	Executive 9th October 2006 **Report from the Director of Environment and Culture**
For Action	Wards Affected: ALL

Local Development Framework – Core Strategy Preferred Options

Forward Plan Ref. E&C-06/07-008

1.0   Summary

1.1   This report presents a draft Core Strategy which is a key document of the new Local Development Framework (LDF). The Council is required to consult with the local community on its 'Preferred Options' for the Core Strategy. The preferred options for the Core Strategy have been drawn up after a round of public consultation in September/October 2005 and the options and the alternative options have been subject to Sustainability Appraisal. Executive is asked to agree the draft Core Strategy for public consultation commencing on October 30th 2006.

2.0   Recommendations

2.1   That Executive agrees the draft Core Strategy Preferred Options, for public consultation between October 30th and 11th December 2006.

2.2   That Executive agrees the proposed changes to the timetable for LDF preparation for inclusion in a revised Local Development Scheme for submission to the Secretary of State.

2.3   That the Director of Planning is authorised to make non-material changes to the Core Strategy Preferred Options as necessary prior to publication for public consultation.

| Executive 9th October 2006	Version No. 4.0 27/9/06

3.0 Detail

3.1 Planning Committee will be considering the draft Core Strategy on 5th October and their views will be reported in a briefing note tabled at the Executive meeting.

The LDF Process Explained

3.2 In taking forward the new system of Plan preparation, introduced by the Planning & Compulsory Purchase Act 2004, there are statutory requirements that must be met. The current development plan for Brent, the Unitary Development Plan (UDP) is being replaced by the LDF. One of the main features of the new system is that the LDF is more strategic and spatial and less of a development control manual. It should also be a spatial expression of the Community Strategy and dovetail better with other plans, policies and proposals of stakeholders in Brent such as the PCT and Park Royal Partnership.

3.3 It is intended that documents are produced in a folder format and different parts of the LDF can be amended at different times, unlike the UDP which had to be reviewed as a whole about every 5 years. The LDF will comprise a series of documents, some of which will have development plan status (as with the UDP), and be subject to independent examination, and others the status of Supplementary Planning Guidance. Those that have development plan status are called Development Plan Documents and, of these, the Council is required to produce a Core Strategy as well as Site Specific Allocations. The Council has also decided to produce a set of detailed Development Control Policies as a separate development plan document. It has also been decided to produce a number of Supplementary Planning Documents on various matters such as detailed site briefs or more detailed design guidance.

Timetable for LDF

3.4 The intention to produce these documents, and the timetable for producing them, was agreed by the Secretary of State. The timetable is contained in Brent's Local Development Scheme (LDS), which is essentially a project plan for producing the LDF. Other documents the Council is required to produce as part of the LDF include a Statement of Community Involvement (adopted by Full Council in June 2006) and an Annual Monitoring Report (to be produced before the end of the year). The documents which make up the LDF folder are illustrated in the diagram below.

Executive	Version No. 4.0
9th October 2006	27/9/06
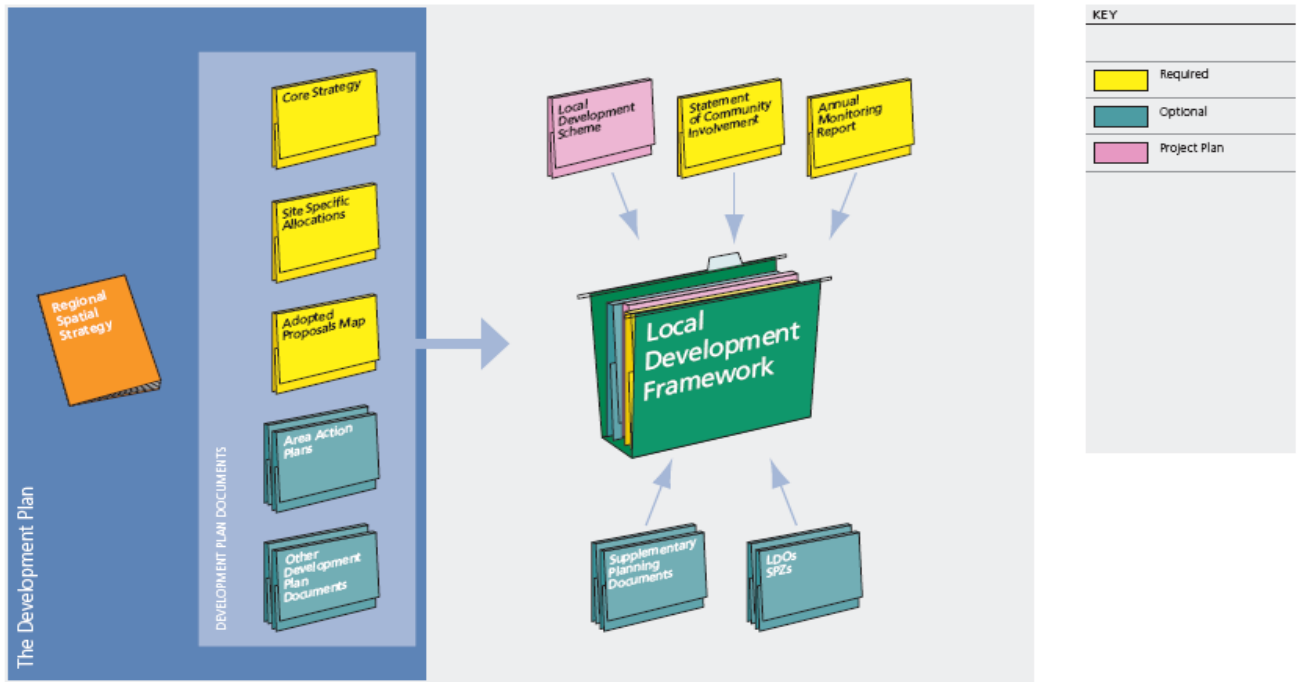
3.5 In preparing the LDF the Council must follow a number of statutory stages. The process for taking forward the part of the LDF which will replace the UDP (i.e. Development Plan Documents such as the Core Strategy) is set out in the following diagram.

