

Brent's Local Development Framework (LDF)

Draft Core Strategy Preferred Options



September 2006

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1. Introduction



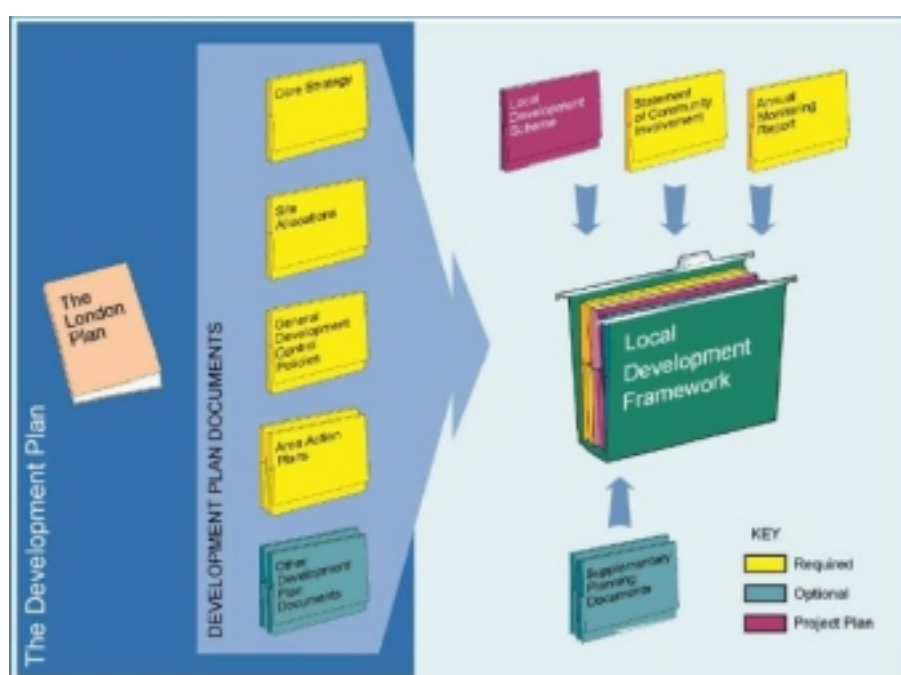
1. Introduction

Purpose of the Core Strategy Preferred Options

1.0.1 This document has been produced by Brent Council as a basis for consultation on the second stage of preparing Brent's new Local Development Framework (LDF). It builds on the earlier Issues & Options consultation stage in September 2005, taking account of views expressed then in identifying a preferred approach to the future development of the Borough.

What is a Local Development Framework?

1.0.2 The Local Development Framework will replace Brent's Unitary Development Plan 2004. The Council is required to prepare the LDF by the Planning and Compulsory Purchase Act 2004, and it will provide a strategic planning framework for the borough, guiding change to 2016 and beyond. When adopted, Brent's LDF, together with the London Plan, will form the statutory Development Plan for the borough.



Local Development Contents

1.0.3 The LDF will be made up of a number of documents. This includes this Core Strategy, as well as a separate document containing more detailed Development Control Policies to be used in determining planning applications and a further document identifying the preferred development options for particular sites called Site Specific Allocations. The Council consult on ~~all 3 documents~~ *the Core Strategy commencing on October 30th 2006 until December 11th 2006. It intends to consult on Development Control Policies and Site Specific Allocations Preferred Options in April 2007.* together. The LDF will also include more detailed guidance in the form of Supplementary Planning Documents to replace existing Supplementary Planning Guidance. The documents that make up the Local Development Framework are illustrated in Figure 1.

What is the Core Strategy?

1.0.4 The Core Strategy sets out a spatial vision, objectives and key policies for the future development of the Borough. It is guided by sustainable development principles and must therefore be subject to a sustainability appraisal, the report of which will be published for public consultation. It also meets the requirements of National planning policy and of the spatial development strategy for London, known as the London Plan. The Core Strategy reflects community aspirations as expressed in the Community Strategy and is the spatial expression of other important local strategies such as the the Borough's Regeneration Strategy, the Children and Young People's Plan and Brent PCT's Local Delivery Plan.

1. Introduction

How is the Core Strategy Structured?

1.0.5 The document is first introduced by a description of Brent and its relationship to London and the United Kingdom. Details of these Borough trends are found in Section 2 *Brent Context*.

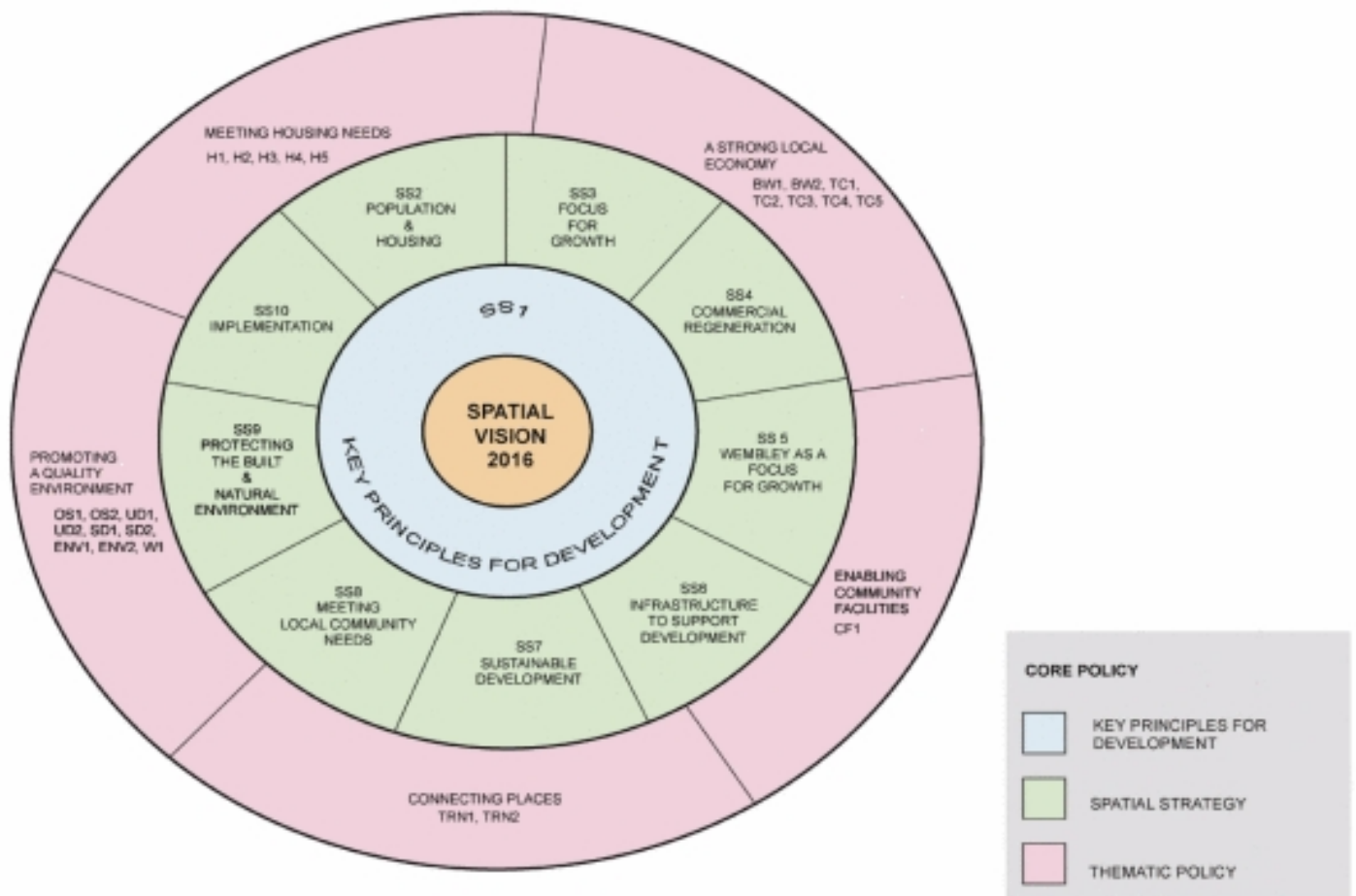
1.0.6 Section 3 *Planning Policy Context*, sets out National and Regional Planning Policy which the Core Strategy must have regard to. Being a spatial strategy, the document must take into account guidance set out by regional and central government and be in conformity with this.

1.0.7 At the heart of the Core Strategy is the spatial vision, which is an expression of what the Borough aspires to in the future. This draws upon from the Community Strategy and various other plans and strategies, together with research and consultation with a wide range of stakeholders. The spatial vision is followed by 14 objectives, which set out how the vision will be achieved. The vision and objectives are found in Section 4, *A Spatial Vision for Brent*.

1.0.8 The delivery of the vision and objectives is set out through key core policies, with the spatial strategy policies forming the basis and delivery of all other core policies. The first spatial strategy policy SS1 *Key Principles for Development*, broadly outlines how and where development will take place in the Borough, and underpins the implementation of the spatial strategy policies. These are outlined in Section 5 *A Spatial Strategy for Brent*.

1.0.9 Building upon the spatial strategy policies, there are a series of more detailed core policies which fall into the themes of Maintaining a Quality Environment (Section 6), Meeting Housing Needs (Section 7), Connecting Communities (Section 8), A Strong Local Economy (Section 9), and Enabling Community Facilities (Section 10). The relationship between the spatial vision and the supporting policies is illustrated in Figure 2.

1. Introduction



Relationship between Spatial Vision and Core Policies

2. Brent Context



2. Brent Context



Brent Children

2.0.1 Brent covers an area of 4325 hectares - almost 17 square miles, between inner and outer North West London. It extends from Burnt Oak, Kenton and Kingsbury in the North to Harlesden, Queens Park and Kilburn in the South. The North Circular Road divides the less densely populated northern part of the Borough from the south. It has the L B of Barnet on its border to the east, Harrow to the north, and Ealing to the west. It has small boundaries with the inner boroughs of Hammersmith and Fulham, Kensington and Chelsea, Westminster, and Camden in the south. The Metropolitan centres of Harrow and Ealing, together with Brent Cross regional shopping centre, all of which are outside of the Borough, currently meet many of the shopping and leisure demands of a large number of Brent residents.

2.0.2 Brent is the second most ethnically diverse local authority area in the country. Among its population of 267,000, with black and minority ethnic groups comprising 55%, over 120 languages are spoken.

2.0.3 The south of the Borough was substantially developed between 1890 and 1910, mainly with terraced houses for workers in industry and services, but with some estates of larger houses around Kilburn. This area has been the focus of substantial change in recent years: much housing renewal has been achieved both through concerted public action and through piecemeal improvement in the private sector, often associated with conversions. Proximity of the inner part of the area to Central London has contributed to these latter pressures.



Neasden Village

2.0.4 Parts of the Borough continue to suffer from high levels of social and economic disadvantage. The extent of deprivation has long been officially recognised and Brent qualifies for a number of European and National regeneration programmes. Brent contains four of the Government's Priority Community Areas eligible for regeneration funding: Harlesden, Willesden, Kilburn and Cricklewood, the major focus of such areas in West London.

2.0.5 In much of the inner part of Brent, as in so many other areas of Inner London that are distant from London's major parks and open spaces, there is a deficiency of the green spaces that are essential to the quality of life and to a pleasant urban environment. Other Inner London characteristics can also be seen: industrial activities operating cheek by jowl with residential uses and the problems of the re-adjustment of town centres to shifting patterns of retailing and changing populations.



Dudley Road

2.0.6 The substantial development of the north of the Borough occurred in the 1920's and 1930's with the expansion outwards of London that accompanied the growth of rail and underground services in the capital. That essentially suburban nature, with its characteristically lower densities, survives today. This part of the Borough forms part of the large ring of areas of Inner London that continues to house people working in Central London and, more so today, elsewhere. As in much of suburban London, increased demand for housing in the 1990s has brought pressures for redevelopment at higher densities.

2.0.7 The fortunes of all parts of the Borough depend now, as much as ever, on the prosperity of London as a whole. Other parts of London provide the workplaces for a substantial proportion of Brent's residents. But Brent has its own contribution to make to London's economic well-being. In particular, it contains some 360 hectares (nearly 900 acres) of industrial estates many of which were originally developed during the expansion westwards of London's manufacturing in the inter-war period. These estates have long been seen as a strategic resource providing relatively rare opportunities in West London to house manufacturing activities, including both emerging new industries and those traditional industries, such as in the food and printing sectors, which continue to serve the London market from a base within the capital.

2.0.8 The Borough is famous for being the home of the new Wembley Stadium. Wembley is now a major focus for regeneration and will not only have the finest stadium in the world, but it will also be a major regional, national and international destination with a range of major retail and leisure attractions as well as being a focus for the local community.

3. Planning Policy Context



3. Planning Policy Context

3.0.1 Brent's planning strategy and policies **need** have to be in line with national and regional policy **unless there are reasons justifying a local exception**.

3.1 National Policy

3.1.1 National planning policy is mainly set out in a series of Planning Policy Statements, but is also contained in circulars, ministerial statements and other strategy documents. The Planning Policy statements generally deal with particular topics or issues. An important, overarching policy statement is PPS 1, Delivering Sustainable Development. This sets out a number of key principles for development to ensure that development plans, and decisions taken on planning applications, contribute to the delivery of sustainable development. In summary, the key principles are as follows:

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

3.2 Regional Policy

3.2.1 The Spatial Development Strategy for London, known as **The London Plan** and adopted in 2004, provides the regional planning context for Brent's Local Development Framework, and hence the Core Strategy. Along with the current UDP for Brent, it also forms part of the development plan for the Borough. Policies in Brent's LDF, which will ultimately replace the UDP, must be in general conformity with the London Plan.

3.2.2 The London Plan sets out a strategy to accommodate substantial growth in London's economy and population at the same time as creating a more open and equitable society and preserving and improving London's heritage and environment. It accepts that if development is to be encouraged without allowing further encroachment on green spaces, London has to become a more densely populated and densely developed city. The strategy integrates commercial and residential development, transport and communications infrastructure, and the promotion of local communities.

3.2.3 Enhancing the vitality of London's town centres is a key spatial priority of the London Plan. They are seen as key locations for a diverse range of activities and uses, including office space, housing, retail, leisure, community facilities and regeneration initiatives.

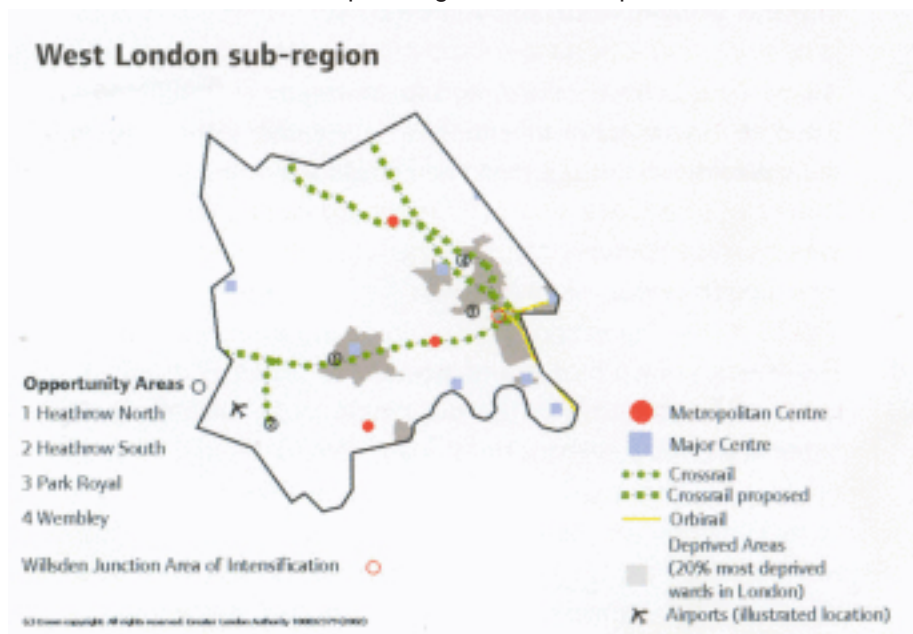
3.2.4 Suburban areas are considered to have an important part to play in the future development of London. District, local and neighbourhood town centres should be supported and enhanced. Maintaining and enhancing a range of employment uses in suburban areas is important to support sustainable communities. Areas around town centres are seen as most appropriate for higher density development and a greater mix of uses in accordance with their greater levels of accessibility relative to other suburban areas.

3.2.5 Manufacturing, wholesale distribution and a number of other industrial activities rely on the planning system to sustain adequate development capacity to meet their needs. The main concentrations of this capacity are identified as Strategic Employment Locations.

3.2.6 There is a need to coordinate transport and development: spatial policies cannot be considered in isolation from their links to existing and proposed transport accessibility and capacity.

3. Planning Policy Context

3.2.7 Within the overall planning framework, specific areas have been identified as Opportunity Areas, Areas for Intensification and Areas for Regeneration.



It is within these areas that regenerative development should be focused to meet the needs of those communities suffering from substantial social exclusion and deprivation. Significant parts of Brent have been identified as Areas for Regeneration. The Opportunity Areas of Wembley and Park Royal and the Willesden Junction Area for Intensification are particularly well located to meet the needs of Brent's deprived communities. The Opportunity Areas include major brownfield sites and places with potential for significant increases in density. Development in these areas should be geared to the use of public transport. Areas for Intensification have significant potential for more intensive use – and for more varied use – than at present where they are well served by public transport.

West London Sub-Region

exploiting the sub-region's dynamism and potential and addressing the needs of significant pockets of deprivation, especially in inner areas such as Park Royal. Wembley is recognised as having major potential as a nationally and internationally significant sports, leisure and business location.

3.2.8 New development will be aimed at

3.2.9 To assist with implementation of the London Plan, a Sub-Regional Development Framework (SRDF) has been produced for each of London's Sub-Regions. Relevant to Brent is the West London SRDF, published in May 2006.

