



**Executive**  
23 June 2010

**Report from the Director of  
Environment and Culture**

Wards Affected:  
ALL

**Brent LDF - Adoption of Brent's Core Strategy**

**1.0 Summary**

- 1.1 This report asks Executive to recommend that Full Council of 12<sup>th</sup> July adopts Brent's Core Strategy, as submitted to the SoS in September 2009, and incorporating the changes recommended by the Inspector, which are binding on the Council. It summarises the key recommendations of the Planning Inspector and explains what the implications of the changes are.

**2.0 Recommendations**

- 2.1 That Executive recommends to Full Council that the Core Strategy, as submitted to the Secretary of State and incorporating the changes recommended by the Inspector, and set out in Appendix1, be adopted.

**3.0 Detail**

**Examination of the Core Strategy**

- 3.1 The Core Strategy is a key document of Brent's Local Development Framework. It sets out an overarching spatial strategy for development in the Borough. It identifies the key locations in the Borough for new development, particularly housing, and shows these as Growth Areas. It sets out what the infrastructure requirements are to meet the need arising from the development It also sets out some general, Boroughwide requirements for development relating to matters such as sustainable design and protection of open space.
- 3.2 The Core Strategy has been subject to a long, statutory process including four rounds of public consultation requiring a number of

changes to the document. It has now been formally examined by a Planning Inspector, who considered objections to the strategy at a series of hearings in January 2010. His report, which was received on April 19<sup>th</sup>, finds the strategy sound, i.e. it can now be formally adopted, subject to a number of recommended changes which are binding upon the Council. The full Inspector's report is available on the Council's website at <http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-310>

- 3.3 The Act that introduced the Local Development Framework requires that the independent Planning Inspector's report is binding on the council. This is a change to the previous Unitary Development Plan process where the council did not have to accept all of the Inspector's recommendations. The council has limited choices: accept the changes or start the process of submission and examination over again. Since the Inspector's recommendations are based almost entirely on changes officers accepted at the examination hearings, it is recommended that the Core Strategy be adopted. To start again will be time consuming, take at least a year and will cost approximately £100k- the costs of the examination process. Brent is now among a few London Boroughs that will have an adopted a Core Strategy and in the top 20% of authorities in the country to complete the complex and onerous task of taking the authority's Core Strategy through Examination to Adoption. Your officers clearly support the adoption of Brent's LDF Core Strategy, and seek Executive's recommendation to Council to do so.

### **Inspector's Report**

- 3.4 The Planning Inspector states that his "overall conclusion is that the Core Strategy is sound, provided that it is changed in the ways specified" in the binding report. The changes are specified only where there is a clear need to amend the document in the light of legal requirements and/or tests of soundness set out in Government guidance. Many of the recommended changes are relatively minor and most of them were agreed by Council officers during the examination. The Inspector's recommended changes are set out in full in Appendix 1. The most significant changes are as follows:

- a) Increased policy support for the provision of family housing.

The submitted version of the Core Strategy included an objective that 25% of new homes should be family-sized (3 bed or above). The Inspector considered that this should be articulated in policy and has recommended accordingly. Council officers accepted that this would help achieve the objective.

- b) Amendment of shopping centre hierarchy to give Kilburn equal status with Wembley and to redesignate Colindale as a District centre

The Inspector considered that the preference expressed in the Core Strategy for shopping development at Wembley ahead of Kilburn was at odds with national planning policy and had not been adequately justified. Council officers supported the proposed change. In practical terms this will make little difference to the application of policy as there are substantial opportunities and proposals to extend shopping provision at Wembley whilst opportunities are very limited in Kilburn, on either side of the High Road, and are likely to remain limited.

The re-designation of Colindale as a District centre was proposed by officers to bring it into line with revisions in Barnet's LDF and with the London Plan.

c) Deletion of support for enabling development at Northfields industrial estate.

The GLA had objected to a policy within the Core Strategy which would allow for some enabling housing development on the Northfields industrial estate. This enabling development was considered by officers to be necessary to help facilitate a regeneration of the site with new employment development and a new direct road link from the North Circular Road across the river Brent. However, the land in question comprises part of the Strategic Employment Area, which is also a designation in the London Plan, and which protects the land for employment use, i.e. industry and warehousing. The Inspector was unable to accept the proposed de-designation because the Council was not proposing a revised Strategic Employment Area boundary and had not provided viability evidence as to the need for enabling housing development. Accordingly, the Inspector has recommended (RC36) that the reference to enabling development at Northfields Industrial Estate be removed from policy CP12.

d) Deletion of requirements to provide for decentralised energy networks in growth areas other than Wembley

While the Inspector was satisfied that the technical feasibility of establishing sustainable energy infrastructure in the form of Combined Heat and Power (CHP) had been established at Wembley, he did not feel that financial feasibility had been demonstrated. At the same time, he did not consider that technical feasibility had yet been demonstrated for growth areas other than Wembley. The Inspector has recommended, therefore, that the requirement for CHP be limited to Wembley at this stage.

e) Clarification of the policy approach to tall buildings

The inspector has recommended that policy CP6 and supporting text should be amended to reflect current local guidance on the appropriate

locations for tall buildings contained in supplementary planning documents for Wembley and Kilburn.

- 3.5 The Inspector supported the Council's position on almost all of the key elements of the strategy. This includes the approach of identifying growth areas and generally protecting local character and open space outside of these areas, the new housing targets and requirement for affordable housing, policy to achieve higher levels of building sustainability by requiring new housing in the growth areas to achieve level 4 of the code for sustainable homes and the requirement for CHP in Wembley subject to financial viability. He also generally supported the infrastructure requirements identified as necessary to support new development, the provision of new shopping development at Wembley, and the Council's approach to the protection of employment land (with the, exception of the land at Northfields estate referred to above).
- 3.6 It should be noted that the policies in the Core Strategy supersede a number of policies in the UDP 2004. A list of these is provided in Appendix B of the Core Strategy.

#### **Future LDF Priorities**

- 3.7 Alongside the Core Strategy, the council has also approved a Site Specific Allocations document which, incorporating 3 additional sites agreed for consultation in January 2010, it is intended to submit in June 2010 to the SoS for examination. It is anticipated that this will be examined in the Autumn and adopted in early 2011. Work is also ongoing on Supplementary Planning Documents for Alperton and South Kilburn growth areas and it is intended that planning policy for Wembley be consolidated into an Area Action Plan before a revised Development Policies Development Plan Document is brought forward. At this point all policies in the UDP will be superseded by the LDF.

