A Balanced Housing Stock

To generally meet a narrower needs range would be contrary to London Plan and Council housing strategies.

Over 75% of the housing completions between 1997-2004 have been 1/2 bedroom units. This does not accord with Brent's demography and housing needs. Current definition of family accommodation as comprising a minimum of two bedrooms is not evidentially supportable, particularly in private sector. Hence, need to redefine family accommodation. As the proposed 30% three bedroom requirement would only apply to sites of ten or more units and would be further subject to site suitability, the overwhelming majority of units would still be 1/2 bedrooms to meet the predominant smaller household needs.

Retention of current two bedroom definition would not generate sufficient additional family accommodation. Higher bedroom size requirement, specified mix of 1/2/3/4 bedroom or application without regard to site suitability, could be regarded as unduly prescriptive.

To better meet the needs of household with mobility disabilities.

Omission of requirements would either not be in conformity with the London Plan or would require an empirical justification which cannot be evidenced.

To recognise that there is a range of housing needs that cannot viably be met by the provision of self contained accommodation. Failure to make satisfactory enabling provision would ignore significant housing needs.

CP H4 Affordable Housing Provision

6. Other Core Policies

A lower target and/or higher threshold would not be in conformity with the London Plan and would significantly fail to address Borough housing needs. A higher target and/or lower threshold would better address Borough housing needs but may not be financially viable.

6.3 Connecting Communities

Reducing The Need To Travel

In order to facilitate a growing population and economic prosperity, as well as improving the quality of life of the local community, transport connections need to be improved. It is also important, to help combat climate change and minimise adverse impacts, to reduce dependence on the private car by reducing the need to travel and promoting walking, cycling and public transport. The Council will seek, and lobby for, increased Central and Regional government funding for improved transport provision to facilitate growth and regeneration.

CP TRN1 Prioritising Investment & Promoting Non-Car Modes of Transport

Investment in transport infrastructure will be prioritised so that it meets the needs of the growth and regeneration areas identified above. Contributions will be sought from development to improve modes of transport other than the private car.



Development that attracts large numbers of people (such as shops, leisure uses and offices) should be located in areas with good public transport access, so as to reduce the use of the private car. In accordance with national and regional policy, the plan applies a sequential approach to the consideration of proposals for such uses so that only if no sites are available in town centres will they be permitted outside town centres.

Also, if development that generates significant numbers of trips (including housing) is located near to local facilities and work (through, for example, mixed use developments) then the need to travel can be reduced. One of the key aims of the Plan is to promote access by the whole community, and reducing the need to travel, through promoting developments with a mix of land uses, can help in this. The location of housing in relation to public transport is also important in determining whether people use a car for work or leisure trips.

6. Other Core Policies



Policies on the location of development must be supported by policies that influence the means of transport. Sustainable means of transport such as walking, cycling and public transport are promoted in the strategy so that the whole community can access new development.

CP TRN2 Reducing the Need to Travel

A pattern of development that reduces the need to travel, especially by car, will be achieved by:

- (a) Locating major trip generating activity in areas most accessible to public transport, in particular at the main transport interchanges;
- (b) Giving priority to public transport, walking and cycling;
- (c) Encouraging developments with a mix of uses in appropriate locations;
- (d) Increasing residential densities, particularly in, or close to, town centres; and
- (e) Securing significant public transport improvements.

Parking And Traffic Restraint

In order to improve the environment and reduce congestion a number of measures to restrain the use of the private car will be necessary. The amount of parking available at the end of a journey is the key means within planning powers to reduce car usage, particularly if combined with the use of on-street parking controls, i.e. controlled parking zones.

CP TRN3 Parking & Traffic Restraint

Maximum off-street parking standards, related to public transport accessibility, will be applied to new development to reduce over-reliance on the car.

Transport Links In London

Brent's roads and rail lines form part of a wider network of transport links in London. It is important to co-ordinate strategic transport links such as the London Bus Priority Network and the London Cycle Network across London.