Executive	Version No. 4.0
9th October 2006	27/9/06
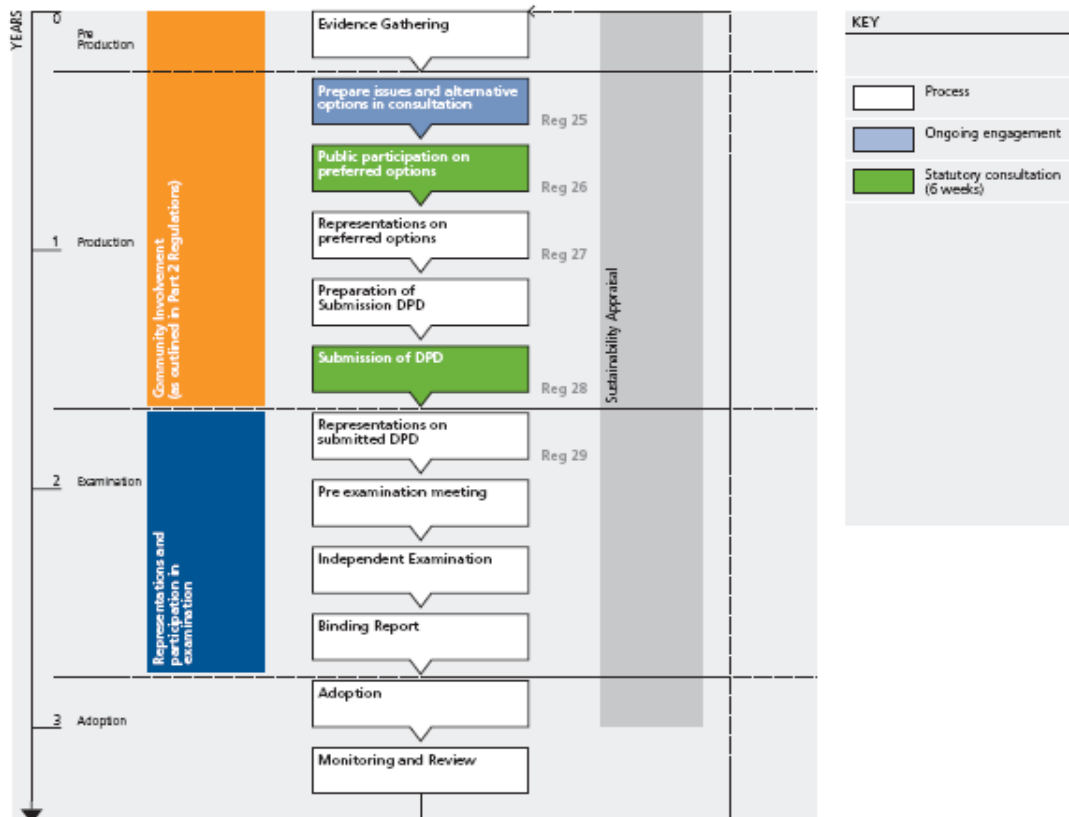
The next formal stage for the Council is public participation on Preferred Options, (i.e. the third box down). This is a statutory consultation period of 6 weeks and it is proposed by officers that the previously agreed timetable be revised so that the Council now consults on only the Core Strategy in November/December this year, and then consults upon on the Site Specific Allocations and Development Control Policies documents in April/May 2007.The current LDS shows the intention to produce all 3 DPDs and consult upon them at the same time. Although the proposed change will increase the workload by undertaking two formal consultation exercises instead of one, it has the advantage of allowing people to focus on the basic planning strategy for the future of the Borough before dealing, at a later date, with the more detailed policies and proposals necessary for determining planning applications. See Appendix 4 for chart showing proposed revised timetable. Members are asked to agree to this change.

3.6   In addition to the proposed change to the timetable for replacing the UDP outlined above, Executive are asked to agree to changes in the timetable for the preparation of Supplementary Planning Guidance as set out below:

Kilburn, former Gaumont State (Mecca Bingo) - delete from programme - no longer necessary as little prospect of re-use/development in the short term.

SPG17 Design Guidance -   consultation in spring 2007, rather than autumn 2006, to coincide with consultation on DC Policies Preferred Options.

Wembley West End South, currently on consultation - to be adopted November 2006

Planning Obligations - consultation spring 2007 rather than spring 2006 to coincide with consultation on DC Policies Preferred Options

Queens Park Station - consultation November 2006, adoption February 2007

Public Consultation Undertaken

3.7   A major round of public consultation on the 'Issues and Options' for drawing up a new development plan for the Borough was carried out in September/October 2005. The consultation consisted of a questionnaire distributed via the Brent Magazine, the distribution of a set of Issues and Options papers with a response section (including the ability to respond online) and two workshops held in different parts of the Borough. A summary of the outcome of this consultation was put to Planning Committee on 16th November 2005. The main themes

4

coming out of this round of consultation have been set out in the summary attached as Appendix 2 to this report. The views from this round of consultation, as well as any views that have been submitted to the Planning Service subsequently, have been taken into account in drawing up the Core Strategy. (NB - the detailed responses from individuals or organisations to the Issues and Options papers have been compiled into a single document, which is available to anyone on request, and the individual responses are available to view online as well.) The report of the Community Workshops is also available online.

Sustainability Appraisal

3.8   It is a statutory requirement that a sustainability appraisal be undertaken as an integral part of drawing up the new or revised policies and proposals of the Plan. The Sustainability Appraisal, which incorporates a Strategic Environmental Assessment as required by European legislation, has been undertaken by consultants Collingwood Environmental Planning to enable an independent assessment to be made of the emerging policies. The outcome in terms of changes to the Core Strategy recommended by the appraisal forms Appendix 4 to this report.

3.9   The final Sustainability Appraisal report (which will be made available separately to Members) must also be made available to the public as part of the consultation round. The sustainability appraisal has been undertaken as an integral part of the drafting of core policies, and has therefore fed into the development of the policies. In particular, interim reports received at different intervals during the process have resulted in changes to draft policy. The changes incorporated were in response to a need to be clear about the precise meaning of policy and to recognise that the housing growth strategy relies on addressing the consequential social and economic impacts for it to be acceptable. Some of the key concerns addressed are listed below:

  ➢ Setting out the importance of addressing the social and environmental impacts of the strategy (employment, education, waste, energy, service provision etc.)

  ➢ The timely provision of support infrastructure

  ➢ The importance of ensuring that local people can access local jobs

  ➢ Providing new as well as protecting existing greenspace

  ➢ The involvement of local communities in implementing the plan.

The SA report will explain the process of appraisal in more detail.

The Draft Core Strategy

3.10   As well as taking account of views expressed during the formal consultation period and of the Sustainability Appraisal, the Core Strategy has also been drawn up in liaison with other stakeholders both across the

Executive	Version No. 4.0
9th October 2006	27/9/06

Council and partner organisations such as Brent PCT, Park Royal Partnership and locally active housing associations. A working draft of the Core Strategy was presented to Partners for Brent (Local Strategic Partnership Executive) in May where it received general support. The draft Core Strategy has also been amended after consideration by Planning Policy Committee on 12th July 2006 where some significant changes in policy direction and emphasis were sought. The changes made since that Planning Committee met in July are shown in the draft strategy by strikethrough and highlighted/underlined text.

