



**Executive**  
24 March 2014

**Report from the Strategic Director of  
Regeneration and Growth**

Wards affected:  
Wembley Central, Tokyngton, Barnhill,  
Preston, Stonebridge

**Brent Local Plan - Development Management Policies and  
Alterations to Core Strategy**

**1.0 Summary**

- 1.1 This report presents a draft Development Management Policies document, a proposed set of Minor Alterations to the Core Strategy and proposed changes to the Proposals Map of Brent's Local Plan. Planning Committee considered the report on 19<sup>th</sup> February and recommends that Executive agree the documents for public consultation starting on 26<sup>th</sup> May 2014.

**2.0 Recommendations**

- 2.1 That Executive agrees the draft Development Management Policies document, and the proposed alterations to the Core Strategy, for public consultation starting on 26<sup>th</sup> May 2014 for 6 weeks.
- 2.2 That the Strategic Director, Regeneration & Growth is authorised to make further editorial changes to the document prior to finally issuing it for public consultation.
- 2.3 That Executive agrees the revised timetable for the preparation and review of Brent's Local Plan as set out in paragraph 3.25.

## 3.0 Detail

### Introduction

- 3.1 Planning Committee considered the draft Development Management Policies and the proposed Alterations to the Core Strategy at their meeting on 19<sup>th</sup> February 2014 and resolved to recommend to Executive that it be agreed for public consultation subject to some minor changes that have been incorporated into the documentation.
- 3.2 The reasons for producing the Development Management Policies document derive from the need to bring UDP policy, first drafted in 2000 and adopted in 2004, up-to-date. It is the final step in drawing up the folder of Development Plan Documents (DPDs) that will make up the borough's development plan and ultimately supersede the UDP. Planning law requires that planning applications should be determined in accordance with the Development Plan. The National Planning Policy Framework (NPPF) states that local plans are key to achieving sustainable development that reflects the vision and aspirations of local communities. Having a set of up-to-date policies will mean that the council will be in a good position to defend decisions on planning applications, especially on appeal. It will also provide more certainty for developers in proposing development.
- 3.3 The Development Management Policies document will complete the suite of documents that will make up Brent's local plan (the term Local Development Framework is no longer referred to in the National Planning Policy Framework). It sets out policies which are primarily required for determining planning applications, unlike the other documents which comprise the Local Plan such as the Core Strategy, which contains the basic spatial planning and growth strategy for the borough, or the Site Specific Allocations document which sets out planning requirements and guidelines for about 80 individual sites. The Wembley Area Action Plan, currently being examined, provides a detailed planning framework for the Wembley regeneration area. As with the UDP, the DM Policies document is structured under topic headings for ease of use.
- 3.4 There is also a need to make some minor alterations to the Core Strategy, including certain designations on the Policies Map (formerly known as the Proposals Map), to ensure that it is in accordance with both the NPPF and the London Plan, and that it has taken account of some fundamental changes to the Plan's context such as the need to amend the boundaries of Strategic Industrial Locations (SIL) in light of a revised Employment Land Demand assessment.

### Current Stage

- 3.5 This round of consultation on a draft Development Management Policies document provides the main opportunity for the local community and businesses to comment upon the proposed policies. The draft development policies must be in accordance with Brent's own Core Strategy as well as the London Plan and the NPPF. The policies have been developed in light of Issues and Options considered and consulted upon prior to the adoption of the Core Strategy, and where new issues have arisen giving rise to new or revised policy, the policy options have been assessed through the Sustainability Appraisal process.

## Policies Map

- 3.6 The map forms part of the development plan and was last updated after the Site Specific Allocations were adopted in 2011. Many of the designations currently on it date from UDP adoption in 2004. It is being reviewed now partly because of the new Development Management Policies superseding the UDP saved policies and partly because of the alterations to the Core Strategy. As explained above, changes to the boundaries of SIL are proposed as part of the overall Employment Land review. Other changes to the Policies Map are as a direct result of the review of policies in the DM Policies document. This includes some changes to the boundaries of open space or Primary Shopping Areas for example. There will be a further review of boundaries of Sites of Importance for Nature Conservation after this round of consultation. This review has been delayed because it is important that a survey of habitats is undertaken in the Spring/Summer months. Any amendments to sites or site boundaries will be included at the next stage of the Plan-making process and will be available for comment or objection in the Publication version of the Plan towards the end of the year.

## Public Consultation

- 3.7 The council is required to consult upon the Plan prior to its publication and submission to the Secretary of State for examination. Wide publicity will be given to the public consultation. It will be advertised in the local press as well as the Brent Magazine and leaflets will be made available in the council's offices and libraries. The draft Plan and comments forms will be available in Brent libraries and One Stop service offices as well as online.

## Summary of Main New Policies / Policy Changes

- 3.8 A number of the changes to policy since the adoption of the UDP in 2004 result from new requirements set out in the Government's NPPF or in the Mayor's London Plan (currently being reviewed). Other changes result from other changing circumstances such as new Government requirements on flooding or relating to the impact of noise for example. In addition there are changes proposed because of local requirements either identified through new evidence or because there is community and political will to make a change, e.g. further limits on betting offices or hot food take-aways.
- 3.9 The following is a summary of the main new policies or changes to policies proposed in the draft plan.

### Town Centres, Shopping, Leisure and Tourism

- 3.10 For town centres to be successful it is imperative that they provide a range of uses providing a breadth of products and services to encourage a diverse customer base, and increased footfall. An overconcentration of a particular use harms the diversity, and therefore viability and vitality, of centres. Members and the local community have expressed a wish to address the harm particular uses are having on the vitality of our town centres and the wellbeing of residents. This has informed the following policies:-

- **Betting Shops, Amusement Centres and Pawnbrokers** – In addition to amusement centres, which are currently covered by UDP policy, a policy is proposed (**DMP2**) to prevent an over-concentration of betting shops,

pawnbrokers and pay day lenders in Brent's town centres. These uses have increased significantly in Brent in recent years. Between 2007 and 2013 the number of betting shops in Brent's town centres increased by 41% and the number of pawnbrokers/payday lenders by 171%. It is, therefore, proposed that a cap should be set to prevent an overconcentration of these uses. In addition, to prevent clustering and ensure these uses do not dominate any single length of frontage, a limit is proposed on the proximity of these uses to each other.