3. Planning Policy Context

4. A Spatial Vision for Brent



4. A Spatial Vision for Brent

4.0.1 The LDF as a spatial plan should provide the spatial expression of all the relevant strategies that will have an influence on the future development of the Borough. In taking account of the various relevant strategies it is useful to gain a sense of the visions of the Borough that underpin them before a spatial vision can be adopted.

4.1 Community Strategy

4.1.1 The Core Strategy should set out a spatial vision of what the Borough will be like in 10 years time. It is important that this is important that this reflects the community Strategy which is a combined statement of the needs and priorities of local people. Brent's community strategy, drawn up by 'Partners for Brent', the Local Strategic Partnership (LSP) in the Borough, sets out a vision for the Borough as follows:

"Brent will be a prosperous and lively borough, full of opportunity and welcoming to all. A place that will thrive for generations to come, whose future will be determined by local people."

4.1.2 Below this overarching vision the Community Strategy sets out some further aspirations which are relevant to the drawing up of a spatial vision for Brent. These are:

"Brent will be a great place to live in and to visit. It will be safe, clean, green and lively. Local people will be confident that our streets and open spaces are safe places to be and that our green spaces and leisure facilities will be worth visiting. Residents will care for their surroundings, appreciate where they live and enjoy what Brent has to offer"

"Brent will be a prosperous, healthy place where there are opportunities for all. A place where income and employment levels will be higher than the London average, where businesses thrive and where residents will enjoy good health and be able to make healthy choices"

4.2 Corporate Strategy

Brent's Draft Corporate Strategy 2006-2010

4.2.1 Brent's new Corporate Strategy is currently only available in draft. The draft vision at the heart of the Strategy envisages: A Great Place, A Borough of Opportunity, An Inclusive Community with the Council taking a Civic Leadership role to deliver its vision and priorities. The draft Corporate Strategy is reflected in the Core Strategy (Preferred Options).

4.2.2 The Core Strategy reflects the priority to make Brent a great place to live in and visit, reducing crime, improving the public realm, improving open space and leisure facilities, promoting environmentally sustainable practices and promote and celebrate cultural identity.

4.2.3 The second part of the vision in the Corporate Strategy is to create a borough of opportunity and the Core Strategy seeks to meet Corporate Strategy key priorities; creating a place where businesses can succeed, improving the skill levels of residents, creating conditions for inward investment and improving healthcare, in particular addressing health inequalities.

4.2.4 The third part of the vision in the draft Corporate Strategy is to create an inclusive community by providing affordable homes, regenerating priority neighbourhoods, and improving educational opportunity in the widest sense.

4.2.5 The Draft Strategy may well change and the Core Strategy will, where appropriate, be altered to take account of these changes.

4.3 Regeneration Strategy

4.3.1 Brent has also produced a Regeneration Strategy which has the following vision at its core:

4. A Spatial Vision for Brent

"The vision is of a Brent fully integrated into the city - a single urban borough which makes a full and positive contribution to the London economy. Brent's communities will enjoy a high quality of life and will be fully able to participate in society.

The borough will have a reputation for high quality services focused on tackling and preventing social exclusion. Unemployment will be below the London average, and everybody will have access to high quality education, health provision and affordable homes. The areas where currently deprivation is most concentrated will be physically, socially and economically reconnected with London as a whole. Brent will provide a home of choice for its diverse populations and businesses.

At the core of Brent will be a landmark international development at Wembley, providing a source of pride, identity, wealth and aspiration for the borough as a whole"

4.4 Vision for Wembley

4.4.1 At the core of regeneration and growth in Brent is Wembley. Because of the significance of Wembley, not just to Brent but to London as a whole, in 2002 the Council adopted a vision, endorsed by the Mayor of London, of what it wished to see from regeneration at Wembley. The vision set out a number of core principles for regeneration which can be encapsulated in the following statement.

"By 2020, Wembley will be a national and international destination, a key contributor to the London economy and the vibrant heart of the London Borough of Brent"

4.5 Spatial Vision for Brent



Community Workshop

The spatial vision for Brent is the spatial expression of the strategies outlined above. The vision has also been developed from views expressed by representatives and the local community during the consultation on Issues and Options.

*In 2016, Brent is a dynamic and sustainable area fully integrated into the City. Its diverse communities are prosperous, healthy and safe, living in a high quality environment and benefiting from a **wide** range of affordable homes and community facilities. Its commercial centres, with the iconic Wembley at the heart, are easily accessed by residents and visitors alike, providing a good range of shops, leisure facilities and jobs*

4.6 Objectives

4.6.1 In order to achieve the vision outlined above, a number of key objectives have been identified. These are:

1. **Achieving Sustainable Development** - through prioritising locations, land-uses and mixed-use development with particular regard to parking and public transport to aid the creation of a sustainable and inclusive future for Brent residents, businesses, works and visitors focusing on the importance of social cohesion
2. **Encourage sustainable Development Practices** - through design, construction and demolition with particular regard given to energy, water and waste efficiency as well as minimising potential effects on climate change

4. A Spatial Vision for Brent

3. **Reducing the Need to Travel** - through placing emphasis on meeting needs locally and the promotion and improvement of walking, cycling and public transport, whilst recognising that car ownership is important to many and that it is planned for accordingly .
4. **Protecting and Enhancing the Natural and Built Heritage and Environment of the Borough** - by respecting and enriching the special character of the Borough
5. **Meeting Housing Needs** - secure housing at the locations and of the size, density and tenure needed to meet and Borough and Regional needs as appropriate
6. **Meeting the Impacts of Housing Development** - secure provision / contributions to satisfy the needs arising from new housing development; including education, health facilities, open space and play areas
7. **Meeting Employment Needs and Aiding the Regeneration of Industry and Business** - creating a climate of certainty that appropriate employment sites and premises are available whilst acting as an attractor to new inward and indigenous investment, and improving employment and training opportunities
8. **Regenerating Areas Important to London as a Whole** - securing regenerative development in locations such as Wembley, Park Royal, South Kilburn and Willesden Junction where the benefits will be felt both within and beyond the Borough boundary
9. **Revitalise Town and Local Centres** - through the maintenance and enhancement of their vitality and viability ,by improving accessibility and by securing new development proposals
10. **Promoting Tourism & the Arts** - for the benefit of Brent residents, businesses, workers and visitors and maximise their regenerative effect. Special regard is to be had to the role of Wembley as a key attractor
11. **Protecting, Providing and Enhancing Open Space and Leisure and Recreational Activities** - for the enjoyment of Brent residents now and in the future
12. **Meeting the Community's Diverse Needs** - continue to deliver a more responsive, sensitive and fair service to all members of Brent's diverse community securing ,including the provision of a range of community facilities and services for all
13. **Treating Waste as a Resource** - ensuring that there is an appropriate network of facilities for integrated waste management
14. **Creating a Safe and Secure Environment** - embrace a design-led approach to reduce crime and fear of crime

5. A Spatial Strategy for Brent



5. A Spatial Strategy for Brent

5.1 Key Principles for Development

5.1.1 Flowing from the objectives for development set out in [the Spatial Vision](#) above, there are a number of principles that will underpin the spatial strategy for the Borough as set out in policy SS1 below.

CP SS1 Key Principles For Development

The key principles which underpin the spatial strategy for Brent are:

- Focusing higher density development in five key growth areas, especially in the main growth area of Wembley.
- Change will be considered on a local area basis, thus facilitating comprehensive planning and provision of infrastructure to ensure that growth is sustainable. *A design-led approach to development will be taken.*
- Alongside growth will be the improvement of transport nodes, mainly stations and bus/rail interchanges, improvement of travel corridors around, *improvement of walking and cycling* and linking growth areas with particular emphasis on the improvement of bus services.
- Controlling development in other areas, for example in maintaining [the character of](#) quality suburbs and protecting open space. Any development ~~in these locations~~ *outside the growth areas* will be at significantly lower densities than in the growth areas
- Promoting improvements in town centres [and local centres](#), strategic industrial areas and on housing estates in need of regeneration.
- Development in the key growth areas will be required to be mixed-use and also have a mix of housing size and tenures.
- All development should be sustainable so as to help combat climate change through, for example, sustainable construction methods [measures which mitigate or adapt to climate change](#)
- [High quality design resulting in a](#) significant improvement in urban design quality and improvement in the quality of the public realm
- [Ensuring that dwelling size and quality of neighbourhoods encourage people to stay in Brent over the long term](#)

5.2 Regeneration and Growth

5.2.1 As highlighted above [within the Borough context](#), Brent contains some significant pockets of deprivation and run-down areas. A fundamental objective of the development plan, therefore, is to tackle social exclusion and to regenerate the run-down parts of the Borough so that not only is the environment and infrastructure enhanced, but an economic uplift is achieved through inward investment which benefits the whole community. In particular, regeneration should meet the needs of our deprived neighbourhoods by providing the much-needed affordable homes, jobs and shopping, leisure and community facilities. The key driver of regeneration, because of the increase in land values associated with it, is residential development. The London Plan has accepted that population growth in London is inevitable and that significant new house building is necessary to accommodate this. There is also a Government imperative to achieve a significant increase in house building in areas of need. Brent's strategy is to harness growth to help achieve its regeneration objectives.

5.2.2 Just as London is a dynamic place so too is Brent. There is substantial evidence that Brent's population is not only dynamic and changing quickly but also, compared to national or London-wide characteristics, is relatively young and growing. For example, Brent's secondary schools are full and there is a need to expand provision to cater for growing demand. The pressures to accommodate population growth, to meet the changing characteristics of the local population such as more, smaller households and to meet housing shortages that already exist mean that more and more homes are needed. There is also a need for a better range of housing to reflect specific local needs, including the 3rd highest household size in England and the 2nd highest overcrowding level in London. The strategy for the future development of the Borough, therefore, must be to accommodate growth. The issue is how much growth is appropriate and how, and where, it can be provided for. The Council has concluded that up to about [accepts that at least](#) 40,000 [10,146](#) new homes [\(including 1,000 self-contained homes\)](#) can be accommodated in the Borough up until 2017. In adding 4,000 [1,030](#) currently vacant dwellings which it is

5. A Spatial Strategy for Brent

estimated can be brought back into use, the borough's housing capacity target of 11,200 new homes, identified in the London Plan, is reached. This equates to an approximate increase in population of 25,000-28,000. [The London Plan aim at present is for 50% of new housing to be affordable.](#)

5.2.3 At the same time, large areas of the Borough can be regarded as an asset because of the quality of the environment or because of their particular local characteristics that are worthy of preservation, be they valued open spaces, attractive residential areas or important commercial locations. In initial consultation on the new plan, local residents expressed a clear view that they valued much about their local areas and wished to see this preserved or enhanced. As well as accommodating growth and the change associated with it, it is also important that those parts of the Borough that are valued are protected from over-development or unnecessary change. The strategy, therefore, should focus growth where it is most appropriate and where it can be more readily accommodated.

5.2.4 Growth can also be harnessed to achieve the regeneration of run-down areas and support economic renewal, providing jobs as well as new facilities such as shops, leisure and community provision. By requiring a mix of uses alongside housing on sites and in locations which are very accessible then new sustainable communities can be created where the schools, health centres, leisure facilities and shops are provided as well as homes.

Appropriate Level of Growth

5.2.5 As stated above, the appropriate level of population growth for the Borough up to 2017 has been judged to be 25,000-28,000. This would take the Borough population up to about 300,000. This is above the current population projections for the Borough but is compatible with Brent's status as an 'Opportunity Borough' and with its ability to accommodate new housing. It is considered to be an acceptable level of growth, given the capacity of sites to accommodate new development and the constraints that the need for new infrastructure will impose. This level of proposed growth will still require an increase in provision at schools and health centres as well as improved public transport facilities if it is not to result in 'over-heating', i.e. where schools and health facilities are unable to cope with demand and a lack of good public transport [infrastructure leads to greater car use and increasing congestion on the roads. Also, population growth means that additional jobs should be available locally, more waste will be generated and that there will be increased use of resources and pressure on the environment generally. These issues are addressed by the strategy \(see particularly policies CP SS4 and CP SS6\).](#) In this way the borough can benefit from the advantages that growth and associated regeneration brings, whilst ensuring that there is an adequate provision of key infrastructure, both social and physical.

CP SS2 Population And Housing Growth

The Borough will plan for a population growth of up to 28,000 people by 2017. The development of over ~~10,000~~ [10,146 \(including 1000 non self-contained\)](#) additional homes will be sought between 2007 and 2017. ~~of which~~ [The Borough will aim to achieve the London Plan target that](#) 50% [of new homes](#) should be affordable.

Key Locations for Regeneration and Growth

5.2.6 Two areas of Brent are identified in the London Plan as Opportunity Areas. These are Park Royal and the Wembley regeneration area, where the impetus for regeneration is mainly commercial renewal. In Park Royal there is a need to renew, what had become in the 1980s a run-down industrial estate, to provide new business opportunities and jobs. The impetus for renewal at Wembley was provided by the decision to rebuild Wembley Stadium as the new National Stadium and the associated enhancement of the infrastructure. The availability of large development sites close to the stadium means there is an opportunity for major growth and renewal. Both Wembley and Park Royal are well located to provide job opportunities, and access to other facilities, for the deprived neighbourhoods nearby. Although Wembley has potential to provide significant levels of new housing, there is little opportunity in Park Royal apart from specialist key worker housing associated with the redevelopment of Central Middlesex Hospital.

5. A Spatial Strategy for Brent

5.2.7 Other priority areas for physical and social renewal are large housing estates built in the 1960s or 1970s where a combination of physical and social problems means that wholesale redevelopment or refurbishment is necessary. Much progress has already been made, with the Chalkhill estate completed and Stonebridge estate having been substantially rebuilt and renewed. Progress has also been made at Church End and South Kilburn, where New Deals for the Community funding is promoting major regeneration. At both Church End and South Kilburn there are opportunities for additional housing and other facilities as well as replacing sub-standard accommodation and both areas, therefore, can be identified as foci for further growth. Both areas benefit from good accessibility by public transport.

5.2.8 Other areas of the Borough where growth can be focused are those where there is potential to redevelop with a mix of uses. This means that sites have to be available, there has to be at least a good level of public transport accessibility and they are not areas that are worthy of protection, i.e., are a generally poor environment or townscape and are not strategic employment locations that should be retained as such. Two such areas can be identified, at Alperton and on or close to the Edgware Road at Burnt Oak/Colindale.

5.2.9 Apart from the areas identified above, the only other locations where significant population growth can be accommodated are within, or on the edge of, the larger town centres such as Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden. The focus on growth areas does not mean however that other areas in need of regeneration will be neglected. The council is working up proposals for the redevelopment of the Barham estate for example. It is giving consideration to regeneration ideas for the Brentfield and Stonebridge estates, notably where they interface with the North Circular Road. These and other regeneration proposals will be worked up into appropriate guidance during the life of the LDF. *In all areas of growth, appropriate engagement with the local community will be required to help plan the future development and infrastructure / amenity improvements*

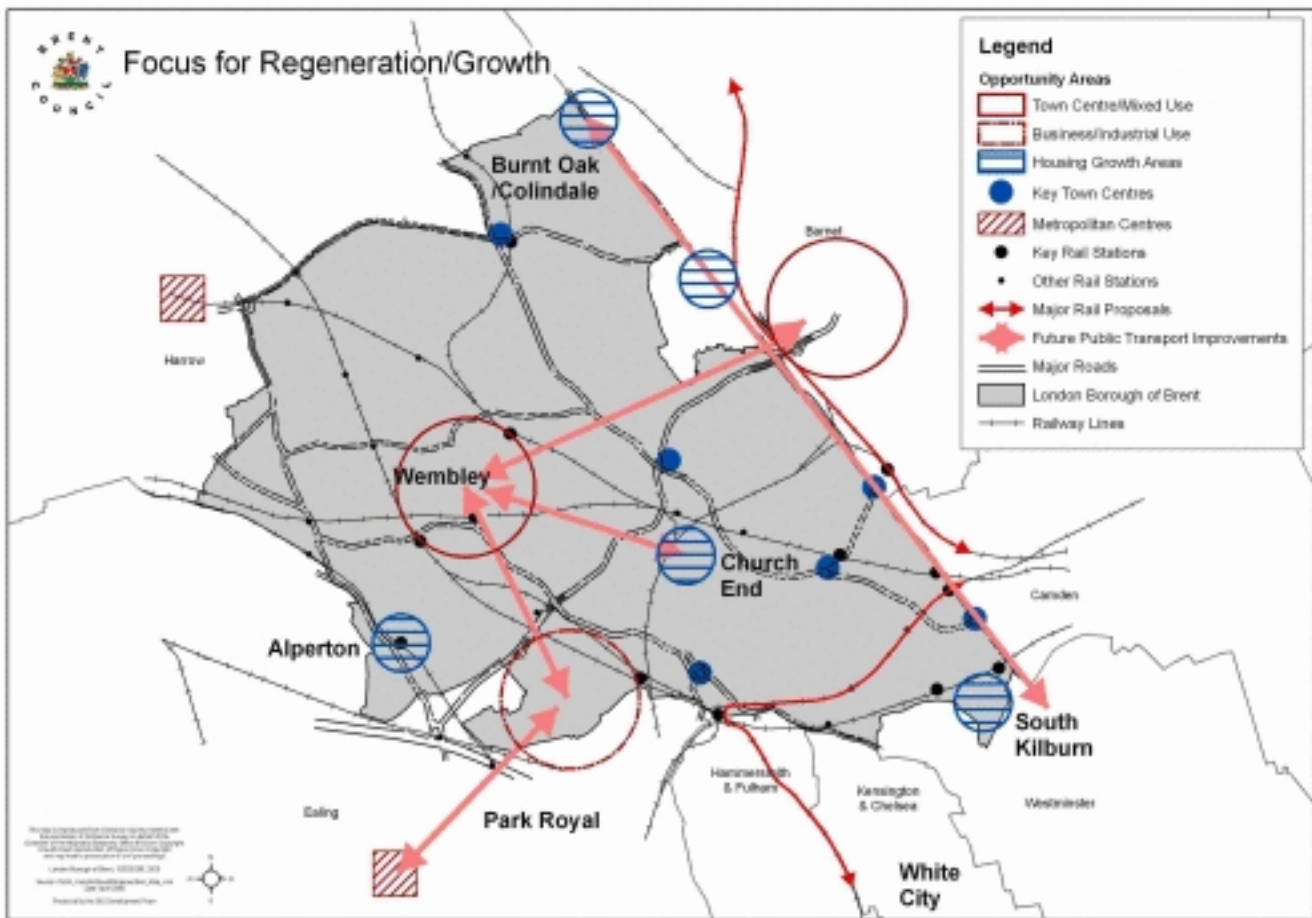
CP SS3 Focus for Growth

The focus for population growth, and therefore significant new housing development, in the Borough will be the Wembley Opportunity Area and the regeneration areas of South Kilburn, Church End, Alperton and Burnt Oak/Colindale. These will be directly linked to infrastructure improvements.