3.11 Guidance on the preparation of the Core Strategy and its content is provided by Government in a Planning Policy Statement on LDFs (PPS12). This states that :

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

It goes on to say that :

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

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

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

Key Issues for the Core Strategy

3.13 In addition to taking account of local public opinion, the Core Strategy must also reflect and incorporate national and regional planning policy. It must be in conformity with the Mayor of London's 'London Plan'. The Mayor's strategy for London is to see London grow significantly over the next 10-20 years (by 700,000 people - equivalent to the size of Leeds). The Mayor has published new housing targets for London and each borough. These are contained in his Alterations to the London Plan. The Mayor of London proposes to alter the current London Plan to increase new housing output in London from 22,000 to 31,000 homes annually. This means that housing development in Brent in the next 10 years should

6

be almost double the rate in the current London Plan and Brent's UDP. This speeding up of the quantity of housing development is consistent with, and responds to, the Government's approach as evidenced by the Barker Report which recommended that, in order to deliver a trend in real house prices of 1.8 per cent, an additional 70,000 houses each year in England might be required.

3.14   Brent will, when the London Plan Alterations are adopted, be required to produce a step change in new housing provision year on year for the next 10 years, needing to provide 11,200 new homes between 2007 and 2017. Because about 1,000 units are expected from bringing existing vacant dwellings back into use, it means that about 10,000 new homes will have to be built or converted in Brent over this period. This would increase both the population and the housing stock by 10%. The Panel Report into the Examination in Public of the London Plan Alterations, published on 20th September, confirms the target figure for Brent and this will almost certainly be included in the adopted Alterations when these are finally published. There are three main considerations to housing growth:

1. Brent has a commitment to over 4,000 homes in Wembley and 1500 new homes in South Kilburn and a number of other housing sites, which count towards the 10,200 so, although the figure is challenging, it is achievable.

2. Housing growth is likely to be the main vehicle for driving regeneration in key areas of the Borough. No housing growth effectively equals little change and very limited regeneration.

3. Housing growth will have significant impacts on the Borough in terms of the need for new schools, health and other social infrastructure as well as transport, open space and waste and energy needs.

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

3.15   Residents often say that the Borough is full up and cannot conceive of a 10% increase in the number of new homes and a further 10% increase in population. We should therefore not build further homes. The counter view is that new homes are needed and it is that investment that will help regenerate the Borough. To resist housing growth will bring the Council into conflict with the Mayor of London who will be able to insist that we plan for the number of homes set out in the London Plan. Perhaps the more pressing point is that if we undershoot our targets developers will be able to argue that non-housing sites should be developed to meet the shortfall. This will leave the Council unable to control housing growth in growth areas nor able to plan and manage its consequences.

3.16   The clear recommendation from officers is that, as housing growth is a London-wide and national priority, it is better that it is managed locally, that the benefits of regenerative housing development are embraced and the infrastructural requirements are planned for. This planning must start with the LDF and its Core Strategy which sets out the direction of travel for the Borough.

3.17   The attached Core Strategy sets out a fourfold strategy for the development of the Borough:

1. Concentration of major housing growth into 5 growth areas, Wembley, South Kilburn, Church End, Alperton and Colindale
2. Regeneration of industrial areas, town centres and poor quality 'estates'
3. Protection of open space, conservation areas and the best of suburbia
4. Local benefits meeting the needs of diverse communities

3.18   The strategy is different from the UDP in which sites were allocated to housing across the Borough where opportunities arose. This new strategy is looking to actively funnel housing into key growth areas. This has a number of benefits:

➢ Concentrations of housing and the infrastructure needed can be planned together
➢ Sites can be put together to get, for example, both housing and schools - not so easy if we disperse growth
➢ Growth can be accommodated in areas of good transport access, and the amount of development will be able to fund transport improvements, with an emphasis on non-car modes of travel
➢ Higher density growth takes place in the most accessible locations
➢ Other parts of the Borough such as open space or main employment areas and many of the better quality environments, e.g. conservation areas, can be protected from inappropriate development

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

➢ Developments that are mixed in use, tenure and house type (including affordable housing for families)
➢ Changes demanded in the quality of architecture and design

8

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

<u>Why have these 5 areas been chosen as growth areas? Are these the right areas?</u>

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

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

<u>What about other areas in need of regeneration?</u>

3.21 The 5 growth areas are where over 1000 housing units could be supplied in each area. And of course the housing growth is acting as the main driver of regeneration within them. This is not to ignore other areas in need of regeneration. There will be other designations in the LDF to pick these out:

- ➢ Regeneration estates - notably Brentfield/North Circular Road corridor or Barham Park
- ➢ Site Specific Allocations - proposals for individual sites such as Metro House, 1-3 The Mall
- ➢ Supplementary Planning Documents (SPD) set out detailed guidance on key development sites such as Guinness

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<u>Which parts of the Borough should be protected?</u>

3.22   One of the advantages of focusing growth into key locations is that most of the borough can be protected from the development pressures that the 'hope-value' of new housing can bring. An integral part of the strategic spatial approach is the protection of open space, the character of valued suburban environment, existing community facilities and of industrial land for business and industry. There are therefore strong policies on the design of new development, on preventing development in open areas, and in not allowing the incursion of housing (and other inappropriate uses) into the principal industrial estates.

3.23   Also important, particularly in addressing climate change and associated problems, is that development should be sustainable. As well as focusing development where public transport access is good, and where it will reduce the need to travel, it is also important that new development should contribute towards the minimisation of carbon emissions, by for example ensuring that a proportion of its energy needs are derived from renewable sources, and incorporate climate change mitigation measures.

<u>Summary of Advantages of the Proposed Strategy</u>

3.24   Housing growth presents significant challenges, notably in terms of providing infrastructure, but it is better that this process is managed rather than challenged. Close liaison with Public Service partners will be necessary.

3.25   A scenario of no housing growth will largely mean no large-scale regeneration.

3.26   The strategy is based on concentrating housing growth into 5 main areas and ensuring that the infrastructure is also concentrated in these areas. This allows the protection of the most valued areas of Brent.

3.27   It requires us to use powers such as Compulsory Purchase to bring forward sites for development and use the S106 process creatively.

3.28   There will be significant infrastructure and running costs, and the Council will have to devise a strategy to meet these by effective dialogue with Government, creative use of planning powers and existing land resources, re-shaping existing service provision, and supporting and influencing public service partners.

