

SUSTAINABILITY APPRAISAL
of
**London Borough of Brent's
Local Development Framework
Core Strategy**

Commentary on the Draft Core Strategy (June 2006)

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Prepared for Brent Council

by

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ABBREVIATIONS

CEP	Collingwood Environmental Planning
DC	Development Control
DPD	Development Plan Documents
LBB	London Borough of Brent
LDD	Local Development Documents
LDF	Local Development Framework
ODPM	Office of the Deputy Prime Minister
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UDP	Unitary Development Plan

1. BACKGROUND

Purpose of this report

- 1.1 The purpose this report is to provide an initial commentary and recommendations, from a sustainability perspective, on the London Borough of Brent's (LBBs) Local Development Framework (LDF) draft Core Strategy (June 2006) and the specific policies contained within it. This initial report aims to inform LBB's planning policy officers of the views of the team responsible for the Sustainable Appraisal (SA)¹ on the evolving document prior to its submission to the Planning Committee for consideration at their July 2006 meeting.
- 1.2 The Core Strategy is the first of three Development Plan Documents (DPDs) being prepared in Brent as part of their LDF. The three DPDs being developed are:
- The Core Strategy;
 - a suite of generic policies for the management of development (Development Control Policies – DC policies); and
 - site specific allocations.
- 1.3 The report aims to provide initial feedback to the policy planning team, and is part of the ongoing sustainability appraisal of policies. It is hoped this commentary will assist policy officers in developing and reviewing the strategy and its policies. This initial commentary will inform the more detailed sustainability appraisal which will be ongoing during the preparation of the preferred options version of the DPDs which will be subject to public consultation, along with a SA Report(s).
- 1.4 This report has been developed in a very short timeframe, due to the availability of draft policies and the time constraint of submission of documentation to the Planning Committee. Thus, the commentary and recommendations provided on each policy are intended to focus on a limited number of key issues, and are not necessarily comprehensive. However, the commentary is based on a review of each policy together with the sustainability objectives and criteria and key sustainability issues and problems in the borough as identified through the SA scoping process and consultation work to date. These are included in Appendix 1 (objectives and criteria) and 2 (sustainability issues and problems²).
- 1.5 The sustainability appraisal team reviewed the draft Core Strategy dated 19/06/06. An updated version of this was made available on 30/06/06, however formal review of this version has not been possible in the time available. Informal discussion with

¹ Note that the SA of Brent's LDF has been commissioned from Collingwood Environmental Planning (CEP), external consultants working with the planning policy team.

² Note that the sustainability issues and problems identified through the SA scoping process and appraisal of issues and options, were reviewed again by LBB officers at an SA workshop on 15th March 2006 and the revised version is included in Appendix 2.

Ken Hullock of the Planning Team (30/06/06) suggests that no major modifications were made between these two versions, although one policy section (Business and Industry) was modified, and we have accounted for this modification in this commentary.

Contents of this report

- 1.6 Following this background section, **Section 2** of this report sets out a brief introduction to the background and methodology of the SA process. It is hoped this will provide sufficient information to those who are new to the LDF and SA processes³.
- 1.7 Sections 3 and 4 of this report these provide a commentary on the draft Core Strategy. **Section 3** deals with comments on the 'Spatial Vision' and 'Spatial Strategy' for Brent (chapters 4 and 5 of the draft Core Strategy respectively). **Section 4** deals with comments on the 'Other Core policies' (chapter 6 of the draft Core Strategy). The structure of these two sections follows the structure of the draft Core Strategy and considers each of the policies included in turn. The policies are also included here to make it easier to relate the comments to the current draft policy wording.
- 1.8 **Section 5** provides a short summary of the next steps in the SA process.

³ Further information on the LDF development process, including progress on the SA to date can be found on the Brent Borough Council website, at:
<http://www.brent.gov.uk/planning.nsf/013459d30f2ad00680256623005fcc0a/29ce9562ca0cf33380256f5800503b06!OpenDocument>

2. SUSTAINABILITY APPRAISAL METHOD

Sustainability Appraisal of Development Plan Documents

- 2.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA will consider the DPD's implications, from a social, economic and environmental perspective, by assessing options and the draft DPDs against available baseline data and sustainability objectives.
- 2.2 SA is mandatory for Local Development Documents (LDDs) under the requirements of the Planning and Compulsory Purchase Act (2004)⁴, which includes DPDs. Article 19 (5) states that the local planning authority must also "(a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal". The Act also requires that SA is an integral part of the LDF production process.
- 2.3 The Government's guidance on Strategic Environmental Assessment (SEA)⁵ indicates that SAs of DPDs are also likely to need to fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁶ – the SEA Regulations.
- 2.4 In November 2005 the Government published guidance entitled *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*⁷. While SEA and SA are distinct processes, the SA guidance adopts an approach to appraisal which also integrates the requirements of the SEA Directive and Regulation.

Introduction to proposed sustainability appraisal method

- 2.5 The SA process for the Brent DPDs will follow the SA process set out in Government guidance. To date the SA has been undertaken in parallel with the preparation of all three DPDs and a single SA Scoping Report was prepared and consulted upon in June 2005. Depending on the timing of the preparation and consultation on the DPD preferred options (concurrent or consecutive), a single or multiple SA Report will be produced for the three DPDs being prepared in Brent.
- 2.6 This SA is also being conducted in the context of the *Sustainability Appraisal of Brent's Unitary Development Plan Deposit Draft 2000* (Brent Council, March 2001) and the SA of the adopted UDP. It is intended to use the findings of these previous

⁴ <http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm#aofs>

⁵ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

⁶ Statutory Instrument 2004 No. 1633.