6. Other Core Policies

CP TRN4 Transport Links in London

The implementation of the London Bus Priority Network and the London Cycle Network will be a priority, including requiring provision as part of the development of appropriate sites.

Alternative options not selected

CP TRN1 Prioritising Investment & Promoting Non-Car Modes of Transport

An alternative to prioritising infrastructure investment in the growth areas would be to spread investment evenly across the borough. This would be a less sustainable approach as the critical mass of investment could not be achieved in particular locations which is necessary to influence people's modal choices. The strategy could also recognise that car usage is inevitable and not seek to promote investment in non-car modes. This is an unsustainable approach which is likely to result in higher levels of greenhouse gas emissions and congestion and would disadvantage those without access to a car.

CP TRN2 Reducing the Need to Travel

Spreading development more evenly around the borough at lower densities is a more unsustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc.

CP TRN3 Parking & Traffic Restraint

There is no option other than to apply maximum parking standards as this is a requirement of both national government policy and the London Plan. An alternative to relating standards to public transport accessibility is to apply the same standard across the borough but this could result in serious under-provision of parking in areas where there is little or no alternative means of access resulting in excessive on-street parking and potential under-investment in development opportunities.

CP TRN4 Transport Links in London

An alternative is to not prioritise the strategic links but to prioritise on purely local grounds. This would result in key strategic routes not being implemented with a consequential impact on the ability to meet strategic aims and objectives in promoting public transport and walking.

6. Other Core Policies

6.4 A Strong Local Economy

6.4.1 Business and Industry

Business, Industry and Warehousing

Within a diverse economy, employment can take many different forms and present a range of challenges and opportunities in terms of spatial planning. People work in office businesses, within hospitals and schools, within factories and warehouses and within shops within town centres. It is important to recognise that the employment profile is changing across London but also that different sectors have important roles to play.

Although such development can and does create employment, policy direction for the development of community facilities such as education and healthcare is contained within the Community Facilities section. The Council will prefer to see certain uses within town centres, such as retail and office (except business park development) and the Town Centres and Shopping section will provide direction in this regard.

This section is concerned with the use or reuse of land and premises employment uses. This includes industrial based operations, and those typically found within office accommodation.

Industrial employment has experienced structural change across the world in the face of globalisation. In many areas, this has resulted in the disappearance of business and sources of employment. This has presented opportunities for land owners and house builders as sites have become redundant and pressure for more homes has increased. The London Plan 2004 forecasted a loss of 58,000 industrial and warehousing across London.

The office development market is sensitive and is currently not at its strongest across London. Less speculative development is occurring and developments of a strategic nature are locating towards the east, where the financial and services sector is expected to expand from the City and Canary Wharf. There remains interest in some office development in Brent at Park Royal and Wembley Stadium.

It is therefore important for the Council to provide certainty to current and prospective employers that they can locate and expand in Brent. By identifying land for such activities, it is also likely that there will be premises and parcels of land that are less suitable or attractive for occupation or development. The Council will need to provide policy direction as to the best use of these sites.

Protection of Employment Land and Premises

The key function of the Local Development Framework in terms of industry is the protection and designation of sufficient land and premises for sustainable economic development. Such land and premises are coming under intense pressure for the development for higher value uses, particularly residential development.

6. Other Core Policies

Despite this pressure, and the structural change that has been experienced within industrial sectors, in the interests of maintaining a strong and diverse local economy that also provides a regional and national role, the protection of land and premises for business, industry and warehousing remains significant.

CS BIW1 Protection of Employment Land and Premises

Industrial Employment Areas (IEAs) are designated for the protection, establishment and expansion of industrial operations characterised by use classes B1c, B2 and B8, or Sui Generis uses that are closely related.

Some of the Industrial Employment Areas are also Strategic Employment Locations, a designation that is determined by the Greater London Authority and enshrined within the London Plan. The London Plan states that Strategic Employment Locations (SELs) can be Industrial Business Parks for operations requiring a high level of environmental quality and Preferred Industrial Locations for those with less demanding requirements.

