



Planning Committee

12th July 2006

Report from the Director of Planning

For Action

Wards Affected:
ALL

Local Development Framework – Core Strategy Preferred Options

1.0 Summary

1.1 This report presents a draft Core Strategy which is a key document of the new Local Development Framework (LDF). The Council is required to consult with the local community on its 'Preferred Options' for the Core Strategy. The preferred options for the Core Strategy have been drawn up after a round of public consultation in September/October 2005 and the options and the alternative options have been subject to Sustainability Appraisal. Views are sought from Planning Committee on the Core Strategy which will be considered by the Executive in September.

2.0 Recommendations

- 2.1 That Planning Committee recommends to the Executive that the draft Core Strategy Preferred Options be agreed as a basis for public consultation and
- 2.2 That any views on the draft Core Strategy from Members of Planning Committee are put to the Executive for consideration.

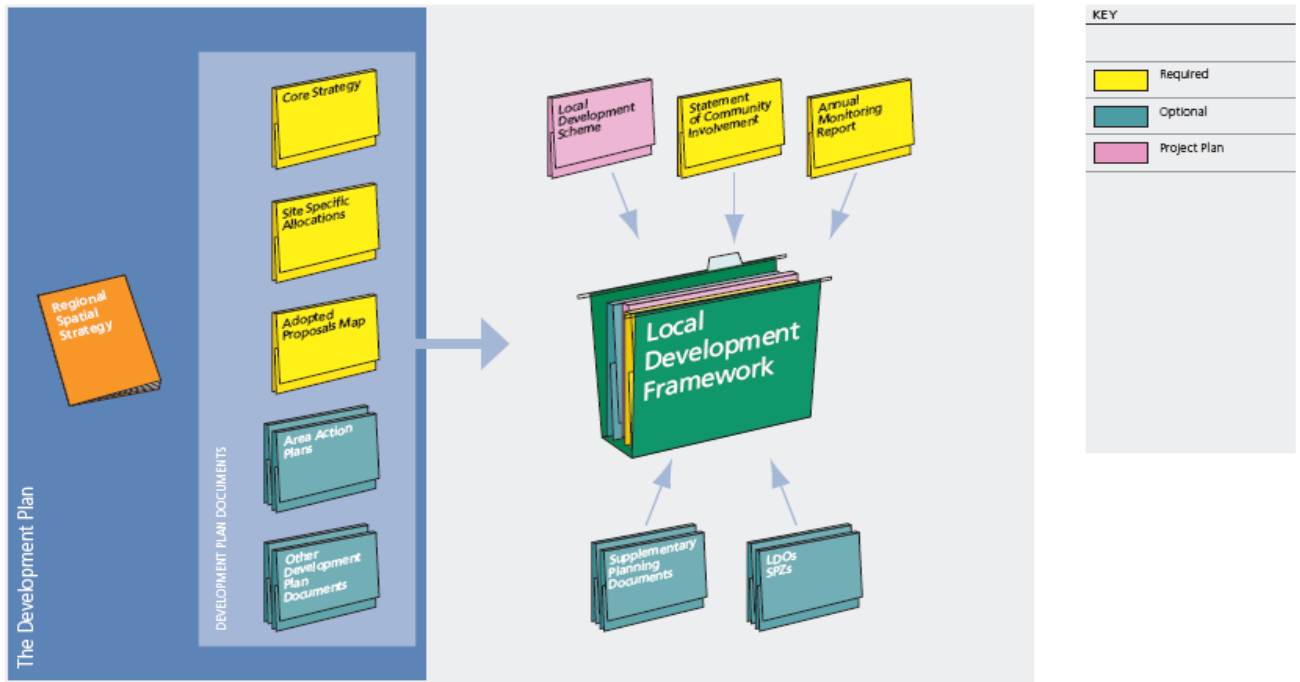
3.0 Detail

The LDF Process Explained

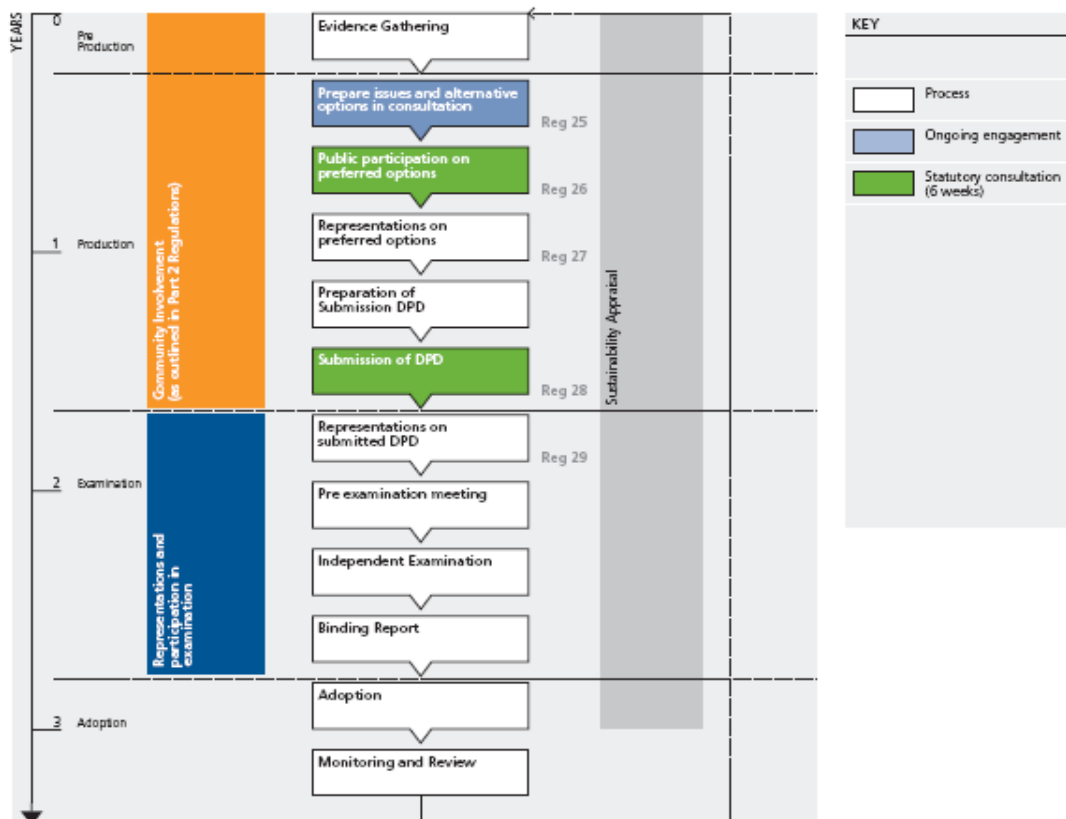
3.1 In taking forward the new system of Plan preparation, introduced by the Planning & Compulsory Purchase Act 2004, there are statutory requirements that must be met. The current development plan for

Brent, the Unitary Development Plan (UDP) is being replaced by the LDF. One of the main features of the new system is that the LDF is more strategic and spatial and less of a development control manual. It should also be a spatial expression of the Community Strategy and dovetail better with other plans, policies and proposals of stakeholders in Brent such as the PCT and Park Royal Partnership.

- 3.2 It is intended that documents are produced in a folder format and different parts of the LDF can be amended at different times, unlike the UDP which had to be reviewed as a whole about every 5 years. The LDF will comprise a series of documents, some of which will have development plan status (as with the UDP), and be subject to independent examination, and others the status of Supplementary Planning Guidance. Those that have development plan status are called Development Plan Documents and, of these, the Council is required to produce a Core Strategy as well as Site Specific Allocations. The Council has also decided to produce a set of detailed Development Control Policies as a separate development plan document. It has also decided to produce a number of Supplementary Planning Documents on various matters such as detailed site briefs or more detailed design guidance.
- 3.3 The intention to produce these documents and the timetable for producing them has been agreed by the Secretary of State and is contained in the Local Development Scheme (LDS), which is essentially a project plan for producing the LDF. It is likely that the LDS will have to be amended to reflect some slippage in the timetable. Other documents the Council is required to produce as part of the LDF is a Statement of Community Involvement (adopted by Full Council in June 2006) and an Annual Monitoring Report (to be produced before the end of the year). The documents which make up the LDF folder are illustrated in the diagram below.



