

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	Remaining saved UDP policies will be superseded by the DMDPD.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	2.6	In terms of National Policy Brent must comply with <u>the National Planning Policy Framework</u> , a series of Planning Policy Statements, as well as associated circulars,	To reflect the introduction of the NPPF

<p>Planning for Brent: formation of the Core Strategy</p>		<p>ministerial statements and various strategy documents which generally deal with particular topics or issues. The important and overarching policy statement is PPS 1, <i>Delivering Sustainable Development</i>. This sets out a number of key principles for 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 <u>three dimensions to sustainable development are</u> as follows:</p> <ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • <u>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;</u> • <u>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</u> • <u>an environmental role – contributing to protecting and enhancing our</u> 	<p>which replaced PPS1.</p>
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		<u>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.</u>	
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> Brentin2Work .	Brentin2Work has been disbanded.
Strategic Area Policies	4.52	Guidance for Alperton growth area will be <u>has been</u> produced in the form of a Masterplan Supplementary Planning Document. The document will establish <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	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.	Included in error. Falls outside Growth Area and duplicates CP 20.
Strategic Area Policies	CP21	9 hectares of land will be protected for appropriate industrial operations within use classes B1c, B2 and B8 or closely related sui generis uses.	Included in error. Falls outside Growth Area and duplicates CP 20.
Strategic Area Policies	4.69	An 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. A further documents are <u>is</u> in the pipeline for Alperton, Burnt Oak/Colindale and Church End, while sub-regional guidance is being <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 four <u>three</u> categories according to their characteristics, the designations set out in the London Plan <u>2011</u> 2008 and the local strategies of neighbouring boroughs for centres that have shared boundaries. Town Centres which share boundaries with	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

		<p>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.</p> <p>The town centre categories in Brent are:</p> <ul style="list-style-type: none"> • Major Town Centres within London; • District Centres (called Main District Centres in the UDP 2004); • Local Centres (called Other District Centres in the UDP 2004). <p><u>Outside of town centres</u> Neighbourhood Centres (called Local Centre in the UDP 2004), is the fourth centre category in the hierarchy, . Centres falling in this category 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>significance.</p> <p>To cross reference DMDPD.</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 five <u>four</u> 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="593 1093 1668 1457"> <thead> <tr> <th data-bbox="593 1093 891 1173">Major Town Centres</th> <th data-bbox="891 1093 1373 1173">District Centres</th> <th data-bbox="1373 1093 1668 1173">Local Centres</th> </tr> </thead> <tbody> <tr> <td data-bbox="593 1173 891 1457"> <ul style="list-style-type: none"> • *Kilburn • Wembley </td> <td data-bbox="891 1173 1373 1457"> <ul style="list-style-type: none"> • *Burnt Oak • *Colindale/ <u>The Hyde</u> • *Cricklewood • Ealing Road • Harlesden • <u>*Kenton</u> • Kingsbury </td> <td data-bbox="1373 1173 1668 1457"> <ul style="list-style-type: none"> • <u>Church End</u> • Kensal Rise • Queen's Park Sudbury • *Kenton </td> </tr> </tbody> </table>	Major Town Centres	District Centres	Local Centres	<ul style="list-style-type: none"> • *Kilburn • Wembley 	<ul style="list-style-type: none"> • *Burnt Oak • *Colindale/ <u>The Hyde</u> • *Cricklewood • Ealing Road • Harlesden • <u>*Kenton</u> • Kingsbury 	<ul style="list-style-type: none"> • <u>Church End</u> • Kensal Rise • Queen's Park Sudbury • *Kenton 	<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"> • *Kilburn • Wembley 	<ul style="list-style-type: none"> • *Burnt Oak • *Colindale/ <u>The Hyde</u> • *Cricklewood • Ealing Road • Harlesden • <u>*Kenton</u> • Kingsbury 	<ul style="list-style-type: none"> • <u>Church End</u> • Kensal Rise • Queen's Park Sudbury • *Kenton 							

		<ul style="list-style-type: none"> • Neasden • Preston Road • Wembley Park • Willesden Green 	
Maintaining Existing Town Centres	5.7	National guidance (PPS 4), 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>Town Centres and the Sequential Approach to Development</p> <p>In identifying potential sites, and in considering proposals for major new retail and other town centre uses in Brent, the following sequential test order of centres will be applied.</p> <p>Major Town Centres (Wembley and Kilburn) District Centres Local Centres Neighbourhood Centres Out-of-centre locations</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	<p>The distinctive suburban character of Brent will be protected from inappropriate development. 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.</p> <p>Development of garden space and infilling of plots with out-of-scale buildings or extensions that do not respect the settings of the existing dwellings will not be acceptable.</p>	<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	Major applications will be required to submit an accompanying sustainability checklist to demonstrate how the expected level of performance will be achieved.	Sustainability checklist is no longer a requirement. Instead checklist is covered by policies in DMDPD.