5.2.10 In addition the larger town centres, i.e. Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden will also be are appropriate locations for higher density housing as part of mixed use development schemes linked to infrastructure/amenity improvements .

5.2.11 If we are to have sustainable communities, hand in hand with population growth there must also be a growth in a range of job opportunities. These must also be local and accessible to local people so that the benefits are felt locally and excessive commuting into central London and elsewhere is to be avoided. As well as seeking a range of new job opportunities, S106 agreements will be used to ensure that training is made available where this will improve the job prospects of local people. Establishing links between schools and local businesses/industry will also help to sustain local social and economic well-being. In common with the rest of London, much of the new employment will be provided in the service industries such as in shops, hotels and the leisure industry as well as offices. These activities can be readily accommodated in, and should be directed towards, the larger town centres, and other accessible locations such as designated business parks. However, there is also a need to encourage new manufacturing and distribution businesses to locate in the borough as well as retaining existing. In order to do this it is important to protect and promote renewal and regeneration in those employment areas that are strategically important to London by virtue of their size, access to the strategic road network and where businesses can operate freely away from the constraints of potentially impacting on the residential environment. There are four strategic industrial and business areas either partly or wholly within Brent, three of which have good access to the North Circular Road, i.e. Park Royal, Wembley/Neasden and Staples Corner, whilst East Lane has rail sidings and is located on a main road.

5. A Spatial Strategy for Brent



Focus for Regeneration and Growth

Policy

CP SS4 Commercial Regeneration

Park Royal*, Staples Corner Wembley/Neasden [and East Lane](#) will be promoted as strategic industrial/business locations where redevelopment for incompatible uses will be resisted, new development for business and industry will be encouraged and investment in new infrastructure, [such as transport improvements](#), focused. In addition mixed use development, including employment generating uses, will be promoted in town centres and in the Wembley regeneration area.

* A development framework is being prepared jointly with Ealing and Hammersmith & Fulham to guide and promote the regeneration of Park Royal. In the longer term a joint Area Action Plan will be prepared.

Destination Wembley

5.2.12 In line with the Council's vision for Wembley, the planning strategy for the area aims to promote the regeneration of Wembley as a regional sports, entertainment and leisure destination, taking advantage of the opportunities presented by the Stadium development and the potential for development of sites in the surrounding area. The aim is to achieve a critical mass of visitor attractions, building on the area's current role as a major leisure and entertainment centre for London. The intention is that Wembley will become an all year round visitor destination catering for a range of entertainment and leisure

5. A Spatial Strategy for Brent

activities as well as Stadium and Arena events and conferences. The existing town centre will also be regenerated by allowing its expansion eastwards and by ensuring that *the physical* linkages to the regeneration area to the east, *especially pedestrian routes*, are improved. The first stage of this improved link, the new White Horse Bridge across the Chiltern line, is already in place.

CP SS5 Wembley as a Focus for Growth

Wembley is *being* the main focus for growth, and will be developed as a new sustainable community where the stadium will be complemented by regeneration of the area as a regional sport, entertainment and leisure destination including new shops, hotels and community facilities as well as 5,000 new homes, *and on its role as an Olympic venue in 2012*. This will be supported by new infrastructure *such as schools, health facilities and transport provision, including adequate appropriate parking facilities*. *Regeneration should provide a range of activities complementary to one another as well as to the Stadium such as retailing or leisure.*

Alternative options not selected

CP SS2 Population and Housing Growth

There is no alternative option to that of accommodating the level of growth proposed as the housing targets are set at a strategic level in the London Plan. *A higher level of growth was rejected because London Housing Capacity Study demonstrated that suitable sites are not available which could include substantially more housing. A higher target would be difficult to sustain without developing on open space or putting an unacceptable strain on infrastructure.*

CP SS3 Focus for Growth

The alternative to focusing growth is to disperse new housing around the borough. This would be a less sustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc. It would also be more difficult to provide the necessary infrastructure to support development.

CP SS4 Commercial Regeneration

The Strategic Industrial locations have been identified in the London Plan and therefore must be reflected in Brent's strategy. The alternative to promoting a mix of uses in town centres is to develop as single uses and at lower densities. This approach, however, would not make the best use of town centres as accessible locations to public transport, would result in a greater need to travel and would mean an under-use of land.

CP SS5 Wembley as a Focus for Growth

Much of the growth in housing and commercial development at Wembley is committed already through planning consents therefore it is too late to pursue an alternative option of more dispersal of investment.

5.3 Infrastructure to Support Development

5.3.1 If sustainable growth is to be achieved in the borough then it is vitally important that the necessary supporting infrastructure is adequate, particularly in terms of its capacity to meet future demands upon it. Vital infrastructure includes transport facilities, especially the capacity of public transport, utilities such as water supply, drainage, sewerage and waste management, and community infrastructure such as schools, health provision and leisure / recreation facilities.

5.3.2 In order to ensure an adequate level of provision of transport or community infrastructure, it may be necessary to achieve a critical mass of development in order to support, for example, a new health centre. Few single development schemes are brought forward which in themselves can provide the infrastructure, such as a new school, to meet the demand.

5. A Spatial Strategy for Brent

Generally development is smaller scale and piecemeal so that it is only cumulatively, when put together with other schemes, that a critical mass can be reached. Provision of adequate infrastructure can only be achieved in a planned way by identifying sites where there is some certainty that new housing will come forward, estimating what the infrastructure requirements are, identifying how and where this will be provided and ensuring that development contributes an appropriate amount to the costs of provision through section 106 agreements or other mechanisms. Other sources of funding will also be sought to meet the costs of such provision.

CP SS6 Infrastructure to Support Development

The likely level of additional housing and its location will be assessed and the Council will plan accordingly for the provision of supporting infrastructure, identifying sites for new facilities where appropriate. Before granting planning permission for large-scale residential development, the Council will have to be satisfied that the infrastructural requirements arising from the scheme will be met *by time of occupation*. Contributions will be sought from development giving rise to the need for new infrastructure.

Alternative options not selected

CP SS6 and CP SS8 Infrastructure to Support Development and Local Benefits

An alternative option is to allow for major new development and the associated population growth without requiring provision of supporting infrastructure on development, but to allow infrastructure provision to catch up at a later date. This could not be sustained because it would lead to insufficient school places, health facilities, etc. to meet needs and would result in increased congestion on transport systems with the consequential impact on the environment and local amenity through, for example, poorer air quality.

Another alternative is to require any development, of whatever size, to fulfill infrastructure requirements. This is not acceptable because it is not reasonable to expect all small developments to meet their own infrastructure requirements directly.

5.4 Sustainable Communities

5.4.1 *Aiming towards* achieving sustainable development is an important objective for the borough. It is fundamental to international obligations as well as being central to all aspects of national and regional policy. Some of the issues that Brent faces in terms of tackling sustainable development are: addressing climate change, protecting biodiversity and open spaces, dealing with waste, and reducing consumption of non-renewable resources. *New development must be socially sustainable providing a quality of homes and facilities that encourage those who have a choice to stay in the borough. - dwellings that allow people to remain in the borough in the long term* - It is important that planning policies for Brent address these issues in a way that is consistent with both Government guidance and the London Plan. The need for development to *contribute towards achieving -be- sustainable development* is established in policy CP SS1 on development principles. Policy CP SS7 below shows how this can be achieved.

5. A Spatial Strategy for Brent

CP SS7 Sustainable Communities

Planning policies will ~~ensure that development is~~ *contribute towards achieving* sustainable *development* by:

- optimising the use of previously developed land and vacant or underused buildings
- requiring a high quality of design to facilitate higher density development
- ensuring that development occurs in locations that are ~~currently, or are planned to be~~ , accessible by public transport, walking and cycling
- ensuring that development takes account of the capacity of existing or planned infrastructure, including public transport, utilities and community infrastructure, such as schools, health, community facilities, open space and leisure.
- taking account of to the physical *and environmental* constraints on the development of land, including, for example, flood risk *and drainage capacity,* *and air quality and noise pollution.*
- ensuring that no significant harmful impacts occur to the environment, to peoples health or to cultural *and historic* assets or that such impacts are acceptably mitigated
- minimising the use of energy and water, minimising waste ~~and~~ ~~use of the right materials~~ ~~ensuring the use of sustainable materials~~;
- *ensuring an appropriate mix of dwellings that meet Brent's and London's needs*
- *taking into account the impacts on natural resources and promoting the use of more sustainable materials* (deleting "and ensuring the use of sustainable materials" from the current last bullet)
- *ensuring that development incorporates green networks as an integrated part of the wider open space network*
- *recognising the value and need to enhance the waterways and waterbodies in the borough and promoting the principles of the Blue Ribbon Network*

Alternative options not selected

CP SS7 Sustainable Communities

There is no alternative to this general approach as it is a central plank of Government policy for sustainable development.

5.5 Local Benefits

5.5.1 In promoting regeneration through growth there must be significant tangible benefits for the local community, and it is important that new development enhances the environment locally rather than having an adverse impact, through, for example, public realm improvements. Development should be aimed at enhancing the quality of life for all of Brent's diverse communities. *Key infrastructural requirements of development are dealt with in policy CP SS6.*

5. A Spatial Strategy for Brent

CP SS8 Meeting Local Community Needs

The needs of both existing and new communities, such as for community facilities, shops, leisure facilities, etc. ., should be met by development. The Council will carry out appraisals of the key growth areas to ascertain local community needs. Such needs will be met either directly or cumulatively by securing contributions from individual schemes. This could include improvements to the public realm, community facilities, schools, health facilities, new sports provision, public open space, training, child care facilities, public transport provision, etc.

Alternative options not selected

CP SS6 and CP SS8 Infrastructure to Support Development and Local Benefits

An alternative option is to allow for major new development and the associated population growth without requiring provision of supporting infrastructure on development, but to allow infrastructure provision to catch up at a later date. This could not be sustained because it would lead to insufficient school places, health facilities, etc. to meet needs and would result in increased congestion on transport systems with the consequential impact on the environment and local amenity through, for example, poorer air quality.

5.6 Protection and Conservation

5.6.1 As well as areas where growth and change can be focused and encouraged, there are also extensive parts of the Borough that need to be protected and conserved. This is not to say that change is inappropriate but that where the character of particular areas is valued then this should be retained and enhanced if possible. This is particularly important for the borough's 22 designated conservation areas. Policies detailing the areas that will be protected and the criteria that will be used to protect key suburban neighbourhoods will be set out in detail elsewhere in the LDF. Detailed guidance on how new development should fit in within existing neighbourhoods will be set out in detailed SPD. This guidance will also consider how higher buildings can be appropriately accommodated within the borough.

5.6.2 Because open space is generally limited in the borough, and extensive parts of the Borough have not got even reasonable access to public open space, there should also be a presumption against any development of open space. Areas of nature conservation value should not be under threat from new development. A growing population will also need new and improved open space.

CP SS9 Protecting the Built and Natural Environment

The quality and character of the borough's built and natural environment will be protected and enhanced, and new or improved open space and nature conservation value will be provided to meet existing deficiencies and, in particular, the needs of a growing population. ~~There will be a presumption against Development~~ will not generally be permitted on the borough's open spaces. The character of high quality neighbourhoods will be protected from inappropriate development. New development will pay due regard to the design and scale of existing quality neighbourhoods.

5. A Spatial Strategy for Brent

Alternative options not selected

CP SS9 Protecting the Built and Natural Environment

An alternative approach would be to have less protection of those open or built up areas that are valued in the borough to varying degrees. Such an approach would lead to greater loss of the borough's existing character, its open areas and its biodiversity which would substantially reduce the borough as an area in which to live or work and would be contrary to the wishes of the vast majority of the local community.

5.7 Implementation

5.7.1 In order to bring forward development the Council will need to be pro-active in assembling sites and areas for development and in using the full range of its powers to effect positive, regenerative change and housing growth. It will carry out this work with a wide range of governmental, voluntary and statutory partners in close consultation with local communities.

CP SS10 Implementation

The Council will , when appropriate, use its Compulsory Purchase Powers to assemble sites. Where new development is likely to result in significant impacts upon the local area, ~~It will also bring forward S106~~ obligations will be sought to mitigate against these impacts, as detailed in the Supplementary Planning Document (SPD) on Planning Obligations.* This will include standard charges together with the allocation of sites and the preparation of SPD and Area Action Plans to help achieve its strategic planning aims.

*see glossary

Alternative options not selected

CP SS10 Implementation

An alternative option is to take a less pro-active approach to implementation of the strategy. This would result in a less sustainable approach as for SS6 and SS8 above.

6. Promoting a Quality Environment



6. Promoting a Quality Environment



Cambridge Gardens, Kilburn

6.0.1 The quality of Brent's environment affects every resident, worker and visitor to the Borough. An attractive, healthy and well-functioning environment makes people more satisfied with their surroundings, promotes well-being and contributes to a strong local economy. This means that people are less likely to leave Brent to live, work or shop elsewhere. A 'quality environment' is the outcome of many different factors and their interplay but, for the purpose of this section of the Core Strategy, these can be broadly classified into three primary categories; built environment, natural environment and environmental protection.

6.0.2 Brent's built environment, including roads and railways, covers most of the Borough's area, occupying 83% of the land in Brent. Housing accounts for over 75% of Brent's buildings. Brent's very diverse townscape encompasses individual buildings of such architectural and historic interest to merit 'listing,' to ensure their retention, and areas where the grouping of buildings is collectively of such quality as to warrant their 'conservation'. A key objective of the LDF is to protect the existing attractive built environment. But Brent also has substantial areas where the townscape is at best indifferent. Redevelopment schemes in such areas could substantially contribute towards a more attractive environment providing they are well designed and constructed using high quality materials, which minimise the use of scarce resources, energy and water consumption.

6.0.3 Brent's natural environment accounts for less than a fifth of the Borough's land area but its open spaces, water courses and wildlife habitats make a very valuable contribution to the quality of the environment. Brent's very wide range and size of green and blue (water) spaces have many functions, ranging from providing essential breaks in an otherwise, unbroken townscape, affording pleasant vistas, offering opportunities for recreation and sports activities and preserving wildlife habitats. Ensuring the continuation of these diverse contributions towards maintaining the quality of Brent's environment requires a general presumption in this draft LDF against their loss through inappropriate development.

6.0.4 Brent's environment, and the quality of life of its residents, workers and visitors, is endangered by a number of threats, mostly stemming from the impact of people's uncontrolled activities. Responding to these requires strong environmental protection policies; particularly to reduce air pollution, which is not only unpleasant but can seriously damage health. Allowing development on natural flood plains could even result in the loss of life from sudden floods. Effective waste reduction and waste management policies are also important in protecting the environment.

6.0.5 Environmental quality is also endangered by another threat, whose potential dangers have only been very recently, if belatedly, recognised, 'climate change'. Every environmental aspect which contributes to the present quality of life in Brent is threatened by climate change; rivers and streams will be more likely to flood; more frequent and lengthier droughts will kill many trees, plants, wildlife and even threaten the safety of buildings through subsidence; rising temperatures will lead to such a demand for air conditioning as to very substantially increase air pollution. These risks will increasingly threaten environmental quality unless development adapts to these threats, for example, by not building in flood plains, by planting hardier trees and shrubs in landscaping schemes and, most importantly, by designing sustainable buildings so that they do not require artificial air conditioning and air cooling systems to such an extent where summer energy use is greater than the winter heating requirement. Climatic change adaptation and mitigation measures to ensure sustainable development is crucial to promoting a quality environment in Brent for both current residents and future generations.



Welsh Harp (Brent Reservoir)

6.0.6 The following sections detail the core policies to ensure the achievement of the above strategic objectives. These core policies provide the thematic framework for the more detailed development control policies.

6. Promoting a Quality Environment

6.1 A Better Townscape - By Design



The Salusbury, Queens Park

6.1.1 Design is not just about the appearance or style of buildings. It is about how spaces are organised to achieve the best relationships and functioning of activities, and how this creates a sense of well being, commercial efficiency, community cohesion and a 'sense of place' –local identity. An individual building may achieve internationally recognised levels of *visual* harmony and elegance, but it must still relate to other buildings and the spaces in its particular location, and must serve people well. Whether the general public and local community actually use the building's interior or not, they are still affected by the way its internal layout allows interactions with the street, the quality of its landscape design, and how this contributes to the public realm.

6.1.2 The suite of new urban design policies, introduced in Brent's 2004 Unitary Development Plan, have enabled the Council to improve design and to refuse the worst schemes. There have been some notable successes in achieving exemplary design quality.