3.4 In preparing the LDF the Council must follow a number of statutory stages. The process for taking forward the part of the LDF which will replace the UDP (i.e. Development Plan Documents such as the Core Strategy) is set out in the following diagram.



The next formal stage for the Council is public participation on Preferred Options, (i.e. the third box down). This is a statutory consultation period of 6 weeks and was originally scheduled for September 2006 in the agreed LDS. It was proposed to consult on 3 DPDs; the Core Strategy, the Site Specific Allocations and the Development Control Policies. It is expected that the formal consultation period will have to be put back until the beginning of November. This will be the subject of a further Committee report. The draft Core Strategy element of this consultation is the subject of the report before you tonight.

Public Consultation

- 3.5 A major round of public consultation on the 'Issues and Options' for drawing up a new development plan for the Borough was carried out in September/October 2005. The consultation consisted of a questionnaire distributed via the Brent Magazine, the distribution of a set of Issues and Options papers with a response section (including the ability to respond online) and two workshops held in different parts of the borough. A summary of the outcome of this consultation was put to Planning Committee on 16th November 2005. The main themes coming out of this round of consultation have been set out in the summary attached as Appendix 2 to this report. The views from this round of consultation, as well as any views that have been submitted to the Planning Service subsequently, have been taken into account in drawing up the Core Strategy. (NB - the detailed responses from individuals or organisations to the Issues and Options papers have been compiled into a single document, which is available to anyone on request, and the individual responses are available to view online as well.) The report of the Community Workshops is also available online.

Sustainability Appraisal

- 3.6 It is a statutory requirement that a sustainability appraisal be undertaken as an integral part of drawing up the new or revised policies of the Plan. This Sustainability Appraisal, which incorporates a Strategic Environmental Assessment as required by European legislation, has been undertaken together with consultants, Collingwood Environmental Planning, to enable an independent assessment to be made of the emerging policies. The results of this appraisal are contained in a separate report which forms Appendix 3 to this report. As explained in the report, some further amendments have been made to the draft Core Strategy since the consultants undertook the appraisal. In particular, an additional policy, CS TC5 on the Network of Town Centres, has been added since the appraisal was carried out. The consultants will be asked to appraise this, and any other changes or additions, before the draft strategy is finally agreed for public consultation.

- 3.7 The Sustainability Appraisal Report attached as Appendix 3 sets out some further recommended changes to the Draft Core Strategy. These have not been incorporated in the Draft Strategy as the SA has only just been received. The Collingwood recommended changes revolve around being clear and underlining that the housing growth strategy relies on addressing the social and economic impacts of such growth for it to be acceptable. Some of the key concerns are:
- Setting out the importance of addressing the social and environmental impacts of the strategy (employment, education, waste, energy, service provision etc.)
 - The timely provision of support infrastructure
 - The importance of ensuring that local people can access local jobs
 - Providing new as well as protecting existing greenspace
 - The involvement of local communities in implementing the plan.

Officers will consider these main themes and other recommendations and incorporate changes into the draft Core Strategy for Executive.

The Draft Core Strategy

- 3.8 As well as taking account of views expressed during the formal consultation period and of the Sustainability Appraisal, the Core Strategy has also been drawn up in liaison with other stakeholders both across the Council and partner organisations such as Brent PCT, Park Royal Partnership and locally active housing associations. A working draft of the Core Strategy was presented to Partners for Brent (Local Strategic Partnership Executive) in May where it received general support.
- 3.9 Guidance on the preparation of the Core Strategy and its content is provided by Government in a Planning Policy Statement on LDFs (PPS12). This states that :

“The core strategy should set out the key elements of the planning framework for the area. It should be comprised of a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery. It must be kept up-to-date and, once adopted, all other development plan documents must be in conformity with it. The core strategy should normally be the first development plan document to be produced...”