- 3.11 Betting Shops, Pawnbrokers and Pay Day Lenders are use class A2, meaning these businesses can open without the need for planning permission in units previously used by financial and professional services (A2), restaurants and cafés (A3), drinking establishments (A4) and hot food takeaways (A5). Although there have been calls for revisions to the use class order, there has been no suggestion that changes will be made in the near future. Given the rapid increase in the number of these uses and the need for expedient action, consideration should be given to introducing an Article 4 Direction, to remove national permitted development rights. Introducing an Article 4 Direction has financial implications, such as loss of fees and potential compensation claims. It is recommended a more detailed report on the implications of introducing an Article 4 Direction is submitted to Planning Committee for consideration.
- 3.12 New policies on hot food takeaways and shisha cafes are proposed which seek to address health inequalities and support the Brent Health and Wellbeing Strategy (2013-2015).
- **Takeaways** - National and regional planning policy and a growing evidence base supports the need to prevent an overconcentration of takeaways due both to health implications, and the fact they detract from the primary retail function of centres and result in cumulative impacts on amenity. Brent residents suffer from health and wellbeing challenges which can be related to a poor diet, including rising obesity levels, particularly amongst young people, cardiovascular disease and diabetes. To promote healthy eating and support the Brent Obesity Strategy (2010) it is proposed to introduce a policy which prevents an overconcentration of takeaways and restricts their proximity to schools.
  - **Shisha cafes** - Tobacco use is still the single greatest cause of preventable ill health and premature mortality both in the UK and in Brent (Department of Health, 2011). The Brent Young Persons Cigarette and Shisha Audit (2012) highlights two thirds of new smokers are young people under the age of 18, and those who start smoking before the age of 16 are twice as likely to continue to smoke as those who begin later in life. The study found students from a school in Brent that had more than one shisha café within a 0.5 mile radius were twice as likely to be current shisha smokers than students from schools that had no shisha cafés within a 0.5 mile radius. In light of this evidence it is proposed to restrict the proximity of shisha cafes to schools.
  - **Frontage** - Policy **DMP2** takes a slightly more flexible approach on uses within the primary and secondary frontage. It is proposed the limit on the proportion of primary frontage in non-retail use increases from 35% to 40%, in recognition that projected demand for comparison floorspace has reduced and that with the exception of Ealing Road Brent's town centres are currently exceeding the limit. This allows for some diversity in use, whilst ensuring retail remains the core

function of Brent's town centres in keeping with the Mayor's draft Town Centres SPG (2013). Furthermore, the policy allows for the redevelopment of unviable peripheral secondary frontage to residential development.

- **Retail impact assessment** – The National Planning Policy Framework sets a default threshold of 2,500 sqm for retail impact assessments, but advises local authorities should consider setting a locally appropriate threshold. Based on an assessment of known proposals relative to the scale of town centres, it is felt that the national threshold would potentially allow for developments which could cause harm to Brent's town centres, and as such a local threshold of 500 sqm gross retail floorspace is required.
- **Meanwhile use** - Bringing empty properties back into use maintains levels of activity on a street, visual attractiveness and supports the vitality of a centre. In recognition of this, it is proposed town centre policy (**DMP1**) states that meanwhile uses will be supported.
- **Neighbourhood centres and isolated shop units** – Many of Brent's neighbourhood centres (small neighbourhood parades located outside of town centres) suffer from high vacancy levels. It is proposed that policy **DMP3** allow unviable shop units to be redeveloped for housing, providing there is equivalent provision within a reasonable walking distance. This approach will protect the provision of essential services, whilst making an important contribution to housing supply.
- **Visitor accommodation** - Due to concerns that applications for apart-hotels are being used as a back door to gain permission for residential or student accommodation, it is proposed policy states conditions will be applied to ensure visitor accommodation is not permanently occupied. Amendments have also been made to the policy to ensure it fully complies with London Plan policy 4.5, by requiring applications for hotel development to be accompanied by an Accessibility Management Plan, and by stating strategic hotel capacity

## Built Environment

3.13 Much of the reworking of the Built Environment chapter includes a rationalisation of policy. Policy also refers to more detailed guidance to be contained in draft Supplementary Planning Document 17 (SPD17) on Design in Brent which will also be subject to public consultation alongside the Development Management Policies document. This will be brought to Committee at a future date. The supporting text also refers to relevant policies for determining planning applications included in the London Plan.

- **Urban Design** – A rationalisation of multiple UPD policies is proposed in policy **DMP7**. A reference in the supporting text to London Plan decision making policies on urban design, which are relatively detailed, is included.
- **Design Principles** – Policy **DMP4** is also a rationalisation of multiple UDP policies, including the re-introduction of policy directly concerned with domestic extensions as well as the introduction of criteria setting out requirements for outbuildings.

- **Inclusive and Accessible Design** – Locally appropriate policies regarding accessibility and inclusion are required by the London Plan and are, therefore included in policy **DMP9**.
- **Protecting Amenity** - Policy **DMP10** is to bring together all elements of amenity with reference to other policies or regulations as appropriate. It is intended to be applicable both during construction and over the lifetime of a development.
- **Urban, Greening, Landscaping and Trees** – Policy **DMP11** is applicable to all types of development and introduces the London Plan promotion of urban greening and green roofs.
- **Heritage** –Policy **DMP13** now includes decision making criteria in line with the NPPF for Conservation Areas, Listed Buildings, Sites of Archaeological Interest, Registered Parks and Gardens, Local Heritage Assets and Local Views. The most significant difference is the reintroduction of Listed Building policy criteria.

### Open Space

3.14 The most significant change to open space policy was made when the Core Strategy was adopted in 2011, which was to introduce a general policy, expressed as a clear wish of the local community on public consultation, to protect all open space of local value. New policies are partly as a result of this.