A Spatial Design Strategy

6.1.3 Although a high quality of design is expected in all parts of the Borough, limited resources mean there is a need to consolidate particular design attention on the areas where the quality of the environment is currently below the standard local community rightly expect of their area, as well as in the proposed new Growth Areas to ensure new development is designed and constructed to the highest standards. Brent's Spatial Design strategy will take an holistic view of the requirements in these areas, and ensure appropriate development and design guidance is produced to ensure an environment Brent can be proud of.

6. Promoting a Quality Environment

CP UD1 Spatial Design Strategy

A high quality of urban design is expected in development proposals throughout the Borough. Particular regard will be had to the design of schemes within the Borough's 'Growth Areas', in 'Areas of Low Townscape or Public Realm Quality', as well as Brent's 'Transport Corridors & Gateways'.

Development proposals in these areas will be expected to:

- a. Significantly enhance the character of the local townscape and public realm within Areas of Medium-high Townscape Quality – being disciplined by **regard should be had**, however, by **to** existing building lines and the overall scale of the area, **unless there are good planning or urban design reasons for deviating from these**.
- b. Make efficient use of sites with high levels of public transport accessibility, reflected in a sustainable intensity and mix of development –however, higher densities will depend on quality of design, and will only be permitted if the design is of an exemplary or exceptional standard;
- c. In Areas of Low Townscape or Public Realm Quality, to have an independence of form and design, creating where appropriate, new compositions and points of interest –making a positive design statement, including a creative use of space and materials; and
- d. Be consistent with any approved Development Framework for the Growth Area, and
- e. Make an on-site, or in-lieu, contribution towards implementation of key design or infrastructural measures in the Framework, commensurate with the scale of the proposed development.

The Council will produce, in collaboration with its partners, Development Frameworks for Growth Areas, Areas of Low Townscape or Public Realm Quality, and the Transport Corridors & Gateways.

A key consideration in assessing schemes will be the ability of applicants and their project team to commit to Brent's Design Protocol (**See Policy CP UD2 below**) for delivering the required quality as set out above and in other policies below, to ensure the design standards of approved schemes are implemented.

“What Happens After Permission is Granted?”

6.1.4 A key factor which has impacted negatively on the delivery of higher quality design schemes on the ground, relates to the fact that the Planning system mainly interfaces with design at relatively early stages of the development procurement process.

6.1.5 As a result, after consent is granted, the design quality of many approved schemes often gets eroded during the detailed specification and construction stages as budgets are squeezed –and a mediocre or much poorer quality scheme is built. The public and local community are let down and have to live with the consequences. Their confidence and trust in the outcomes of planning and development is lost and is difficult to regain.

6.1.6 For these reasons, and due to the levels of projected growth that will occur in the Borough over the next decade, it is crucial for the spatial design strategy in Brent to significantly raise not only the quality of design proposals submitted, but also, to ensure that these design improvements are actually delivered on the ground.

An Integrated, Implementation-focused Approach

6.1.7 A stricter and more integrated approach is, therefore, being adopted –a 'Design Protocol' that will:

- Target the 'Growth Areas' and other Priority Areas, for special design attention;
- Integrate a number of existing and new mechanisms (e.g. Pre-applications, Design Statements),
- Ensure greater clarity of its expectations (e.g. through site design briefs, guidance, frameworks),
- Provide incentives for developers (e.g. higher end of intensity range for exceptional design); and
- Provide incentives for architects / designers (e.g. use by Brent of its own/partners' Approved Lists or Competitions)
- Subject major schemes to design review before consent is granted (Review Panels)

6. Promoting a Quality Environment

- Require developers to commit to the specific design measures / specifications proposed (e.g. Conditions / S106)
- Condition consents to provide pre-commencement evidence that procurement methods to be used can deliver quality outcomes
- Ensure schemes are subject to a review after construction (Independent Monitoring);
- Rigorously enforce against material deviations / non-compliance which reduce design quality; and
- Be more proactive in seeking external recognition for excellent schemes (e.g. Awards)

CP UD2 Design Delivery Protocol

The Council will establish a Design Delivery Protocol. Significant development proposals within the Borough's Growth Areas, Areas of Low Townscape Quality, as well as Brent's Transport Corridors and Gateways, will be required to adhere to this Protocol.

Conditions incorporating its principles and procedures will form part of any planning consent.

Significant developments are those on sites of 0.3 hectare or more; 1,000 sqm floorspace or more, 10 or more residential units, sites likely to have a significant impact on the public realm, major new regeneration projects, and sites affecting the setting of listed buildings.

Key elements of the Design Protocol methodology will include:

- a. A pre-application matrix showing how due account is taken of contextual issues & officer advice;
- b. The submission with applications of a comprehensive Design Statement (based upon a format and contents set out in SPG4 and any revisions) clearly setting out the scheme in its context, the design rationale / principles, a schedule of specific design measures integral to the scheme, and the main specifications / their selection criteria,
- c. The use of reputable and/or appropriately skilled architects or designers from a Council or CABI Approved Listing of those who have produced quality work within Brent; or from the RIBA Client Service's recommendation based on the Council's quality criteria;
- d. Agreement to facilitate subjecting the scheme to a Design Review Panel;
- e. Conditions based on the Design Statement, and requiring submission prior to commencement, of detailed specifications for Council approval, demonstrating that approved design quality standards will be met; and
- f. Ensuring an appropriate procurement strategy is put in place for cascading design quality requirements through the project and construction teams; and
- g. Submission of an Independent Post-construction Quality Report, as a basis for enforcement action to be taken in the event of non-compliance with approved design standards.

6. Promoting a Quality Environment

Alternative options not selected:

CP UD1 Spatial Design Strategy

The alternative to this policy approach is to continue the current disparate policies dealing separately with the 'Areas of Low Townscape Quality'; the 'Transport Corridors & Gateways' and other priority areas.

The current approach has had some positive effect in terms of negotiating for design improvements in proposals within these areas, but this has been ad-hoc and limited in scope. It has not been effective in securing contributions for infrastructure improvements.

In view of the growth areas being proposed, continuing with the existing approach therefore means the full potential for achieving significantly higher design standards and public realm quality is unlikely to be realised.

CP UD2 Design Delivery Protocol

The alternative to introducing a delivery methodology (protocol) is NOT to have one. It means continuing with the existing situation of outcomes on the ground, which do not always reflect the quality that was initially intended.

The local community would be unlikely to be confident about the Council's ability to ensure the quality townscape and public realm needed to help contribute to raising their quality of life, and enjoyment of their locality.

The opportunity to use the proposed growth which is inevitable, to help regenerate areas in the borough, would be lost.

6.2 Towards a Sustainable Brent, 2020

The Climate is Changing - 'Future-Proofing' Our Borough

6.2.1 The Council will lead by example, through assessing the climate change *mitigation and* adaptation requirements of the Borough, developing a ~~strategy~~ *programme* for meeting them through ongoing development, and integrating these with its *emerging* own Carbon Management Implementation ~~Plan~~ *Strategy*, *and* with further measures such as:

- purchase of green electricity, use of energy efficient vehicle fleets, installation of renewably powered street furniture, increase energy efficiency, use of renewables and CHP in its own buildings;
- establish a source of alternative clean fuels for its service vehicle fleet, including refueling / recharging infrastructure around the borough; and
- help provide where feasible, through public sector buildings, an anchorage heat load for community heating networks

6.2.2 *Guidance on the wider types of measures involved, is provided by the GLA publication 'Adapting to Climate Change:a Checklist for Development'.*

6. Promoting a Quality Environment

CP SD1 Climate Adaptation Infrastructure

An 'holistic' approach will be adopted towards developing Brent's Climate Adaptation infrastructure. The Council will produce in collaboration with its partners, a 'Climate Adaptation & Carbon Management' *Strategy Programme* during the Plan-period.

This will take a Boroughwide view of embedded energy generation requirements to ensure security of supplies, particularly for key services, and the need to co-ordinate the incremental provision of these, along with a 'sustainable urban drainage' and 'sustainable waste management' infrastructure from ongoing development activity in Brent (See CS ENV1).

A key development and regeneration consideration will be the ability of design proposals to enable future connectivity between related sustainable infrastructure systems within the Borough.

National & Regional Targets:

6.2.3 *Within individual developments, the use of sustainability principles during the design, detailed specifications and demolition or construction of buildings and external spaces, are a major determinant of whether sustainable development is actually achieved on the ground. Sustainable design and construction thus, influences how people can manage their operational impacts on sustainability. Particular UK and regional targets for mitigating climate change are indicated below. Brent is expected to contribute towards achieving these .*

1. UK 20% Carbon emissions reduction (on 1990 level) by 2010, & 60% reduction (on 2000 level) by 2050
2. UK to generate 10% of electricity from renewable energy sources by 2010.
3. UK to generate 20% electricity from renewables and pursue policies to achieve this by 2020.
4. 15% CHP by 2010

Specific London Targets

6.2.4 The Mayor's Energy Strategy estimated the level of renewable technologies needed across London. When divided between the London Boroughs, these amounted to a minimum for each Borough of:

- 213 domestic photovoltaic systems
- 7.5 PV installations on public and commercial buildings
- 15 small wind generators on public/private sector buildings
- 760 domestic solar water heating schemes,
- 61 solar water heating schemes at swimming pools,
- anaerobic digestion plants with energy recovery; and
- Biomass-fuelled combined heat and power plants

Brent Objectives

6.2.5 Small scale (micro-generation) projects provide a limited but valuable contribution to outputs of renewable energy and meeting energy needs. To meet obligations, targets include:

- Set targets, consistent with London's, for local generation of renewable energy
- Other measures to meet Brent's contribution to minimum power generation target from renewable energy
- Eradicate 'fuel-poverty' in Brent by 2018
- Mainstream sustainability in the Borough through planning powers, Low-carbon regeneration and working with schools to reduce Carbon emissions
- Create a level playing field for businesses / developers
- Stimulate sustainability sector & local employment opportunities

6. Promoting a Quality Environment

6.2.6 *The following policy approach aims to ensure an integrated sustainable design and construction approach is adopted within all development in the Borough, to ensure achievement of the above, and other (e.g. waste) targets.*

CP SD2 Sustainable Design & Construction

All development is expected to contribute towards achieving sustainable development and , **including** climate change mitigation **and adaptation** in Brent. Particular regard to climate adaptation measures (See CS ENV1) will be expected of proposals in, and adjacent to, flood-risk areas (**as** defined on ~~Proposals Map~~ **by the** Environment Agency) and in the Borough's Growth Areas.

A 'Sustainability & Climate **Mitigation and** Adaptation' Strategy is required for new development, extensions and refurbishment proposals. This should demonstrate that all the following objectives **matters** (relevant to the nature and scale off the proposal) have been adequately addressed at the design stage:

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

The strategy should include an appraisal of the proposal using the Brent / London Checklist, and / or an alternative, recognised methodology. Major schemes are expected to achieve 'Excellent' on these assessments ~~unless extenuating circumstances make this unfeasible~~. Other schemes will be expected to achieve a minimum (equivalent) rating of 'Very Good'.



Rainwater collection

6.2.7 *Also important in mitigating the effects of climate change is the potential trip generation of new development. It is important, therefore, that regard is also had to general policies on sustainable development, particularly policy CP SS7 and on transport (CP TRN1 and CP TRN2).*

Implementation

6.2.8 *The Council's* Sustainability Checklist in Supplementary Planning Guidance note 19 will be **updated and** required to be submitted on development. Also, guidance will be provided on the format and content of submitted Sustainability Strategies. S106 Benefits will be sought and a monitoring regime established.

6. Promoting a Quality Environment

Alternative options not selected:

CP SD1 Climate Adaptation Infrastructure

The alternative to this policy is not to have a Borough strategy. This is not a viable option for two reasons; firstly because each local authority is expected to put in place preparedness measures to deal with climate change contingencies. Secondly, the Council cannot reasonably expect developers to demonstrate adaptation measures in their development proposals, while failing to set an example in its own operations. In addition, there are potential synergies and economies in taking a strategic approach to these issues -ensuring that opportunities from ongoing development are harnessed along with the Council's own efforts to provide an integrated strategy to enable Brent prepare effectively for the challenges ahead.

CP SD2 Sustainable Design & Construction

There is no viable alternative to this policy approach. The Planning & Compulsory Purchase Act 2004 and Government planning guidance in PPS1 have defined the purpose of the planning system as being to deliver sustainable development. The London Plan has existing policies on this issue, and is proposing alterations for more detailed policies, and Brent's LDF polices must be in conformity with the London Plan. It is also reasonable to combine sustainable development and climate change adaptation requirements as they are related and there are some solutions common to both.

6.3 Environmental Protection



Walled Garden, Roe Green Park

6.3.1 The land, air and water in the borough are vital assets and important natural resources which should be preserved and enhanced to achieve an attractive and healthy borough for everyone. Planning plays an important role in the protection of the environment through guiding development to locations that will not harm the environment or local amenity, preventing potentially polluting development or requiring mitigation measures to minimise any possible negative environmental impacts. The following section sets out our core planning policies which aim to protect the environment of Brent and work towards reducing the potential impacts of climate change locally. The policies focus on air quality, noise, contaminated land, amenity, water quality, flooding and energy generation, other sections of the plan deal with the protection of open spaces and biodiversity in general.

Climate Change

6.3.2 The potential impact of climate change on the global environment and our economic, social and environmental well being is now well documented. The target set at Kyoto for the UK is to cut greenhouse gas emissions to 12.5% below 1990 levels over the period 2008- 2012. Further to this, the Government has set a target of cutting CO2 emissions to 20% below 1990 levels by 2010. These are very challenging targets, and require changes in the way we all live and of particular relevance to planning, the way we use land. The planning process has a significant role to play in addressing and mitigating

the potential impacts at a local scale through promoting sustainable development.

6. Promoting a Quality Environment

6.3.3 Flood risk is an increasingly important issue associated with climate change and its consequences. Sea levels are predicted to rise and local climate conditions are expected to change potentially increasing the flood risk of susceptible areas. In urban areas such as Brent, the risk of flooding is exacerbated by the increase in hard surfaces in recent decades, through concreting /paving gardens, patios, extensions and driveways of individual homes, which cumulatively increase surface run-off in the water system and reduce the amount of land which is able to absorb water. Policy DC ENV6 addresses this issue and seeks to mitigate the potential future risks of climate change and flooding through the control of development in flood risk areas.

In addition to this, draft PPS25 requires local authorities to produce Strategic Flood Risk Assessments to inform the production of local development documents and planning applications and guide development away from existing and potential flood risk areas. Flood risk assessments will also be required for applications in flood risk zones 2 and 3 (as identified by the Environment Agency and on the proposals map) and a brief FRA is required for all development proposals over 1Ha. The Council will examine the option of undertaking an SRFA with other West London Boroughs or will undertake a borough SRFA if necessary.



Brent Reservoir

6.3.4 The efficient use of energy and the promotion of renewable energy are also vital climate change adaptation **mitigation** measures and will help to meet the Governments renewable energy and carbon emissions targets. Policy DC ENV 7 promotes the use of renewable energy in the borough and restricts other methods of energy generation to locations where there is a demonstrable need. To demonstrate the feasibility locally of exemplary best practice, and to comply with the obligation placed on Boroughs in the Mayor's energy strategy, a minimum of two sites will be allocated for zero carbon developments within the Site Specific Allocation document.

6.3.5 The council will take an holistic approach to climate change, and will seek to ensure the security of supplies of key services such as water to new developments (see policy SD1). Developers should consult "Adapting to Climate Change a checklist for development" published by the GLA in 2005 for detailed information on adaptation measures that can be incorporated into developments. These measures together with the policies seeking to reduce the dependence on car travel, promoting the use of alternative fuels for transport and climate proofing all policies and developments will go some way to adapt to the changing climate. Policies in this section, the sustainable development section and the transport section, all seek to address these issues specifically. Throughout the whole plan policies seek to fulfill these objectives.

6. Promoting a Quality Environment

CP ENV1 Climate Change

The Council will expect development to take account of the potential impacts of climate change in any new development through mitigation measure such as:

- minimising flood risk;
- [promoting the renewable energy generation within developments and at a larger scale \(see policy DC ENV 7\);](#)
- [seeking to reduce the need to travel, and in particular journeys by private motor car \(see policies DC ENV 1\);](#)
- [promoting the use of alternative fuels for transport \(see policy DC ENV 1\);](#)
- seeking to reduce harmful emissions from new development and refurbishments ([see policy CP SD2](#)) .

and, through adaptation measures such as:

- [minimising flood risk \(see policy DC ENV 6\)](#) ;
- promoting renewable energy;
- seeking to reduce dependence upon car travel;
- promoting the use of alternative fuels for transport;
- climate proofing all policies and developments.

Protecting the Environment



Demolition of building

6.3.6 Development in the borough both individually and cumulatively has environmental implications in terms of resource depletion and possible direct or indirect pollution such as impacts upon air quality or increased surface water run-off which increases the risk of flooding.

6.3.7 Paragraph 2 of PPS23 –states that ‘any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to impacts on health is capable of being a material planning consideration, in so far as it may arise from or may affect any land use’. The role of planning is complementary to that of the Environment Agency and also the Environmental Health Department within Brent Council, whom have the power to protect and enhance water courses, to prosecute polluters and promote nature conservation and recreation.

6.3.8 The following core policy CP ENV 2 and complementary development control policies DC ENV 1-7 aim to prevent and mitigate any significant potential pollution impacts arising from development in terms of air quality, noise & vibration, smell, light, dust and visual pollution, land contamination and on water quality. Flooding is covered in this section at policy DC ENV 6 as it is a significant risk to the environment of the borough. [In addition policies CP SD1 and CP SD2 expect the design of development to contribute towards achieving sustainable development and pollution control.](#) The Council will encourage

pre-application discussions where it is considered that any of the issues listed above may become a problem arising from the proposals.