<u>Changes since May 2006</u>

3.29   Members of the new administration have made a number of comments at the issues and options stage. These are either reflected in the Core Strategy or will be picked up in Site Specific Allocations and DC Policy DPD's. The main issues have been:

Executive	Version No. 4.0
9th October 2006	27/9/06

- The desire for further growth of retail uses in the Wembley area

- Making reasonable accommodation for the car

- Improving the sustainability of new buildings

- Appropriateness of high buildings in certain instances

- Importance of infrastructure

- Clear protection of open space

- Importance of high quality, liveable developments

- Importance of retaining family housing and providing developments that people will stay in long term

- Changes in site specific allocations (e.g. no longer need casino site)

- Ensure Protection of best of suburbs as a counterpoint to concentration of growth

3.30   Each of the above points are dealt with in turn to show how officers have addressed member concerns.

Improved retail growth in Wembley- Wembley is one of the main growth areas and a detailed study has been commissioned to get a clear picture of demand for further retail growth. This will be reported to Executive by the end of the year.

Accommodating the Car – The Core Strategy has a better balance now but the key policy approach will be set out in the Development Control DPD which will be before members in Spring 2007.

Sustainability requirements – The need to improve the sustainability of new buildings is a key and integral part of the core strategy attached

High buildings – Additions to policy CP SS9 set out the importance of paying due regard to the existing neighbourhood. DC policies will add more detail looking at criteria to judge the appropriateness of high buildings and a new SPD on Design will contain more detailed control.

Infrastructural Requirements – as a result of members comments and the sustainability appraisal, the need for infrastructure –see policies CP SS3 and SS6.

Retaining and building family housing – reference in CP SS7 and para 5.4.1

Site Specific Allocations-report to Executive will follow in the new year

Protection of suburbs – new text to para 5.6.1 and policy CPSS9

<u>Topic-based Core Policies</u>

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

<u>Development Control Policies</u>

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

<u>Site Specific Allocations</u>

3.33 A further document of Site Specific Allocations, showing individual sites that have been allocated to specific uses, will also be brought forward to a future Executive for public consultation alongside the DC policies Preferred Options.

Next Steps

3.34 Although it was originally intended that consultation at this stage should include Development Control Policies as well as the Core Strategy and Site Allocations, officers are now proposing that this forms part of a separate public consultation in April 2007. Although this will mean an additional administrative burden, it will have the advantage of allowing people to concentrate upon the key spatial planning issues first before dealing with more detailed control policies. Officers will prepare a revised timetable proposing this approach which, after agreement from the Executive, will be put to the Secretary of State for approval. As the chart in Appendix 3 demonstrates, this will mean that that the Core Strategy will be progressed to adoption on an earlier timetable to the DC Policies and Site Specific Allocations and will, therefore, be adopted at an earlier date.

4.0 Financial Implications

4.1 An allowance was made in the 2005/6 budget for costs over and above staff costs including that for consulting upon and publishing the LDF.

Most of the funding required has been met from the Planning Delivery Grant. Government officials have made it clear that the Planning Delivery Grant (PDG) should be used to meet additional resource requirements of the new system. The slippage in the timetable for preparing the DPDs is likely to result in a reduction in the PDG Brent receives in 2007/8. The costs of consulting upon the LDF will be met from the Planning Service budget for 2006/7. For future years only a rough approximation of costs can be provided (see table below). There is a requirement for funding for Examination across two financial years because there will be a need now to hold two separate 'Examinations in Public' because of the different timetables for the Core Strategy and the other DPDs. With the likely ending of PDG, there will be a need to find funding from other sources for 2007/8 and 2008/9.

	£		
	2006/7	2007/8	2008/9
Estimated annual costs			
Public Inquiry costs		80,000	80,000
Other Costs	75,000	80,000	85,000
Total Costs	80,000	160,000	165,000
Sources of funding			
Planning Delivery Grant	80,000	60,000	?
Potential growth required		100,000	165,000

4.2   There will be significant capital investment needs and additional running costs as a result of housing and population growth. A fundamental point, however, is that it will be more cost effective to channel growth into key growth areas because there will be greater certainty over the scale, nature and phasing of development and the impacts can be assessed more easily and therefore the infrastructure needed more easily identified. It also allows a coherent business case to be put to government departments for future funding projects.

5.0   Legal Implications

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

13

regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004.

5.2 The Core Strategy Preferred Options will become a material consideration in the determination of planning applications once it is available for public consultation on October 30th 2006.

6.0   Diversity Implications

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

Background Papers

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

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Draft Core Strategy
Preferred Options, July 2006

(circulated separately)

Executive	Version No. 4.0
9th October 2006	27/9/06

APPENDIX 2 Summary of Issues and Options Consultation Responses

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

Questionnaire in Brent Magazine

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

3   Key results are set out below

Housing

   - 50% of respondents think that there should be more affordable homes

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

Built Environment

   - 50% think that requiring 10 percent of energy from renewable sources was too little whilst 45% thought that it was about right

   - 96% think that it is either important or very important for developers to include sustainable design in new housing

   - 86% think that buildings over 10 storeys are inappropriate in the borough

Transport

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

Employment

16

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

Town Centres

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

Community Facilities

- 56% think there are not enough community facilities

- 87% think that housing developers should help fund new health facilities

Tourism and Leisure

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

Open Space

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

Waste

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

Issues and Options Papers

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

Local community   25

National Bodies   10

Commercial Interests   28

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

6 Northwick Park Residents Association carried out their own questionnaire of their members, based on the questions that were asked in the Issues and Options papers but given a local area focus, and received 126 replies.

7 Although a wide variety of views have been expressed, a number of themes have emerged. These can be summarised as follows:

   • By far the majority of representations would like to see a limit on the height of buildings or, at least, to have high buildings confined to locations where they might be more acceptable, i.e away from more suburban residential areas

   • General opposition to an increase in the level of affordable housing sought in new housing schemes

   • Generally considered that new housing development should be supported by new social infrastructure such as schools and health facilities

   • Open land should be protected from development

   • General support for development to be more sustainable

   • A mixed response on parking provision, but the majority of respondents seem to be in favour of restrictions on parking