#### **4.0 Financial Implications**

- 4.1 The costs of examining the Core Strategy are estimated at up to £100,000. A provision exists to cover these costs. The Council has yet to be invoiced by the Inspectorate for the costs of examining the Core Strategy. If the Core Strategy were not adopted and resubmitted a similar cost would be required.

#### **5.0 Legal Implications**

- 5.1 The preparation of the LDF, including the Core Strategy, is governed by a statutory process set out in Government planning guidance and regulations. Once adopted the Core Strategy will have substantial weight in determining planning applications and will supersede a number of policies in the UDP.

## **6.0 Diversity Implications**

- 6.1 Full statutory public consultation has been carried out in preparing the Core Strategy and an Impact Needs / Requirement Assessment (INRA), which assessed the process of preparing the Core Strategy, was prepared and made available in November 2008.

## **7.0 Staffing/Accommodation Implications (if appropriate)**

- 7.1 There are no staffing or accommodation implications arising directly from this report.

## **8.0 Environmental Implications**

- 8.1 The Core Strategy will have a major impact upon the environment, particularly as it relates to new development and the protection of local character and open space. It includes significant new policy to help mitigate against the effects of climate change. Sustainability appraisal has been undertaken at all stages of developing the Core Strategy.

## **9.0 Background Papers**

- 9.1 London Borough of Brent LDF – Core Strategy Proposed Submission DPD, June 2009
- 9.2 Inspector's Report on the Examination into Brent's Core Strategy, April 2010
- 9.3 Brent UDP, 2004

## **Contact Officers**

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

**Richard Saunders**  
**Director of Environment and Culture**

## **Appendix 1**

### **Inspector's Recommendations**

RC1: Policy CP2: 1st sentence: add "between 25,000 and" before "28,000".

RC2: Delete Appendix A, including the housing trajectory, figure A.1 and tables i - vii. Consequent renumbering of subsequent appendices.

RC3: Policy CP2: 4th sentence: add "(excluding the reoccupation of vacant homes)" after "the following minimum targets".

RC4: Paragraph 5.92: Add new sentence to end of paragraph: "More detailed policy criteria to ensure the implementation of relevant London Plan affordable housing policies will be provided in the Development Management Policies DPD."

RC5: Policy CP2: Insert new penultimate sentence (before "Over 85% .."): "At least 25% of new homes should be family sized (3 bedrooms or more)."

RC6: Paragraph 5.77: Add new sentence to end of paragraph: "More detailed policy criteria to ensure the implementation of policy CP21 will be provided in the forthcoming Development Management Policies DPD."

RC7: Paragraph 5.82: 1st sentence: delete "a subsequent Development Plan Document" and insert "the Development Management Policies DPD".

RC8: Delete paragraph 4.36 and insert "Town centre uses are those defined in paragraph 7 of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS 4), including retail, leisure and offices."

RC9: Paragraph 5.6(1): delete "PPS 6" and insert "PPS 4".

RC10: Appendix C (Glossary): definition of Sequential Approach: delete "the Planning Policy Statement 6: Planning for Town Centres" and insert ", for example, Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS 4)"

RC11: Paragraph 5.6: Add new penultimate sentence (after "... by 2026"): "The results of this study were tested in the Scenario and Sensitivity Testing Paper on Retail Matters (September 2009)."

RC12: Paragraph 5.6(3): delete "November 2008".

RC13: Paragraph 5.4: 2nd bullet: add "(called Main District Centres in the UDP 2004)" after "Centres".

RC14: Paragraph 5.4: 3rd bullet: add "(called Other District Centres in the UDP 2004)" after "Centres".

RC15: Paragraph 5.5: 1st sentence: add ", called Local Centres in the UDP 2004" after "hierarchy".

RC16: Policy CP16: delete hierarchy and insert:  
"Major Town Centres (Wembley and Kilburn)  
District Centres  
Local Centres  
Neighbourhood Centres  
Out of Centre Locations"

RC17: Policy CP16: 1st paragraph: insert "major" before "new retail".

RC18: Policy CP16: 2nd paragraph: delete 1st and 3rd sentences.

RC19: Policy CP1: 3rd para: insert "Within the five growth areas," at start of sentence (i.e. before "Wembley will be ...").

RC20: Paragraph 5.5: delete "Colindale" from list of Local Centres and add to list of District Centres. Consequent change to map 5.1.

RC21: Paragraph 5.5: 5th sentence: add "Colindale," before "Wembley Park".  
6th sentence: delete "three" and insert "four".

RC22: Paragraph 5.8: 1st sentence: delete "have also been identified" and insert "will be identified in the Site Specific Allocations DPD". 2nd sentence: delete ", as listed in the Site Specific Allocations DPD," and insert "will".

RC23: Policy CP16: 3rd paragraph: 2nd sentence: delete "have been identified within, or on the edge of, some existing" and insert "will be identified within, or on the edge of,". 3rd sentence: delete "usually" and insert "likely to be".

RC24: Policy CP1: 5th paragraph: delete "Strategic and Borough Employment Areas" and insert "Strategic Industrial Locations and Locally Significant Industrial Sites". Same change at paragraph 5.45: 1st sentence.

RC25: Paragraph 5.46: 1st sentence: delete "Strategic Employment Areas (SEAs) and Borough Employment Areas (BEAs)" and insert "Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)".

RC26: Paragraph 5.47: 1st sentence: delete "Strategic Employment Areas are the local expression of". Insert "are" after "Strategic Industrial Locations". 3rd sentence: delete "SEAs" and insert "SIL"

RC27: Paragraph 5.49: delete paragraph and insert: "Locally Significant Industrial Sites are those of local significance for Brent's economy and should be protected. Occupancy within these areas is generally similar to that within SIL, but is also more varied and may include quasi-office or trade uses".

RC28: Paragraph 5.52: delete table and insert new table as follows:

Strategic Industrial Locations Locally Significant Industrial Sites

Park Royal Alperton

Staples Corner Brentfield Road

Wembley Church End

East Lane Colindale

Cricklewood

Honeypot Lane

Kingsbury

Neasden Lane

RC29: Paragraph 5.53: 2nd sentence: delete "and Borough Employment Areas" and insert "Industrial Locations and Locally Significant Industrial Sites".