6. Promoting a Quality Environment

CP ENV2 Protecting the Environment

The council will seek to protect **and enhance** the environment and amenity of the borough through:

- i) using its powers to prevent potentially polluting development arising from or affecting any land use ([see policies DC ENV 1 -3 & 5](#));
- ii) encouraging development that ~~has a positive impact on~~ **enhances** the **quality of the natural and built** environment;
- iii) [seeking the remediation and re-use of contaminated land \(policy DC ENV4\)](#) ; and
- iv) encouraging development that uses ~~resources sustainably~~ **sustainable design and construction techniques (see CP SD2) and makes efficient use of resources** .

Development Control policies DC ENV 1-7 seek to achieve these aims. Developments will be expected to meet the requirements of these policies **and to achieve best practice in terms of sustainability wherever possible.**

Alternative options not selected:

CP ENV1 Climate Change

An alternative to mitigating and adapting to climate change would be to allow commercial judgement and innovation to govern any climate change mitigation measures or adaptation in development. This strategy would mean that Government guidance would be relied upon, which is quite detailed on some issues. However, experience suggests that commercial forces alone will not address climate change, and Government guidance advises the inclusion of policies on climate change at the local level.

CP ENV 2 Protecting the Environment

An alternative option for the protection of the environment could be to develop a more prescriptive policy. This was not considered appropriate at this level, as development control policies, and supporting SPDs will provide the detailed level of guidance.

6.4 Enhancing Open Space and Biodiversity



Welsh Harp

6.4.1 [Open space is largely a place where people can relax, exercise, play and enjoy being amongst nature. Often it is also a place where wildlife can breed and species can flourish without undue interference from humans. Through their provision, they contribute to the health and well being of people and wildlife, and provide an attractive respite within the built up urban environment.](#)

6.4.2 [Open space includes public open space, private gardens, sports and recreation grounds, school playing fields, allotments, outdoor play areas, urban green space, burial grounds and waterways. Whilst it is largely a place of recreation, sports and recreational facilities are dealt with within the Culture, Leisure and Tourism Chapter. Particularly important open spaces are areas of Metropolitan Open Land, Green Chains and the Blue Ribbon Network for their open character and linking of strategic open space, while Sites of Special Scientific Interest, Local Nature Reserves and Sites of Important Nature Conservation are recognised for their importance to specie and wildlife habitats.](#)

6. Promoting a Quality Environment

6.4.3 Even though open space forms an important element to the urban environment, it is often faced with strong development pressure, due to its attractive development potential over brownfield sites, and demand for other priority uses. Pre 1998 approximately 48ha of open space (mainly sports grounds) were lost to other uses, and Brent is now deficient in many different types of open space, with an uneven distribution throughout the Borough. Some open spaces have also fallen into decline and neglect, and it is recognised that these require better investment and management to bring them back into good use.

6.4.4 The plan therefore aims to secure the retention of open space now and in the future, for the biodiversity of all species and for outdoor recreation and amenity use. Inappropriate development, which is considered to be any development harmful to the use or purpose as open space, will be opposed unless very special circumstances apply and where benefits far outweigh its loss. Development which is ancillary to the main use of the site as open space, or are essential facilities for outdoor sport and recreation, cemeteries, and other uses which preserve the openness of open space are generally considered appropriate.

6.4.5 All open space, including public open space, private gardens, sports grounds, playing pitches, allotments, outdoor play areas, urban green space, cemeteries and waterways will be secured for the biodiversity of plants and animals and for outdoor recreation and amenity use. Any development that takes place should be for the benefit and enhancement of open space use.

6.4.6 As well as protecting existing open space there is a need to maintain and enhance the quality of open space. Brent has two public open spaces which have been awarded the Green Flag Award in 2006 which is the national standard for parks and open spaces, being Roundwood Park and Gladstone Park. Queens Park, owned and managed by the City of London also has been awarded a Green Flag Award. The quality of open space will encourage residents and visitors to use them for recreation, leisure, amenity and health and well being.

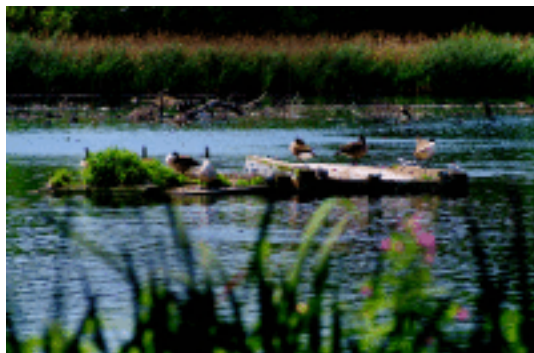
6.4.7 Metropolitan Open Land, Green Chains, and the Blue Ribbon Network are classified as being of London importance for their open character and linking of strategic open space. Sites of Special Scientific Importance, Local Nature Reserves and Sites of Important Nature Conservation value also require individual protection due to their strategic importance for specie and wildlife habitats.

6.4.8 In addition to protecting and enhancing open space, there is a need to promote and enhance biodiversity, particularly habitats of important nature conservation value and species listed within the Mayors Biodiversity Strategy and the local Biodiversity Action Plan. Protecting habitats and recognising important species are significant to the future survival of biodiversity within the urban environments. Enhancing new areas of open space for biodiversity should also be considered through good landscaping and design, particularly in areas that are deficient in Nature Conservation (i.e. >1km from sites of Accessible Metropolitan or Borough (Grade 1) Nature Conservation Importance) *with preference given to the use of native species* .



Neasden Recreation Ground

6. Promoting a Quality Environment



Birds on Brent Reservoir

6.4.9 Providing good public access to areas of open space, will help increase activity and raise awareness and appreciation of nature. The Metropolitan Walk Network links areas of public open space while promoting walking as a recreational activity.

6.4.10 New areas of open space should be promoted for benefit, enjoyment, health and wellbeing of Brent's residents, visitors and wildlife. Where development would result in additional pressure on existing public open space, particularly where public open space is not easily accessible by foot, cycling or public transport, to a proposed development, on-site provision or contributions towards new or improved public open space, nature conservation and play facilities will be required. Usable on-site amenity space will also be required within new residential developments. This will help increase the quality of life for people living and working in the area

balanced with the enhancement of habitats and biodiversity within our urban environment.

CP OS1 Protection and Enhancement of Open Space and Biodiversity

All open space, private and public, of recreational, amenity or nature conservation value, will be protected from inappropriate development, particularly areas designated to be of strategic or borough importance, and those which contain important habitats for wildlife species. Enhancement of open space, including new or improved provision, will also be sought through all new development where additional pressure on open space and outdoor play facilities would be created.

All open space will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well being of Brent's residents, visitors and wildlife. Support will be given to the enhancement and management of open space for recreational and amenity use, and the improvement of sites for biodiversity and nature conservation. New or improved provision will be sought in areas of deficiency, and where additional pressure on open space and outdoor play facilities would be created.

CP OS2 Promotion of Biodiversity and Nature Conservation

Biodiversity of all plants, animals and species will be promoted, and priority given to habitats and species listed within the Regional or Local Biodiversity Action Plan. Existing habitats will be protected, including those designated to be of important nature conservation value, and enhancements will be sought in new developments. Public access, particularly the routes and paths that form the Metropolitan Walk Network, will be encouraged for a wider appreciation of nature and wildlife.

6. Promoting a Quality Environment

Alternative options not selected

CP OS1 Protection and Enhancement of Open Space and Biodiversity

a) To only protect MOL, POS and areas of National, Regional or Local significance, allowing the loss of other open space - Allowing development on non designated open space areas such as private sports grounds and allotments, would exacerbate pressure on existing public open space, and reduce overall opportunities for sport and recreational activity. Other non designated open space areas also have an important role to play in maintaining biodiversity and balancing the health and well being of people, particularly young people who need access to play and recreation for their physical growth and development.

b) Protect MOL, POS, and areas of National, Regional or Local significance and allow the loss where it is not in a deficiency area and surplus to requirements - Assessments of provision and demand for open space demonstrate that there is a deficiency in the borough of public open space, playing fields and remaining allotments are well used. It is known that Brent is a third below the recommended National Playing Fields Association standards for open space area per population, and deficiencies are not evenly distributed. In addition public consultation has shown that most people wish to provide further protection for allotments and playing fields than currently exists.

CP OS2 Promotion of Biodiversity and Nature Conservation

Not to promote biodiversity or to protect identified habitats and species

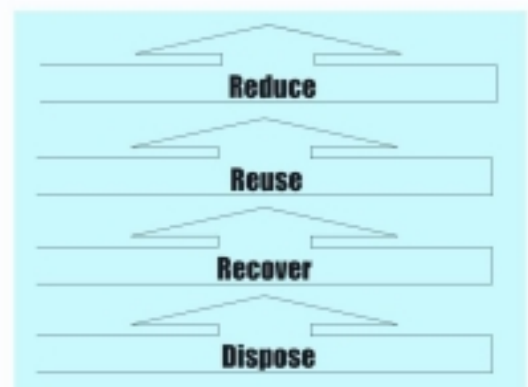
This would be contrary to the Mayors Biodiversity Strategy and Best Practice Guidance of the London Plan for biodiversity. Not preserving biodiversity or habitats would result in an imbalance of economic and social elements with an apparent loss of nature. Public consultation showed that most people thought that areas of wildlife conservation should be protected.

6.5 Dealing with Waste

6.5.1 The Council has a responsibility to make sure that policies for waste comply with Government guidance set out in PPS10, the London Plan and the Brent Municipal Waste Management Strategy. Both require the presence of sustainable waste management facilities which enable and encourage the recovery and re-use of waste materials. This can be achieved by applying the Waste Hierarchy to all development materials, designs and plans (see also policy CS SD2 on Sustainable Design and Construction).

6.5.2 Additionally, under the Landfill Allowance Trading Scheme ('LATS'), Brent has an allowance set by Government for the amount of waste arisings that can go to landfill. This allowance will decrease each year until 2020 and covers all waste arising from the borough, regardless of its source. Developers, traders and householders are therefore expected to play their part in reducing overall waste arisings, and ensuring that all waste is managed toward the upper end of the Waste Hierarchy.

6.5.3 More sustainable means of dealing with waste have to be introduced to reduce the current amounts that are being sent to landfill. The Government have emphasised the importance of addressing, as a priority, the need for new facilities for waste management. Waste must be seen as a resource with disposal being considered only as the last option. There is also a need to ensure



Waste Hierarchy

6. Promoting a Quality Environment

that waste is disposed of as near as possible to its place of production. *Also, the need to minimise or recycle waste arising from demolition or development is addressed by policy CP SD2 and in more detail in the Development Control Policies document.*



Glass Recycling Bins

6.5.4 Requirements in terms of the number and type of waste management facilities have been established London-wide by the Mayor, but boroughs are expected to identify specific sites in their own areas to meet the need. It is estimated that by 2015 Brent will generate 394,000 tonnes of municipal, commercial and industrial waste *2% more than in 2005*. *As a constituent member of the West London Waste Authority (WLWA) Brent, along with Ealing, Harrow, Hillingdon, Hounslow and Richmond, will produce a Joint Waste Development Plan Document in order to deal with waste at a strategic West London level.*

6.5.5 Because dealing with waste is best planned at a wider than individual borough level, it is proposed that the planning be done jointly with other West London boroughs:

CP W1 Sustainable Waste Management ~~Facilities~~

Development and activities will be encouraged which support the minimisation of waste and the reuse of materials, and in particular abide with the delivery of the priorities of the waste hierarchy - which seeks first to promote the reduction of waste, followed by its re-use, then recycling and composting, followed by energy recovery, before finally accepting its disposal as a last resort.

Support will be for the provision of accessible and well-designed recycling facilities and recycling collection points. All new developments will need to make appropriate provision for recycling facilities and the collection of waste.

With respect to managing waste locally, the Council will have regard to the forecast waste arisings identified in the London Plan for the borough and the West London sub-region. ~~We~~ Brent and will work with the other boroughs that comprise the West London Waste Management authority to identify sites and to develop policies for the consideration of applications for waste management facilities.

Alternative Options - not selected

CP W1 Sustainable Waste management Facilities

To not follow the Waste hierarchy and to collect unsorted waste for landfilling instead. Since the LATS agreement has been introduced and space for landfilling is running out, this alternative is not feasible in the long term in terms of both practicality and cost.

An alternative option is For the borough to plan for waste management facilities on its own. Given that Brent is a member of the West London Waste management consortium which jointly decides how the constituent boroughs waste will be dealt with then it is sensible and appropriate to plan for facilities jointly.

7. Meeting Housing Needs



7. Meeting Housing Needs

Planning for More and Better Housing



Chalkhill Estate Regeneration

7.0.1 As Brent's current housing stock of 105,000 homes is clearly insufficient to meet its residents needs; over 4,300 households are in temporary accommodation; over 18,000 are registered on the Council's Housing Waiting List as needing more suitable and more affordable homes; and Brent has the second highest level of housing overcrowding in London. ~~The new~~ **Therefore**, the Plan needs to provide for substantially more new homes in Brent, in accordance with both Government strategy and the London Plan. And **to** ensure that these new homes better meet residents needs, particularly for affordable and family sized accommodation.

7.0.2 The Plan must ensure that all new housing is developed sustainably (ie) without causing harm to the environment and existing amenities, and is able to respond to future occupiers changing needs. This will require that the new housing is built on 'brownfield land' (land already developed) and designed and constructed so as to minimise the use of scarce resources, such as water and energy, provide a good residential environment and cope with future climatic change.

7.0.3 The following four core housing policies cover the crucial areas of housing capacity, sustainable housing development, a balanced housing stock and affordable housing provision. Collectively, they will enable Brent to provide more housing that better meets its residents very diverse accommodation needs **in compliance with** ~~New housing that will comply with the requirements of the London Plan, which is part of Brent 's statutory development plan.~~

Brent's Housing Capacity

7.0.4 Brent has been designated by the Government as a Housing Opportunity Borough on account of its potential capacity to provide substantially more homes. The Mayor of London undertook in 2004, with the assistance of Brent Planning Officers, a detailed Housing Capacity Study which determined that Brent has the capacity to provide an additional minimum of **9,146** ~~50~~ self contained homes in the period between 2007 - 2017, using only previously developed (brownfield) sites and existing buildings (ie) without developing on existing open space and green field sites. .

7.0.5 Although, ~~9,150~~ **9,146** additional homes appears to be a high target, it should be seen in the context that it will represent less than a one per cent annual increase in the current housing stock. And that planning consents, for schemes involving more than 10 homes, have already been granted for 6,774 homes (equivalent to 74% of this target); the vast majority of which will not have been completed before the start of the 2007 target monitoring period. Furthermore, a further 1,500 homes are to be provided through the approved regeneration strategy for South Kilburn.

7.0.6 The Mayor's Housing Capacity Study also estimated that Brent had the potential capacity to provide a further **1,000** non –self contained homes and should be able to bring back into residential use **1,030** vacant homes. The **1,000** non self contained homes target was derived by the Mayor from historical development trends, mostly for hospital staff and student housing schemes; which may or may not be replicated to such an extent in the future. And the **1,030** vacancies target stem from Brent's relatively high number of private homes (1,820) which have been vacant for more than six months. However, the reoccupation of such vacancies is a matter largely outside the control of the Planning system.

7.0.7 The Mayor has recently recognised (Proposed Alterations to the London Plan), that these non self contained and vacant targets should be separately monitored from the self contained target; inferring that Brent would not be expected to produce more than 9,150 self contained additional homes simply to compensate for not attaining the non self contained and vacant targets.



New Housing Old Kenton Lane

7. Meeting Housing Needs

7.0.8 The Mayor has also supported Brent's Housing Opportunity Borough stance that the implementation of Brent's potential housing capacity is very dependent on the provision of any necessary enhanced or new physical (eg, roads and transport) and social (eg, schools and health centres) infrastructure.

CP H1 Housing Provision

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

- a) Enabling the sustainable provision of an additional minimum of ~~9,150~~ 9,146 self contained, and ~~1,030~~ 1,000 non self contained, homes through new build, conversion, estate regeneration and change of use schemes on brownfield (previously developed land) sites between 2007 and 2017, in accordance with the London Plan Proposed Alterations (as informed by the London Housing Capacity Study 2004).
- b) Preventing any net loss of housing unless it is required to meet a regeneration objective or the provision of an essential community facility.

Attaining these additional housing targets will be dependent on the timely provision of any environmental, physical and social infrastructural enhancement required to prevent unacceptable overstress on existing provision and amenities. Developers will be expected to make ~~a a n-appropriate~~ contribution of an appropriate scale to the provision of required environmental, physical and social infrastructure .

The Council will regularly monitor the provision of new housing consents and completions in the Brent Annual Monitoring Report.

Sustainable Housing Development



Gallions Eco Park

7.0.9 Ensuring sustainable housing development in Brent requires that all sites suitable for new housing are developed so as to accommodate the number and types of homes most appropriate to the site's location and character maximising the number of new homes on all sites suitable for new housing without causing harm to the existing local environment and townscape and the amenities enjoyed by existing occupiers.

7.0.10 The appropriate number of new homes for a particular site (density) will be assessed in accordance with the illustrative London Plan Matrix, as elaborated in Supplementary Planning Guidance Note 17 (Design Guide For New Development, SPG 17). The appropriate type of new homes will be in assessed with reference to the site's potential capacity to best meet Borough housing needs, including family accommodation, in accordance with Policy CP H3 A Balanced Housing Stock.

7.0.11 The livability and long term capability of the proposed housing scheme to afford a safe and attractive environment for its likely residents will be a paramount consideration in determining the suitability of the site to satisfactorily accommodate the proposed numbers and types of home. Sustainable housing development requires ensuring that new homes are of sufficient internal size, with enough external amenity space, to provide a reasonable quality of accommodation and amenity provision for their occupiers. Particular consideration will be given to the site's capacity to provide the appropriate amenities, including external amenity space, required to ensure a satisfactory residential environment for family housing.