   • Little support for a large casino in Wembley

Community Workshops

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

9 A full report on the workshops is available online as well as from the Planning Service.

APPENDIX 3 Timetable for Producing LDF Documents

ID	Task Name	Duration	Start	Finish
1	SCI	479 days	Thu 02/09/04	Fri 30/06/06
10	Core StrategyDPD	922 days?	Thu 02/09/04	Tue 11/03/08
11	Preparation of DPD (Incl evidence gathering & SA prep)	499 days?	Thu 02/09/04	Fri 28/07/06
12	DPD I & O drafted	8.7 mons	Mon 01/11/04	Thu 30/06/05
13	SA - Carry our appraisal of strategic issues and options	3 wks	Fri 01/07/05	Thu 21/07/05
14	DPD I & O informal ongoing consultation period & SA consultation	6 wks	Mon 05/09/05	Fri 14/10/05
15	Consider Reps & Produce DPD Preferred Options	11.45 mons	Mon 17/10/05	Thu 31/08/06
16	Core StrategyDPD Pref Ops drafted & SA conducted	13 wks	Tue 01/08/06	Mon 30/10/06
17	Draft Core Strategy DPD to committee & executive	4 days?	Wed 04/10/06	Mon 09/10/06
18	Core Strategy DPD Consultation on Preferred Options & final SA report	6 wks?	Tue 31/10/06	Mon 11/12/06
19	Core Strategy DPD Produce final version	3 mons?	Tue 12/12/06	Mon 05/03/07
20	Core Strategy DPD submission to Committee & Executive	24 days?	Wed 14/03/07	Mon 16/04/07
21	Core Strategy DPD & SA Submission to SofS & Mayor / For consultation	6 wks?	Wed 18/04/07	Tue 29/05/07
22	PEM	1 day?	Wed 01/08/07	Wed 01/08/07
23	Core Strategy DPD Examination	3 mons?	Thu 02/08/07	Wed 24/10/07
24	Core Strategy DPD binding report received	1 day?	Mon 14/01/08	Mon 14/01/08
25	Core Strategy DPD Adoption (Full Council)	1 mon?	Thu 14/02/08	Tue 11/03/08
26	Site Specific Allocations (SSA) & DC Policies DPDs	1045 days?	Thu 02/09/04	Fri 29/08/08
42	SPDs (First tranch)	346 days?	Mon 02/04/07	Fri 25/07/08

Project: Generic programme
Date: Wed 13/09/06

Task
External milestone ◆
Internal milestone ◆
Tasks summary

\\bhh2nt40.env.brent.gov.uk\ARP\Policy\LOCAL DEVELOPMENT FRAMEWORK (LDF)\LDS\Latest & Programme\Revised Sept 06 Generic Overall Programme Qtr - 12 Sept.mpp

19

Executive	Version No. 4.0
9th October 2006	27/9/06

ID	Task Name	Duration	Start	Finish	2005	2006	2007	2008	200
					tr tr tr	tr tr tr tr	tr tr tr tr	tr tr tr tr	tr
1	SCI	479 days	Thu 02/09/04	Fri 30/06/06					
10	Core StrategyDPD	922 days?	Thu 02/09/04	Tue 11/03/08					
26	Site Specific Allocations (SSA) & DC Policies DPDs	1045 days?	Thu 02/09/04	Fri 29/08/08					
27	Preparation of DPD (Incl evidence gathering & SA prep)	499 days?	Thu 02/09/04	Fri 28/07/06					
28	DPD I & O drafted	8.7 mons	Mon 01/11/04	Thu 30/06/05					
29	SA - Carry our appraisal of strategic issues and options	3 wks	Fri 01/07/05	Thu 21/07/05					
30	DPD I & O informal ongoing consultation period & SA consultation	6 wks	Mon 05/09/05	Fri 14/10/05					
31	Consider Reps & Produce SSA & DC policies DPDs Preferred Options	13.75 mons?	Mon 17/10/05	Fri 03/11/06					
32	SSA & DC policies DPDs Pref Ops drafted & SA conducted	13 wks?	Mon 06/11/06	Fri 02/02/07					
33	Draft SSA & DC policies DPDs to committee & executive	2.2 mons?	Wed 10/01/07	Mon 12/03/07			12/03		
34	SSA & DC policies DPDs Consultation on Preferred Options & final SA report	6 wks?	Mon 09/04/07	Fri 18/05/07					
35	SSA & DC policies DPDs Produce final version	4 mons?	Mon 28/05/07	Fri 14/09/07					
36	SSA & DC policies DPDs submission to Committee & Executive	1 mon?	Mon 01/10/07	Fri 26/10/07			26/10		
37	SSA & DC policies DPDs & SA Submission to SofS & Mayor / For consultation	6 wks?	Mon 05/11/07	Fri 14/12/07					
38	PEM	1 day?	Mon 04/02/08	Mon 04/02/08				04/02	
39	SSA & DC policies DPDs Examination	3.05 mons?	Mon 11/02/08	Fri 02/05/08				02/05	
40	SSA & DC policies DPDs binding report received	1 day?	Mon 07/07/08	Mon 07/07/08				07/07	
41	SSA & DC policies DPDs Adoption (Full Council)	1 mon?	Mon 04/08/08	Fri 29/08/08				29/08	
42	SPDs (First tranch)	346 days?	Mon 02/04/07	Fri 25/07/08					

Project: Generic programme
Date: Wed 13/09/06

Task
External milestone ◆
Internal milestone ◆
Tasks summary

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9th October 2006

27/9/06

Appendix 4: Sustainability Appraisal of Core Strategy Preferred Options

The following schedule includes the changes to the Core Strategy recommended by the consultants as a result of the Sustainability Appraisal of the Core Strategy Preferred Options. The changes which officers are recommending for inclusion in the draft Core Strategy have already been incorporated. These changes, together with some grammatical or spelling corrections, etc. are indicated by italicised and highlighted text.

The final Sustainability Appraisal report which will be consulted upon alongside the Core Strategy Preferred Options will be available to Members on request.

Suggested textual changes to the "Draft Core Strategy

General comments

The following general topics were raised in the SA output sent to LB Brent on 21st September 2006, and for context should be read in conjunction with these. The suggested changes below attempt to provide a pragmatic approach to dealing with the comments previously raised given the limited opportunity to amend the draft DPD at this stage. Several of the previous comments can also be dealt with subsequently in other DPDs, such as the Development Control Policies.

Topic	Suggested changes to the policy wording or supporting text as a result of the SA	LBB response
Terminology	Some comments are included below on the suggested changes chapter by chapter on terms, including "infrastructure" and "sustainable", to provide clarification.	
Potential omissions (either in supporting text or of policies)	Where we flagged up possible omission in the previous note (see list below), we have tried to at least suggest some additional words to include in the existing supporting text (see comments chapter by chapter below). Perhaps these could be revisited as part of developing the Development Control policies. • historic environment, cultural assets, conservation areas, archaeology etc.	Changes to incorporate reference to historic environment, Blue Ribbon Network., trees and Olympics will be added. Adressed under relevant policies below.