⁷ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*.




SAs to inform and assist the process, for example by adapting objectives, identifying issues and understanding the wider development context of the DPDs.

- 2.7 The guidance advocates a five stage process to undertaking SA, with each stage are dived into a number of tasks:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
 - Stage B: Developing and refining options.
 - Stage C: Appraising the effects of the preferred options.
 - Stage D: Consultation on the preferred options and SA Report.
 - Stage E: Monitoring implementation of the DPDs.
- 2.8 The SA process is illustrated in Table 1. This also shows which tasks will be reported in which outputs.

Proposed programme

- 2.9 The SA will be ongoing during the production of the DPDs and therefore will follow the proposed DPD programme. This commentary and recommendations represents the first step towards the formal appraisal of the Core Strategy policies. More detailed appraisal, including the completion of appraisal matrices to record the potential performance of policies against the sustainability objectives, will be undertaken prior to the consultation on the Core Strategy preferred options which is likely in September 2006. This will be accompanied by an SA Report.
- 2.10 It is currently proposed that consultation on the preferred options of the DC Policies and Site Allocations will follow on from the Core Strategy, possibly in early 2007. The sustainability appraisal of these two DPDs will therefore be ongoing during 2007 with an SA Report(s) produced to coincide with the consultation on the preferred options

Table 1: Proposed Sustainability Appraisal stages and tasks

DPD Pre-Production	Outputs
SA Stage A: Setting the context & objectives, establishing the baseline & deciding on the scope	 <p style="color: blue; font-size: small;">Included in the SA Scoping Report (June 2005)</p>
Tasks	
<ul style="list-style-type: none"> Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the DPDs (Task A1) 	
<ul style="list-style-type: none"> Collect relevant social, environmental and economic baseline information and produce characterisation of the DPD area (Task A2) 	
<ul style="list-style-type: none"> Identify key sustainability issues for the SA to address (Task A3) 	
<ul style="list-style-type: none"> Develop the SA framework, including defining the sustainability objectives, indicators and targets (Task A4) 	
<ul style="list-style-type: none"> Produce Scoping Report and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible solutions (Task A5) 	
DPD Production	 <p style="color: green; font-size: small;">Included in SA commentary (October 2005)</p>  <p style="color: orange; font-size: small;">To be included in the SA Report</p>
SA Stage B: Developing and refining options	
Tasks	
<ul style="list-style-type: none"> Test the DPD objectives against the sustainability objectives (Task B1) 	
<ul style="list-style-type: none"> Develop the DPD options (Task B2) 	
<ul style="list-style-type: none"> Predicting the effects of the DPD including options (Task B3) 	
<ul style="list-style-type: none"> Evaluating the effects of the DPD including options (Task B4) 	
<ul style="list-style-type: none"> Mitigating adverse effects and maximising beneficial effects (Task B5) 	
<ul style="list-style-type: none"> Proposing measures to monitor the significant effects of the DPDs implementation (Task B6) 	
SA Stage C: Preparing the SA Report	
Tasks	
<ul style="list-style-type: none"> Preparing the SA Report (Task C1) 	
SA Stage D: Consultation on the draft DPD and SA Report	
Tasks	
<ul style="list-style-type: none"> Public Participation on the draft DPD and SA Report (Task D1) 	
<ul style="list-style-type: none"> Assessing the significant changes (Task D2) 	
DPD Examination	
Tasks	
<ul style="list-style-type: none"> Submission of DPD, Pre-Submission Consultation Statement and SA Report to Secretary of State 	
<ul style="list-style-type: none"> Assessing significant changes made as a result of representations, if necessary (Task D2 cont.) 	
DPD Adoption and monitoring	
Tasks	
<ul style="list-style-type: none"> Make the DPD and SA Report available for public viewing 	
<ul style="list-style-type: none"> Produce an adoption statement 	
<ul style="list-style-type: none"> Making decisions and providing information (Task D3) 	
SA Stage E: Monitoring implementation of the DPDs	
Tasks	
<ul style="list-style-type: none"> Developing aims and methods for monitoring (Task E1) 	
<ul style="list-style-type: none"> Publishing results of monitoring the sustainability effects of the DPD in the annual monitoring reports as new information becomes available 	
<ul style="list-style-type: none"> Responding to adverse effects (Task E2) 	

3. COMMENTARY ON THE SPATIAL VISION AND STRATEGY

- 3.1 This section deals with comments on the 'Spatial Vision' and 'Spatial Strategy' for Brent (chapters 4 and 5 of the draft Core Strategy respectively). These comments build upon those provided by CEP on 17th March 2006⁸ an earlier version of the draft Core Strategy policies (8th March 2006). This also drew on the results of a workshop convened with LBB officers on 15th March 2006⁹.