7.0.12 The built form of the proposed housing should at least complement the local environment and its built character, particularly in areas with well-defined high quality townscape. In areas of low townscape and public realm quality, the proposed residential development will be expected to enhance the local character. This strategy will require careful consideration of the suitability of any proposed high residential buildings. (normally over 25 metres) .

7. Meeting Housing Needs

7.0.13 Concentrating new housing development in areas with good public transport links will reduce the environmental problems caused by traffic generated pollution and congestion. Although, new housing is a major user of materials, energy and water. There is no reason why it cannot be designed and constructed so as to minimise the use of scarce materials and non renewable resources. It is very feasible to design and build new housing that will consume much less energy and water than older housing. Larger housing developments with their inherent 'economies of scale' offer enhanced opportunities to employ the most sustainable design and construction techniques, such as solar and photo voltaic panels for energy production and 'grey water' and sustainable urban drainage (SUDS) recycling systems.



BedZed

7.0.14 Sustainable housing development also requires ensuring that new homes are of sufficient internal size, with enough external amenity space, to provide a reasonable quality of accommodation and amenity provision for their intended occupiers.

CP H2 Sustainable Housing Development

The Plan seeks to ensure that all new housing is located, designed and constructed *to lifetime home standards* so as to :

- a) ~~Maximise the opportunities the site affords~~ Provide the number and types of homes most appropriate to the site's location and character, in accordance with the London Plan Density Matrix, in order to make the most efficient use of the site
- b) Complement and / or enhance the local environment / townscape.
- c) Promote travel efficiency so as to reduce the length of journeys between home, work, educational, shopping and leisure opportunities
- d) Minimise the use of non renewable resources *and generation of waste*
- e) Maximise energy and water conservation
- f) Provide a liveable safe and attractive environment for both new and existing occupiers by 'designing out crime', providing a reasonable level of amenities and employing high quality materials and landscaping

7. Meeting Housing Needs

Maintaining And Providing A Balanced Housing Stock



Church End

7.0.15 Brent's very diverse population means that it has a corresponding need for a wide range of accommodation sizes and types.

7.0.16 Ensuring sufficient family housing provision is a particular need in a Borough with the second highest household size in London and where 23% of the households are living in overcrowded accommodation. This problem is exacerbated by the fact that Brent is not providing sufficient new family housing, particularly for larger households, as over 75% of the housing completions between 1997-2004 have been 1/2 bedroom units.

7.0.17 Brent has also lost irreplaceable larger family accommodation through conversion and housing demolition and redevelopment.

7.0.18 These housing development trends therefore indicate the need to reconsider the current UDP definition of family accommodation, as comprising a minimum of two bedrooms, in favour of accommodation capable of providing at least three bedrooms on sites providing ten or more homes and in house conversions schemes. Family accommodation would not be required on sites where it **is** not possible to provide a **satisfactory** ~~reasonable~~ environment for young children.

7.0.19 Many Brent residents have mobility problems and require accommodation that is designed and constructed so as to be easily accessible either on foot or by lift. Brent has a particular shortage of housing suitable for those confined to wheelchairs. The London Plan requires that these mobility housing needs should be addressed through ensuring that all new homes are designed and constructed to Mobility Housing Standards and that 10% should be wheelchair accessible.

7.0.20 In addition to this range of self contained accommodation, the new Plan also has to make provision for those requiring non self contained accommodation, such as hostels for households without children and housing providing care and support, such as nursing homes.

CP H3 A Balanced Housing Stock

The Plan seeks to maintain and provide a balanced housing stock by protecting existing accommodation that meets known needs and ensuring that new housing appropriately contributes towards the wide range of Borough household needs including :

- a) An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) .
- b) Housing designed and constructed to meet 'lifetime homes standards'; 10% of ground floor units and those with lift access should be designed and constructed to wheelchair accessible/adaptable standards.
- c) Non-self- **contained** accommodation to meet identified needs
- d) Care and support accommodation for those unable to live independently

7. Meeting Housing Needs

Affordable Housing

7.0.21 As Brent has relatively high house prices but its residents have relatively low average earned incomes (£6,000 £14,357 lower than the London average of £41,759; Office of National Statistics 2006), the Borough needs at least 3,386 new affordable homes each year (Brent Housing Needs Survey 2004) to ~~satisfactorily~~ accommodate the needs of its households who cannot afford market purchase or rental . Although it will never be realistically possible to provide new affordable homes on anything approaching this scale, it should be possible to substantially increase the number of new affordable homes (249 in 2004/5), and hence better achieve the 50% affordable housing target, by reducing the current 15 homes site threshold to 10 units. This proposal would be in accordance with both the London Plan and evolving Government strategy.



Johnson Rd, Stonebridge

7.0.22 The London Plan also requires that new affordable housing should be provided in a 70%: 30% social rental housing and intermediate housing (such as shared ownership) ratio. This also accords with the Brent Housing Needs Survey finding that only 32% of those in priority housing need could afford intermediate housing and mostly only for the smaller (1/2 bed units). There is a clear presumption that affordable housing should be provided on-site.

CP H4 Affordable Housing Provision

The Plan seeks to increase the Borough's stock of affordable housing by :

- a) Protecting existing affordable housing unless it is required to meet a regeneration objective or provide an essential community facility
- b) Ensuring that new housing in suitable schemes on sites with a capacity of ten or more dwellings makes the maximum reasonable on-site contribution towards the Borough's target of 50% affordable new housing provision.

7. Meeting Housing Needs

Alternative options not selected:

CP H1 Housing Provision

Only potentially feasible option would be a higher housing target, as lower or 'stand still' targets would not be in conformity with the London Plan ([as proposed for alteration](#)), or generally accord with Government strategy. However, a significantly increased housing target may not be environmentally or infrastructurally sustainable. A significantly higher target would require substantial loss of employment sites and/or significant Greenfield housing development, involving the loss of open space amenity areas. Not requiring developers contributions to enable the necessary physical, social and environmental infrastructural enhancements would place an unreasonable new provision burden on existing residents and occupiers.

CP H2 Sustainable Housing Development

Ignoring sustainability issues would be contrary to the above strategies. More detailed sustainability implementation requirements may be deemed unduly prescriptive.

CP H3 A Balanced Housing Stock

To generally meet a narrower needs range would be contrary to London Plan and Council housing strategies.

a) Over 75% of the housing completions between 1997-2004 have been 1/2 bedroom units. This does not accord with Brent's demography and housing needs. Current definition of family accommodation as comprising a minimum of two bedrooms is not evidentially supportable, particularly in private sector. Hence, need to redefine family accommodation. As the proposed 30% three bedroom requirement would only apply to sites of ten or more units and would be further subject to site suitability, the overwhelming majority of units would still be 1/2 bedrooms to meet the predominant smaller household needs.

Retention of current two bedroom definition would not generate sufficient additional family accommodation. Higher bedroom size requirement, specified mix of 1/2/3/4 bedroom or application without regard to site suitability, could be regarded as unduly prescriptive.

b) To better meet the needs of household with mobility disabilities.

Omission of requirements would either not be in conformity with the London Plan or would require an empirical justification which cannot be evidenced.

c) & d) To recognise that there is a range of housing needs that cannot viably be met by the provision of self contained accommodation. Failure to make satisfactory enabling provision would ignore significant housing needs.

CP H4 Affordable Housing Provision

a) [Not generally protecting existing affordable housing would exacerbate the lack of affordable housing.](#)

b) A lower target, or higher threshold ([higher than the current UDP](#)) would not be in conformity with the London Plan and would significantly fail to address Borough housing needs. A higher target and/or lower threshold would better address Borough [affordable](#) housing needs. [However, a target higher than other London boroughs may not satisfy the 'reasonableness test' of the proposed Plan's 'robustness', while a lower threshold may generate difficulties in securing overall new housing delivery. _ but may not be financially viable.](#)

7. Meeting Housing Needs

8. Connecting Places



8. Connecting Places

Reducing The Need To Travel

8.0.1 In order to facilitate a growing population and economic prosperity, as well as improving the quality of life of the local community, transport connections [access to jobs, services and facilities](#) needs to be improved for all. It is also important, to help combat climate change and minimise adverse impacts, to reduce dependence on the private car by reducing the need to travel and by promoting walking, cycling and public transport [as viable alternative modes](#). The Council will seek, and lobby for, increased Central and Regional government funding for improved transport provision to facilitate growth and regeneration. [It is also important to integrate land-use and transport planning](#)

CP TRN1 Prioritising Investment & Promoting Non-Car Modes of Transport

Investment in transport infrastructure will be prioritised so that it meets the needs of the growth and regeneration areas identified above. Contributions will be sought from development to [promote public transport, walking and cycling](#) .modes of transport other than the private car.



Cycle parking outside Willesden Green Tube Station

8.0.2 Developments that generate significant travel demands should be located in areas where the distance needed to be travelled is minimised; for example, by locating housing close to employment opportunities or promoting mixed-use developments. In accordance with national and regional policy, the plan applies a sequential approach to the consideration of proposals for such uses so that only if no sites are available in town centres will they be permitted outside town centres.

8.0.3 Also, if development that generates significant numbers of trips (including housing) is located near to local facilities and work (through, for example, mixed use developments) then the need to travel can be reduced. One of the key aims of the Plan is to promote access by the whole community, and reducing the need to travel, through promoting developments with a mix of land uses, can help in this. The location of housing in relation to public transport is also important in determining whether people use a car for work

or leisure trips.

8.0.4 Policies on the location of development must be supported by policies that influence the means of transport used. Sustainable means of transport such as walking, cycling and public transport are promoted in the strategy so that the whole community can access new development.

CP TRN2 Reducing the Need to Travel

A pattern of development that reduces the need to travel, especially by car, will be achieved by:

- (a) Locating major trip generating activity in areas most accessible by public transport, in particular at the main transport interchanges [/ town centres](#) ;
- (b) Giving priority to [Improving](#) public transport, walking and cycling [facilities](#) ;
- (c) Encouraging developments with a mix of uses in appropriate locations [where public transport access is good, particularly town centres](#) ;
- (d) Increasing residential densities, particularly in, or close to, town centres;
- (e) Securing significant public transport improvements.

8. Connecting Places

Parking And Traffic Restraint

8.0.5 In order to improve the environment and reduce congestion, a number of measures to restrain discourage the use of the unnecessary private car journeys will be necessary should be introduced where appropriate. The amount of parking available at the end of a journey is the key a means, ~~within planning powers,~~ of reducing car usage, particularly if combined with the use of on-street parking controls, i.e. controlled parking zones. It is also important to ensure that easy to use and efficient alternative transport modes are available. The standards applied will strike a balance between the need to ensure that car users are not unduly penalised and are allowed to take benefit from car ownership whilst, at the same time, seek to discourage unnecessary car use and promote other modes of travel so as not to lead to severe problems of congestion with its associated impacts. Consequently, parking standards will be related to public transport accessibility so that more parking spaces are allowed where public transport accessibility levels are low. Car clubs will be promoted to allow for access by car, particularly for more essential car journeys, where available parking is limited. Parking allowable in town centres will have regard to existing public off-street parking provision and on-street spaces. Where publicly available spaces are clearly insufficient to support the range and mix of uses in a town centre, a higher standard of parking may be permitted than implied by the Council's parking standard. However, a proportion of such parking permitted in new developments will have to be publicly available. *promoting the preparation of travel plans for business etc.*

CP TRN3 Parking & Traffic Restraint

Maximum Off-street parking standards, will set maximum levels of off-street parking that can be provided in new developments, with least parking provided in areas of good related to public transport accessibility will be applied to new development to reduce over-reliance on the car.

Transport Links In London

8.0.6 Brent's roads and rail lines form part of a wider network of transport links in London. It is important to co-ordinate strategic transport links such as the London Bus Priority Network and the London Cycle Network across London. Implementation of these links should not reduce other means of access to the extent that it could jeopardise commercial activity.

CP TRN4 Transport Links in London

The implementation of the London Bus Priority Network and the London Cycle Network will be a priority, including requiring provision as part of the development of appropriate sites. Bus and cycle facilities will be implemented only where the interests of all road users are safeguarded.

8. Connecting Places

Alternative options not selected

CP TRN1 Prioritising Investment & Promoting Non-Car Modes of Transport

An alternative to prioritising infrastructure investment in the growth areas would be to spread investment evenly across the borough. This would be a less sustainable approach as the critical mass of investment could not be achieved in particular locations which is necessary to influence people's modal choices. The strategy could also recognise that car usage is inevitable and not seek to promote investment in non-car modes. This is an unsustainable approach which is likely to result in higher levels of greenhouse gas emissions and congestion and would disadvantage those without access to a car.

CP TRN2 Reducing the Need to Travel

Spreading development more evenly around the borough at lower densities is a more unsustainable approach as people will have to travel further, and more often, to access facilities such as shops, schools, leisure facilities, etc.

CP TRN3 Parking & Traffic Restraint

There is no option other than to apply maximum parking standards as this is a requirement of both national government policy and the London Plan. An alternative to relating standards to public transport accessibility is to apply the same standard across the borough but this could result in serious under-provision of parking in areas where there is little or no alternative means of access resulting in excessive on-street parking and potential under-investment in development opportunities.

CP TRN4 Transport Links in London

An alternative is to not prioritise the strategic links but to prioritise on purely local grounds. This would result in key strategic routes not being implemented with a consequential impact on the ability to meet strategic aims and objectives in promoting public transport and walking.

9. A Strong Local Economy



9. A Strong Local Economy

9.1 Business, Industry and Warehousing

9.1.1 Historically, London Boroughs have attempted to protect industrial land uses because they provided a significant numbers of skilled and unskilled 'blue collar' jobs. These employment uses have been grouped together in traditional 'industrial' areas where noisy and dirty activities with associated heavy vehicle usage can generally be accommodated without adverse impact upon residential uses. Also, industrial land has been protected from the encroachment by higher value land uses, such as office or residential development.

9.1.2 The London Plan 2004 forecasted a loss of 58,000 industrial and warehousing across London, with much of the change forecast to occur within the East sub region. As part of the west sub-region however, Brent faces a set of challenges characterised by the need to protect and maintain a provision of land and premises for industrial types operations, but also reacting to the impact of structural changes to the global economy that has and will continue to affect the nature of industrial employment:

9.1.3 Overall, the policy position seeks to manage the portfolio of employment land to provide a readily available, developable supply to support the strengthening and diversification of the local economy. This entails the protection of sites of London and Borough-wide significance and the managed consolidation and / or release of more locally recognised sites. This is in accordance with the principles of sustainable development and the requirements of national and regional policy:

9.1.4 The possibility of development of locally recognised industrial areas will however be subject to a presumption that new and modern workspace will also be provided, and the Council will explore the possibility of the provision of managed affordable workspace to support new business start ups and the growing creative and cultural industry sector.

9.1.5 The industrial land policy hierarchy

9.1.6 The importance of industrial land in Brent ranges from those areas that perform a strategic role for London and the UK to those that have only a local significance. It is proposed that industrial land in Brent will be designated as Principal Employment Areas where protection for industrial uses is high and proposals for alternative uses are strongly resisted, and Neighbourhood Employment Areas where protection is less stringent and alternative land uses are considered:

9.1.7 Some of the Principal Employment Areas are also Strategic Employment Locations, a designation that is determined by the Greater London Authority and enshrined within the London Plan – the strategic spatial strategy for Greater London. The London Plan states that Strategic Employment Locations (SELs) can be Industrial Business Parks for operations requiring a high level of environmental quality and Preferred Industrial Locations for those with less demanding requirements. Four Principal Employment Areas within Brent are also considered to be Strategic Employment Locations as both Industrial Business Parks and Preferred Industrial Locations. Policy **CP-BIW2** below contains a list of Principal Employment Areas including those that are also Strategic Employment Locations:



Diageo Building, Park Royal

9.1.8 Within a diverse economy, employment can take many different forms and present a range of challenges and opportunities for spatial planning. People work in offices, in hospitals and schools, in factories and warehouses and in shops within town centres. It is important to recognise that the employment profile is changing across London and that different sectors have important roles to play.

9.1.9 Although such development can and does create employment, policy direction for the development of community facilities such as education and healthcare is contained within the Community Facilities section. The Council will prefer to see certain uses within town centres, such as retail and office (except business park development) and the Town Centres and Shopping section will provide direction in this regard.

9.1.10 This section is concerned with the use or reuse of land and premises employment uses. This includes industrial based operations, and those typically found within office accommodation.

9. A Strong Local Economy

9.1.11 Industrial employment has experienced structural change across the world in the face of globalisation. In many areas this has resulted in the disappearance of business and sources of employment. This has presented opportunities for land owners and house builders as sites have become redundant and pressure for more homes has increased. The London Plan 2004 forecasted a loss of 58,000 industrial and warehousing jobs up to 2016 across London.

9.1.12 The office development market is sensitive and is currently not at its strongest across London. Less speculative development is occurring and developments of a strategic nature are locating towards the east, where the financial and services sector is expected to expand from the City and Canary Wharf. There remains interest in some office development in Brent at Park Royal and Wembley Stadium.



The French Croissant Company Ltd, Park Royal

9.1.13 It is therefore important for the Council to provide certainty to current and prospective employers that they can locate and expand in Brent. By identifying land for such activities, it is also likely that there will be premises and parcels of land that are less suitable or attractive for occupation or development. The Council will need to provide policy direction as to the best use of these sites.

Skills

9.1.14 To be of benefit to Brent's residents, it is important that employment growth in the Borough matches the local skills profile, but within the context of improving the level of qualifications among the population. There is a balance to be achieved between increasing the overall level of employment, and addressing the disproportionate imbalance within the local occupational structure.