It goes on to say that :

“The core strategy should set out the long term spatial vision for the authority's area and the strategic policies required to deliver that vision.”

It is clear therefore that the Core Strategy is of fundamental importance in establishing how a local authority area will change over the next 10 years or so.

- 3.10 In setting out the Council's Preferred Options for the Core Strategy, it must also be demonstrated what alternative options for development, where genuine alternatives exist, have been rejected and why. For the purposes of public consultation on this the alternatives that have been considered, together with the reasons for not accepting them, have been set out in a separate box at the end of each section of the strategy where relevant.

Key Issues for the Core Strategy

- 3.11 In addition to taking account of local public opinion, the Core Strategy must also reflect and incorporate national and regional planning policy. It must be in conformity with the Mayor of London's 'London Plan'. The Mayor's strategy for London is to see London grow significantly over the next 10-20 years (by 700,000 people - equivalent to the size of Leeds). The Mayor has published new housing targets for London and each borough. These are contained in his Alterations to the London Plan. The Mayor of London proposes to alter the current London Plan so that housing development in Brent in the next 10 years should be almost double the rate in the current London Plan. This speeding up of the quantity of housing development is consistent with, and responds to, the Government's approach as evidenced by the Barker Report which, recommended that in order to deliver a trend in real house prices of 1.8 per cent an additional 70,000 houses each year in England might be required.
- 3.12 Brent will, if the London Plan Alterations are approved, be required to produce a step change in new housing provision year on year for the next 10 years, needing to provide 11,200 new homes between 2007 and 2016. Because about 1,000 are expected from bringing existing vacant dwellings back into use, it means that about 10,000 new homes will have to be built in Brent over this period. This would increase both the population and the housing stock by 10%. There are three main considerations to housing growth:
1. Brent has a commitment to over 4,000 homes in Wembley and 1500 new homes in South Kilburn and a number of other housing sites, which count towards the 11,200 so, although the figure is challenging, it is achievable.
 2. Housing growth is likely to be the main vehicle for driving regeneration in key areas of the borough. No housing growth effectively equals little change and very limited regeneration.
 3. Housing growth will have significant impacts on the borough in terms of the need for new schools, health and other social infrastructure as well as transport, open space and waste and energy needs.

One of the key objectives of the proposed LDF Core Strategy is to show how the authority can manage housing growth for its regenerative benefits, but limit the other impacts such growth will have and also limit the financial burden on the Council.

- 3.13 Residents often say that the Borough is full up and cannot conceive of a 10% increase in the number of new homes and a further 10% increase in population. We should therefore not build further homes. The counter view is that new homes are needed and it is that investment that will help regenerate the Borough. To resist housing growth will bring the Council into conflict with the Mayor of London who will be able to insist that we plan for the number of homes set out in the London Plan. Perhaps the more pressing point is that if we undershoot our targets developers will be able to argue that non-housing sites should be developed to meet the shortfall. This will leave the Council unable to control housing growth in growth areas nor able to plan and manage its consequences.
- 3.14 The clear recommendation from officers is that housing growth is a London-wide and national priority - it is better that it is managed locally, that the benefits of regenerative housing development are embraced and the infrastructural requirements are planned for. This planning must start with the LDF and its Core Strategy which sets out the direction of travel for the Borough.
- 3.15 The attached Core Strategy sets out a fourfold strategy for the development of the borough:
1. Concentration of major housing growth into 5 growth areas, Wembley, South Kilburn, Church End, Alperton and Colindale
 2. Regeneration of industrial areas, town centres and poor quality 'estates'
 3. Protection of open space, conservation areas and the best of suburbia
 4. Local benefits meeting the needs of diverse communities
- 3.16 The strategy is different from the UDP in which sites were allocated to housing across the Borough where opportunities arose. This new strategy is looking to actively funnel housing into key growth areas. This has a number of benefits:
- Concentrations of housing and the infrastructure needed can be planned together
 - Sites can be put together to get, for example, both housing and schools - not so easy if we disperse growth
 - Growth can be accommodated in areas of good public transport access so that there is less reliance on the car, and the amount of development will be able to fund public transport improvements