General comments on the Spatial Vision and Strategy

- 3.2 The inclusion of the Spatial Vision for 2016 and the objectives included in chapter 4 of the draft Core Strategy, as suggested in our previous SA comments (17th March 2007) is welcomed. It is also recommended that in the introductory section to the Core Strategy a more specific and descriptive definition of what sustainability means in the context of Brent and its LDF is included.
- 3.3 There remains some language ambiguity within the supporting text and policies. Whilst it is acknowledged that it is not possible to include context and definitions for every terms used, it is recommend that where possible language could be made clearer, with terms such as 'appropriate', 'sustainable', 'will be sought' and 'taking account of' used only where they are clearly explained or put in context.
- 3.4 We would recommend the inclusion of climate change adaptation and mitigation as a more mainstream / fundamental issue within the spatial vision and strategy. In addition, we would suggest that the vision and strategy should recognise the importance of potential / predicted environmental / regulatory change over the plan period. Although accurate prediction of such change is not possible an awareness and recognition of such 'risks' would strengthen the vision and strategy. This is particularly relevant given that developments made / changes introduced during the plan period will outlive the LDF itself. Examples may include implementation of the Water Framework Directive and the Public Participation Directive, as well as London Mayoral plans and startegies.
- 3.5 Broadly the environmental implications of the developmental vision (especially housing provision) for Brent is somewhat downplayed. It is recognised that the main focus of the Vision and Strategy is the regeneration of the Borough, however the important interrelation between environmental (in broadest sense) quality and quality of life should not be overlooked. Overlooking the negative impacts of growth / expansion of housing and population may negate many of the beneficial effects expected. We suggest that it is considered whether an additional policy should be included within the Spatial Strategy to specifically address the social and environmental impacts inevitably arising from the scale of growth planned for Brent.

⁸ CEP (17 March 2006) Brent LDF Sustainability Appraisal Note: Initial Comments on the Draft Core Strategy Policies.

⁹ CEP(17 March 2006) Brent LDF Sustainability Appraisal Note: record of comments made during the Assessment Workshop at Brent House on 15th march 2006. SWOT analysis of Core Strategy policy SS1 – key Principles.

- 3.6 Connected to the above point, the emphasis of the Spatial Strategy is primarily on housing provision and growth. It is recognised that employment is addressed under Core Policies section “A Strong Local Economy”, however strategic level recognition of the importance of employment, and suggestion of how it may be provided to meet additional as well as existing population needs is recommended.
- 3.7 Employment opportunities and new business development must be suitable for local people. If not, growth in employment will simply encourage increased commuting to the Borough, and exacerbate local traffic congestion, air-pollution and social exclusion / unemployment problems. Recognition at the highest strategic level of this issue is suggested.

Policy specific comments and recommendations on the Spatial Strategy

- 3.8 In the ‘Initial Comments on the Draft Core Strategy Policies’ (March 2006) a number of recommendations were made. The commentary provides an update on these recommendations, seeking to avoid duplication where amendments have already been made between the early and latest draft Spatial Strategy policies. The focus here is on some key recommendations in terms of clarification of wording or improving the sustainability performance. The more detailed appraisal work which will follow over the coming months will provide a more rigorous appraisal of the policies against sustainability objectives.

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

Comments and recommendations

- This policy captures many of the principles that will be needed to ensure the spatial strategy minimises negative sustainability impacts and some that should improve sustainability
- The previous comments (March 17th 2006) have been largely taken on board.

- The penultimate bullet could suggest that sustainability is primarily a climate change issue – we welcome the requirement to combat climate change, however would recommend wording which seeks to mitigate and also adapt to climate change, as one aspect of creating more sustainable developments.

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.

Comments and recommendations

- The previous comments (17th March 2006) on this policy expressed the need to account at the highest level for employment, education, waste generation, resource use and environmental pressures implied by such dramatic population growth. We recommended an additional Core Strategy policy to address these issues. Although it is recognised that these issues are addressed in the topic specific Core Policies, we maintain that this may be a very positive addition to the Spatial Strategy, in order that these issues are recognised at the most strategic level.

SS3 Focus of 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.

Comments and recommendations

- This policy has been modified since the earlier version (March 2006), with text referring to other 'larger town centres' (i.e. Kilburn, Harlesden, Willesden Green, Cricklewood etc.) as also being appropriate locations for higher density housing / mixed use development removed. However, our previous comments remain salient:
 - Population growth will require new amenity and service provision. Although covered elsewhere in the chapter / other policies, we would advise explicitly referring to this need in SS3.
 - We would recommend acknowledgement of the specific environmental and resource / waste generation implications of population growth in specific areas.

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.

Comments and recommendations

- We welcome the inclusion of new text referring to employment generating uses.
- To be an effective part of a spatial strategy to improve life for residents of Brent, it is important that employment opportunities generated by commercial regeneration are suitable for the skills of the local workforce. Inappropriate employment will simply increase in-commuting to the borough with little employment benefit to local people.
- We previously commented that more specific detail on what infrastructure is needed would provide more clarity, this remains the case.

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.

Comments and recommendations

- Our previous comment (17th March 2006) that it is important to expand on what 'new infrastructure' is required remains important. The overall aim should be to ensure that new development / homes have no negative impact on existing service provision, traffic, employment opportunities, waste etc. Infrastructure provision is one way of helping to achieve this, but highest levels of design quality, building efficiency etc. are also important.
- We suggest that the borough could seek to develop Wembley as an exemplar of sustainable community development – concentrating on the highest levels of public transport and walking / cycling access and use, excellent (such as BREEAM 'excellent' ratings) design standards for all new building and stringent controls to ensure very high quality public space and public realm quality.

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.

Comments and recommendations

- It is vital that phasing and timing considerations are accounted for. In particular provision of public transport / cycling infrastructure, but also other amenities, such as education, health etc. should precede occupation of new developments in order that sustainable patterns of behaviour are encouraged. This is a fundamental quality of life issue. In addition, retrospectively providing infrastructure is a far less effective means of engendering sustainability, as

people become used to unsustainable behaviour patterns. This issue of phasing should be explicitly addressed in the Spatial Strategy.