- **Protection of Open Space** – Policy **DMP14** rationalises existing policy in accordance with the general policy CP18 in the Core Strategy The council is required to set decision making criteria in line with the London Plan and appropriate to the open space designation. Food growing is also protected and promoted in line with the London Plan. The revised Policies Map will show all open space of local value that should be protected.
- **Enhancing Biodiversity and Access to Nature** – Policy **DMP15** requires that developments must protect and enhance the biodiversity value of a site, with reference to London Plan policy 7.10 and Brent's Biodiversity Action Plan. A review of Sites of Importance for Nature Conservation (SINC) will be commissioned, and the boundaries of sites amended as necessary, before the publication of the draft Plan later this year.
- **Waterside Development** – Policy **DMP16** will be applicable to developments affecting all waterways and is in support of the London Plan's strong promotion of London's Blue Ribbon Network.

### Environmental Protection

3.15 New policy content is primarily as a result of new requirements set out in National policy or through the London Plan.

- **Noise & Vibration** – Policy **DMP17** introduces a new consideration of impact of noise generating development on Quiet Areas. These will be defined by

Brent's Environmental Health service. In the meantime, Quiet Areas will be identified for the purposes of the development plan as the borough's main natural open spaces including Fryent Country Park and the Welsh Harp.

- **Air Quality** – There is a new requirement in policy **DMP18** (in accordance with the London Plan) that major development should be air quality neutral and development likely to be used by people vulnerable to poor air quality should not be located in areas with existing very poor air quality.
- **Surface Water** – Policy **DMP21** includes a new requirement that development on sites over 0.5 hectare should include wider surface water management measures. This is a reflection of advice provided through Brent's Surface Water Management Plan. The scope of this policy can be extended when the identification of areas of the borough particularly subject to surface water flooding are appropriately mapped.

### Sustainability

3.16 Again, much of the change in this section is as a result of national or regional policy changes.

- **Renewables and Decentralised Energy** – This policy introduces new criteria to require connection to District Energy Networks subject to viability. Policy also requires on-site renewables to be maximised and all opportunities for retrofitting to be considered.
- **Overheating and Cooling** – Policy **DMP23** introduces a hierarchy of design criteria which will be applicable to all new residential developments (excluding conversions where there is no extension).
- **Allowable Solutions** – Criteria are set out in policy **DMP24** to enable decision making when the carbon reduction target is not achieved on site in accordance with London Plan policy 5.2 and the Mayor's Draft Sustainable Design & Construction SPG. To implement this policy, a list of suitable projects needs to be drawn up and capacity to manage the money and projects identified.

### Transport

3.17 Much of the transport policy contained in the UDP has been rationalised and simplified to focus on those policies that are particularly relevant to the determination of planning applications.

- **Transport Assessment** – Policy **DMP15** on Transport assessment rationalises what are currently 4 policies in the UDP into a single policy. The requirements for a transport assessment with development remain as before.
- **Parking Standards** – Policy **DMP29** and Appendix TRN1 shows a general, small reduction in parking standards proposed although, in some cases, they have increased e.g., shopping where the standard for food shopping over 2,500 sq m has gone up from 1 space per 100 sq m to 1 space per 60 sq m. The council commissioned consultant's to undertake a study of parking standards and the proposed new standards are based upon their recommendations.

## Employment

- 3.18 It was necessary to commission a new Employment Demand study to inform the review of policy towards Local Employment Sites and this has resulted in a quantum of land being identified that can be released from employment use. Core Strategy policy CP20 deals with the protection of more strategic employment land.
- **Local Employment Sites** – A more flexible approach is proposed in policy **DMP31** for Local Employment Sites with the intention of allowing these sites to contribute to housing supply, and meet the identified need for affordable workspace in the borough. The policy allows the release of Local Employment Sites up to the maximum threshold of 7.5ha, as identified in the Employment Land Demand Study (2013), subject to the following:-
    - a) It being demonstrated there is no current or future demand for the site, as evidenced by the site being vacant despite a thorough marketing exercise at realistic prices for the area being sustained over a 24 month period; or
    - b) The redevelopment of the site for a mixed use scheme incorporating the maximum amount of employment floorspace, which would accommodate the existing employment use or, where the site is vacant, would result in employment space that meets an identified need for affordable workspace in the borough.
  - **Office development** - It is proposed policy **DMP32** now stipulates the loss of vacant office floorspace will be subject to the applicant demonstrating it is unviable, by submitting evidence of a thorough marketing exercise at realistic prices for the area, sustained over a 12 month period.
  - **Affordable workspace** – The National Planning Policy Framework states that planning policies must set criteria to ensure ‘anticipated needs’ for employment space are met. The Employment Land Demand study (2013) identified a shortage of affordable workspace suitable for SMEs, as such it recommends seeking 10% of floorspace within major schemes to be affordable workspace for SMEs subject to viability (policy **DMP33**)
  - **Work-Live development** –The Employment Land Demand Study (2013) identified little genuine demand for work-live development. There is concern this form of development has been used as a means to gain permission for residential development on employment sites. To ensure only genuine work-live developments come forward, it is proposed policy **DMP35** states such developments are to be managed by an organisation committed to their use primarily for employment, as evidenced by a management plan.

## Housing



3.19 It is important that Brent's detailed policies for considering proposals for new residential accommodation are in line with changing national and regional requirements, as well as ensuring that the council has sufficient detailed criteria for assessing the need for different types of provision. New or amended policy seeks to achieve this.

- **Affordable Housing** – Policy **DMP36** includes decision making criteria in support of policies CP2 and CP21 of the Core Strategy. This policy also sets out our approach to affordable/social rent, which is currently based upon the wording in the National Planning Policy Framework which is that “affordable rented housing must meet the needs of households eligible for social housing, with eligibility determined with regard to local incomes and local house prices...”.
- **Dwelling Size Mix** – This policy (**DMP37**) also includes decision making criteria and introduces a dwelling size table showing the preferred mix for each tenure. At the present time this is reliant upon the West London Strategic Housing Market Assessment (SHMA) published in 2010, but should be further informed by a borough SMAA.
- **Maximising Housing Supply** – Policy **DMP38** seeks the most appropriate housing density and, as with policy in the UDP, states that there should not be a loss of housing units but also sets out where exceptions are permitted.
- **Conversions** – Policy **DMP39** introduces a 130sqm minimum dwelling size for all houses where a conversion is proposed. This is based upon a review of applications determined since the Core Strategy was adopted. Proposals should also comply with Transportation policy DMP29.
- **Housing Standards** – Policy **DMP40** sets out criteria to ensure the quality of new accommodation, introducing in policy the principle of outbuildings not being acceptable as accommodation. It also sets out the requirement that the Mayor's '1 person 1 bed' unit size must be laid out as a studio. This policy also sets amenity space criteria bringing in the standards from SPG17 and sets requirement for play facilities in large schemes.
- **Hostels and HMOs** - New policy **DMP41** re-introduces detailed criteria for determining proposals including how to assess whether it meets a need required by policy CP21 of the Core Strategy.
- **Student Accommodation** – New policy **DMP42** sets out decision making criteria for student Housing in support of policy CP21 of the Core Strategy.