RC30: Paragraph 5.55: 1st sentence: delete "Employment Areas and Borough Employment Areas" and insert "Industrial Locations and Locally Significant Industrial Sites". 2nd sentence: delete "or Borough Employment Areas" and insert "Industrial Locations or Locally Significant Industrial Sites". 3rd sentence: delete "or Borough Employment Areas" and insert "Industrial Locations or Locally Significant Industrial Sites".

RC31: Policy CP20: delete title and insert "Strategic Industrial Locations and Locally Significant Industrial Sites". 1st paragraph: 1st sentence: delete "Employment Areas" and insert "Industrial Locations": and delete "(SILs)". Delete 2nd sentence and insert: "The council will protect Locally Significant Industrial Sites for the same range of uses as SILs". 2nd paragraph: 1<sup>st</sup> sentence: delete "SEAs and BEAs" and insert "SIL and LSIS". 3<sup>rd</sup> paragraph: delete "and Borough Employment Areas" and insert "Industrial Locations and Locally Significant Industrial Sites".



RC32: Key Diagram (fig 4.1) and Wembley Growth Area Key Diagram (fig 4.2): amend legend to delete "Strategic Employment Area" and insert "Strategic Industrial Location."

RC33: Appendix C: Glossary: replace title of "Strategic Employment Area" with "Strategic Industrial Location". List of Abbreviations: delete "SEL: Strategic Employment Location" and insert "SIL: Strategic Industrial Location". Add new entry: "LSIS: Locally Significant Industrial Site".

RC34: Appendix E: delete "Borough Employment Areas" and insert "Locally Significant Industrial Sites". Consequent changes to legends of maps E.2, E.3 and E.5, including clarification that shaded areas represent deletions.

RC35: Paragraph 5.51: delete 2nd sentence.

RC36: Policy CP12: 2nd paragraph: delete comma and insert "and" before "First Central": delete "and parts of the Northfields Industrial Estate, in order to secure industrial and commercial regeneration."

RC37: Paragraph 5.62: Add new sentence after last bullet point: "The council will bring forward policy to protect these sites, and designate them on the Proposals Map, in its Development Management Policies DPD."

RC38: Paragraph 5.25: delete 1st and 2nd bullet points and insert new bullet point: "The UK Government has set a legally binding level of 34% reduction in greenhouse gas emissions below 1990 levels by 2020 and 80% by 2050."

RC39: Paragraph 5.26: 1st sentence: delete "20%" and insert "15%".

RC40: Paragraph 5.27: delete last sentence and insert: "To assist in the achievement of these targets Brent will seek to mitigate the effect of climate change by reducing carbon dioxide emissions from its own buildings and operations by 12% by 2016 and 43% by 2025 from a 2008/9 baseline<sup>70</sup>."

RC41: Paragraph 5.29: delete 1st sentence and insert: "The council has produced a Climate Change Strategy which contains mitigation and adaptation measures to reduce the impact of climate change on Brent." 4<sup>th</sup> sentence: delete "will take" and insert "takes".

RC42: Policy CP7: delete penultimate (15th) bullet point (as amended by the November 2009 Further Changes) and insert: "Combined Heat and Power plant, if financially viable".

RC43: Policy CP19: 4th paragraph: delete 2nd sentence (as amended by the November 2009 Further Changes) and insert: "Within the Wembley growth area, proposals will be expected (relative to their scale) to connect to, provide or contribute towards a Combined Heat and Power plant, unless it can be demonstrated that such provision is not financially feasible."

RC44: Delete paragraph 4.100.

RC45: Paragraph 5.32: delete 2nd, 3rd and 4th sentences.

RC46: Policy CP19: 4th paragraph: delete 1st sentence and insert: "Within the growth areas, major proposals are required to achieve a minimum rating of Code for Sustainable Homes level 4, subject to scheme feasibility."

RC47: Appendix E: delete points (3) and (4). Consequent changes to map E.1 and key diagram (fig 4.1).

RC48: Paragraph 5.33: delete last two sentences (and bullet points) and insert: "The council will bring forward sites considered suitable for low/zero carbon development in the Site Specific Allocations DPD".

RC49: Paragraph 6.3: delete 2nd sentence and insert: "It is intended to provide more detail about the development of individual sites, notably in growth areas, in the forthcoming Site Specific Allocations DPD. Area Action Plans may also be prepared, as appropriate."

RC50: Fig 4.2: delete title and insert "Wembley Growth Area Key Diagram (illustrative only)". Fig 4.3: add "(illustrative only)" after title. Figs 4.4, 4.5 and 4.6: add "Key Diagram (illustrative only)".

RC51: Delete diagram and legend of fig 4.2 and replace with revised version (see Annex 2). [Note further change to legend set out in RC32].

RC52: Amend fig 4.3 as shown in Annex 3. Policy CP8: last paragraph: delete "31" and insert "20.6".

RC53: Policy CP5: 1st sentence: delete "development schemes" and insert "proposals in the growth areas (policies CP7 to CP11) and regeneration areas (policies CP12 and CP13)"

RC54: Policy CP6: delete 3rd sentence and insert: "In growth areas (policies CP7 to CP11) and regeneration areas (policies CP12 and CP13) the following

factors will be taken into account in determining density and requiring good design.”

RC55: Paragraph 4.30: add the following to end of paragraph: “Locations considered suitable for tall buildings have been identified in Supplementary Planning Documents for the Wembley and South Kilburn growth areas.

Policy CP12 states that tall buildings are suitable at two sites in Park Royal. The council will more clearly define locations for tall buildings in forthcoming LDDs.”

RC56: Policy CP6: delete 7th bullet point and insert: “Tall buildings are acceptable in the Wembley and South Kilburn growth areas, as identified in adopted SPDs, and at Park Royal as set out in policy CP12. Additional areas suitable for tall buildings, notably in the Burnt Oak/Colindale and Alperton growth areas, will be identified in forthcoming LDDs.”

RC57: Delete paragraph 4.42 and insert: “In addition to the Core Strategy, planning policy for the Wembley growth area comprises relevant saved UDP policies, supported by the Wembley Masterplan SPD (adopted in June 2009). The council is progressing a Site Specific Allocations DPD which, on adoption, will include planning policy for specific sites within this growth area. It is also the council’s intention to review and consolidate detailed policy and guidance for the Wembley area into an Area Action Plan. This London Borough of Brent Core Strategy Inspector’s Report 2010 - 25 - will provide an opportunity to undertake a review of infrastructure requirements for this growth area.”