- High density growth takes place in the most accessible locations
- Other parts of the borough such as open space or main employment areas and many of the better quality environments, e.g. conservation areas, can be better protected from inappropriate development

3.17 What is absolutely critical in accepting concentrations of higher density housing is that there is a step change in its quality and the way it is provided. The Core Strategy will also set out in more detail the policies that will demand more sustainable development - the section attached lists the main requirements. They are in brief:

- Developments that are mixed in use, tenure and house type (affordable housing for families)
- Changes demanded in the quality of architecture and design
- Infrastructural (schools, health, leisure, transport, community facilities, open space, etc) requirements met before development is agreed
- Improvements to the surrounding public realm as well as the development
- Appropriate job training and local labour agreements
- Buildings that are designed to minimise creation of waste and use of energy and water and are constructed in a sustainable way
- Development that responds to, and meets, the needs of Brent's diverse communities

Why have these 5 areas been chosen as growth areas? Are these the right areas?

3.18 There were a number of reasons the 5 areas were chosen as growth areas:

- Most have existing/planned proposals
- Most have good public transport access or, if not have some potential for it to be improved
- They all include opportunity sites, i.e. there are sites to accommodate at least 1000 new homes
- They are in areas that need, and would benefit from, new infrastructure
- They are in areas in need of regeneration or are showing signs of decline
- They are largely deliverable within the 10 year time frame of the plan

What about other areas in need of regeneration?

- 3.19 The 5 growth areas are where over 1000 housing units could be supplied in each area. And of course the housing growth is acting as the main driver of regeneration within them. This is not to ignore other areas in need of regeneration. There will be other designations in the LDF to pick these out:
- Regeneration estates - notably Brentfield/North Circular Road corridor or Barham Park
 - Site Specific Allocations - proposals for individual sites such as Choitram's, Lancelot Road
 - Supplementary Planning Documents (SPD) set out detailed guidance on key development sites such as Guinness

Which parts of the Borough should be protected?

- 3.20 One of the advantages of focusing growth into key locations is that most of the borough can be protected from the development pressures that the 'hope-value' of new housing can bring. An integral part of the strategic spatial approach is the protection of open space, the character of valued suburban environment, existing community facilities and of industrial land for business and industry. There are therefore strong policies on the design of new development, on limiting development in open areas, and in not allowing the incursion of housing (and other inappropriate uses) into the principal industrial estates.
- 3.21 Also important, particularly in addressing climate change and associated problems, is that development should be sustainable. As well as focusing development where public transport access is good, and where it will reduce the need to travel, it is also important that new development should contribute towards the minimisation of carbon emissions, by for example ensuring that a proportion of its energy needs are derived from renewable sources, and incorporate climate change mitigation measures.

Summary of Advantages of The Proposed Strategy

- 3.22 Housing growth presents significant challenges, notably in terms of providing infrastructure, but it is better that this process is managed rather than challenged. Close liaison with Public Service partners will be necessary.
- 3.23 A scenario of no housing growth will largely mean no large-scale regeneration.
- 3.24 The strategy is based on concentrating housing growth into 5 main areas and ensuring that the infrastructure is also concentrated in these areas. This allows the protection of the most valued areas of Brent.

- 3.25 It requires us to use powers such as Compulsory Purchase to bring forward sites for development and use the S106 process creatively.
- 3.26 There will be significant infrastructure and running costs, and the Council will have to devise a strategy to meet these by effective dialogue with Government, creative use of planning powers and existing land resources, re-shaping existing service provision, and supporting and influencing public service partners.