#### Social Infrastructure

3.20 Policy on social infrastructure introduces more detailed criteria so that applicants must demonstrate that a community facility is no longer needed before loss is considered appropriate.

- **Loss of social infrastructure** – To fully comply with London Plan policy 3.1, new policy **DMP44** has been introduced which states that proposals involving loss of social infrastructure without adequate justification or provision for

replacement will be resisted. The policy sets out detailed requirements to justify loss. Alternatively, loss will be acceptable where a replacement facility of at least equivalent quantity and quality is provided.

### Core Strategy

- 3.21 Proposed alterations to the Core Strategy are largely as a result of a need to bring it up to date and align it with the NPPF, published in March 2012 and the London Plan, which was published in 2011 but is currently proposed to be altered. The most significant change to the Core Strategy is the proposed de-designation of parts of Strategic Industrial Locations at Northfields Industrial Estate and at Willesden Junction, as shown on the changes to the Policies Map. The other change worthy of note is the categorisation of Church End as a Local Centre rather than Neighbourhood and of Kenton as District instead of Local. A schedule of alterations to the Core Strategy and the reasons for these is provided at appendix 2.

### Policies Map

- 3.22 Changes to the map are required for a number of reasons such as the review of Employment Land, the bringing forward of development proposals associated with HS2 at Old Oak, which will affect land in Brent around Willesden Junction, as well as a rationalisation of policy for open space which means fewer designations are required. Some designations are no longer needed, such as the London Bus Priority Network, so policy no longer refers to them and they can be deleted. Most of the proposed changes to the Policies Map are attached as Appendix 3 although those concerned with policy protecting open space of local importance, because it must be shown on a large plan at borough level, will be made available in hard copy at the meeting (an electronic version will be made available in advance of the meeting).

### **Public Consultation**

- 3.23 Appendix 1 sets out in full the draft consultation version of the document. Appendix 2 includes the proposed changes to the Core Strategy and Appendix 3 the changes to the Policies Map. Executive is asked to agree these documents for public consultation, subject to officers making further minor changes such as improving the document's legibility with better images, illustrations, etc. It is proposed that the consultation starts on 26<sup>th</sup> May for 6 weeks.
- 3.24 Those who wish to respond to the consultation will have the opportunity to do so in detail via the online consultation module, and to make written submissions including by e-mail. All representations made will be taken into account and a responded to before the proposals are brought back to agree for publication and submission to the Secretary of State later this year.

### **Timetable for Progressing the Local Plan**

- 3.25 The timetable for taking the Development Management Policies and Alterations to the Core Strategy forward is set out below. Executive is asked to agree this timetable, together with the timetable for progressing the West London Waste Plan to adoption,

for inclusion in Brent's Local development scheme and to be made available on the council's website:

### **DM Policies & Alterations to the Core Strategy**

Consultation on draft DM Policies & Alterations to the Core Strategy	May/June 2014
Pre- submission Consultation (Publication)	Nov/Dec 2014
Submission following agreement of Full Council	Feb 2015
Examination Hearings	June 2015
Adoption	Nov 2015

### **West London Waste Plan**

Pre-submission Consultation on WLWP	March 2014
Submission following agreement of Full Council	May 2014
Examination	Summer 2014
Adoption	Spring 2015

## **4.0 Financial Implications**

- 4.1 The preparation and ultimate adoption of Development Management Policies, together with the alterations to the Core Strategy, will result in a more up to date statutory Plan which carries greater weight in making planning decisions, which leads to fewer appeals and reduced costs associated with this. It also provides greater certainty for developers who are more likely to bring forward sites for development.
- 4.2 The costs of progressing the DM Policies will be met mainly from Planning & Regeneration budget. A number of studies have been completed to provide evidence to support the proposed policies. However, there is a need for a further study associated with the need to review Sites of Importance for Nature Conservation. Officers have yet to approach consultants to do this work as it has to be undertaken during the Spring or Summer months. It is estimated that this will cost approximately £30,000. To date the total cost of studies associated with bringing forward the Development Management Policies, which have been completed and paid for, is about £100,000.
- 4.3 Additional costs associated with progressing the DM Policies, including examination costs, will depend upon the level of objection when it is published but will not fall on the council until 2015/16. It is anticipated it will be in the region of £50,000. The costs would be contained within the overall cash limited budget for Planning and Regeneration.

## **5.0 Legal Implications**

- 5.1 The preparation of the borough's local plan, including the Development Management Policies, is governed by a statutory process set out in the Planning and Compulsory Purchase Act 2004, and associated Government planning guidance and regulations. Once adopted the Plan will have substantial weight in determining planning applications and will then mean that the UDP is fully superseded.

## **6.0 Diversity Implications**

- 6.1 Full statutory public consultation is being carried out in preparing the Local Plan and an Impact Needs / Requirement Assessment (INRA), which assessed the process of producing the Plan, was prepared and made available in 2008 and has recently been updated.

## **7.0 Staffing/Accommodation Implications**

- 7.1 The timetable proposed for progressing the Plan to adoption is contingent upon the appropriate staffing levels being maintained.

## **8.0 Environmental Implications**

- 8.1 The Development Management Policies deal with development across the whole of the Borough. They will have a significant effect on controlling impacts on the environment including requiring measures to mitigate climate change such as policies to deal with flooding and surface water drainage. Sustainability appraisal is undertaken and updated at all stages of preparing the DPD.