Topic	Suggested changes to the policy wording or supporting text as a result of the SA	LBB response
	• Planting new and protecting existing trees • Developing London's Blue Ribbon Network • Support to markets (street, farmers etc) • Mayor's proposal for a Low Emission Zone • Strategic Flood Risk Assessment • Olympics • Zero carbon development	Sentence added to para. 6.3.4 on proposals for zero carbon developments. Strategic Flood Risk Assessment already dealt with in para 6.3.3 Markets will be dealt with in DC policies
Cross references and readability	As agreed, the Core Strategy may benefit from a clearer description up front of what will be covered in the forthcoming Development Control Policies as these will now not be available at the same time as the Core Strategy DPD Preferred Options.	Sentence to be added to introduction to clarify timetable and in particular to explain when more detailed policy to be brought forward
Scale of development / growth	As discussed the potential negative environmental effects are flagged up in a couple of places and this will suffice in this version. The SA will inevitably flag up the potential negative effects, but also the benefits and the other Core Strategy policies and forthcoming DC policies which will seek to mitigate them as far as possible.	No change necessary
Climate change	We have made detailed comments on the Climate Change policies below, including suggested rewording of policy ENV1 for LB Brent to consider. This attempts to remove the confusion over mitigation and adaptation, ensure it is more comprehensive and reflects the London Plan alterations. Suggestions are also made on policy SD1.	See below
Spatial Vision	Para 4.5.1 - Would read better as a vision if "In 2016" was added at the start.	Agree to minor change proposed
Objectives	3. reducing the need to travel – we do not see that reducing the need to travel is incompatible with car ownership and recommend from a sustainability perspective that the text added: "whilst recognising that car ownership is important to many and that it is planned for accordingly" is deleted.	Change not considered necessary.

Spatial Strategy

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
SS1: Key Principles for Development	*Amendment to policy wording:* 2nd bullet point – this point could be enhanced by specific mention of the benefits of a 'design led approach' and masterplanning and the use of SPDs and AAPs to provide a comprehensive planning and design framework for major sites and collections of related smaller sites. 3rd bullet point - No explicit mention of "walking and cycling" as an important transport mode, this could be incorporated into the third bullet point of the current wording. 4th bullet point – 'these locations' could be read to include 'open space' and therefore text should be rewritten to avoid this presumably unintentional interpretation. 6th bullet - reference to 'affordability' of housing could be added to 'housing size and tenure'. In addition reference under the same bullet could be made to 'building for life' 7th bullet - "All development should be sustainable" should be amended to "All development should contribute towards achieving sustainable development", or something similar, as development is always likely to be a compromise between different dimensions of sustainability and delivering sustainable development is an aspiration concept. Reference to climate change should also be amended, so reads: "All development should contribute towards achieving sustainable development so as to help mitigate the causes and adapt to the effects of climate change through, for example, sustainable construction methods". last bullet – could add ", open space and environmental quality" after "public realm"	Agreed to include reference to design-led approach. Other changes suggested are considered unnecessary. Agreed that 'walking & cycling' be added Agreed – delete 'these locations and add 'Any development outside the growth areas'. Considered that reference to tenure includes affordable housing therefore no change. Building for life considered too detailed for SS1 but included in H2 Agreed – amend as proposed Not considered necessary
CP SS2: Population and Housing Growth	No changes proposed on the policy or supporting text *Suggested amendment to the "Alternative options not selected" box:* Whilst not an options preferred on sustainability grounds, a potentially feasible option to refer to would be a higher housing target. This options is included, with reasons why it was not selected, under the alternatives not selected for policy H1 and should also be included under SS2.	Agreed. Included reference to higher level of growth being rejected because London Housing Capacity Study demonstrated that suitable sites are not available which could accommodate substantially more housing. A higher target would be

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
		difficult to sustain without developing on open space or putting an undue strain on infrastructure.
CP SS3: Focus of Growth	*Suggested addition to supporting text:* Add reference to engaging the local community in planning future development – e.g. at the end of para 5.2.9 or 5.2.10 add "In all areas of growth, appropriate engagement with the local community will be required to help plan the future development and infrastructure / amenity improvements".	Agreed to include proposed sentence.
CP SS4: Commercial Regeneration	*Point of clarification on policy wording:* Is it possible / desirable to clarify what are considered "incompatible" uses? Are all other uses apart from industrial / business being resisted or may other uses be acceptable under certain circumstances? If the later is the case, presumably this wording is deliberately being used to allow flexibility / case by case judgement? If not, it would be clearer to just state 'other uses' or list them.	No change. Some flexibility is necessary because apart from B1, B2 and B8 uses, there are also closely related uses such as builders' yards or depots which are acceptable in Brent's industrial estates.
CP SS5: Wembley as a Focus for Growth	*Clarification on supporting text:* It would be useful to clarify what is meant by 'linkages' in paragraph 5.2.12. Presumably this is physical linkages – access routes etc, but it could also other meanings such as community identity for example. Consider adding a reference to the 2012 Olympics in the supporting text and the need to realise the opportunities this presents particularly as Wembley is one of the venues. *Point of clarification on policy wording:* Unclear what is meant by 'activities' in the context of the last sentence of the policy, is it possible to clarify what activities regeneration should provide and are being referred to here?	Agreed to clarify that means physical linkages Add " ..and on its role as an Olympic venue in 2012" to end of second sentence in para. 5.2.12. Add " ,such as retailing or leisure," to clarify meaning.
CP SS6: Infrastructure to Support Development	*Point of clarification on policy wording:* It is appreciated that the policy requires the council to be satisfied that infrastructure requirements arising will be met "before granting planning permission", but we feel the timing / phasing issue is not necessarily explicit from this wording used. It would benefit from "and at an appropriate time", or something similar, being added after "will be met". *Suggested amendment to the "Alternative options not selected" box:*	Agreed but add 'by time of occupation' after 'will be met'. Agreed. Add as alternative option and