Other Core Policies

- 3.27 In addition to the fundamental policies establishing the spatial strategy for the borough, there follows a series of additional policies for topic areas that provide some additional detail as to how the strategy will be applied. For example, included are key strategic policies governing sustainable design and construction of new buildings, the need to comply with the sequential approach to development for town centres and policy to promote the development of transport modes other than the private car.

Development Control Policies

- 3.28 Not being produced at this stage are the more detailed Development Control policies which cover matters such as detailed design requirements, policies covering the control of pubs, restaurants and take-aways in town centres, housing conversions, etc.; in other words, those policies that are used to determine the acceptability of design of development at the planning application stage. In the meantime this will continue to be provided by the adopted UDP until it is superseded by a comprehensive set of development control policies.

Changes to Core Policy

- 3.29 Members may wish to consider changes to, or place greater emphasis on, certain policies or policy directions. Concern has been expressed in certain areas, for example:
- The amount of development in relation to supporting infrastructure
 - Tall buildings
 - Higher Density Residential Development, particularly where suburban housing is redeveloped
 - Lack of adequate car parking provision in residential schemes
 - Lack of emphasis on sustainability of buildings
 - Development of Open Space in particular instances
 - Location of particular uses
 - The future role and size of Wembley Town Centre

It is important to remember that the broader general core policies can be amended if Members feel that proposed policies do not meet their concerns. It will be difficult to amend policies if they are at odds with the London Plan, however, as our LDF must be in general conformity with it. Some changes may also be more appropriately expressed in the more detailed policies. A good example could be Parking Standards which will be set out in detail in the suite of Development Control policies. Members may want to bring particular attention to the future use of key sites through Site Specific Allocations (e.g., the future use of Wembley Park Sports Ground).

Next Steps

- 3.30 Once the Core Strategy is agreed as a basis for consultation officers will bring forward specific Site Allocations, i.e. the preferred options for the development of individual sites for comment and ultimately approval by Executive for public consultation. Consultation on the Core Strategy and Site Specific Allocations can then be undertaken before Xmas.
- 3.31 Although it was originally intended that consultation at this stage should include Development Control Policies as well as the Core Strategy and Site Allocations, officers are now proposing that this forms part of a separate public consultation early in the New Year. Although this will mean an additional administrative burden, it will have the advantage of allowing people to concentrate upon the key spatial planning issues first before dealing with more detailed control policies. Officers will prepare a revised timetable proposing this approach which, after agreement from the Executive, will be put to the Secretary of State for her approval.

4.0 Financial Implications

- 4.1 An allowance was made in the 2005/6 budget for costs over and above staff costs including that for consulting upon and publishing the LDF. Most of the funding required has been met from the Planning Delivery Grant. Government officials have made it clear that the Planning Delivery Grant (PDG) should be used to meet additional resource requirements of the new system. The costs of consulting upon the LDF will be met from the Planning Service budget for 2006/ 7
- 4.2 There will be significant capital investment needs and additional running costs as a result of housing and population growth. A fundamental point, however, is that it will be more cost effective to channel growth into key growth areas because there will be greater certainty over the scale, nature and phasing of development and the impacts can be assessed more easily and therefore the infrastructure needed more easily identified. It also allows a coherent business case to be put to government departments for future funding projects

5.0 Legal Implications

- 5.1 The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. The Unitary Development Plan and Supplementary Planning Guidance will be replaced by a Local Development Framework. The Council is required to carry out pre-submission consultation by regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004.

6.0 Diversity Implications

- 6.1 Full statutory public consultation has been, and will continue to be, carried out in the preparation of this development plan document, which will include seeking the views of different groups across the Borough. An Equalities Impact Assessment of the LDF process has been produced.