## **9.0 Background Papers**

Brent's UDP, 2004

Brent Core Strategy July 2010

Brent Proposals Map, July 2011

Brent Site Specific Allocations Development Plan Document

The London Plan, July 2011

Draft Further Alterations to the London Plan, January 2014

### **Contact Officers**

Any person wishing to inspect the above papers should contact Ken Hullock, Planning & Development 020 8937 5309

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**Appendix 1 – Draft Development Management Policies**

## Appendix 2 – Proposed Minor Alterations to Core Strategy

### February 2014

The National Planning Policy Framework (NPPF) was published on 27 March 2012. This sets out the Government’s planning policies for England. It is a requirement that Local Plans are consistent with the NPPF and the London Plan. The Core Strategy is central to the Local Plan; therefore, the following minor alterations are proposed to ensure consistency.

Further minor alterations are proposed for consistency with the Development Management Development Plan Document (DMDPD).

*N.B New text is in red and underlined. Text to be deleted has been struck through.*

Chapter	Policy/Para	Proposed Change	Reason
Throughout	Throughout	Replace reference to Local Development Framework with <u>Local Plan</u> .	To reflect updated terminology in NPPF.
Throughout	Throughout	Update all references to the London Plan to correspond with the updated London Plan.	To reflect updated London Plan.
Throughout	Throughout	Reference to planning obligations replaced with CIL where appropriate.	To reflect the introduction of the Community Infrastructure Levy (CIL), by the Planning Act 2008, and the formal introduction of Brent CIL on 1 July 2013.
Throughout	Throughout	Reference to Planning Policy Statements replaced with NPPF.	To reflect the introduction of the NPPF which replaced Planning Policy Statements.
Throughout	Throughout	Replace reference to saved UDP policies with <u>Development Management policies</u> , and reference to DMDPD being prepared to has been produced.	Remaining saved UDP policies will be superseded by the DMDPD.
Throughout	Throughout	Replace reference to Proposals Map with <u>Policies Map</u> .	To reflect updated terminology in NPPF.
Throughout	Throughout	Replace reference to Strategic Employment Locations with <u>Strategic Industrial Location</u> .	To reflect updated London Plan.
Towards Spatial Planning for Brent: formation of	2.6	In terms of <b>National Policy</b> Brent must comply with <u>the National Planning Policy Framework</u> , a series of Planning Policy Statements, as well as associated circulars, ministerial statements and various strategy documents which generally deal with particular topics or issues. The important and overarching policy statement is <b>PPS 1, Delivering Sustainable Development</b> . This sets out a number of key principles for	To reflect the introduction of the NPPF which replaced PPS1.

the Core Strategy

development to ensure that development plans and decisions made on planning applications contribute to the delivery of sustainable development. In summary the key principles are three dimensions to sustainable development are as follows:

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

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Strategic Area Policies	4.44	Wembley will have a modern, service based economy comprising retail, sport, offices, conference facilities, hotels, leisure, tourism and visitor attractors, creative industries and a regenerated industrial estate, supported by training and skills development such as <u>Wembley Works</u> <del>Brentin2Work</del> .	Brentin2Work has been disbanded.
Strategic Area Policies	4.52	Guidance for Alperton growth area <del>will be</del> <u>has been</u> produced in the form of a Masterplan Supplementary Planning Document. The document <del>will establish</del> <u>es</u> principles for development including uses, physical and social infrastructure, the relationship of development with the canal and phasing and delivery.	Alperton SPD was adopted in 2011.
Strategic Area Policies	CP20	<del>A further 6.5 hectares of land will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generis uses.</del>	Included in error. Falls outside Growth Area and duplicates CP 20.
Strategic Area Policies	CP21	<del>9 hectares of land will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generis uses.</del>	Included in error. Falls outside Growth Area and duplicates CP 20.
Strategic Area Policies	4.69	<del>An</del> draft Opportunity Area Planning Framework has been prepared by the GLA with input from the boroughs and the Partnership.	Framework was adopted in 2011.
Strategic Area Policies	4.73	To facilitate delivery, the council has prepared and will prepare planning guidance for growth areas, such as the Wembley Masterplan, <u>Alperton, Burnt Oak/Colindale</u> and a revised document for South Kilburn. <del>A further documents</del> <u>are</u> is in the pipeline for <del>Alperton, Burnt Oak/Colindale</del> and Church End, while sub-regional guidance <del>is being</del> <u>has been</u> prepared for Park Royal. The intention is to properly consider the capacity of sites in advance and provide certainty for developers and encourage long term planning to respond as economic conditions improve.	To reflect progress in producing guidance.
Maintaining Existing Town Centres	5.3	Town centres are categorised in a hierarchy according to their functions and roles which take account of size, extent of catchment area and the range of shops and facilities provided. Brent's town centres have been re-categorised and divided into <del>four</del> <u>three</u> categories according to their characteristics, the designations set out in the London Plan <u>2011</u> <del>2008</del> and the local strategies of neighbouring boroughs for centres that have shared boundaries. Town Centres which share boundaries with neighbouring London Boroughs are indicated by an asterisk (*). There will be close liaison with neighbouring boroughs to ensure compatibility of policies and proposals for the centres as a whole.	To be in keeping with the NPPF definition of town centres, which states references to town centres excludes small parades of shops of purely neighbourhood significance.  To cross reference DMDPD.