24

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
	A possible alternative that could also be referred, with reasons why it was not selected, is to require all sizes of development to fulfil infrastructure requirements; this would take into account the cumulative infrastructure requirements of smaller scale developments.	that not selected because unreasonable to expect all small developments to meet their own infrastructure requirements directly.
CP SS7: Sustainable Communities	*Suggested amendment to supporting text:* Para 5.4.1 – suggest amending "Achieving sustainable development" to "Aiming towards achieving sustainable development" or "Promoting sustainable development" and amend "The need for development to be sustainable" to "The need for development to contribute towards achieving sustainable development".	Agreed. Proposed change will be included.
	Suggested amendment to policy text: Amend "Planning policy will ensure that development is sustainable by" to "Planning policy will contribute towards achieving sustainable development by".	Agreed. Proposed change will be included
	Amend 5th bullet – add "environmental" to "physical constraints" i.e. "physical and environment constraints" and add to examples at end "and air quality and noise pollution"	Agreed. Proposed change will be included
	Amend 6th bullet – add reference to "historic" assets i.e. "to cultural and historic assets".	Agreed. Proposed change will be included
	Add new bullets: • "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" • "where appropriate, modernising or redeveloping the housing stock"	Agreed. Proposed change will be included Agreed. Proposed change will be included Agreed. But refer to "the London Plan's Blue Ribbon Network". Not accepted as too detailed.
	Also reference to "mixed use development" could be added as a key element of the approach to sustainable communities (add at end of second bullet?)	Not necessary as referred to in policy SS1

25

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
CP SS8: Meeting Local Community Needs	*Suggested cross reference in the supporting text:* There is a strong link between this policy and policy SS6: Infrastructure to support development. The relationship between them could be acknowledged in the supporting text.	Agreed. Cross reference will be included
CP SS9: Protecting the Built and Natural Environment	*Suggested amendment to policy text:* Clarify what "new or improved areas" / "existing deficiencies" are i.e. add"of open space and nature conservation value" after "improved areas". Last sentence of policy is at present not entirely clear. We would recommend retaining 'presumption against' and removal of new text 'will not generally be permitted'.	Agreed. Proposed change will be included. Not accepted. Current wording allows for limited circumstances where development associated with the use of the open space, e.g changing facilities, will be acceptable.
CP SS10: Implementation	No changes proposed	

Maintaining a Quality Environment Policies

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
UD1: Spatial Design Strategy UD2: Design Delivery Protocol	No significant changes proposed *Clarification on supporting text:* Although the need to concentrate on 'significant developments' is recognised, the cumulative effects of many smaller schemes can also be significant from a sustainability perspective. Some more recognition of this fact in the supporting text to UD1 addressing how design issues within smaller schemes may be addressed would be beneficial.	It was intended for this broad approach to cover smaller schemes as well –an abridged version was to be included in a DC policy –this will be mentioned in supporting text and cross-referenced in CP policy.

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
SD1: Climate Adaptation Infrastructure	*Clarification on and amendments to the supporting text:* 6.2.1 – add "mitigation and" after "assessing the climate change" 6.2.2 – as the GLA publication referenced is more relevant to new development delete from here and therefore on reflection just leave the reference to it in para 6.3.5 6.2.1 – this includes reference to the council's own "Carbon Management Implementation Plan", but the policy text refers to "Carbon Management Strategy"? Use consistent terminology. *Point of clarification on policy wording:* We do not really understand what is meant by 'Climate adaptation infrastructure' (as far as we are aware it is not a term in common use) and the intended purpose of this policy, which makes it difficult to comment in detail on it. If it could be clarified what is meant by and what the aims / coverage are of the proposed "Climate Adaptation Strategy" and "Carbon Management Implementation Plan / Strategy" then perhaps this policy could focus on being a commitment to produce the relevant plan / strategy. (Are they just for the Councils own operations or wider?) To reflect guidance in PPS1 and PPS2 and the London Plan alterations, the policy could then go on then to say that "the council will seek to mitigate the effects of climate change locally to reduce carbon dioxide emissions by 25% by 2020 from 1990 baseline" (this is one of the figures in the London Plan alterations' mitigating climate change policy – 4A.2ii, which is working towards 60% in 2050. The borough could obviously have its own targets or use the target for a different year). Alternatively / in addition these London targets could be added to the text in para 6.2.4. The final sentence of the policy, we don't understand what "to enable future connectivity between related sustainable infrastructure systems" means? Therefore clarify / delete.	6.2.1 –accepted 6.2.2 –not accepted, as a reference to the relevant 'adaptive' aspects of development is useful at this point. 6.2.1 –accepted it is inconsistent. But, the documents are not the same –the latter is a 'Programme'. The sentence will be amended to clarify this. *See definitions in footnote. The intent is to push the boundaries here for two reasons: • The Council has joined the Carbon Trust's Carbon Management Programme, and will be mapping its own operational emissions to come up with projects for reducing this –to be included in a Plan/Strategy to 2011. • Climate adaptation measures sought from development seem currently to be considered on an 'ad-hoc', site by site basis. There is little way of ascertaining the minimum level of such measures needed to enable continued service delivery in event of emergencies. And also, no way of being confident that these would all interact effectively in

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* The Cambridge online dictionary defines 'infrastructure' (noun) –as: the basic systems and services, such as transport and power supplies, that a country or organization uses in order to work effectively: and the Merriam Webster dictionary definition includes: a 'basic substructure or network'.

27

Executive 9th October 2006	Version No. 4.0 27/9/06

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
		such situations.
		The aim of this policy is to shift the focus to a strategic view of Brent's requirements – so measures are seen as potentially comprising an overall, borough-wide infrastructure –i.e. an incremental back-up system. This ensures individually provided site measures are not isolated oases, but eventually link-up into a network across the borough. It is thus reasonable to expect systems to be compatible with each other.
SD2: Sustainable Design and Construction	*Clarification on supporting text:* There is no specific supporting text to this policy, it sits within the text on climate change, but sustainable design and construction is a wider issue. Perhaps some text could be added at a later stage (after the Preferred Options) to provide the context? 6.2.3 to 6.2.5 – it is not clear how these paras fit in as there is limited explanation. They seem to mainly relate to energy, rather than climate change more generally – add some explanation if possible. Para 6.2.5, the bullet points are mostly broad aspirations / objectives rather than "targets" ("eradicate 'fuel-poverty' in Brent by 2018" is the only real target – by the way isn't the government's target by 2016?), therefore rephrase – call objectives or aims? 6.2.7 – is there any commitment to update the existing SPG 19 (to reflect the latest good practice) and / or produce it as an SPD? Would this have benefits to give it greater weight etc? Add "and climate mitigation and adaptation" after "sustainability". *Point of clarification on policy wording:* No changes proposed – as the list of bullet points just provides links to the DC policies it is not possible to comment on how comprehensive this list is – e.g. does this list cover microclimate/heat islands/design – passive solar etc, internal building environment / comfort / security etc?	Supporting text will be added. SPG19 will be updated (See LDS) A mention of this will be made in 6.2.7