Principles of Business, Industrial and Warehousing Development

As economic structural change has occurred, the nature and the impacts of industry have changed. There are less factories than before, but more wholesalers and distribution centres. This means that the environmental impact of industry has also changed, so that emissions of pollutants are likely to be less localised and instead contribute to the increased pressure upon the road system, so that the impacts may be felt on a regional or national scale.

Office developments can attract large numbers of people and journeys and therefore have the potential to generate increased congestion on the Borough's road networks. In addition, the density of employment within offices is such that employees will require a range of services that are generally found within town centres.

In order to encourage sustainable economic development in Brent, proposals for new business, industrial and warehousing should be developed to modern standards so that the development meets sustainable development objectives.

6. Other Core Policies

CS BIW2 Principles of Business, Industrial and Warehousing Development

Applications for business, industrial and warehousing development will be required to demonstrate that principles of modern usage have been considered, in particular:

- the sequential approach (for office development)
- the efficient use of land, including the possibility of intensification
- relationship with adjoining sites and uses and the spaces between buildings and parcels of land
- modern premises that are fit for purpose
- flexible workspace
- energy efficiency and waste management (see policy CS SD2)
- environmental impact of operations and movement, and mitigation measures

The Re-use of Employment Land and Premises

There are some industrial areas located adjacent to or within the residential fabric of Brent. These areas perform a different function to IEAs as they entail a more intensive use of land; provide local employment opportunities across the borough; and provide workspace for new and emerging enterprise.

However, some cases, these areas are unsuitable to be located in such proximity to residential areas and/or may be unsuitable for employment led regeneration, or there may be little or no demand for the premises. As such, and in order to meet the Council's wider regeneration objectives, the Council may consider redevelopment of these areas.

CPBIW3: The Re-use of Employment Land and Premises

Apart from Industrial Employment Areas, the Council will permit the redevelopment of employment land and premises where proposals:

- Entail a provision of modern workspace that is fit for purpose and may include managed affordable workspace for emerging business
- Significant environmental improvements and sustainability gains to the environment by virtue of the design of workspace and operational standards
- Meet the Council's wider regeneration objectives.

6. Other Core Policies

Alternative options not included

CS BIW1 Protection of Employment Land and Premises

If the Council decided not to protect industrial employment land, there would remain a supply of Strategic Employment Land– designated by the London Plan. This approach would allow significant opportunities for residential development upon previously developed brown field land, significantly increasing housing numbers within Brent.

This would be unsustainable due to substantially increased residential development will lead to many more cars upon the borough's roads and lead to greater congestion; increased levels of local and regional unemployment; and a disproportionate number of homes to jobs resulting in a 'dormitory' borough where people travel away to work.

CS BIW2 Principles of Business, Industrial and Warehousing Development

Establishing principles of business, industrial and warehousing development along the themes of sustainable development helps to contribute to the creation of sustainable communities. Such principles can also help to support the viability of industrial employment land by maintaining modern standards of land use and managing the cumulative impact of development.

An alternative approach could be to 'deregulate' such development in order to maximise the potential of economic development by removing the requirements of developments. However, the Council could also decide to establish more prescriptive standards of development, but that could prove inflexible and restrictive to some development in some areas.

CPBIW3: The Re-use of Employment Land and Premises

Although the Council seeks to protect a supply of readily available industrial employment land, national and regional policy requires that the supply is reviewed and that surplus land be identified for alternative uses, especially for residential development.

There is therefore a presumption for the redevelopment of industrial areas under certain circumstances, except for designated Industrial Employment Areas, where such change will be strongly resisted.

Two alternative approaches could be considered. Firstly, these areas could be awarded no protection so that their redevelopment for alternative uses would be subject to the performance of the market; and secondly, the Council could afford more stringent protection and not consider redevelopment under any circumstances.