		<p>The town centre categories in Brent are:</p> <ul style="list-style-type: none"> <li>• Major Town Centres within London;</li> <li>• District Centres (called Main District Centres in the UDP 2004);</li> <li>• Local Centres (called Other District Centres in the UDP 2004).</li> </ul> <p><u>Outside of town centres</u> Neighbourhood Centres (called Local Centre in the UDP 2004), is the fourth centre category in the hierarchy, <del>Centres falling in this category</del> have small catchment areas and usually provide services to the immediately surrounding population. <u>Development Management DPD policy x applies to Neighbourhood Centres.</u></p>							
<p>Maintaining Existing Town Centres</p>	<p>5.6</p>	<p>Town centres are dynamic and will continue to evolve so that their relative positions in the hierarchy can change over time. The hierarchy of centres within Brent has been monitored regularly. Recent surveys have observed some positive changes in the characteristics of Colindale, <u>Kenton</u>, Wembley Park, Preston Road and Neasden town centres acknowledging a need to review their positions in the hierarchy. These <u>five</u> <del>four</del> town centres have therefore been elevated from the category of Other District Centre in the UDP 2004 to District Centre. <u>Recent surveys also observed Church End now displays the characteristics of a local centre. Church End centre is therefore included in the hierarchy as a local centre.</u></p> <table border="1" data-bbox="551 975 1585 1390"> <thead> <tr> <th data-bbox="551 975 837 1015">Major Town Centres</th> <th data-bbox="837 975 1294 1015">District Centres</th> <th data-bbox="1294 975 1585 1015">Local Centres</th> </tr> </thead> <tbody> <tr> <td data-bbox="551 1015 837 1390"> <ul style="list-style-type: none"> <li>• *Kilburn</li> <li>• Wembley</li> </ul> </td> <td data-bbox="837 1015 1294 1390"> <ul style="list-style-type: none"> <li>• *Burnt Oak</li> <li>• *Colindale/ <u>The Hyde</u></li> <li>• *Cricklewood</li> <li>• Ealing Road</li> <li>• Harlesden</li> <li>• <u>*Kenton</u></li> <li>• Kingsbury</li> <li>• Neasden</li> <li>• Preston Road</li> <li>• Wembley Park</li> </ul> </td> <td data-bbox="1294 1015 1585 1390"> <ul style="list-style-type: none"> <li>• <u>Church End</u></li> <li>• Kensal Rise</li> <li>• Queen's Park Sudbury</li> <li>• <del>*Kenton</del></li> </ul> </td> </tr> </tbody> </table>	Major Town Centres	District Centres	Local Centres	<ul style="list-style-type: none"> <li>• *Kilburn</li> <li>• Wembley</li> </ul>	<ul style="list-style-type: none"> <li>• *Burnt Oak</li> <li>• *Colindale/ <u>The Hyde</u></li> <li>• *Cricklewood</li> <li>• Ealing Road</li> <li>• Harlesden</li> <li>• <u>*Kenton</u></li> <li>• Kingsbury</li> <li>• Neasden</li> <li>• Preston Road</li> <li>• Wembley Park</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Church End</u></li> <li>• Kensal Rise</li> <li>• Queen's Park Sudbury</li> <li>• <del>*Kenton</del></li> </ul>	<p>To reflect changes to the town centre hierarchy in the London Plan (2011), and the findings of the Town Centre Background Report (2013) which provides supporting evidence to the DMDPD.</p>
Major Town Centres	District Centres	Local Centres							
<ul style="list-style-type: none"> <li>• *Kilburn</li> <li>• Wembley</li> </ul>	<ul style="list-style-type: none"> <li>• *Burnt Oak</li> <li>• *Colindale/ <u>The Hyde</u></li> <li>• *Cricklewood</li> <li>• Ealing Road</li> <li>• Harlesden</li> <li>• <u>*Kenton</u></li> <li>• Kingsbury</li> <li>• Neasden</li> <li>• Preston Road</li> <li>• Wembley Park</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Church End</u></li> <li>• Kensal Rise</li> <li>• Queen's Park Sudbury</li> <li>• <del>*Kenton</del></li> </ul>							

		Willesden Green	
Maintaining Existing Town Centres	5.7	National guidance ( <del>PPS 4</del> ), and London Plan policies, including the sequential approach to site selection, the potential impact on existing centres and the accessibility of the location;	PPS4 superseded by NPPF.
Maintaining Existing Town Centres	CPI6	<p><b>Town Centres and the Sequential Approach to Development</b></p> <p>In identifying potential sites, and in considering proposals for major new retail and other town centre uses in Brent, the <del>following</del> sequential test <del>order of</del> centres will be applied.</p> <p><del>Major Town Centres (Wembley and Kilburn)</del>  <del>District Centres</del>  <del>Local Centres</del>  <del>Neighbourhood Centres</del>  <del>Out-of-centre locations</del></p>	To comply with the sequential test as defined in the NPPF, which states main town centre uses are to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.
Protection and Conservation	CPI7	The distinctive suburban character of Brent will be protected from inappropriate development. <del>The council will bring forward design guidance that limits development, outside of the main town centres and away from corner plots on main road frontages, which would erode the character of suburban housing.</del> Development of garden space and infilling of plots with out-of-scale buildings <b>or extensions</b> that do not respect the settings of the existing dwellings will not be acceptable.	<p>To be covered by DMDPD policy rather than separate guidance.</p> <p>To clarify policy applies to extensions.</p>
Tacking Climate Change and Achieving Sustainable Development	5.32	<del>Major applications will be required to submit an accompanying sustainability checklist to demonstrate how the expected level of performance will be achieved.</del>	Sustainability checklist is no longer a requirement. Instead checklist is covered by policies in DMDPD.
Tacking Climate Change and	5.34	<del>The London Plan requires each council in London to designate a site for a ZED and the Mayor of London has included a number of policies (4A.1 – 4A.11) that address climate change and related sustainability issues in developments. These</del>	No longer a requirement of the London Plan.

Achieving Sustainable Development		<del>include the energy hierarchy which sets out the preferred approach to energy supply in new development. The council will bring forward sites considered suitable for low/zero carbon development in the Site Specific Allocations DPD.</del>	
Tacking Climate Change and Achieving Sustainable Development	CP 19	In all areas, <del>major proposals are required to achieve a minimum</del> rating of Code Level 3 <del>should be achieved</del> . For non-residential, a rating of BREEAM 'Excellent' is expected, or the equivalent on any 'Code for Sustainable Commercial Schemes' (when forthcoming).	Clarity.
Dealing with Waste	5.43	<del>Whilst the council is not aware of exploitable mineral deposits in the borough, policy to deal with any application to extract minerals will be set out in the Development Management Policies DPD.</del>	There are no existing mineral extraction sites in the borough. Should any proposals come foreword these will be assessed against relevant Sustainability and Environmental Protection policies in the DMDPD.
Maintaining Employment outside of Growth Areas	5.49	<del>SIL and LSIS</del> Indicative boundaries of Strategic Industrial Locations are <del>shown on the Policies Map</del> included within the West London Sub-Regional Development Framework. As an exception to the policy of protecting SIL for employment uses, small scale service or shopping facilities meeting the needs of businesses and employees are generally appropriate.	To reflect revised terminology.
Maintaining Employment outside of Growth Areas	5.52 – 5.53	The <del>Industrial Employment</del> Land Demand Study <del>2008</del> <del>2013</del> calculated the amount of strategic industrial and warehousing land the borough needs to meet demand <del>to 2029</del> in the plan period - this is <del>327</del> <del>375</del> Ha. The council will continue to protect industrial and warehousing land for which there is a demand.  The council's <del>2013</del> <del>2008</del> study shows those sites that the council proposes to release for mixed development, and the study justifies those releases.	To reference updated Employment Land Demand Study.
Maintaining Employment outside of Growth Areas	5.54	The following designated employment areas are identified on the <del>Policies Map</del> <del>proposals map</del> :	To reflect revised terminology.
Maintaining	5.57	Outside of the hierarchy of Strategic Industrial Locations and Locally Significant Industrial Sites are a number of pockets of land that are more "local" in nature and are	To ensure terminology is