SS7 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

Comments and recommendations

- The third bullet suggests that development will be allowed at those locations that are “planned to be, accessible by public transport, walking and cycling”. Our comment on phasing of infrastructure on Policy SS6 is relevant here as well. Infrastructure should be provided *before* development is completed, not after.
- The wording of the last bullet is a little unclear – it could be read as if the policy seeks to ‘minimise’ the use of the ‘right materials’. It would also benefit from clarification of what is meant by the ‘right materials’.
- The language is ambiguous in places, e.g. ‘acceptably mitigated’ in penultimate bullet – ideally these impacts would be avoided, thus negating the need to mitigate them.
- Our previous comments (17th March 2006) remain salient:
 - SS7 and SS1 are strongly related – some form of cross-reference / linking of the two policies would be beneficial.
 - The wording of the policy should reflect a policy aim to enhance the environment, improve natural and built environment, realising opportunities etc., rather than simply ensuring no significant negative impacts.
 - Greater emphasis is needed on the social aspects, e.g. reflecting the needs and aspirations of the local people / existing residents.

SS8

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.

Comments and recommendations

- A title for the policy should be added, e.g. contributions to community needs.

- We commented previously (17th March 2006) that the term 'needs' should be more clearly explained / expanded upon. How are needs to be identified and/or prioritised? If this is through surveys and community appraisals clearly these would need to precede planning decisions and development. Surveys could feed in very usefully to master planning or development frameworks for specific areas.

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.

Comments and recommendations

- With respect to open space, the policy could go beyond a 'presumption against development on ... open space', and seek to increase provision. Although it is recognised there are considerable constraints in the borough for new open space provision, a requirement to increase it could drive innovative approaches – such as pocket parks, community gardens etc.
- Our previous comment (17th March 2006) remains relevant:
 - Within the growth areas, open / public space is still needed and important. SS9 could explicitly require the inclusion of new open and green space both public and private (through design / layout etc.) in new and high density development. This could include balconies, green roofs etc.

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.

Comments and recommendations

- This policy is welcomed. Comprehensive planning of development opportunities at an early and strategy level should provide opportunities to maximise the delivery of sustainability benefits. The involvement of local communities in this process, as highlighted in the supporting text to the policy, is vital.

4. COMMENTARY ON THE CORE POLICIES

- 4.1 This Section deals with comments on the 'Other Core policies' (chapter 6 of the draft Core Strategy).

Overall comments

- 4.2 The references to climate change require review within policies SD1, SD2 and ENV1. There is confusion about the distinction between climate change 'adaptation' and 'mitigation'¹⁰ within these policies and they need to be revised to correct this. There is also considerable overlap between these three policies and they therefore need to be reviewed to improve their clarity and ensure the focus of each policy is clear.
- 4.3 Throughout we would recommend that policies should be reviewed in order that they go beyond 'prevention of negative effects' and actively promote positive and beneficial effects / improvements on the current situation.

Policy specific comments and recommendations

Maintaining a quality environment

Urban Design

CS Policy 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 5 'Growth Areas', in 'Areas of Low Townscape or Public Realm Quality', as well as Brent's 'Transport Corridors & Gateways' (**See Proposals Map**).

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.

¹⁰ Adaptation is usually accepted to mean action taken by society in response to the potential impacts of predicted climate change and mitigation as activities which seek to reduce the human effects on global warming by reducing the quantity of greenhouse gases released to the atmosphere.

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.

Comments and recommendations:

- Point 'b' contains reference to 'exemplary or exceptional' and 'a sustainable intensity and mix', for example. Further clarification and/or definition of such terms would strengthen this policy and provide greater clarity.
- The 'Development Frameworks' referred to should also fully incorporate sustainability objectives.

CS Policy 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 pre-application matrix showing how due account is taken of contextual issues & officer advice;
- 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, (**See DC Policy UD3**);
- The use of reputable and/or appropriately skilled architects or designers from a Council or CABE 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;
- Agreement to facilitate subjecting the scheme to a Design Review Panel;
- 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
- Ensuring an appropriate procurement strategy is put in place for cascading design quality requirements through the project and construction teams; and
- 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.

Comments and recommendations:

- The definition of a 'significant development' in the second paragraph may not be broad / inclusive enough to capture all development which could potential have significant sustainability effects, as a development which falls outside the definition in UD2 could still have a significant impact on environmental or social factors, for example. A catch all other category related to significance of effects negative effects on sustainability could be added to address this. Further clarification of what is meant by 'significant impact on the public realm' might be sufficient to address this.

*Towards a Sustainable Brent, 2020***CS Policy 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 Borough wide 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 Policy 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.

Comments and recommendations:

- Note general comment above regarding confusion over the difference between climate change 'adaptation' and 'mitigation' in the supporting text and policy. Purchasing green energy, encouraging efficiency etc. are examples of mitigation actions, not adaptation.
- Suggest that an explicit reference is made to "Adapting to Climate Change a Checklist for Development" (see: <http://www.london.gov.uk/climatechangepartnership/development.jsp> for pdf download) for information on definitions and adaptation responses.

CS Policy 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 (**DC Policy SD3**);
- Water Management & Sustainable Drainage (**See DC Policy ENV5-ENV6**);
- Sustainable Materials (**DC Policy SD5**);
- Landscape & Biodiversity (**DC Policy SD6**);
- Sustainable Demolition & Construction (**DC Policy SD7**);
- Operational Waste Management (**DC Policy SD8**);
- Pollution Control (**See DC Policies ENV1 –ENV2 & ENV4**).