6. Other Core Policies

6.4.2 Town Centres and Shopping

Wembley Town Centre

Brent Household Shopping Survey 2003 demonstrated that Wembley is the main shopping destination within Brent. However, a low proportion of shoppers do their main food shopping in Wembley. Centres in Brent do not operate in isolation, but are influenced by neighbouring retail locations. Brent centres will be affected in particular by:

- Current and future development at Brent Cross, as a regional shopping centre.
- Harrow and Ealing are neighbouring Metropolitan centres, which will continue to attract some of the retail expenditure of Brent's residents.
- White City is being developed into a major retail destination, which will attract residents from the south of the borough.
- And the West End, the principal shopping destination for London, will always attract Brent shoppers.

Basically all these centres will compete with Wembley for shoppers and for national retailers. A Boroughwide Retail Capacity study recommended that the majority of the available expenditure growth in the Borough should be allocated to Wembley, to secure its Major centre status, and attract regenerative investment to ensure future growth. This will enable it to become Brent's pre-eminent centre.

CS TC1 Wembley Town Centre - Principal Retail Location

Wembley Town centre is designated as the principal centre within the Borough, with a civic focus.

The Council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development.

Major retail or leisure development will only be permitted in other town centres or edge-of-centre locations, if it can be demonstrated that no sites are available in Wembley.

The Council will continue to work with its partners to produce a Design Framework (see policy CS UD1) for implementing a comprehensive environmental improvement programme in Wembley. Proposals are expected to significantly enhance the quality of shopping, leisure provision, and the townscape and public realm in Wembley in accordance with its Borough status.

6. Other Core Policies

Town centre uses are those defined in PPS6 (para.1.8), including: retail, leisure, entertainment, intensive sport/ recreation, commercial and civic offices, as well as arts, culture and tourist uses, along with housing in mixed use, multi-storey developments.

Location of New Development



Given that the main aims of Council policy are to improve shopping and other facilities and ensure that they are accessible to all sections of the community, including those without access to a car, then it is important that major developments should be directed to those locations which are most accessible by public transport, i.e. town centres. In this way, shopping facilities and other services can be conveniently located together and, for example, a visit to a food shop can be combined with a visit to other shops and services, thus reducing the need to make additional journeys. This is

particularly important for those without access to a car such as the elderly and those with caring responsibilities. New retail investment is also vital if Brent's run-down centres are to be regenerated and thus continue to be important foci for their local communities. Major retail developments would provide the town centres with a considerable boost, increasing their attractiveness to shoppers and bringing infrastructure improvements in the form of better servicing, car parking and road improvements. These considerations also apply to other key town centre uses which generate high numbers of visitors such as leisure and entertainment facilities.

In order to promote major development in town centres, the sequential approach set out in Government policy will be applied when considering the location of new retail and other major development such as cinemas.

6. Other Core Policies

CS TC2 Other Preferred Locations

Proposals for retailing and other town centre uses which attract a lot of people, will be determined in accordance with the sequential approach.

Major & District Centres

Within the Major Town Centres and District Centres schemes for the above use should be consistent with the scale and function of the centre within which they are located.

Town centre proposals that reinforce, or help implement the Strategy for particular centres will be particularly encouraged.

On the edge of Major Town Centres and District Centres, proposals will be required to comply with the above and should be designed to integrate effectively in existing frontages. In addition they are required to demonstrate:

- (1) A Need for the development in the format proposed;
- (2) That no sequentially preferable site is available (for major development) in Wembley (CS TC1);
- (3) That there would be no unacceptable impact on the vitality and viability of other town or district centres; and
- (4) That the development would be accessible by a choice of means of transport.

Local Centres

In local centres, proposals for small to medium scale retailing and town centre uses, will be permitted where they serve a local catchment area, meeting people's day to day needs.

Proposals for larger scale retailing or other facilities will be required to comply with criteria (1) (2) and (4) governing the consideration of edge-of-centre developments as set out above.

6. Other Core Policies

CS TC3 Exceptional Locations

Neighbourhood Centres

Only very small-scale town centre uses will be permitted to locate in Neighbourhood centres.