9.1.15 As of March 2005 64.4% of the population were of working age. Of these (71%) were economically active compared with London (74.3%) and the South East (82.1%). Brent's workforce is generally employed in the same occupations as across London, although there is a higher proportion employed in administrative, sales and elementary occupations. Because of locational factors, some sectors are over-represented in the Borough, and growth is expected to continue – the storage and distribution sector is a particular example. This sector, along with sales, administrative and elementary positions do not necessarily require high levels of skills.

9.1.16 48% of Brent's working age residents have obtained their GCSEs compared to 59% in London and 66% in the South East. 37.4% people are educated to degree level and above compared with 45% in London and 46.9% in the South East. The 2004/2005 school year saw 1,885 18 to 20 year olds are registered for full time higher education places. There are proportionally less people in Brent educated to a degree level when compared to London as a whole and proportionally more people maintain no skills or training at all.

9.1.17 Brent's Community Strategy states that a key priority for the Council is to reduce unemployment levels across the Borough to below the London average, concentrating efforts on those people most in need; and to increase income levels across Brent to above the London average. The Council is seeking a more balanced and diverse economic base with a range of jobs requiring a range of skills, however a recent employment land demand study suggests that employment growth is likely to be in construction; transport and communication; distribution, hotels and restaurants; public services; and other services.

9.1.18 Some of Brent's residents do not hold basic skills for employment – 29% have basic or no numeracy skills, 17% have basic or no literacy skills, 19% have basic or no communication skills and 51% have basic or no IT skills. Incoming employers within growth sectors can make a contribution to improving the skill sets of prospective employees.

9.1.19 Employment development of a certain scale may be required to make contributions to or deliver training schemes and forums and summits can be useful exercises for employers and potential employees. In addition, the Council may explore means of fostering links between prospective high value employers and local schools and colleges so that the social and economic benefits to the Borough and its residents are sustained.

9. A Strong Local Economy

9.1.20 Ultimately however, improving the socio-economic profile of the Borough's residents will depend on life chances, and these can be influenced by factors such as educational attainment, an improved, safe and unthreatening environment and better living conditions.

Protection of Employment Land and Premises

9.1.21 The key function of the Local Development Framework in terms of industry is the protection and designation of sufficient land and premises for sustainable economic development. Such land and premises are coming under intense pressure for the development for higher value uses, particularly residential development.

9.1.22 Despite this pressure, and the structural change that has been experienced within industrial sectors, in the interests of maintaining a strong and diverse local economy that also provides a regional and national role, the protection of land and premises for business, industry and warehousing remains significant.

CP BIW1 Protection of Employment Land and Premises

Principal Employment Areas Industrial Employment Areas (IEAs) are designated for the protection, establishment and expansion of industrial and warehouse uses operations characterised by use classes B1c, B2 and B8, or Sui Generis uses that are closely related.

9.1.23 Some of the Industrial Employment Areas are also Strategic Employment Locations, a designation that is determined by the Greater London Authority and enshrined within the London Plan. The London Plan states that Strategic Employment Locations (SELs) can be Industrial Business Parks for operations requiring a high level of environmental quality and Preferred Industrial Locations for those with less demanding requirements.

Principles of Business, Industrial and Warehousing Development

9.1.24 ~~All development is now required to contribute to the creation of sustainable communities, embracing social, environmental and economic facets of sustainable development. This can entail the physical configurations of buildings, reacting to change or impacts of development of the local and wider environment. Proposals for new business, industrial and warehousing should be developed to modern standards so that the development meets sustainable development objectives.~~

9.1.25 As economic structural change has occurred, the nature, configurations and the impacts of industrial development have changed. There are less factories than before, but more wholesalers and distribution centres. This means that the environmental impact of industry has also changed, so that emissions of pollutants are likely to be less localised and instead contribute to the increased pressure upon the road system, so that the impacts may be felt on a regional or national scale.

9.1.26 Office developments can attract large numbers of people and journeys and therefore have the potential to generate increased congestion on the Borough's road network. In addition, the density of employment within offices is such that employees will require a range of services that are generally found within town centres.

9.1.27 In order to encourage sustainable economic development in Brent, proposals for new business, industry and warehousing should be developed to high standards so that ~~the~~ development meets ~~they contribute to meeting~~ sustainable development objectives.

9. A Strong Local Economy

CP BIW2 Principles of Business, Industrial and Warehousing Development

Applications for business, industrial and warehousing development will be required to demonstrate that principles of modern usage have been considered **will be achieved**, in particular:

- the sequential approach (for office development)
- **reducing the need to travel by car and promoting non-road travel to work**
- the efficient use of land, including the possibility of intensification
- **the** relationship with adjoining sites and uses and the spaces between buildings and parcels of land
- modern premises that are fit for purpose, **entailing high standards of design and build**
- flexible workspace
- **maximising** energy efficiency and ~~reducing~~ **minimising** waste management **generation** (see policy CS SD2)
- **minimising** environmental impact of operations and movement, and **detailing appropriate** mitigation measures

Neighbourhood Employment Areas

9.1.28 Neighbourhood Employment Areas (NEAs) are generally located close to or within the residential fabric of Brent. Such areas provide a different function to PEAs as they generally entail a more intensive use of land; allow for the provision of local employment opportunities across the Borough; and provide workspace for new and emerging enterprise.

9.1.29 In some cases, such areas are unsuitable to be located in such proximity to residential areas and/or may be unsuitable for employment led regeneration, or there may be little or no demand for the premises. As such, and in order to meet the Council's wider regeneration objectives, the Council may consider redevelopment of Neighbourhood Employment Areas in some circumstances.

CP-BIW3

~~The Council designates Neighbourhood Employment Areas (NEAs) for the protection and expansion of industrial uses within B1c (light industrial) and B2 (general industrial) and closely related Sui Generis uses, provided that there would be no adverse environmental impact upon nearby residential areas.~~

~~Proposals for the mixed redevelopment of Neighbourhood Employment Areas may be permitted where:~~

- ~~the current use is deemed to have an adverse environmental impact on surrounding residential areas by virtue of the business activity and movement into and out of the operation;~~
- ~~it can be demonstrated that the site is not capable of being developed for employment use; or there is no effective demand for the premises or site for the preferred use, and there is no reasonable prospect in the medium term of re-use, or redevelopment.~~

~~Proposals are expected to include the re-provision of modern workspace, deliver significant environmental improvements, and may include residential development. Applicants will be expected to demonstrate a design-led approach to address the combination and interface of uses and intensification and maximise the potential of the site having regard to the local transport capacity and sound urban design principles.~~

The Re-use of Employment Land and Premises

9.1.30 There are some industrial areas located adjacent to or within the residential fabric of Brent. These areas perform a different function to IEAs as they entail a more intensive use of land; provide local employment opportunities across the Borough; and provide workspace for new and emerging enterprise.

9. A Strong Local Economy

9.1.31 However, in some cases these areas are unsuitable to be located in such proximity to residential areas and/or may be unsuitable for employment led regeneration, or there may be little or no demand for the premises. As such, and in order to meet the Council's wider regeneration objectives, the Council may consider redevelopment of these areas.

CP BIW3: The Re-use of Employment Land and Premises

The Council may permit the redevelopment of employment land and premises, except within Industrial Employment Areas where this will be strongly opposed, where proposals:

- Entail a provision of modern workspace that is fit for purpose and may include managed affordable workspace for emerging business,
- Significant environmental improvements and sustainability gains to the environment by virtue of the design of workspace and operational standards,
- Meet the Council's wider regeneration objectives.

Regeneration of Employment Areas

Areas of industrial employment activity are often characterised by a poor appearance, local or wider environmental impacts (such as dust or litter) and a poor environment for pedestrian users. Such issues can undermine the vitality of designated areas and in turn lead to development pressure for alternative higher value uses, such as residential development. In the interest ensuring that areas remain viable and attractive for further investment the Council will support initiatives to improve industrial employment areas.

Proposals for the regeneration of Industrial Employment Areas will generally be supported. In particular, proposals should demonstrate improvements to the transport and pedestrian accessibility, appearance of buildings and land parcels and the public realm. The Council will work with partners to support the preparation of Opportunity Area Planning Frameworks for designated Opportunity Areas at Park Royal and Wembley.

Office development

Purpose built office developments can attract large numbers of people and journeys and therefore have the potential to generate increased congestion on the Borough's road networks. With this in mind, and within a general context of seeking to reduce travel by car, high density development should be matched to areas with the greatest public transport provision. As such, and in accordance with Planning Policy Statement 6 – Planning for Town Centres, such developments will be subjected to a sequential test with a presumption that the preferable location shall be town centres.

However, in the interests of promoting sustainable regeneration and the provision of increased employment in particular locations, the Council is also promoting office development within the National Stadium Policy Area and at Park Royal.

CP-BIW4

Proposals for purpose-built offices (B1a) will be determined according to the sequential approach to development (see policy CS-TC2), having regard for the nature and scale of the proposal:

Office development will be promoted in the National Stadium Policy Area and in the proposed business parks at Wembley and Park Royal provided that such development is accompanied by significant improvements to public transport (see policies in the Wembley Regeneration Area and Park Royal Inset Plans of the saved UDP):

9.1.32 Park Royal

9. A Strong Local Economy

9.1.33 Park Royal is the largest industrial and business park in London and 40% of the land is within Brent. Park Royal's significance to London cannot be underestimated, supporting some 40,000 jobs and almost 2,000 businesses. Park Royal felt the impact of the 1980s recession with firms closing or vacating the area and those that remained consolidated their operations.

9.1.34 Park Royal remains a significant and viable employment area, but suffers from accessibility and parking problems, a poor local environment in some areas and a lack of facilities and amenities for staff and visitors. These problems may threaten the ability of Park Royal to attract new investment and to ensure that development builds on the level of skills and knowledge that are central to the success of firms in Park Royal and local people themselves.

9.1.35 International structural economic changes have resulted in the decline of manufacturing and growth in the service and distribution sectors in western economies such as the UK. Within Park Royal, this has meant a shift from making products to moving them around. Research conducted in 2006 on behalf of the Park Royal Partnership suggests that 38% of the land within Park Royal is used for B8 (storage and distribution) and 14% for B1 (general industry).

9.1.36 To meet the challenges presented by Park Royal and to attract new investment, the Park Royal Partnership has been set up between the three local authorities, the private sector and Training and Enterprise Councils; with the support of Central Government. The Park Royal Partnership has an overall aim of:

9.1.37 *'Building on its prime location and traditional strengths, to achieve the regeneration of Park Royal by promoting substantial physical, economic and social improvements for the benefit of businesses and communities in West London.'*

9.1.38 The Partnership published a 10-year strategy in 2002 to set out a vision for consolidating, improving and changing Park Royal's position as a premier business location in London. The strategy identifies gateways that present significant opportunities for development and improving the accessibility and movement into and within the area. The northern, eastern and western gateways have a direct impact for planning policy and practice in Brent.

9.1.39 Park Royal is recognised as an Opportunity Area by the Mayor of London and as such a planning framework should be prepared to manage the specific issues and to maximise the development potential of the area. The London Plan designates Opportunity Areas across Greater London that are typically capable of accommodating at least 5,000 new jobs; 2,500 new homes or a mix of the two. Preparation should support significant improvements to transport accessibility, in particular forms of public transport.

9.1.40 Park Royal is subject to increasing pressure for the release of land to allow mixed use but predominantly residential development. This is not considered to be a preferable scenario and as such the Opportunity Area status will aim to consolidate the position of Park Royal as a Strategic Employment Location providing certainty and protection for preferred uses.

9.1.41 The 10-year strategy suggests that Park Royal could benefit from a central core that is often referred to as the 'heart of Park Royal' to establish a place for the provision of local shops and services and to build upon the provision of facilities and amenities for staff and visitors. Options for such a centre and the role of gateway development shall be explored through the preparation of the Opportunity Area Planning Framework.

9.1.42 The Council, along with partners at Park Royal Partnership, the Greater London Authority and the London Boroughs of Ealing and Hammersmith and Fulham are working together to prepare an Opportunity Area Planning Framework (OAPF). The priorities for the OAPF are to maximise accessibility, particularly for public transport; promoting and enhancing social inclusion and regeneration; building upon the industrial heritage; improving the provision of facilities and amenities for employees and visitors. It is envisaged that although the OAPF will not be statutory document, it will be a material consideration and a strategic tool for determining change within Park Royal.

9. A Strong Local Economy

CP BIW/PR1

The Council will work with partners to support the preparation of the Park Royal Opportunity Area Planning Framework to coordinate and deliver the improvement and consolidation of the viability of the Strategic Employment Location. The framework will become a material consideration and be used as a strategic planning tool to determine development and change.

Alternative options not included

CP BIW1 Protection of Employment Land and Premises

If the Council decided not to protect industrial employment land, there would remain a supply of Strategic Employment Land— designated by the London Plan. This approach would allow significant opportunities for residential development upon previously developed brown field land, significantly increasing housing numbers within Brent.

This would be unsustainable due to substantially increased residential development will lead to many more cars upon the Borough's roads and lead to greater congestion; increased levels of local and regional unemployment; and a disproportionate number of homes to jobs resulting in a 'dormitory' Borough where people travel away to work.

CP BIW2 Principles of Business, Industrial and Warehousing Development

Establishing principles of business, industrial and warehousing development along the themes of sustainable development helps to contribute to the creation of sustainable communities. Such principles can also help to support the viability of industrial employment land by maintaining modern standards of land use and managing the cumulative impact of development.

An alternative approach could be to 'deregulate' such development in order to maximise the potential of economic development by removing the requirements of developments. However, the Council could also decide to establish more prescriptive standards of development, but that could prove inflexible and restrictive to some development in some areas.

CP BIW3 The Re-use of Employment Land and Premises

Although the Council seeks to protect a supply of readily available industrial employment land, national and regional policy requires that the supply is reviewed and that surplus land be identified for alternative uses, especially for residential development.

There is therefore a presumption for the redevelopment of industrial areas under certain circumstances, except for designated Industrial Employment Areas, where such change will be strongly resisted.

Two alternative approaches could be considered. Firstly, these areas could be awarded no protection so that their redevelopment for alternative uses would be subject to the performance of the market; and secondly, the Council could afford more stringent protection and not consider redevelopment under any circumstances.

9. A Strong Local Economy

9.2 Town Centres and Shopping

Wembley Town Centre

9.2.1 Brent Household Shopping Survey 2003 demonstrated that Wembley is the main shopping destination within Brent. However, a low proportion of shoppers do their main food shopping in Wembley. Centres in Brent do not operate in isolation, but are influenced by neighbouring retail locations. Brent centres will be affected in particular by:

- Current and future development at Brent Cross, as a regional shopping centre.
- Harrow and Ealing are neighbouring Metropolitan centres, which will continue to attract some of the retail expenditure of Brent's residents.
- White City is being developed into a major retail destination, which will attract residents from the south of the borough.
- And the West End, the principal shopping destination for London, will always attract Brent shoppers.



Wembley High Road

9.2.2 Basically all these centres will compete with Wembley for shoppers and for national retailers. A Boroughwide Retail Capacity study recommended that the majority of the available expenditure growth in the Borough should be allocated to Wembley, to secure its Major centre status, and attract regenerative investment to ensure future growth. This will enable it to become Brent's pre-eminent centre. It is proposed that Wembley becomes Brent's pre-eminent centre for the following reasons:

- A Boroughwide Retail Capacity study recommended that the majority of the available expenditure growth in the Borough should be allocated to Wembley, to secure its Major centre status, and attract regenerative investment to ensure future growth.
- It is the main focus of civic function in the borough and the level of development should complement this role, particularly in view of the proposed future expansion to include the stadium precinct.
- It is the only major centre wholly within the Borough.

CP TC1 Principal Retail Location

Wembley Town centre is designated as the principal centre within the Borough. In order to establish Wembley as a civic focus for the Borough, the Council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development.

Major retail or leisure development will only be permitted in other town centres or edge-of-centre locations, if it can be demonstrated that no sites are available in Wembley, follow **and** the preferred location order set out in policies CP TC2 & TC3 is followed.

The Council will continue to work with its partners to produce a Design Framework (see policy CS UD1) for implementing a comprehensive environmental improvement programme in Wembley. Proposals are expected to significantly enhance the quality of shopping, leisure provision, and the townscape and public realm in Wembley in accordance with its Borough status.

9.2.3 Town centre uses are those defined in PPS6 (para.1.8), including: retail, leisure, entertainment, intensive sport/recreation, commercial and civic offices, as well as arts, culture and tourist uses, along with housing in mixed use, multi-storey developments.

9. A Strong Local Economy

Location of New Development



Kilburn High Road

9.2.4 Given that the main aims of Council policy are to improve shopping and other facilities and ensure that they are accessible to all sections of the community, including those without access to a car, then it is important that major developments should be directed to those locations i.e. town centres, which are most accessible by public a choice of transport modes, i.e. town centres: particularly walking, cycling and public transport. In this way, shopping facilities and other services can be conveniently located together and, for example, a visit to a food shop can be combined with a visit to other shops and services, thus reducing the need to make additional journeys. This is particularly important for those without access to a car such as the elderly and those with caring responsibilities.

9.2.5 New retail investment is also vital if Brent's run-down centres are to be regenerated and thus continue to be important foci for their local communities. The scale of development is one key consideration in determining the development location. It is crucial that development is consistent with the catchment areas the centre is expected to serve and the capacity of the centre to maintain the balance of the network of centres. Major retail developments would provide the town centres with a considerable boost, increasing their attractiveness to shoppers and bringing infrastructure improvements in the form of better servicing, car parking and road improvements. These considerations also apply to other key town centre uses which generate high numbers of visitors such as leisure and entertainment facilities.

9.2.6 In order to promote major development in town centres, the sequential approach set out in Government policy will be applied when considering the location of new retail and other major development such as cinemas.

9. A Strong Local Economy

CP TC2 Other Preferred Locations

Proposals for retailing and other town centre uses which attract a lot of people, will be determined in accordance with the [following](#) sequential approach.