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'.

Comments and recommendations:

- In the first sentence reference to climate change adaptation as well as mitigation would strengthen policy.
- The emphasis on specific areas, 'particular regard', in the second sentence (i.e. Growth Areas) potentially downplays the importance of Sustainable Design and Construction elsewhere in the borough.
- The reference to 'adjacent to' flood-risk areas is potentially not broad enough as flood risk in the future may need to be considered in areas in contiguous with areas currently identified. Potential wording could be 'areas where flood risk is a potential threat in the future', for example. This would strengthen this policy.
- In the second paragraph the reference to an 'Adaptation Strategy' should also include mitigation. The first bulleted point (energy efficiency etc.) is in fact a mitigation action not adaptation. (see comment above regarding climate change mitigation and adaptation).
- Additional consideration could be given to the social impacts of climate change in the bulleted list – health, shaded public spaces / waiting areas etc. Are these covered in DC policy SD3?
- Include references in the supporting text to which Brent/London checklist are being referred to in the last paragraph.
- There is currently no reference / link across to the transport policies. This is important from a mitigation angle.
- The reference to 'unless extenuating circumstances' in the last paragraph may weaken the implementation of this policy. All developments should be expected to meet excellent standards as the policy should be aspirational. It is not clear under what circumstances such an exception may be acceptable.
- In the last paragraph there is no definition of a 'major scheme' and therefore it could be open to considerable interpretation which schemes need to meet which standards. It is not clear how the requirement of excellent for major schemes and very good for other schemes is being justified. If it is on financial grounds (i.e. the availability of funds on larger developments), does this take into consideration whole-life costs of the development (in terms of energy efficiency etc)?
- The list in the bullets should be reviewed against the range of issues covered in "Adapting to Climate Change a Checklist for Development" (3 regions partnership – see GLA website) to check it is comprehensive. Again, bearing in mind the difference / importance of both adaptation and mitigation.

Environmental Protection

CP ENV 1: 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.

Comments and recommendations:

- The relationship between this policy and SD2 is unclear.
- The list of adaptation and mitigation measures is not clear or comprehensive – use references to guidance / checklists mentioned in the comments on SD1 and SD2 to produce a more comprehensive list. The first bullet point under mitigation is an adaptation and all the bullets under adaptation are mitigation, with the last one on proofing also being potentially relevant to adaptation depending what is included.
- Supporting text paragraph commencing “the efficient use of energy...” – adaptation and mitigation is confused. This is an example of a mitigation measure *not* an adaptation measure.

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.

Comments and recommendations:

- The language is ambiguous, especially points ii) and iii).
- There are many other factors which would ‘protect’ the environment other than pollution, positive impacts and sustainable resource use. Consider broadening this policy to include a more comprehensive set.
- This policy would be stronger if it went beyond just prevention of negative impacts (as reflected in DC ENV 1-7) and focus / clarify what environmental enhancements are being sought.

- This policy does not capture all the topics discussed in DC policies ENV 1-7 and therefore does not provide a framework for them all. Consider broadening its scope to reflect this.

Dealing with waste

CP W1

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.

Comments and recommendations:

- Consider inclusion of a broader 'linking' policy between 'Dealing with waste', and other spatial planning policies / issues. Whilst it is understood that waste issues will be dealt with jointly with West London Boroughs, waste has an impacted upon by a broad range of spatial planning issues such as minimising waste / resource efficiency in construction and construction, design issues around recycling facilities etc. Consider broadening this section to reflect this.

Meeting Housing Needs

CP H1 Housing Provision

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

- 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).
- 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.

Comments and recommendations:

- Clearly delivering these targets in isolation are likely to result significant negative impacts on sustainability issues. The DPD, although bound by external targets, can still be influential in minimising negative impacts – and it should not be afraid to stress the potential severity of negative impacts in support of strong policies to control these impacts.

- Some of the language is ambiguous, e.g. 'unacceptable overstress' and 'appropriate contribution' ideally need to be defined.
- If there are already stresses and problems, it is not clear if this policy is only considering additional stresses that the housing may cause, or whether it takes account of what may be an already unacceptable situation given existing problems / issues. The wording seems to suggest it is only the additional stresses which are accounted for which could mean an unacceptable current situation is made even worse as the impact is only minor (but is acting in a cumulative way). Consider revising the wording strengthen this..

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

Comments and recommendations:

- There is some ambiguity in the wording, for example, travel efficiency could relate to efficiency in movement rather than minimising amount of travel.
- There is a potential inconsistency with Policy SD2, which suggests that 'major' developments should reach 'excellent' standards and others 'very good'. Maximising opportunities and energy / water conservation would imply reaching the highest possible standards.
- Some social considerations are not specifically mentioned. Consider inclusion of social infrastructure and facilities within this policy. These 'infrastructure resources' are also key to sustainability. This will be particularly key to depending on the location.
- This policy could include reference to adaptation and mitigation to climate change to ensure that climate change is imbedded throughout the DPD.
- Point f), it is assumed 'safe' in this context concerns issues of crime etc. However, consideration could be given to extending the scope of this to include health and wellbeing (quality of life) factors, such as access to open space, minimising exposure to air and noise pollution etc.

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

Comments and recommendations:

- In the first paragraph, it is also important to anticipate emerging / future needs – especially given likely demographic and social changes.
- Typo – point c) 'contained' missing.
- Consider need for cross-reference to policy on work-live.

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.