Background Papers

- Brent Local Development Scheme, February 2006
- Brent LDF Issues and Options Papers, September 2005
- Representations on Issues and Options Papers
- Brent Magazine LDF Questionnaire Results
- LDF Stakeholder Workshops Report, Oct 2005
- PPS12 and Companion Guide

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APPENDIX 1 Draft Core Strategy – Preferred Options, July 2006

APPENDIX 2 Summary of Issues and Options Consultation Responses

- 1 For this round of consultation a series of Issues and Options papers were approved for a range of topics such as Housing, Employment, Open Space, etc. There was also a paper which set out the development options for a number of sites, and views on these options were sought. In addition, a questionnaire was placed in the Brent Magazine seeking views on a number of basic planning issues. As well as publicising the round of consultation at all the Local Area Consultative Forums where Issues and Options papers and Questionnaires were made available, two community participation workshops were held, one at the Town Hall and the other at Queens Park Community School.

Questionnaire in Brent Magazine

- 2 There was a good response to the questionnaire with over 900 forms returned which represents about 1% of the borough's households. An detailed report of the results of the 'tick-box' part of the questionnaire is available.
- 3 Key results are set out below

Housing

- 50% of respondents think that there should be more affordable homes
- 60% think that affordable housing should be provided on sites of less than 15 homes

Built Environment

- 50% think that requiring 10 percent of energy from renewable sources was too little whilst 45% thought that it was about right
- 96% think that it is either important or very important for developers to include sustainable design in new housing
- 86% think that buildings over 10 storeys are inappropriate in the borough

Transport

- In reducing the effects of traffic on Brent residents, relatively little support for restricting available parking but strong support for building new shopping and leisure developments within walking distance of public transport and increasing funding for public transport

Employment

- There was a high level of support (34% of responses) for allowing mixed use schemes on employment land

Town Centres

- 64% of respondents think there should be limits on the amount of shopping floorspace allowed outside town centres

Community Facilities

- 56% think there are not enough community facilities
- 87% think that housing developers should help fund new health facilities

Tourism and Leisure

- 70% think that Wembley is not an appropriate location for a large scale casino

Open Space

- Most people think that MOL and public open space is sufficiently protected whilst most think that sports grounds, school playing fields and allotments have insufficient protection

Waste

- 60% think that waste recycling centres should be smaller but that there should be more sites

Issues and Options Papers

- 4 The following gives a general indication of the level of response by different groups, organisations or individuals. These can be divided into those from the local community (i.e. residents' associations, other local groups or individuals), national bodies (such as Government Agencies or pressure groups) and those with commercial interests such as developers, land owners and businesses operating in the Borough. The number of respondents divided up as follows:

Local community	25
National Bodies	10
Commercial Interests	28

- 5 There was a limited response from the local community to the Issues and Options papers which can be explained in part by the fact that many responded to the questionnaire. The community workshops were reasonably well attended by representatives from local residents associations and other groups active in the borough, so their views were mainly expressed through those forums.

- 6 Northwick Park Residents Association carried out their own questionnaire of their members, based on the questions that were asked in the Issues and Options papers but given a local area focus, and received 126 replies.
- 7 Although a wide variety of views have been expressed, a number of themes have emerged. These can be summarised as follows:
- By far the majority of representations would like to see a limit on the height of buildings or, at least, to have high buildings confined to locations where they might be more acceptable, i.e away from more suburban residential areas
 - General opposition to an increase in the level of affordable housing sought in new housing schemes
 - Generally considered that new housing development should be supported by new social infrastructure such as schools and health facilities
 - Open land should be protected from development
 - General support for development to be more sustainable
 - A mixed response on parking provision, but the majority of respondents seem to be in favour of restrictions on parking
 - Little support for a large casino in Wembley

Community Workshops

- 8 These were arranged for Brent Town Hall and Queens Park Community School and were attended by over 40 people, mainly representatives from residents' associations but also local businesses and individuals. A list of attendees is provided below. The two events were conducted by external facilitators, Local Dialogue, and focussed on how people would like to see the Borough developing in the future. The balance of views lay between one of support for growth and regeneration in key locations, whilst maintaining the character of suburban residential areas, and one of little or no-growth. There was little support for tall buildings and there was a consensus that schools and health facilities should be able to cope with new residential development, or that these should be provided along with the development.
- 9 A full report on the workshops is available online as well as from the Planning Service.

APPENDIX 3 Sustainability Appraisal