Employment outside of Growth Areas		generally embedded within the residential fabric of the borough. These areas perform a different function to both Strategic Industrial Locations or Locally Significant Industrial Sites as they usually entail a more intensive use of land, may present localised environmental issues, generate local employment opportunities across the borough and provide workspace for new and emerging enterprise. These are referred to as Local Employment <u>Sites Areas</u> and are not afforded the same level of protection as Strategic Industrial Locations or Locally Significant Industrial Sites. Policy relating to development within these Local Employment <u>Sites Areas</u> is saved in the <u>Development Management DPD UDP-2004 (policy XX EMP9)</u> .	consistent with DMDPD and cross reference.
Maintaining Employment outside of Growth Areas	5.58	Brent's <u>2013 Employment Land Demand Study</u> <del>ies of 2006 and 2008, and the GLA's Office Policy Overview publications,</del> <u>suggest that the borough can capture some of the long term sub-regional demand for office space, as a result of the regeneration of Wembley. It also identifies there is likely to be demand for office space in Park Royal as the Vision for Park Royal is realised.</u> <del>demand suburban outer London can recapture elements of the prime office market due to its proximity to commuter areas (i.e. workforce), relatively lower land values and good public transport accessibility to the City. The London Office Policy Review 2012 2007 predicted that,</del> <u>found Park Royal and Wembley present the best opportunity for new office provision</u> in the Borough, <del>jobs within the Financial and Business Services sector would increase by almost 10,000 to 2026.</del>	To reference updated Employment Land Demand Study and London Office Policy Review.
Maintaining Employment outside of Growth Areas	5.63	<b>1.1</b> Using planning obligations, the council will seek to ensure that skills, training and, ultimately, employment opportunities from major development, will benefit local people by working together with partners such as <u>Wembley Works</u> Brentin2Work.	Brentin2Work has been disbanded.
Maintaining Employment outside of Growth Areas	CP20	<b>1.2 <u>Maintaining Employment</u></b>  <b>Strategic Industrial Locations and Locally Significant Industrial Sites</b>  The council will protect Strategic Industrial Locations designated for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generis uses that are closely related, having regard for the provisions of Preferred Industrial Locations and Industrial Business Parks within the London Plan. The council will protect Locally Significant Industrial Sites for the same range of uses as SILs.	Clarification  Structure of sentence implied Park Royal is a town centre site. It isn't but designated as an Industrial Business Park in the London Plan, and therefore an appropriate location for offices.

		<p>B1 office space is acceptable in SIL and LSIS where it is ancillary to other industrial and warehousing uses and any necessary transport infrastructure required to support development is properly assessed and provided in time for occupation.</p> <p>The regeneration of Strategic Industrial Locations and Locally Significant Industrial Sites is supported where proposals will not undermine the employment land hierarchy. Redevelopment will be expected to:</p> <ul style="list-style-type: none"> <li>• Maximise opportunities to move freight by non-road means (such as water and rail) and minimise the impact of industrial and employment use on the road network.</li> <li>• Provide opportunities for skills training, and employment for local people.</li> <li>• Provide new employment floor space that is fit for modern usage for a range of B use classes including business parks, ‘starter’ and ‘move on’ units for small and medium enterprises, and studios for artists and cultural and creative industries.</li> <li>• Intensify land use, including the efficient movement and use of loading and delivery areas.</li> <li>• Deliver significant environmental improvements in terms of the public realm and landscaping of employment areas and industrial estates; and</li> <li>• Minimise and mitigate any impact from development upon surrounding land uses.</li> </ul> <p><b><u>Offices</u></b></p> <p>Purpose-built offices are promoted in town centres, and the Wembley Regeneration Area, <a href="#">the First Central site in Park Royal</a> and are acceptable otherwise where proposals fulfil the requirements of the sequential approach, such as the First Central site in Park Royal.</p>	
<p>Planning for More and Better Housing</p>	<p>5.85</p>	<p><del>The proposed revision of the London Plan will set specific borough targets for sites and pitches, in accordance with the requirements of Circular 1/2006 ‘Planning For Gypsy and Traveller Caravan Sites’ (CLG, 2006), which will be addressed in the Development Management Policies DPD. This proposed DPD may be further informed by a potential sub-regional (West London)</del></p>	<p>To reflect updated policy position and guidance on traveller sites.</p>

		<p>accommodation strategy which would better reconcile current provision, projected future needs and potential capacities in a manner similar to the wider London Housing Capacity Study (2005) and the current London Strategic Land Availability Assessment.</p> <p><del>Circular 1/2006 and London Plan Policy 3A.14 require that this Core Strategy should have a specific policy to protect existing authorised sites and set out the criteria for the determination of any application for additional sites. Such sites should promote the development of socially inclusive local communities in accordance with PPS 3. <u>Planning policy for traveller sites (CLG, March 2012) requires boroughs to set criteria-based policies as a basis for planning applications.</u></del></p> <p style="text-align: center;"><b>1.3</b></p>	
	5.98	<p><b>1.4</b> Community and cultural facilities (<u>also referred to as social infrastructure</u>) add value and support to community participation and development.</p>	To reflect updated terminology in London Plan.
Protecting Community and Cultural Facilities	5.101	<p><u>Brent Community Infrastructure Levy (CIL) was formally introduced from 1 July 2013. The CIL is a new power which enables a charge to be levied on new development in order to fund infrastructure that is needed to support development. The council's intention is to use CIL for the provision of new community facilities. Planning Obligations (also known as S106 agreements) will continue to provide a valuable means of securing other site specific mitigation required in order to make developments acceptable in planning terms. Planning Obligations will be used to secure community facilities where existing provision is lost through development proposals and compensatory provision is required. Further information on where developer contributions may be applied is set out in the council's S106 Planning Obligations Supplementary Planning Document.</u></p>	To reflect the introduction of the Community Infrastructure Levy (CIL), by the Planning Act 2008, and the formal introduction of Brent CIL on 1 July 2013.
Protecting Community and Cultural Facilities	CP23	<p><u>The council will use existing S106 and new CIL contributions from development to improve the provision of community facilities in the borough. New planning obligations will only be used to secure community facilities where existing sports provision is lost through development proposals and compensatory provision is required.</u></p> <p><del>New multi-functional community facilities (excluding schools, health facilities) should</del></p>	To reflect the introduction of the Community Infrastructure Levy (CIL), by the Planning Act 2008, and the formal introduction of Brent CIL on 1 July 2013.