Comments and recommendations:

- Point a), if affordable housing is lost to meet regeneration objectives or to provide community facilities it would seem reasonable that new affordable housing is provided elsewhere so there is no net loss.
- The terms 'homes', 'units' and 'dwellings' are used in the policy and supporting text. It needs to be clarified if these are interchangeable or whether they mean different things.
- It is unclear what is meant by 'suitable schemes' in point b).
- Is the wording 'with a capacity of ten' meant to ensure that sites are measured as required to meet affordable target based on their capacity – regardless of the actual number of homes / dwellings 'proposed' for the site? If this is the case it is welcomed, but if this was not deliberate, it should be clarified.

Connecting Communities

CP TRN1: Prioritisation Investment and 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.

Comments and recommendations:

- As a policy providing for investment that 'meets the needs' of growth and regeneration areas this does not address the objective of reducing need to travel. In that respect it is more like predict and provide.
- Clearly resources need to be secured to provide infrastructure, but these should be secured with the goal of reduced travel needs / reduced car use and car dependence and provision of walking, cycling and public transport as primary drivers / factors.
- Consideration needs to be given to how this link to spatial planning. Planning for future transport needs from a spatial perspective, consider the need for an overarching policy looking at planning for future needs, so that spatial decisions do not foreclose possible future public transport / alternative travel options.

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.

Comments and recommendations:

- There is some ambiguity in the wording of point c). 'Appropriate locations' should be defined.
- Point d) equates town centres with good public transport connectivity, this may not be the case with respect to rail / tube connections/provision.
- Point b) and e), giving priority to public transport, walking and cycling and improving public transport doesn't necessarily indicate / lead to a reduced need to travel. Emphasise therefore the need to encourage a modal change and reduce overall need to travel – the policy needs to consider both.

CP TRN3: Parking and 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.

Comments and recommendations:

- The wording of this policy ('maximum off-street parking standards') is slightly unclear to those less familiar with parking standards and therefore it could be reworded. It is assumed that this policy is promoting escalating standards – so that parking becomes increasingly constrained nearer public transport – if this is the case, clarify this in the wording.

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.

Comments and recommendations:

- Applying standards / initiative from elsewhere is positive, however Brent could consider going beyond this. For example, the construction of a Brent Cycle Network, which provides for connections / safe routes in a more local context could be included (e.g. cycling to school, cycling to work).

A strong local economy*Business and industry*

- Note that the following policies are those as extracted from the Core Strategy Draft V4 (30/06/06).
- Typographical error: 4th paragraph of supporting text refers to "the London Plan 2004 forecasted a loss of 58,000 industrial and warehousing across London" – however no unit of reference is included.

CPBIW1: 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.

Comments and recommendations:

- Storage and distribution (use class B8) may not be a particularly positive form of employment to promote in the borough, in terms of sustainability. Distribution is unlikely to generate much employment, will create traffic / movement, is likely to involve goods moving in and out of Brent without much local economic or social

benefit. We would question this as an economic / business choice for sustainability in the borough.

- Expansion of industrial operations may have significant environmental and social impacts, depending on type and manner of expansion. It is important that new industry is appropriate in terms of employment creation (to peoples skills in Brent) and in terms of local environmental limitations / thresholds (i.e. air pollution, noise etc.).

CPBIW2: 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

Comments and recommendations:

- There is some ambiguity in the language and wording, are applications required to simply 'consider' principles of modern usage, or should they have to actually 'achieve' results against such principles (i.e. really produce them on the ground)?
- The bulleted points – the aim should be to avoid / minimise / maximise (depending on which) these impacts rather than simply consider them.
- The policy could explicitly refer to reducing travel need, and ensuring non-road means. This may especially be the case in relation to office development, or other person-intensive business.
- Modern premises are not necessarily sustainable. High standards of design and build, including resource / materials use are important.
- SC SD2 covers much more than energy efficiency and waste – so cross referral could be at a more general level to include issues such as SUDS etc.

CPBIW3: The reuse 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.

Comments and recommendations:

- It is unclear how this differs in scope from BIW2. The requirements of BIW2 are more far-reaching (with caveat of our comments, above), and it would seem consistent to combine BIW3 with BIW2 so that the same standards are required across all employment and business developments / reuse.

*Town centres and shopping***CS TC1: Wembley Town Centre Focus**

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 CS Policy UD1**) for implementing a comprehensive environmental improvement programme of 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.

Comments and recommendations:

- It would improve clarity if 'with a civic focus' and 'other town centre development' were explained / expanded upon.
- In the third paragraph, in addition to the requirement to demonstrate that no sites are available in Wembley, the suitability of other locations in sustainability terms will need to be assessed and any necessary mitigation measures identified. It may be appropriate, for example, to secure guarantees on issues such as the provision of improved public transport.

CS TC2: Major, District & Local Centres**MAJOR TOWN CENTRES AND DISTRICT CENTRES**

Within the Major Town Centres and District Centres proposals for retailing and other town centre uses which attract a lot of people, will be determined in accordance with the sequential approach, and should be consistent with the scale and function of the centre within which they are located.

Town centre uses that reinforce, or help implement the Strategy for particular centres (**DC Policies TC X**) will be particularly encouraged.

On the edge of Major Town Centres and District Centres, proposals for town centre uses, will be required to comply with the above, and 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 Policy 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.

Comments and recommendations:

- The first paragraph could be worded more clearly.
- The second paragraph could be stronger from a sustainability perspective if only development was allowed which reinforces or help implement the Strategy for a particular centre.
- Point 4), choice of means of transport should reflect a transport hierarchy with public transport, cycling, walking given primacy over car transport. This could be explicitly brought out.