RC58: Policy CP12: last paragraph: delete 1st sentence and insert “Development proposals should have regard to the Park Royal Opportunity Area Planning Framework.”

RC59: Policy CP15: 2nd paragraph: 1st sentence: delete ‘large scale development’ and insert ‘major proposals’.

RC60: Policy CP15: 3rd paragraph: add the following to the end of the paragraph: “In order to ensure adequate flexibility in the Core Strategy’s delivery, the council will undertake regular reviews of infrastructure requirements against housing and population changes arising from new development, funding availability and assessments of the viability of infrastructure provision.”

RC61: Insert new paragraph 4.100 as follows: “In addition to the requirements of policy CP15, the council will apply relevant policies of the UDP 2004,

supported by its S106 Planning Obligations SPD, when securing appropriate developer contributions.”

RC62: Policy CP7: 1st paragraph: last sentence: delete “This will include:” and insert “Anticipated infrastructure will include:”. Policies CP8, CP9, CP10 and CP11: 1st paragraph: last sentence: delete “Infrastructure Investment Framework, including:” and insert “Infrastructure Investment Framework. Anticipated infrastructure will include:”

RC63: Policy CP7: 1st paragraph: 2nd sentence: add “the new Brent civic centre,” after “offices,”. Delete 10th bullet point (“A new civic centre”). 14<sup>th</sup> bullet point: delete “17 GPs and 13 new dentists” and insert “14 GPs and 11 new dentists”.

RC64: Paragraph 4.39: delete 2nd and 3rd sentences and insert: “The creation of this new shopping street will help facilitate the redevelopment of the eastern end of the High Road, creating a continuous retail link. Together with the delivery of the housing, commercial, retail, leisure and community facilities proposed in the Core Strategy, the new shopping street will be the driver for change in this part of Wembley.”

RC65: Paragraph 5.24: add to end of paragraph: “The council considers that a 6-lane community pool will best serve the needs of the borough. Contributions from development will be sought proportional to the level of demand arising from population expansion.”

RC66: Policy CP18: 2nd para: delete last sentence and insert “The council will also seek a site for a fourth pool.”

RC67: Paragraph 4.86: add the following to the end of the paragraph: “With regard to Park Royal (First Central) the council wishes to secure a new interchange between the Piccadilly Line station at Park Royal and a new station on the Central Line, with connections to bus services outside London Borough of Brent Core Strategy Inspector’s Report 2010 - 26 - the station. If it is either demonstrated that the station is not supported by Transport for London or that it cannot be provided viably given the level of residential and other development that is proposed, then the council will wish to secure significant improvements to Park Royal station’s connections with First Central and the bus services that serve the site. Significant public transport improvements are required to encourage the development of class B1 offices and to promote sustainable modes of travel.”

RC68: Policy CP14: delete 1<sup>st</sup> paragraph and insert: "The key interchanges of Wembley Central, Wembley Stadium, Queen's Park and Park Royal (First Central) will be improved."

RC69: Paragraph 4.71: last sentence: delete full stop and insert ", and the council intends to bring forward proposals for this area in a subsequent local development document."

RC70: Delete monitoring schedule for strategic objectives 1 to 12 inclusive and insert revised schedule set out in Annex 4.

RC71: Strategic Objective 8 (p19): 3rd bullet point: delete "from 37% to 24%" and insert "from 37% towards 25%".

RC72: Paragraph 5.34: delete 6th sentence ("The council ... SFRA") and insert: "The Development Management Policies DPD will include policy criteria for development proposals in areas of flood risk, consistent with national policy in PPS 25, supported by the findings of the SFRA."

RC73: Paragraph 4.97: 1st sentence: after "facilities" insert ", including places of worship".

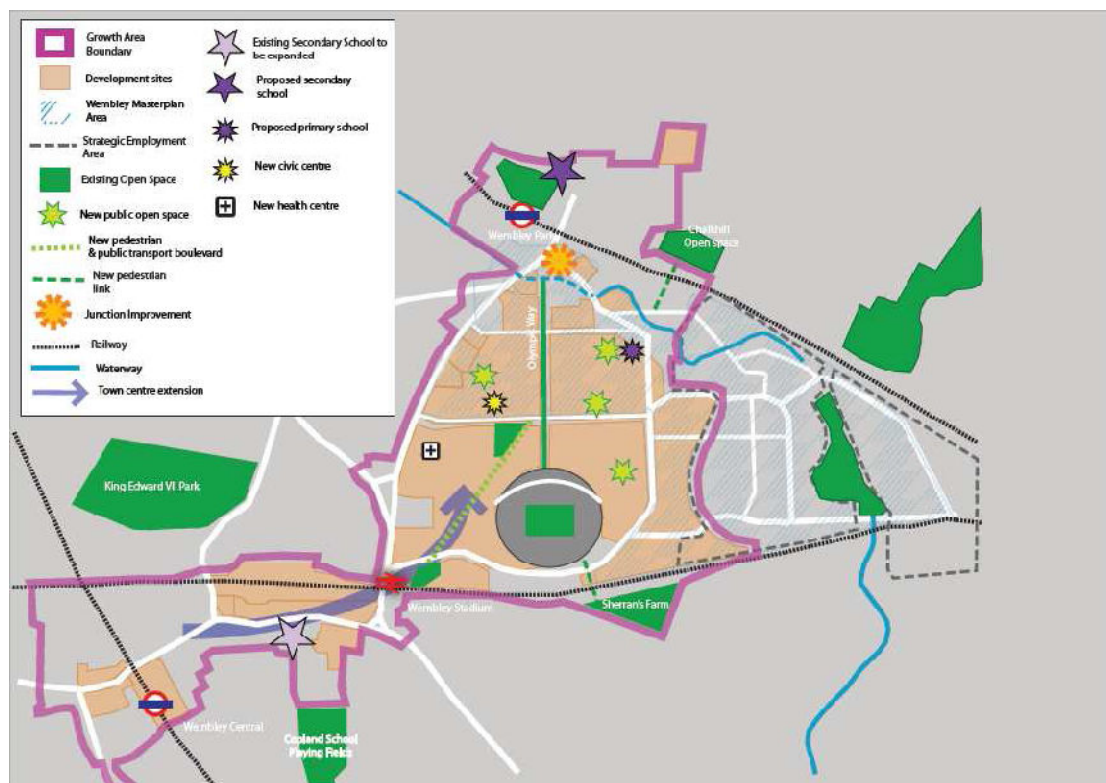
RC74: Paragraph 5.95: add new sentence after 1st sentence: "In particular, the diversity of the borough's population means that there is additional pressure for new places of worship to meet demand from different faiths."