Out-Of-Centre Locations

Out-of-centre proposals for the development or extension of retail and other town centre uses, will not be permitted unless:

- (a) There is a clearly demonstrated Need for the proposal, in the format proposed;
- (b) There is no sequentially preferable site available in Major, District or Local centres (**CS TC2**);
- (c) The proposal, by itself or cumulatively with other completed developments or commitments, would not have an unacceptable impact on the vitality & viability of Town, District or Local centres, nor compromise their ability to attract regenerative investment; and
- (d) The site is, or can be made, moderately accessible or better, by public transport and a choice of other means of transport, including existing or new, suitable pedestrian & cycle access.

In addition, wherever possible, such developments should be combined with other existing out-of-centre developments. Conditions will be used to limit the floorspace, subdivision, goods range, mix of convenience and comparison offer, and keep ancillary nature of subsidiary elements of the schemes.

Town Centre Opportunity Sites

Key to improving Brent's more run-down town centres is a need to identify opportunities to regenerate them through new development, including the redevelopment of existing outmoded property so that it can meet modern requirements. A number of opportunity sites have therefore been identified within, or on the edge of, certain town centres in the Borough.

6. Other Core Policies

CS TC4 Town Centre Opportunity Sites

Within the boundaries of the Boroughs network of Town Centres sites suitable for town centre development have been identified. These opportunity sites are listed within the Site Specific Allocations and shown on the Proposals Map.

These do not preclude the assembly of other town centre sites in Wembley town centre, which may become available for regenerative amalgamation for major retail and/or leisure development, such as a Shopping Mall, if this is demonstrated to be consistent with Brent's strategic Objectives.

Network of Town Centres

There are a number of centres in Brent which, because of their size, status, range of shops and other facilities and the extent of their catchment areas, have been designated as town centres. It is in these centres that the Council will concentrate efforts to achieve environmental improvements and ensure good accessibility for the whole community. In particular, there is a need to ensure ease of access to shops and other facilities from public transport.

They have been divided into either major town centres within London, District Centres and Local centres according to their size and the facilities they provide. This is in accordance with the strategic designations in the London Plan. It is also recognised however, that centres continue to evolve and that relative positions in the hierarchy can change over time. Centres within Brent will be monitored and their categorisation reviewed if appropriate.

Due to the urgent need to improve the provision of shops and key services in accessible locations for local communities, the Boroughwide Retail Capacity study has also recommended that the likely growth in demand for shopping floorspace over the next 5-10 years should be allocated between the designated centres. Opportunity sites have been identified within them, and more sites may become available during the plan period.

NB.* Certain centres, because of administrative boundaries, are divided between Brent and neighbouring London Boroughs. Policies within this Plan apply only to that part of the centre in Brent, although there will be close liaison with neighbouring Boroughs to ensure compatibility of policies and proposals for the centres as a whole.

6. Other Core Policies

CS TC5: Network of Town Centres

The Town Centres in the Borough form a network –based upon the following hierarchy.

Major Town Centres

Wembley

Kilburn

District Centres

*Burnt Oak

Harlesden

*Cricklewood

Willesden Green

Ealing Road

Wembley Park

Kingsbury

Local Centres

*Colindale

Preston Road

*Kenton

Queens Park

Kensal Rise

Sudbury

Neasden

There are also 36 **Neighbourhood** Centres, defined in the Appendix & Proposals Map.

The Boundaries of all the town centres will be defined on the Proposals Map.

6. Other Core Policies

Alternative options not selected

CS TC1 Wembley Town Centre Focus

An alternative option is to have no town centre focus and allow economic growth to be more dispersed. Such an approach could lead to the creation of ad-hoc retail provision and investment in accessible locations. It would also mean that the opportunities which have arisen at Wembley, as a result of stadium regeneration, would not be maximised. It would also diminish the opportunity for Wembley to be regenerated consistent with its status as a major centre. PPS6 states that LPAs should identify the centres within their area where development should be focused.