CS TC3: NEIGHBOURHOOD & OUT-OF-CENTRE 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 Policy 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.

Comments and recommendations:

- It would be useful to define 'very small-scale' in the first paragraph.
- As with TC1, we would suggest that if there is no sequentially preferable site it would, from a sustainability perspective it would be stronger to simply not allow such development.
- The criteria that would be used to demonstrate 'need' should ideally be specified.
- Point d), this is weak from a sustainability perspective. Development at the site should 'ensure' good public transport and walking / cycling access. Also 'can be made' seems a little ambiguous – it could be taken to mean that as long as there

is potential for improved public transport this is acceptable, without actually needing it to be provided.

- It would be more sustainable not to allow out-of-centre development at all.

CS TC4: TOWN CENTRE OPPORTUNITY SITES

Within the boundaries of the Boroughs network of Town Centres (**DC Policy TC5**) 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.

Comments and recommendations:

- This policy would benefit from rewording to clarify its meaning.

CS CT1: Promoting leisure and tourism

Leisure and tourism facilities, 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 significant applications will be sought towards the promotion of arts, culture and tourism throughout the Borough.

Comments and recommendations:

- Clarification of 'accessible location' would improve this policy. Accessible should refer primarily (if not solely) to public transport and walking / cycling. Capacity should also be considered. For example, a site may be 'accessible' by train, but at a capacity insufficient for the likely number of visitors.
- The potential negative impacts of attracting large numbers of visitors from outside the borough should be considered. Such impacts can be mitigated through comprehensive / effective public transport provision, and facilities / policy to manage waste / environmental impacts at the local level.

Open space and recreation

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.

Comments and recommendations:

- This policy would benefit from clarification of what is meant by terms such as 'inappropriate' development.
- By stating that areas of strategic and borough importance will 'particularly' be protected, it suggests others are less important / can be sacrificed. In principle all open space / sites should be protected.
- Enhancement should also be consider for ecology and biodiversity / habitats and not just for recreation / amenity space.
- We would recommend including two separate policies, one on biodiversity and habitat and one on amenity and recreation provision through open space. Rather than including them in one policy.

Community facilities – increasing opportunities and decreasing inequality

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. New or improved provision will be required in major residential or mixed-use developments, and in locations within easy reach of those who need them, while existing facilities will be protected.

Comments and recommendations:

- What is meant by accessible should be clarified as it could mean physically accessible (in terms of location and by walking, cycling etc.), accessible in the sense of mobility (disabled access etc.), or accessible in terms of cost / financially (private versus public – thus a private health centre may be accessible in the sense of being local, but may be financially inaccessible to those on low incomes).
- Improved provision relates to quality as well as quantity.
- Certain facilities even if accessible (physically) to local people may still generate significant external traffic (healthcare facilities for example). The impacts of this should be considered / managed – and how this influences whether a development is appropriate for a particular area or not.

5. NEXT STEPS

5.1 The key next steps of the SA will involve:

- Continuing to develop the evidence base as necessary for each DPD – as some time has passed since the Scoping Report was collated the baseline and policy, plan and programme review will need to be revisited.
- Reviewing the options considered by LBB as part of identifying the preferred options and making recommendations as appropriate.
- Working with LBB to appraise the evolving preferred options for the DPDs and make recommendations for improvement.
- Preparing the final SA Report(s).
- Issuing the SA Report(s), along with the draft DPDs, for formal consultation.

APPENDIX 1: SUSTAINABILITY OBJECTIVES AND CRITERIA

Objective	Criteria
Social	
Prosperity and Social Inclusion S1. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
	Will it improve affordability of essential services?
Health S2. To improve the health of the population	Will it improve access to high quality health facilities?
	Will it encourage healthy lifestyles and provide opportunities for sport and recreation?
	Will it reduce health inequalities?
	Will it reduce death rates?
Education and Skills S3. To improve the education and skills of the population	Will it improve qualifications and skills of the population?
	Will it improve access to high quality educational facilities?
	Will it help fill key skill gaps?
Housing S4. To provide everybody with the opportunity to live in a decent home	Will it increase access to good quality and affordable housing?
	Will it encourage mixed use and range of housing tenure?
	Will it reduce the number of unfit homes?
	Will it reduce homelessness?
Quality of surroundings S5. To provide everybody with good quality surroundings	Will it improve the satisfaction of people with their neighbourhoods as places to live; encouraging 'ownership'?
	Will it improve residential amenity and sense of place?
	Will it reduce actual noise levels?
	Will it reduce noise concerns?
Crime Prevention and & Community Safety S6. To reduce crime and anti-social activity	Will it reduce actual levels of crime?
	Will it reduce the fear of crime?
Community Identity S7. To encourage a sense of community; identity and welfare	Will it encourage engagement in community activities?
	Will it foster a sense of pride in area?
	Will it increase the ability of people to influence decisions?
	Will it improve ethnic relations?
	Will it encourage communications between different communities in order to improve understanding of different needs and concerns?
	Will it encourage people to respect and value their contribution to society?
Accessibility S8. To improve accessibility to key services especially for those most in need	Will it improve accessibility to key local services?
	Will it improve the level of investment in key community services?
	Will it make access more affordable?
	Will it make access easier for those without access to a car?
Environmental	
Traffic EN1. To reduce the effect of traffic on the environment	Will it reduce traffic volumes?
	Will it increase the proportion of journeys using modes other than the car?
	Will it encourage walking or cycling?
Water Quality & Resources EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	Will it improve the quality of inland water?
	Will it reduce water consumption?
Air Quality EN3. To improve air quality	Will it improve air quality?
	Will it help achieve the objectives of the Air Quality Management Plan?
	Will it reduce emissions of key pollutants?