## **Schedule of Minor Changes proposed by the Council**

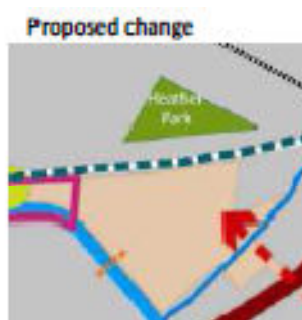
- MC1:** Paragraph 1.10: 4<sup>th</sup> bullet: after "jobs" insert "and improve their provision and numbers".
- MC2:** Key Diagram (p23): add references to Wembley Stadium station improvement and Colindale, Preston Road and Neasden District Centres. Amend "North Circular Road Improvement Area" to "North Circular Road Regeneration Area".
- MC3:** Policy CP3: 2<sup>nd</sup> paragraph: add "office" after "purpose built".
- MC4:** Paragraph 4.26: 1<sup>st</sup> sentence: delete "Public Transport Accessibility Levels (PTALs)" and insert "public transport".
- MC5:** Policy CP12: 5<sup>th</sup> bullet point: delete "transfer" and insert "transport".
- MC6:** Paragraph 4.70: 1<sup>st</sup> sentence: delete "GLA Road" and insert "TfL Road".
- MC7:** Paragraph 4.75: 2<sup>nd</sup> sentence: add the following to the end of the sentence: "(as provided for by policy CP15)".
- MC8:** Picture 4.2 (p48): delete caption and insert "No. 18 bus on Harrow Road".
- MC9:** Paragraph 4.89: last sentence: after "cycle parking" insert "will be reviewed in the Development Management Policies DPD and"
- MC10:** Table in paragraph 5.5: add asterisk to Kilburn.
- MC11:** Paragraph 5.6: 3<sup>rd</sup> sentence: delete "and for a further" and insert "increasing to".
- MC12:** Policy CP17: delete 2<sup>nd</sup> paragraph ("The council supports ... suburban areas") and add this text to end of paragraph 5.13.
- MC13:** Paragraph 5.22: 1<sup>st</sup> sentence: delete "Mayor's Biodiversity Strategy" and insert "Mayor's Biodiversity Action Plan".
- MC14:** Paragraph 5.24: 5<sup>th</sup> sentence: delete "Action" and insert "Active".
- MC15:** Policy CP18: 2<sup>nd</sup> paragraph: delete "Sports Facilities Improvement Strategy" and insert "Planning for Sports and Active Recreation Facilities Strategy".
- MC16:** Paragraph 5.33: Include new sentence after the first sentence: "These include the energy hierarchy which sets out the preferred approach to energy supply in new development."

- MC17:** Paragraph 5.34: last sentence: add the following at end of sentence (after "overflow"): "(in line with London Plan policy 4A.14)."
- MC18:** Paragraph 5.35: move paragraph to follow policy CP19: add heading of "Contaminated Land".
- MC19:** Paragraph 5.38: last sentence: delete "industrial waste<sup>77</sup> and the" and insert "industrial waste<sup>77</sup> and 442,000 tonnes by 2020. The"
- MC20:** Add new paragraph after paragraph 5.41 as follows: "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".
- MC21:** Paragraph 5.66: delete "CP1" and insert "CP2".
- MC22:** Paragraph 5.89: add the following sentence to the end of the paragraph: "The local implications of applying this policy in Brent have been assessed in the council's Affordable Housing Viability Study 2009."
- MC23:** Appendix C: Glossary: amend definition of Major Proposal by adding "(or more)" after "1000 sq m".
- MC24:** Appendix D: Generally, update list of background papers.

Revised Wembley Growth Area Key Diagram (illustrative only) (see RC51)  
 Note: the legend to this diagram requires further amendment to reflect the changed terminology of employment designations (as set out in RC32).



Amendment to Alperton Growth Area Key Diagram (see RC52)  
 Existing version: Amended version:





## Monitoring Schedule (see RC70)

New text is in *italics*; deleted text is in ~~strikethrough~~.

### Economic Performance and Regeneration

<b>STRATEGIC OBJECTIVE 1</b>			
<i>Promoting Economic Performance &amp; Regeneration - by creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses (expanding the town centre eastwards into the Stadium area).</i>			
<b>Core Policies:</b> CP1 – CP11, CP15 – 17, CP20			
<b>Delivery Agencies:</b> Developers, Brent Council			
Performance Measure	Target	Monitoring Point	<i>Specific Policies to be Monitored</i>
<b>Local Indicators:</b>			
Local employment change.	5,000 new jobs in Wembley to 2017 and 10,000 new jobs within Wembley to 2026.	Net increase of 500 jobs p.a. in Wembley area. <b>When:</b> Annually	<i>Policies CP1, CP3 and CP7</i>
New town centre facilities.	*Permission & Completion of 3 large scale hotels in the Wembley area before 2017 *1 large regional visitor attraction before 2017.	End of Plan period.	<i>Policies CP1 and CP7</i>
Amount of new retail floorspace developed by type in Wembley.	25% or 30,000 m <sup>2</sup> increase (whatever is the greater) in the new retail floorspace in Wembley, on that currently existing or consented, by 2026.	Percentage and amount of completed gross retail floorspace by type in Wembley. <b>When:</b> Annually	<i>Policies CP1, CP7 and CP16</i>
Ensure mixed development in Wembley Area.	Ensure that only half of all consented and completed floorspace in Wembley growth area is residential between now and 2026.	No more than 50% of floorspace consents or completions is residential in use in Wembley area. <b>When:</b> Annually	<i>Policies CP1, CP5 and CP7</i>