CS TC2 Other Preferred Locations & CS TC3 Exceptional Locations

It is a requirement under PPS6 that LPAs must apply the sequential approach in their development plans to support retail and related town centre use developments at more central location. There is no alternative option available.

CS TC4 Town Centre Opportunity Sites

Government guidance in PPS6 states that LPAs, after considering the need for development, the likely impacts on other existing centres and accessibility, should identify and allocate sites for town centre development consistent with the sequential approach. The selected policy option recognises that if town centres are to be maintained and enhanced then opportunities for redevelopment and expansion will have to be identified.

CS TC5: Network of Town Centres

PPS6 requires that LPAs consider a network of town centres and their relationship in the hierarchy and to consider the need for regeneration to strengthen them. In addition deficiencies in the network should also be highlighted by promoting centres to function at a higher level in the hierarchy, or by designating new centres. Wembley and Kilburn are the London Plan identified Major Centres. Their position is fixed. Below Major centre, therefore, an option is to identify an alternative network. However, regular monitoring of the town centres such as the level of floorspace, the number of multiples, level of vacancies, etc. means that the hierarchy identified is based on the best available evidence.

6. Other Core Policies

6.4.3 Culture and Tourism

Promoting Leisure and Tourism



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. Wembley particularly, is a prime location for new leisure and tourist facilities due to its good transportation links to inner and outer

London and potential to cater for large numbers of visitors. As a tourist destination, Wembley Stadium has stimulated new growth and regeneration in the area, and will also benefit from the hosting of football at the 2012 Olympic Games.

Leisure and tourism 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 facilities includes, museums, art galleries, theatres, sporting and recreational facilities, snooker halls, nightclubs, cinemas, concert venues, casinos, bingo halls, gyms, swimming pools and other tourism related facilities. These facilities should be made accessible for local communities as well as visitors, and be a place where cultural diversity can be explored and enjoyed.

Brent people take pride in their cultural diversity and are supportive of events such as the Respect Festival, St Patrick's Day Parade and Diwali Festival where local talent in music, arts, dance, and culture can be performed. Good public art, such as sculptures, mosaics and murals that help create interesting and attractive environments, also stimulate community involvement and engender civic pride. To build upon existing opportunities, applications of significant impact and those directly related to the leisure and tourism industry will be required to contribute towards enhancing public realm through the promotion of public art and cultural diversity, and provision of additional visitor facilities where appropriate.

6. Other Core Policies

CS CT1 Promoting Leisure and Tourism

Leisure and tourism activities, including arts, culture, sports and entertainment, will be promoted in accessible locations in accordance with the sequential approach (see policy CS TC2). Facilities will be promoted for the enjoyment of existing communities as well as those visiting the borough, enabling Brent to become a showcase for entertainment and cultural diversity. Contributions from relevant major and all significant applications will be sought towards the promotion of arts, culture and tourism throughout the Borough.

Alternative options not selected

CS CT1 Promoting Leisure and Tourism Two alternative options are:

a) Allowing leisure and tourist facilities to locate anywhere in the Borough without good access - This would attract business away from town centres and result in decentralisation of network infrastructure. By focusing leisure and tourism facilities in town centres with better transport links, these uses are more accessible to a wider range of users and supported by other complementary uses, such as shops, restaurants, information bureaux, and other leisure activities. Also, the impacts of these facilities can be more easily managed, rather than being dispersed throughout the borough where residential character and amenity may be compromised and impacts on surrounding uses may be greater.

b) Leisure and tourism facilities not promoted and no contributions sought - As a borough it would be a missed opportunity to help raise the local economy and promote regeneration, particularly as tourism revenue accounts for 6.4% of the UK's total GDP. Leisure and tourism facilities help make Brent an enjoyable and a pleasant place to be, and would be advantageous for developers who impact on existing infrastructure and resources to help contribute towards improving public realm, the creation of high quality environments, and boosting the local economy.