Tacking Climate Change and Achieving Sustainable Development	5.34	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 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.	No longer a requirement of the London Plan.
Tacking Climate Change and Achieving Sustainable Development	CP 19	In all areas, <u>major proposals are required to achieve a minimum</u> rating of Code Level 3 should be achieved . 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	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.	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	<u>SIL and LSIS</u> Indicative boundaries of Strategic Industrial Locations are shown on the Policies Map 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 Industrial Employment Land Demand Study 2008 <u>2013</u> calculated the amount of strategic industrial and warehousing land the borough needs to meet demand <u>to 2029</u> in the plan period - this is 327 <u>375</u> Ha. The council will continue to protect industrial and warehousing land for which there is a demand. The council's <u>2013</u> 2008 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	5.54	The following designated employment areas are identified on the <u>Policies Map</u>	To reflect revised

Employment outside of Growth Areas		proposals map:	terminology.
Maintaining Employment outside of Growth Areas	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 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> .	To ensure terminology is consistent with DMDPD and cross reference.
Maintaining Employment outside of Growth Areas	5.58	Brent’s <u>2013</u> Employment Land Demand Study ies of 2006 and 2008, and the GLA's Office Policy Overview publications, <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> 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, <u>found Park Royal and Wembley present the best opportunity for new office provision</u> in the Borough, jobs within the Financial and Business Services sector would increase by almost 10,000 to 2026.	To reference updated Employment Land Demand Study and London Office Policy Review.
Maintaining Employment outside of Growth Areas	5.63	1.1 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	CP20	1.2 <u>Maintaining Employment</u>	Clarification

<p>outside of Growth Areas</p>		<p>Strategic Industrial Locations and Locally Significant Industrial Sites</p> <p>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.</p> <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"> • 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. • Provide opportunities for skills training, and employment for local people. • 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. • Intensify land use, including the efficient movement and use of loading and delivery areas. • Deliver significant environmental improvements in terms of the public realm and landscaping of employment areas and industrial estates; and • Minimise and mitigate any impact from development upon surrounding land uses. <p><u>Offices</u></p>	<p>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>
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		Purpose-built offices are promoted in town centres, and the Wembley Regeneration Area, the First Central site in Park Royal and are acceptable otherwise where proposals fulfil the requirements of the sequential approach, such as the First Central site in Park Royal.	
Planning for More and Better Housing	5.85	<p>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) 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>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. Planning policy for traveller sites (CLG, March 2012) requires boroughs to set criteria-based policies as a basis for planning applications.</p> <p style="text-align: center;">1.3</p>	To reflect updated policy position and guidance on traveller sites.
	5.98	<p style="text-align: center;">1.4 Community and cultural facilities (also referred to as social infrastructure) 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>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.</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>New multi functional community facilities (excluding schools, health facilities) should be provided at a rate of 370m² per 1000 new population.</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.
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. When: Annually	London Plan Policy 3A.5 <u>3.8</u>	To reflect changes in London Plan.
		Lifetime homes.	100%	No. of completed new homes built to lifetime home standards. When: Annually	London Plan Policy 3A.5 <u>3.8</u>	
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. When: Annually	London Plan Policy <u>5.13</u> 4A.14	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.
		Application of the GLA's energy hierarchy in order to secure high levels of renewable	All major proposals should submit energy and feasibility assessments and apply Mayor's	Number of applications includes energy and feasibility assessments. All Large schemes	CP19, London Plan Policies 4A.4 & 4A.7	

		<p>energy generation in Growth Areas</p> <p><u>Achievement of Code for Sustainable Homes and BREEAM levels.</u></p>	<p>energy hierarchy. Major proposals to achieve 20% carbon reduction through renewable energy requirements or secure carbon offset payment.</p> <p><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></p>	<p>over 100 units to secure onsite renewable energy generation by type and energy generated (where available as GLA hierarchy).</p> <p><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></p> <p>When: ongoing</p>		
Delivery and Monitoring	Strategic Objective 3	<p>Core Output Indicators:</p>				To reflect changes in London Plan.
		<p>Production of secondary / recycled aggregates.</p>	<p>A minimum 10% of inputs for key standard components coming from recovered</p>	<p>Number of schemes involving demolition and redevelopment which apply the ICE Demolition</p>	<p>London Plan policy 4A.28</p>	

		sources:	Protocol: When: Annually			
		Local Output Indicators:				
		Safeguard existing waste facilities and secure land for new waste operations.	*Net increase of waste facilities *No net loss of existing waste facilities.	Planning approvals p.a. When: Annually	London Plan policy 4A.22- 5.17	
		Waste stream: recycled or composted	35% of municipal waste recycled by 2010 and 45% by 2015 and 50% by 2020 (in line with the London Plan)	Amount of municipal waste recycled or composted. When: Annually	London Plan policy 4A.21- 5.16	
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	District Centres 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. <u>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.</u>				To reflect updated definition in London Plan.
Annex	Appendix B Glossary	Local Centres Local centres include a range of small shops, <u>mostly selling convenience goods</u> 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				To reflect updated definition in London Plan.

		<u>pharmacy and other useful local services</u> . Other facilities could include a hot food takeaway and launderette.	
Annex	Appendix B Glossary	Major Town Centres 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. <u>They generally contain over 50,000 sq.m of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.</u>	To reflect updated definition in London Plan.
Annex	Appendix B Glossary	Sequential Approach National planning policy set out in for example, Planning Policy Statement 4: <i>Planning for Sustainable Economic Growth</i> (PPS 4) <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, brownfield housing sites before greenfield sites, or town centre retail sites before out of centre sites. <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	<u>CIL Community Infrastructure Levy</u>	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	<u>Employment Land Demand Study 2013</u>	Updated Employment Land Demand Study.