<b>STRATEGIC OBJECTIVE 2</b>			
<b>Meeting Employment Needs and Aiding the Regeneration of Industry and Business - by ensuring that sufficient sites and premises are available in the borough's main commercial areas such as Park Royal, and that industrial/ warehousing is renewed.</b>			
Securing Training and access to jobs- by working with developers and end users to offer suitable training and job replacement opportunities			
<b>Core Policies:</b> CP1 – CP5, CP8, CP12, CP15, CP19, CP20			
<b>Delivery Agencies:</b> Developers, Brent Council, Greater London Authority (GLA), LDA, Park Royal Partnership			
Performance Measure	Target	Monitoring Point	<i>Specific Policies to be Monitored</i>
<b>Core Output Indicators:</b>			

Amount of floorspace land developed or redeveloped in Park Royal for employment purposes.	To secure net increase in jobs, 120,000m <sup>2</sup> of floorspace is required. Development or redevelopment of 50 hectares of land for employment purposes	1200m <sup>2</sup> annual net increase in gross internal floorspace (m <sup>2</sup> ) for B1 & other suitable employment uses in Park Royal area to 2017. <b>When:</b> Annually	CP3 and CP12
No net loss of floorspace in other SEA's/BEA's SIL and LSIS.	No net loss of floorspace in SEA's & BEA's SIL and LSIS outside of SSA's site specific allocations (Park Royal has separate target).	No net loss of gross internal floorspace (m <sup>2</sup> ) for use classes B1 and related uses 2007-2017 in SEA's/BEA's SIL and LSIS. <b>When:</b> Annually	CP1, CP3 and CP20
<b>Local Output Indicators:</b>			
Secure job placements from new development.	Secure 800 job placements p.a from 2007-17.	Number of placements made by Brentin2work each year. <b>When:</b> Annually	CP1
Brent Unemployment levels.	By 2021 unemployment below London Average and in line with National rates.	% of unemployment year on year. <b>When:</b> Annually	
Gross Income.	By 2021 less than 25% of Brent Households have an income below the London average.	Average yearly gross income for Brent Residents. <b>When:</b> Annually	

<b>STRATEGIC OBJECTIVE 3</b>			
<b>Enhancing the vitality and viability of Town, District and Local Centres</b> - by maintaining the position of town centres in the retail hierarchy, completing new retail developments in Willesden and Harlesden, and maintaining a range of local services.			
<b>Core Policies:</b> CP1, CP5, CP7, CP15, CP16, CP20			
<b>Delivery Agencies:</b> Developers, Brent Council, Greater London Authority (GLA), LDA			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Core Output Indicators:</b>			
Amount of completed retail, office and leisure development.	A net increase in retail, office and leisure floorspace in Brent's major and district town centres outside Wembley	The completed amount of gross floorspace (sqm) for use classes UCOs B1(a), A1, A2 and D2 should be greater than that lost through change of use/redevelopment. <b>When:</b> Annually	CP16
<b>Local Output Indicators</b>			
Town centre vacancy rates.	No increase of vacancy rates in primary shopping frontages from 2007 to 2026.	The amount of vacant shopfront within major and district centres primary shopping frontages. <b>When:</b> Annually	CP16
Health of Town Centres.	No reduction in inflation adjusted median rent levels in primary shopping area. No reduction in pedestrian footfall in	Annual Rental survey 2 yearly health check data. <b>When:</b> Annually	CP16

	town centres covered in 'health check'.		
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<b>STRATEGIC OBJECTIVE 4</b>			
<b>Promoting the Arts and Creative Industries</b> - by increasing the supply of modern subsidised workplace developments for creative industries in the growth areas and promote new public art to support regeneration in the borough.			
<b>Core Policies:</b> CP1, CP5, CP7, CP8, CP10, CP15.			
<b>Delivery Agencies:</b> Brent Council, Brent Arts Council, Brent Sports Service, Developers, Visit London, Brent Arts and Learning Service.			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Core Output Indicators:</b>			
Net increase of cultural / leisure facilities.	<i>Net increase in floorspace of leisure uses including completion of new cinema in Wembley.</i>	Completions survey. <b>When:</b> Annually	CP7 and CP10
Subsidised workspace for creative industries.	Creation of 5 facilities of at least 1000m2 each in growth areas by 2017.	Permission and completion of affordable creative workspace by 2017. <b>When:</b> Annually	
<b>Local Output Indicators:</b>			
Brent's Tourism economy: Local employment in the Tourism Industry.	Increase in Brent employment in Tourism Sector.	% of Brent Residents employed within Tourism industry. 4% Baseline 2004. <b>When:</b> Annually	CP1 and CP7
Provision of Public Art.	One major piece of public art either completed or secured through S106 agreement p.a.	At least one completed or secured through agreement each year to 2017. <b>When:</b> Annually	

<b>STRATEGIC OBJECTIVE 5</b>			
<b>Meeting social infrastructure needs</b> - by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities, constructing at least three new secondary and three new primary schools in the borough and providing community facilities to meet the needs of Brent's diverse community.			
<b>Core Policies:</b> CP1, CP4, CP5, CP7-CP13, CP15, CP17, CP18, CP23			
<b>Delivery Agencies:</b> Brent Council, Developers, PCT, DfES, Emergency Services, Utility Companies, other boroughs through joint working.			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Local Output Indicators:</b>			
Provision of new or extended community facilities.	Provide new community facilities at a rate of 370m2 per 1000 new population created by new housing	New or extended floorspace that meets rate of population growth. <b>When:</b> Annually	CP7, CP8, CP9, CP10, CP11 and CP23

	development.		
Provide new schools places for increased population.	Approval for <i>and</i> construction of <del>three new primary schools and three new secondary schools</del> by 2017. <i>new and extended schools in Growth Areas and Park Royal as set out in policies CP7 to CP12 inclusive.</i>	<i>Number of new schools and extensions to schools with permission for redevelopment and completed or under construction by 2017.</i> <b>When:</b> Annually	<i>CP7, CP8, CP9, CP10, CP11 and CP12</i>
Annual S106 financial contributions secured for social infrastructure.	Provisions/ contributions are secured for S106 standard charge as a minimum on all developments to 2017.	Secured full S106 financial contributions via standard charge on all developments. <b>When:</b> Annually	
Health Facilities- facilities to meet GP service needs as set out in IIF.	To meet target for GP facilities related to population growth needs.	Secure floorspace for 1 GP per 1500 new population. <b>When:</b> Annually	<i>CP7, CP8, CP9 CP10, CP11 and CP12</i>

#### STRATEGIC OBJECTIVE 6

**Promoting Sports and other Recreational Activities** - by placing particular emphasis on the provision of new facilities to address existing deficiencies and to meet the needs of new population in the growth areas, creating at least one new swimming pool in the borough in the plan period and eight new multi-use games areas (MUGAs).