Major & District Centres

Within the Major Town Centres and District Centres scheme for the above [these uses](#) should be consistent with the scale and function of the centre within which they are located.

Town centre proposals that [should](#) reinforce, or help implement the Strategy for particular centres will be particularly encouraged.

On the edge of Major Town Centres and District Centres, proposals for town centre uses, will be required to comply with the above and should be designed to integrate effectively in existing frontages. In addition they are required to demonstrate:

- (1) A Need for the development in the format proposed;
- (2) That no sequentially preferable site is available [within the Major & District Centres boundaries](#) (for major development) in Wembley) (CS TC1);
- (3) That there would be no unacceptable impact on the vitality and viability of other town or district centres; and
- (4) That the development would be accessible by a choice of ~~means of transport~~ [means supporting the hierarchy in TRN2](#) .

Local Centres

In local centres, proposals for small to medium scale retailing and town centre uses, will be permitted where they serve a local catchment area, meeting people's day to day needs.

Proposals for larger scale retailing or other facilities will be required to comply with criteria (1) (2) and (4) governing the consideration of edge-of-centre developments as set out above.

9. A Strong Local Economy

CP TC3 Exceptional Locations

Neighbourhood Centres

Large scale development will not be permitted to locate in Neighbourhood centres. Only very small-scale town centre uses will be permitted to locate in Neighbourhood centres.

Out-Of-Centre Locations

Out-of-centre proposals for the development or extension of retail and other town centre uses, will not be permitted unless:

- (a) There is a clearly demonstrated Need for the proposal, in the format proposed;
- (b) There is no sequentially preferable site available in Major, District or Local centres (**CS TC2**);
- (c) The proposal, by itself or cumulatively with other completed developments or commitments, would not have an unacceptable impact on the vitality & viability of Town, District or Local centres, nor compromise their ability to attract regenerative investment; and
- (d) ~~The site is, or can be made, moderately accessible or better, by public transport~~ development ensures a 'Good' level of public transport accessibility - or significantly improves and a the choice of other means of transport means, including existing or new, suitable pedestrian & cycle access.

In addition, wherever possible, such developments should be combined with other existing out-of-centre developments. Conditions will be used to limit the floorspace, subdivision, goods range, mix of convenience and comparison offer, and keep ancillary nature of subsidiary elements of the schemes.

Town Centre Opportunity Sites

9.2.7 In order to meet the need for projected levels of retail growth in the Borough, and to increase the capacity of town centres (especially Wembley) to accommodate this growth, means that Council has an obligation to allocate sites.

9.2.8 Key to improving Brent's more run-down town centres is a need to identify opportunities to regenerate them through new development, including the redevelopment of existing outmoded property so that it can meet modern requirements. A number of opportunity sites have therefore been identified within, or on the edge of, certain town centres in the Borough.

CP TC4 Town Centre Opportunity Sites

Within the boundaries of the Boroughs network of Town Centres sites suitable for town centre development have been identified. These opportunity sites are listed within the Site Specific Allocations and shown on the Proposals Map. Development at an appropriate scale which assists the regeneration of the centres will be encouraged on the opportunity sites.

These do not preclude the assembly of other town centre sites in Wembley town centre, which may become available for regenerative amalgamation for major retail and/or leisure development, such as a Shopping Mall, if this is demonstrated to be consistent with Brent's strategic Objectives.

9. A Strong Local Economy

Network of Town Centres



Ealing Road

9.2.9 There are a number of centres in Brent which, because of their size, status, range of shops and other facilities and the extent of their catchment areas, have been designated as town centres. It is in these centres that the Council will concentrate efforts to achieve environmental improvements and ensure good accessibility for the whole community. In particular, there is a need to ensure ease of access to shops and other facilities from public transport.

9.2.10 They have been divided into either major town centres within London, District Centres and Local centres according to their size and the facilities they provide. This is in accordance with the strategic designations in the London Plan. It is also recognised however, that centres continue to evolve and that relative positions in the hierarchy can change over time. Centres within Brent will be monitored and their categorisation reviewed if appropriate.

9.2.11 Due to the urgent need to improve the provision of shops and key services in accessible locations for local communities, the Boroughwide Retail Capacity study has also recommended that the likely growth in demand for shopping floorspace over the next 5-10 years should be allocated between the designated centres. Opportunity sites have been identified within them, and more sites may become available during the plan period.

CP TC5: Network of Town Centres

The Town Centres in the Borough form a network –based upon the following hierarchy.

Major Town Centres	District Centres	Local Centres
Wembley Kilburn	*Burnt Oak Harlesden *Cricklewood Willesden Green Ealing Road Wembley Park Kingsbury	*Colindale Preston Road *Kenton Queens Park Kensal Rise Sudbury Neasden

There are also 36 Neighbourhood Centres, defined in the Appendix & Proposals Map.

The Boundaries of all the town centres will be defined on the Proposals Map.

9.2.12 Certain centres indicated by *, because of administrative boundaries, are divided between Brent and neighbouring London Boroughs. Policies within this Plan apply only to that part of the centre in Brent, although there will be close liaison with neighbouring Boroughs to ensure compatibility of policies and proposals for the centres as a whole.

9. A Strong Local Economy

Alternative options not selected

CP TC1 Wembley Town Centre Focus

An alternative option is to have no town centre focus and allow economic growth to be more dispersed. Such an approach could lead to the creation of ad-hoc retail provision and investment in accessible locations. It would also mean that the opportunities which have arisen at Wembley, as a result of stadium regeneration, would not be maximised. It would also diminish the opportunity for Wembley to be regenerated consistent with its status as a major centre. PPS6 states that LPAs should identify the centres within their area where development should be focused.

CP TC2 Other Preferred Locations & CP TC3 Exceptional Locations

It is a requirement under PPS6 that LPAs must apply the sequential approach in their development plans to support retail and related town centre use developments at more central location. There is no alternative option available.

CP TC4 Town Centre Opportunity Sites

Government guidance in PPS6 states that LPAs, after considering the need for development, the likely impacts on other existing centres and accessibility, should identify and allocate sites for town centre development consistent with the sequential approach. The selected policy option recognises that if town centres are to be maintained and enhanced then opportunities for redevelopment and expansion will have to be identified.

CP TC5: Network of Town Centres

PPS6 requires that LPAs consider a network of town centres and their relationship in the hierarchy and to consider the need for regeneration to strengthen them. In addition deficiencies in the network should also be highlighted by promoting centres to function at a higher level in the hierarchy, or by designating new centres. Wembley and Kilburn are the London Plan identified Major Centres. Their position is fixed. Below Major centre, therefore, an option is to identify an alternative network. However, regular monitoring of the town centres such as the level of floorspace, the number of multiples, level of vacancies, etc. means that the hierarchy identified is based on the best available evidence.

9.3 Culture, Leisure and Tourism

Promoting Culture, Leisure and Tourism



Wembley Arena

9.3.1 Tourism is an important industry for the Brent economy, accounting for 4% of Brent's workforce [Annual Business Inquiry Employee Analysis 2004], and generating an estimated visitor spend of almost £60 million per annum [LDA 2004].

9.3.2 Leisure and cultural activities can stimulate tourism growth, attracting overseas, domestic and day visitors. As well as providing opportunities for recreation, relaxation, and learning and development, leisure and cultural activities can stimulate tourism growth, attracting not only day trippers, but also domestic and overseas visitors. Facilities can include museums, art galleries, theatres, sporting and recreational facilities, snooker halls, nightclubs, cinemas, concert venues, casinos, bingo halls, swimming pools, conference centres, hotels, visitor information centres, and other tourism

related facilities. In Brent, the most well recognised leisure facility and tourist attraction is Wembley Stadium, which is internationally renowned for hosting premier football and other major events such as Live Aid. This has been a catalyst for regeneration and growth for the Borough, bringing about new investment, jobs, and infrastructure. It has also been picked

9. A Strong Local Economy

to host the 2012 Olympic Football, which will further promote Wembley as a key tourist destination. Some examples of other visitor attractions in Brent include the Wembley Arena, Swaminarayan Hindu Temple, Tricycle Theatre, Fryent Country Park, Stables Art Gallery and the Brent Museum.

9.3.3 Leisure and tourist activities attracting large numbers of visitors to an area are best located in town centres, where they can be supported by other complementary uses, are easily accessible by public transport, walking and cycling and where their impacts can be more easily managed. Increasing numbers of visitors to an area can put pressure on existing resources and impact on neighbouring uses. These effects, particularly levels of noise, waste, and traffic can be managed more effectively within Town Centres, while residential character and amenity can be better preserved outside of these areas. Wembley particularly, is a prime location for new leisure and tourist facilities due to its supporting infrastructure including a diverse range of restaurants and shops, capability to cater for large numbers of visitors and its good transportation links to inner and outer London. ~~and the potential to cater for large numbers of visitors. As a tourist destination, Wembley Stadium has stimulated new growth and regeneration in the area, and will also benefit from the hosting of football at the 2012 Olympic Games.~~

~~Leisure and tourism activities can also improve one's physical and mental well being by providing relaxation and pleasure time, away from the working environment. Leisure and tourism facilities includes, museums, art galleries, theatres, sporting and recreational facilities, snooker halls, nightclubs, cinemas, concert venues, casinos, bingo halls, gyms, swimming pools and other tourism related facilities. These facilities should be made accessible for local communities as well as visitors, and be a place where cultural diversity can be explored and enjoyed.~~

~~Brent people take pride in their cultural diversity and are supportive of events such as the Respect Festival, St Patrick's Day Parade and Diwali Festival where local talent in music, arts, dance, and culture can be performed. Good public art, such as sculptures, mosaics and murals that help create interesting and attractive environments, also stimulate community involvement and engender civic pride. To build upon existing opportunities, applications of significant impact and those directly related to the leisure and tourism industry will be required to contribute towards enhancing public realm through the promotion of public art and cultural diversity, and provision of additional visitor facilities where appropriate.~~

9.3.4 Facilities should be made accessible for local communities as well as visitors, and be a place where cultural diversity can be explored and enjoyed. Brent people take pride in their cultural diversity and are supportive of events such as the Respect Festival, St Patricks Day Parade and Diwali Festival where local talent in music, arts, dance, and culture can be performed. Good public art, such as sculptures, mosaics and murals that help create interesting and attractive environments, also stimulate community involvement and engender civic pride.

9.3.5 To build upon existing opportunities, applications of significant impact and those directly related to the leisure and tourism industry will be required to contribute towards enhancing public realm through the promotion of public art and cultural diversity, and provision of additional visitor facilities where appropriate.

CS CT1 Promoting Leisure and Tourism

Leisure and tourism activities, including arts, culture, sports and entertainment, will be promoted in accessible locations locations easily accessible by walking, cycling, and public transport, and in accordance with the sequential approach (see policy CS TC2). Facilities will be promoted for the enjoyment of existing communities as well as those visiting the borough, enabling Brent to become a showcase for entertainment and cultural diversity, while balancing the environmental impacts of increased tourism. Contributions from relevant major and all significant applications will be sought towards the promotion of arts, culture and tourism throughout the Borough.

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Alternative options not selected

CP CT1 Promoting Leisure and Tourism

a) Allowing leisure and tourist facilities to locate anywhere in the Borough without good access - This would attract business away from town centres and result in decentralisation of network infrastructure. By focusing leisure and tourism facilities in town centres with better transport links, these uses are more accessible to a wider range of users and supported by complementary uses, such as shops, restaurants, information bureaus, and other leisure activities. Also, the impacts of these facilities can be more easily managed, rather than being dispersed throughout the borough where residential character and amenity may be compromised and impacts on surrounding uses may be greater.

b) Leisure and tourism facilities not promoted and no contributions sought - As a borough it would be a missed opportunity to help raise the local economy and promote regeneration, particularly as tourism revenue accounts for 6.4% of the UK's total GDP. Leisure and tourism facilities help make Brent an enjoyable and a pleasant place to be, and would be advantageous for developers who impact on existing infrastructure and resources to help contribute towards improving public realm, the creation of high quality environments, and boosting the local economy.

10. Enabling Community Facilities



10. Enabling Community Facilities



Swaminaryan Temple, Neasden

10.0.1 Having good access to education, healthcare, social care, faith institutions and other community facilities and services, are fundamental for helping to decrease social inequalities within and between different communities in Brent. Once these foundations are well established, people can have the opportunity to lead healthy, safe, and well balanced lifestyles and develop the skills to become valued members of society.

10.0.2 Locating these facilities around transport nodes or in areas easily accessible by a choice of transport means, particularly walking, cycling and public transport will enable as many people as possible to utilise them. New facilities, particularly where they attract large numbers of people, are best located within Town Centres where public transportation is good and potential adverse impacts can be minimised. Ensuring facilities also provide for the needs of disabled people, adults with young children, the elderly, and ethnic minorities will help to break down barriers, allowing equal opportunities for a wide range of users.

10.0.3 It is recognised that opportunities for new community facilities are generally limited, as they cannot compete financially on equal terms with land uses such as residential or commercial, residential or mixed use developments, which attract higher land values. To secure the provision of these key facilities and prevent the loss or re-development to other higher value uses, all existing community facilities will be protected, unless they can be appropriately replaced or provided for elsewhere.

10.0.4 These essential facilities, which form the social fabric of our communities, will also need to be provided alongside a growing population with a wide range of needs. Brent has a young and culturally diverse population, with a strong sense of community, and the challenge will be to build upon this. and facilitate equal access to services and facilities in accessible locations. For this reason, the policy seeks to ensure sufficient provision is made for new or improved facilities, particularly where additional need arises from major / significant residential or mixed use developments.

Opportunities for new community facilities are often limited as they cannot compete financially on equal terms with land uses such as residential or commercial use, which attract higher land values. The policy seeks to address this by protecting existing facilities and requiring the provision of new or improved facilities where any new need arises from major residential or mixed use development.

CP CF1 Meeting the needs of the Community

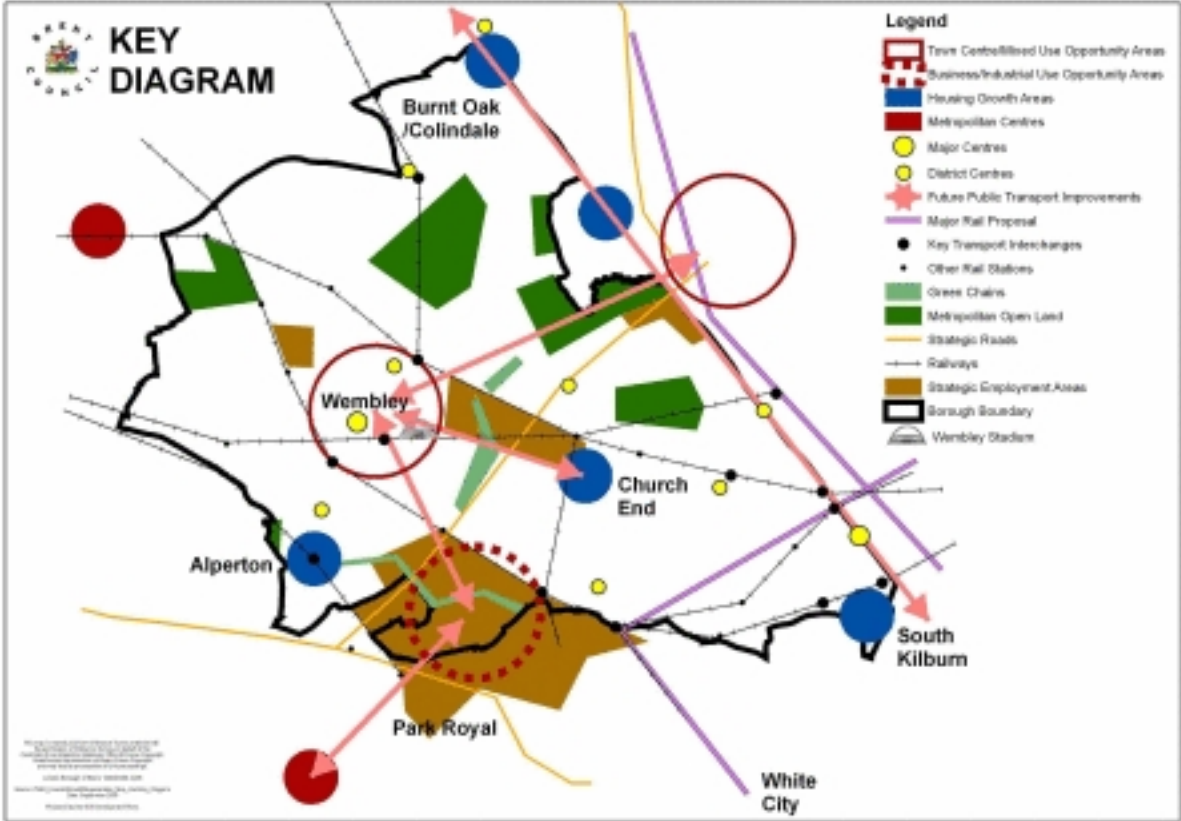
The provision of accessible community facilities that meet the needs of present and future generations will be encouraged while maintaining existing amenity, enabling equal opportunities for learning, health, social care and general well being. Existing facilities will be protected or appropriately replaced to allow for the future needs of the community. Relevant major and significant applications will be required to make contributions towards, or provision for, new or improved facilities to meet the needs of a growing population.

Alternative options not selected

CP CF1 Meeting the needs of the Community

An alternative is to allow the market to determine where community facilities are located. Community facilities, while integral for public or community benefit, are low value uses and cannot compete financially on the open market against higher land use values such as housing or commercial use. As demand for land substantially outweighs supply, community facilities are likely to be under provided or forced to locate in areas not well accessed by the wider community. Existing Facilities are also likely to be over stretched and under-resourced if new provision is not made when allowing for new growth and development.

10. Enabling Community Facilities



10. Enabling Community Facilities