		be provided at a rate of 370m <sup>2</sup> per 1000 new population.				
Delivery and Monitoring	Strategic Objective 2	Number of placements made by Brentin2Work each year.				Brentin2Work has been disbanded.
Delivery and Monitoring	Strategic Objective 7	Wheelchair adaptable.	10% of 10 units +	No. of completed new homes that are wheelchair adaptable. <b>When:</b> Annually	London Plan Policy <del>3A.5</del> <a href="#">3.8</a>	To reflect changes in London Plan.
		Lifetime homes.	100%	No. of completed new homes built to lifetime home standards. <b>When:</b> Annually	London Plan Policy <del>3A.5</del> <a href="#">3.8</a>	
Delivery and Monitoring	Strategic Objective 10	Installation of Sustainable Urban Drainage systems in new development.	Appropriate major proposals should secure SUDs or apply water retention or harvesting measures.	Applications which include SUD measures. <b>When:</b> Annually	London Plan Policy <a href="#">5.13</a> <del>4A.14</del>	To reflect changes in London Plan, whilst ensuring CP 19 continues to be monitored effectively.  Energy and feasibility assessments are a validation requirement. Not necessary to monitor.
		<del>Application of the GLA's energy hierarchy in order to secure high levels of renewable energy generation in Growth Areas</del>  <a href="#">Achievement of Code for Sustainable Homes and</a>	<del>All major proposals should submit energy and feasibility assessments and apply Mayor's energy hierarchy. Major proposals to achieve 20% carbon reduction through renewable energy requirements or secure carbon</del>	<del>Number of applications includes energy and feasibility assessments. All Large schemes over 100 units to secure onsite renewable energy generation by type and energy generated (where available as GLA</del>	<del>CP19, London Plan Policies 4A.4 &amp; 4A.7</del>	

		<u>BREEAM levels.</u>	offset payment.	hierarchy).		
			<u>All major residential proposals in growth areas should achieve Code Level 4, and Level 3 outside of growth areas. All major non-residential proposals should achieve BREEAM excellent.</u>	<u>Number of major residential developments consented set to achieve Code Level 3, or 4 in growth areas. Number of major non-residential developments consented set to achieve BREEAM excellent.</u> <b>When:</b> ongoing		
Delivery and Monitoring	Strategic Objective 3	<b>Core Output Indicators:</b>				To reflect changes in London Plan.
		Production of secondary / recycled aggregates.	A minimum 10% of inputs for key standard components coming from recovered sources.	Number of schemes involving demolition and redevelopment which apply the ICE Demolition Protocol. <b>When:</b> Annually	London Plan policy 4A.28	
		<b>Local Output Indicators:</b>				
		Safeguard existing waste facilities and	*Net increase of waste facilities *No net loss of	Planning approvals p.a.	London Plan policy 4A.22- <del>5.17</del>	



		secure land for new waste operations.	existing waste facilities.	<b>When:</b> Annually			
		Waste stream: recycled or composted	<del>35% of municipal waste recycled by 2010 and 45% by 2015</del> <b>and 50% by 2020</b> (in line with the London Plan)	Amount of municipal waste recycled or composted. <b>When:</b> Annually	London Plan policy 4A.21- <del>5.16</del>		
Annex	Appendix A Superseded UDP Policies	Appendix A deleted in its entirety.				Upon adoption of the DMDPD and Wembley Area Action Plan all saved UDP policies will be superseded.	
Annex	Appendix B Glossary	<b>District Centres</b> <del>District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.</del> <b>Distributed more widely than Major centres, these centres provide convenience goods and services for more local communities and are accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sq.m of retail floorspace. Some District centres have developed specialist shopping functions.</b>				To reflect updated definition in London Plan.	
Annex	Appendix B Glossary	<b>Local Centres</b> Local centres include a range of small shops, <b>mostly selling convenience goods</b> of local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office, and a <b>pharmacy and other useful local services</b> . <del>Other facilities could include a hot-food takeaway and launderette.</del>				To reflect updated definition in London Plan.	
Annex	Appendix B Glossary	<b>Major Town Centres</b> They are the principal centres in a local authority's areas which function as important service centres, providing a range of facilities and services for extensive catchment areas. <b>They generally contain over 50,000 sq.m of retail floorspace with a relatively high proportion of comparison goods relative to</b>				To reflect updated definition in London Plan.	

		<u>convenience goods. They may also have significant employment, leisure, service and civic functions.</u>	
Annex	Appendix B Glossary	<b>Sequential Approach</b> National planning policy set out in for example, Planning Policy Statement 4: <del>Planning for Sustainable Economic Growth (PPS 4)</del> <u>The National Planning Policy Framework establishes where local planning authorities should apply a sequential approach</u> to identify, allocate or develop certain types or locations of land before others. For example, <del>brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.</del> <u>by requiring applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.</u>	To be in keeping with the sequential test as defined in the NPPF.
Annex	Appendix B Glossary	<b><u>CIL Community Infrastructure Levy</u></b>	Due to the introduction of the Community Infrastructure Levy (CIL), by the Planning Act 2008, and the formal introduction of Brent CIL on 1 July 2013.
Annex	Appendix C List of supporting documents	<b><u>Employment Land Demand Study 2013</u></b>	Updated Employment Land Demand Study.

## **Appendix 3 - Proposed changes to the Policies Map**