**Core Policies:** CP1, CP5, CP7, CP11, CP17, CP18, CP23

**Delivery Agencies:** Brent Council, Developers, RSLs, GLA, Sport England, National Sports Governing Bodies

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
<b>Local Output Indicators:</b>			
Secure new community swimming pools for the borough.	Complete and open one new community swimming pool in the borough by 2017.	Swimming pool completion. <b>When:</b> Annually	<i>CP7 and CP18</i>
Provision of new Multi-use games areas.	Complete 8 more MUGA's and 1 full-size floodlit synthetic turf pitch in or near to growth areas.	No. of MUGAs/ STP completed. <b>When:</b> Annually	
Increase level of Health & fitness facilities.	Complete the equivalent of 3, '80 station' Health & fitness centres by 2017.	Health & fitness centres completed. <b>When:</b> Annually	

#### Housing Needs

#### STRATEGIC OBJECTIVE 7

**Achieving housing growth and meeting needs** - by promoting development that is mixed in use and tenure, so that at least 11,200 additional homes are provided in the period to 2016/ -2017 and 85% of the borough's new housing growth is contained within 5 Growth Areas. To ensure that at least 25% of all new homes built in the borough are family sized (3 bed or more) and 50% (approx.) are affordable.

<b>Core Policies:</b> CP1, CP2, CP4 CP11,CP13 CP15, CP21, CP22			
<b>Delivery Agencies:</b> Brent Council, Developers, House-builders, Registered Social Landlords			
Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
<b>Core Output Indicators:</b>			
Total additional homes.	Minimum of 11,200 homes (9150 self contained) supplied 2007/8 -2016/17.	No. of homes completed in borough. <b>When:</b> Annually	CP2
No. of homes completed in defined growth areas.	Minimum of 85% completed are in growth areas 2007/8 – 2016/17.	No.of completed units. <b>When:</b> Annually	CP2
No. of affordable units.	Minimum of 4,575 or 50% completions; 2007/8 - 2016/17. 70% social rental: 30% intermediate	No. of completed units. <b>When:</b> Annually	CP2
<del>Brownfield Land.</del>	95%	<del>Proportion of new homes completed on brownfield sites.</del> <del><b>When:</b> Annually</del>	
Ensure reasonable proportion of family homes.	That 25% of all self contained homes are 3 bed or larger.	No. of new family homes completed per annum. <b>When:</b> Annually	CP21
<b>Local Output Indicators:</b>			
Wheelchair adaptable.	10% of 10 units +	No. of completed new homes that are wheelchair adaptable. <b>When:</b> Annually	London Plan Policy 3A.5
Existing housing loss, including affordable.	No net loss	Housing units lost on completed new development. <b>When:</b> Annually	CP21
Lifetime homes.	100%	No. of completed new homes built to lifetime home standards. <b>When:</b> Annually	London Plan Policy 3A.5

#### Transport Infrastructure

<b>STRATEGIC OBJECTIVE 8</b>			
<p><b>Reducing the need to travel and improving transport choices</b> – by completing first class retail and other facilities in Wembley that reduces the need to travel to other centres. Improving key transport interchanges of Wembley, Alperton, First Central and Queen’s Park. <i>Promoting</i> access by public transport, <del>and by bicycle or on foot will be promoted</del> and <del>there will be reduced</del> reducing car parking standards for growth areas because of their relative accessibility. <i>Reducing modal share of car trips to Wembley from 37% towards 25%. Completing at least 5 car free schemes per annum in the Plan period.</i></p>			
<b>Overall Core Policies monitored under this objective:</b> CP1-CP16, CP19			
<b>Delivery Agencies:</b> Brent Council, Greater London Authority (GLA), Highways Agency & Transport for London (TfL)			
Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
<b>Core Output Indicators:</b>			

Commercial uses complying with car parking standards.	All completions of non-residential developments ( Use Classes A, B, and D) comply with the Council's car parking standards.	Number of developments (completions) within Use Classes A, B, and D which comply with car parking standards. <b>When:</b> Annually	
<b>Local Output Indicators:</b>			
Proportion of trips made by public transport.	Reducing proportion of car trips as a result of Wembley development <del>below from a 37%</del> baseline (currently estimated at 37%), by a minimum of 10% over the life of the development	MVA model <i>currently</i> calculates modal share if no intervention of 37% car use. Re-run model to <del>calculate</del> <i>change refine</i> estimates as land uses become more certain. Monitor targets through the travel plan process. <b>When:</b> every 3-5 years	CP7
Amount of contributions pooled within opportunity and growth areas to aid improving and/or developing transport infrastructure.	Ensure appropriate pooling of contributions which will mitigate the cumulative impacts of development within an area.	Number of pooling schemes within growth and opportunity areas <del>plus implementation</del> i.e. transport improvements /projects. <b>When:</b> Annually	
Secure contributions towards interchange improvements.	Secure major improvements <del>(over £1m)</del> in at Queen's Park, First Central, Wembley Stadium, Wembley Central and Alperton stations by 2017.	Record Planning Obligations and direct works that secure improvements. <b>When:</b> Annually	CP14 and CP15

### Open Space and Environment

<b>STRATEGIC OBJECTIVE 9</b>			
<b>Protecting and Enhancing Brent's Environment</b> - by preserving the borough's open spaces for recreation and biodiversity and creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision. To increase the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value. Enhance the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development. To protect the borough's built heritage.			
<b>Core Policies:</b> CP5, CP6, CP7-CP13, CP16, CP17, CP18, CP19			
<b>Delivery Agencies:</b> Brent Council, Greater London Authority (GLA), Environment Agency, Developers.			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Core Output Indicators:</b>			
Protection of all open space of value.	No net loss of open space to alternative uses.	Amount of open space lost to alternative uses. <b>When:</b> Annually	CP18