Objective	Criteria
Biodiversity EN4. To conserve and enhance biodiversity	Will it conserve and enhance habitats of borough or local importance habitats and create habitats in areas of deficiency? Will it conserve and enhance species diversity; and in particular avoid harm to protected species? Will it maintain and enhance sites designated for their nature conservation interest? Will it maintain and enhance woodland cover and management? Will it encourage protection of and increase number of trees?
Landscape & Townscape EN5. To maintain and enhance the character and quality of landscapes and townscapes	Will it improve the landscape and ecological quality and character of open spaces? Will it enhance the quality of priority areas for townscape and public realm enhancements? Will it minimise visual intrusion and protect views? Will it decrease litter in urban areas and open spaces?
Historic Environment & Cultural Assets EN6. To conserve and where appropriate enhance the historic environment and cultural assets	Will it protect and enhance Conservation Areas and other sites; features and areas of historical and cultural value? Will it protect listed buildings? Will it help preserve and record archaeological features?
Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to climate change	Will it reduce emissions of greenhouse gases by reducing energy consumption? Will it lead to an increased proportion of energy needs being met from renewable sources? Will it reduce emissions of ozone depleting substances? Will it minimise the risk of flooding from rivers and watercourses to people and property? Will it reduce the risk of damage to property from storm events?
Waste Management EN8. To minimise the production of waste and use of non-renewable materials	Will it lead to reduced consumption of materials and resources? Will it reduce household waste? Will it increase waste recovery and recycling? Will it reduce hazardous waste? Will it reduce waste in the construction industry?
Land and Soil EN9. To conserve and enhance land quality and soil resources	Will it minimise development on greenfield sites? Will it ensure that where possible; new development occurs on derelict; vacant and underused previously developed land and buildings? Will it ensure land is remediated as appropriate? Will it minimise the loss of soils to development? Will it maintain and enhance soil quality? Will it reduce the risk of subsidence?
Economic	
Growth EC1. To encourage sustainable economic growth	Will it encourage new business start-ups and opportunities for local people? Will it improve business development and enhance productivity? Will it improve the resilience of business and the local economy? Will it promote growth in key sectors? Will it promote growth in key clusters? Will it enhance the image of the area as a business location?
Employment EC2. To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce short and long-term local unemployment? Will it provide job opportunities for those most in need of employment? Will it help to reduce long hours worked? Will it help to improve earnings?

Objective	Criteria
Regeneration EC3. To reduce disparities in economic performance and promote sustainable regeneration	Will it promote regeneration; reducing disparity with surrounding areas?
Investment EC4. To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business? Will it encourage inward investment? Will it make land and property available for business development?
Efficient Movement EC5. To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting? Will it improve accessibility to work by public transport; walking and cycling? Will it reduce journey times between key employment areas and key transport interchanges? Will it facilitate efficiency in freight distribution?

APPENDIX 2: KEY SUSTAINABILITY PROBLEMS AND ISSUES

The Sustainability Appraisal Workshop to review the emerging Core Strategy and discuss key sustainability issues held at LBB on 25th May 2006 led to suggested modifications to the key sustainability problems and issues as presented in the SA Commentary on the Issues and Options. These suggestions are included below in yellow underlined text. It is proposed that these changes will be agreed with LBB and then used for reference during future stages of the Sustainability Appraisal.

Key sustainability problems and issues

Social

1. Deprivation, exclusion and inequalities. Brent contains some of most deprived wards in London.
2. Disparity in social and economic conditions both between wards within Brent and with other areas.
3. Health inequalities and access to health facilities.
4. Education attainment and projected shortfall of school places.
5. Poor housing conditions, lack of affordable housing and overcrowding, particularly in southern wards.
6. High incidence of crime and fear of crime in certain areas.
7. Provision of and access to essential services and amenities.

Environmental

8. Mixed quality of the built environment and the need for improved architectural design quality.
9. Pressure on biodiversity and habitats and lack of greenspace, particularly in southern wards.
10. Critical need to minimise waste arisings and deal with waste locally and in a sustainable manner.
11. Contaminated land and soils present a potentially significant restriction / cost in developing brownfield / derelict sites.
12. Water quality and pollution are key issues for the watercourses running through Brent.
13. Flooding and flood risks particularly in relation to the Welsh Harp Reservoir and River Brent and its tributaries.
14. Quality of and access to open spaces and parks, including open air sport grounds.
15. The need to preserve and enhance built heritage and the historic and archaeological environment against the pressures of redevelopment.
16. Energy use and efficiency and the lack of renewable energy installations.
17. Poor air quality along major roads and in the south of Brent, with much of southern Brent an AQMA.
18. Noise nuisance, both from domestic and industrial sources as well as from noise and vibration from major road routes in the Borough.

Economic

19. Unemployment: the need to generate job opportunities for local people and provide training and skill development opportunities.
20. Poor transport infrastructure and ease of movement particularly given relatively low levels of car ownership.
21. The conflict between opposing land uses, in particular balancing housing needs with the protection of employment land and open space.
22. The need to manage redevelopment impacts in specific areas. Especially Wembley and Park Royal.
23. The need to support development in existing centres and ensure the health of town-centres.