6. Other Core Policies

6.5 Open Space and Recreation

Protection and Enhancement of Open Space and Biodiversity

All open space, including public open space, private gardens, sports grounds, playing pitches, allotments, outdoor play areas, urban green space, cemeteries and waterways will be secured for the biodiversity of plants and animals and for outdoor recreation and amenity use. Any development that takes place should be for the benefit and enhancement of open space use.



Metropolitan Open Land, Green Chains, and the Blue Ribbon Network are classified as being of London importance for their open character and linking of strategic open space. Sites of Special Scientific Importance, Local Nature Reserves and Sites of Important Nature Conservation value also require individual protection due to their strategic importance for specie and wildlife habitats.



Local Junior Cricket Team

Where development would result in additional pressure on existing open space, particularly where open space is not easily accessible to a proposed development, on-site provision or contributions towards new or improved open space and play facilities will be required. This will help increase the quality of life for people living and working in the area balanced with the enhancement of habitats and biodiversity within our urban environment.

CP OS1 Protection and Enhancement of Open Space and Biodiversity

All open space, private and public, of recreational, amenity or nature conservation value, will be protected from inappropriate development, particularly areas designated to be of strategic or borough importance, and those which contain important habitats for wildlife species. Enhancement of open space, including new or improved provision, will also be sought through all new development where additional pressure on open space and outdoor play facilities would be created.

6. Other Core Policies

Alternative options not selected

CP OS1 Protection and Enhancement of Open Space and Biodiversity

Alternative options are:

a) *To only protect MOL, POS and areas of National, Regional or Local significance, allowing the loss of other open space* - Allowing development on non designated open space areas such as private sports grounds and allotments, would exacerbate pressure on existing public open space, and reduce overall opportunities for sport and recreational activity. Other non designated open space areas also have an important role to play in maintaining biodiversity and balancing the health and well being of people, particularly young people who need access to play and recreation for their physical growth and development.

b) *Protect MOL, POS, and areas of National, Regional or Local significance and allow the loss where it is not in a deficiency area and surplus to requirements* - Assessments of provision and demand for open space demonstrate that there is a deficiency in the borough of public open space, playing fields and remaining allotments are well used. It is known that Brent is a third below the recommended National Playing Fields Association standards for open space area per population, and deficiencies are not evenly distributed. In addition public consultation has shown that most people wish to provide further protection for allotments and playing fields than currently exists.

6.6 Community Facilities - Increasing Opportunities and Decreasing Inequality

Having good access to education, healthcare, social care, faith institutions and other community facilities and services, are fundamental for helping to decrease social inequalities within and between different communities in Brent. Once these foundations are well established, people can have the opportunity to lead healthy, safe, and well balanced lifestyles and develop the skills to become valued members of society.



These essential facilities, which form the social fabric of our communities, will need to be provided alongside a growing population with a wide range of needs. Brent has a young and culturally diverse population, with a strong sense of community, and the challenge will be to build upon this, and facilitate equal access to services and facilities in accessible locations.

Opportunities for new community facilities are often limited as they cannot compete financially on equal terms with land uses such as

6. Other Core Policies

residential or commercial use, which attract higher land values. The policy seeks to address this by protecting existing facilities and requiring the provision of new or improved facilities where any new need arises from major residential or mixed use development.

CS CF1 Meeting the needs of the Community

The provision of accessible community facilities that meet the needs of present and future generations will be encouraged, enabling equal opportunities for learning, health, social care and general well being. Existing facilities will be protected or appropriately replaced to allow for the future needs of the community. Relevant major and significant applications will be required to make contributions towards, or provision for, new or improved facilities to meet the needs of a growing population.

Alternative options not selected

CS CF1 Meeting the needs of the Community

An alternative is to allow the market to determine where community facilities are located. Community facilities, while integral for public or community benefit, are low value uses and cannot compete financially on the open market against higher land use values such as housing or commercial use. As demand for land substantially outweighs supply, community facilities are likely to be under provided or forced to locate in areas not well accessed by the wider community. Existing Facilities are also likely to be over stretched and under-resourced if new provision is not made when allowing for new growth and development.

6. Other Core Policies