Protection of areas designated for intrinsic environmental value including sites of national or regional/sub-regional significance.	No net loss of areas of wildlife and nature conservation importance.	No net loss of land of nature conservation value on designated sites (SSSI, local nature reserves, Sites of more than local Importance for Nature Conservation). <b>When:</b> Annually	CP18
<b>Local Output Indicators:</b>			
Provision for new or extended Public Open Space.	To meet open space targets in growth areas Wembley - 2.4ha Alperton - 1.6ha S Kilburn - 0.8ha Burnt Oak - 0.6ha Church End - 2ha.	Measure new open spaces created and laid out as a result of development. <b>When:</b> Annually	CP7, CP8. CP9, CP11, CP12 and CP18
Improvement of existing Public Open Space.	To increase the number of parks maintained to Green Flag award standard from a baseline of two.	Measure number of parks awarded Green Flag status. <b>When:</b> Annually	CP18
Improvement of existing and provision for new areas of nature conservation.	Enhance and increase nature conservation areas. Reduce area of wildlife deficiency.	Monies negotiated through S106 agreements for application sites in areas of deficiency, where monies have been spent and extent of areas of wildlife deficiency. <b>When:</b> Annually	CP18
New Tree Planting for new neighbourhoods.	To meet tree planting targets in growth area set out in IIF, by 2017 Wembley 1000 Park Royal 4000 Alperton 500 Church End, Burnt Oak, S Kilburn 200.	Count of new trees planted in growth areas. <b>When:</b> Annually	CP7, CP8, CP9, CP10, CP11 and CP12
Provision for new or improved Children's Play Areas.	Meet standards on children's play as set out in Infrastructure & Investment Framework.	Measure number of compliant schemes. <b>When:</b> Annually	CP5, CP7, CP8, CP9, CP10, CP11 and CP18

#### STRATEGIC OBJECTIVE 10

**Achieving sustainable development including mitigating and adapting to climate change** - By promoting mixed use, mixed tenure development in growth areas integrating infrastructure and housing provision, reducing energy demand in the growth areas from current building regulation standards and by achieving exemplar low carbon schemes and CCHP plants.

**Core Policies:** CP1 – CP3, CP5, CP7 – CP13, CP15, CP18

**Delivery Agencies:** Brent Council, Greater London Authority (GLA), PCT

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
<b>Core Output Indicators:</b>			
Percentage of applications approved contrary to Environment Agency advice on Flood risk.	0%	Applications approved contrary to EA advice. <b>When:</b> Annually	
<b>Local Output Indicators (see also transport indicators):</b>			
Installation of sustainable Urban drainage systems (SUDS) in new development.	All <i>Appropriate major developments proposals</i> should secure SUDS or apply water retention or harvesting measures.	Applications which include SUDS measures. <b>When:</b> Annually	London Plan Policy 4A.14
Development apply <i>Application of the GLA's energy hierarchy and in order to secure high levels of renewables energy generation</i> in Growth Areas.	All major <i>developments proposals</i> should submit energy and feasibility assessment and apply Mayor's energy hierarchy. Major <i>development proposals</i> to achieve 20% carbon reduction through renewable energy requirements, or secure carbon offset payment.	Number of applications that include 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 hierarchy). <b>When:</b> ongoing ( <del>by 2010</del> )	CP19, London Plan Policy 4A.7
Secure district wide CCHP in Wembley Area.	Complete one <i>CHP plant</i> <del>two district wide heating system</del> by 2017.	To meet GLA energy hierarchy on very large regeneration schemes. <b>When:</b> Annually	CP7
Ensure that new floorspace in Wembley is mixed in use.	That at least 50% of all new permitted floorspace is non-residential by 2017.	Record floorspace of approved applications in Wembley Growth Areas. <b>When:</b> Annually	
Low carbon housing developments.	At least two exemplar low carbon housing schemes by 2017.	Completion of low carbon housing development. <b>When:</b> by 2017	

#### STRATEGIC OBJECTIVE 11

**Treating Waste as a Resource** - by collaborating with the other West London waste authorities, ensuring that there is an appropriate network of facilities for integrated waste management and that existing, appropriately located, facilities are protected.



<b>Core Policies:</b> CP5, CP17, CP19			
<b>Delivery Agencies:</b> Developers, Brent Council, Greater London Authority (GLA), West Waste, other West London Boroughs			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Core Output Indicators:</b>			
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	<i>London Plan policy 4A.28</i>
<b>Local Output Indicators:</b>			
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. <b>When:</b> Annually	<i>London Plan policy 4A.22</i>
Waste stream: recycled or composted.	<del>Over 30% of household waste by 2010 and over 33% by 2015.</del>  <i>35% of municipal waste recycled by 2010 and 45% by 2015 (in line with the London Plan)</i>	Amount of municipal waste recycled or composted. <b>When:</b> Annually	<i>London Plan policy 4A.21</i>

<b>STRATEGIC OBJECTIVE 12</b>			
<b>Promoting healthy living and creating a safe and secure environment</b> - by ensuring that there is sufficient space for Primary Health Care providers, particularly to meet the additional need in the growth areas. Ensuring development delivers transport solutions and opportunities for healthy lifestyles, embracing a design-led approach to reduce crime and the fear of crime by installing new CCTV systems and ensuring and ensuring that crime levels continue to be reduced.			
<b>Core Policies:</b> CP1 – CP15, CP17 CP19, CP23			
<b>Delivery Agencies:</b> Brent Council, PCT, Emergency Services, TfL, Sport England			
<b>Performance Measure</b>	<b>Target</b>	<b>Monitoring Point</b>	<b>Specific Policies to be Monitored</b>
<b>Local Output Indicators:</b>			
Amount of new space for health service provision.	Floorspace for 1 new GP for every 1500 additional population generated by new housing between 2007-2017.	New GP surgeries are completed to meet population need. <b>When:</b> Annually	<i>CP7, CP8, CP9, CP10, CP11 and CP12</i>
Secure by Design accreditation.	All large schemes over 100 units achieve Secure by Design accreditation between 2007 and 2017.	Accredited planning applications. <b>When:</b> Annually	

Provision of new or extended community facilities.	Community facilities provide at 370m <sup>2</sup> per 1000 new population between 2007 and 2017.	Measure floorspace of new facilities in growth areas against new population (at 2.5 persons per dwelling) <b>When:</b> Annually	
Protection of existing community facilities.	No net loss of community facilities unless compensation provided.	Number of applications approved resulting in the net loss of a community facility for which no compensation made through planning obligation or other agreement. <b>When:</b> Annually	CP23