28

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
	We suggest reviewing the list in this policy against the measures included in the London Plan (further alterations) policy on sustainable design and construction to check all the relevant 'hooks' to DC policies are included: • make most effective use of land and existing buildings • reduce carbon and other emissions that contribute to climate change • design new buildings for flexible uses throughout their lifetime • manage overheating • make most effective and sustainable use of water, aggregates and other resources • minimise energy use, use renewable energy, supply energy efficiently and incorporate decentralised energy systems where feasible • procure materials sustainably • ensure designs make the most of natural systems both within and around the building • reduce air pollution, • manage flood risk • ensure developments are comfortable and secure for users conserve and enhance the natural environment, particularly in relation to biodiversity and enable easy access to open spaces • avoid creation of adverse local climate conditions • promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, CHP schemes and other treatment options. • encourage major developments to incorporate living roofs and walls where feasible • reduce adverse noise impacts	These will all be covered within the linked DC Policies.
ENV1: Climate Change	*Clarification on and amendments to the supporting text:* 6.3.3 - Strategic Flood Risk Assessment – in a previous draft we think we recall a commitment to undertake an SFRA with other west London boroughs? Given the forthcoming requirements of PPS 25, can a commitment be made to undertaking one here? *Amendments to policy wording:* Suggested revised policy wording to the policy is included below to remove confusion over what is mitigation and adaptation and ensure it covers all the key issues:	Add "The Council will examine the option of undertaking an SRFA with other West London Boroughs or will undertake a borough SRFA if necessary".

29

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
	"The Council will expect any new development to make the fullest possible contribution to the mitigation of and adaptation to climate change. This will be achieved by: • *promoting zero and low carbon development to contribute to the borough's carbon dioxide reduction target* • *maximising the energy efficiency of development* • *incorporating decentralized renewable energy generation within developments (see policy DC ENV7);* • *reducing 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)* • *conservation and recycling water, and other materials* • *reducing flood risk and surface run-off and incorporating sustainable drainage (see policy DC ENV6)* • *incorporating flood resilience where appropriate* • *minimising overheating, heat island effects and solar gain in summer* *Climate proofing will be required of all developments."* How is it intended that climate proofing of development will be done? Could this be part of the Sustainability and Climate Mitigation and Adaptation Strategy that has to be prepared under SD2? The policy refers only to 'new' development, ideally some of it would be extended to refurbishments and existing housing stock via retrofitting, but presumably this is not achievable via this policy / the DPD's remit?	Current policy seeks to make a distinction between measures to mitigate the effects of climate change and the need for development tom adapt to climate change. Need for change not accepted.
ENV2: Protecting the Environment	***Amendments to policy wording:*** Add "and enhance" after "seek to protect" in the first line	Agreed

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
OS1: Protection and Enhancement of Open Space and Biodiversity	*Supporting text and policy wording:* Ideally there would be a presumption against loss of open space to development, but from the explanation in para 6.4.4 it is understood why the term 'inappropriate' has been used as a caveat. It is assumed that it would not be acceptable to delete "inappropriate"? It would be beneficial to try to find somewhere in the supporting text to add that it is beneficial for development proposals to incorporate planning of native species in landscaping schemes / tree planting (e.g. in para 6.4.8).	"Inappropriate" is defined in PPG2 Green Belt, amended in 2001. As MOL is treated like the Greenbelt in urban areas it seems appropriate to leave as is. Within the Development Management policies there will be a specific policy on the protection and planting of trees. It is also proposed that the last sentence of paragraph 6.4.8 includes "with preference given to the use of native species."
OS2: Promotion of Biodiversity and Nature Conservation	No changes proposed	
W1: Sustainable Waste Management	*Amendments to policy wording:* Suggest that in the 2nd sentence of the 2nd para "All developments …", that reference is added to good practice re construction and demolition waste and the Brent protocol (or is it covered under sustainable design and construction?).	Covered in sustainable design policies but cross-reference will be added.

Meeting Housing Needs

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
H1: Housing Provision	No changes proposed	
H2: Sustainable Housing Provision	*Clarification / amendments to supporting text and policy wording:* Is there a definition / threshold for 'high residential buildings' (paragraph 7.0.12 and policy CP H2) or is this purely contextual, depending on specific surroundings and / or to be covered in the DC policies?	Current definition of over 25 metres in the UDP will be added.

Executive 9th October 2006	Version No. 4.0 27/9/06

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
	Point c) addition of reference to travel by "public transport, walking and cycling" here would be beneficial	Not accepted as aim is to reduce the need to travel by reducing journey length
	Point d) add at end "and generation of waste"	Agreed
	Point f) could reference to 'homes for life' / 'lifetime homes' be added here?	Agreed but add "to lifetime home standards" after "constructed" in first line of policy.
H3 A Balanced Housing Stock	*Amendments to policy wording:* No significant changes Point c) – the word 'contained' appears to be missing.	Agreed
H4: Affordable Housing Provision	*Amendments to policy wording:* Point b) – we would recommend from a sustainability perspective that the threshold be a capacity of 10 or more dwellings rather than 15 for the provision of affordable housing contributions. Provision of affordable homes is a significant issue for the borough and the lower threshold would mean a substantial increase can be made in meeting need and achieving the 50% target. 10 rather than 15 would conform with the London Plan alterations (which also allows for a lower target than 10 in a borough if it can be justified).	Agreed
	Suggested amendment to the "Alternative options not selected" box: Following on from the above comment, the preferred option would therefore be to have a lower threshold e.g. 10 and not include a lower threshold as one of the alternatives not selected. This would perform better in sustainability terms and conform with the London Plan alterations. However we appreciate that it may not be feasible to amend this given the comments of members, but the implications will have to be included in the SA Report.	Agreed

Connecting Places

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
TRN1: Prioritising Investment	No changes proposed	
TRN2: Reducing the Need to Travel	No changes proposed	
TRN3: Parking and Traffic Restraint	*Amendments to supporting text:* Para 8.0.5 – could a reference be added to "promoting the preparation of travel plans for businesses etc" to the last sentence as another potentially valuable mechanism in addition to car clubs? We assume that the DC policies will pick up on these as part of policies. Para 8.0.5 – in terms of sustainability given the current problems with congestion, air quality etc and the need for a step change in transport towards more sustainable modes, we would recommend that the following text was not included: "the need to ensure that car users are not unduly penalised and are allowed to take benefit from car ownership".	Agreed. Reference to be added Not accepted. The inclusion of the word "unduly" recognises that restraint on the unnecessary use of the private car continues to be a key element of the strategy
TRN4: Transport Links in London	*Amendments to supporting text:* Para 8.0.6 – in terms of sustainability given the current problems with congestion, air quality etc and the need for a step change in transport towards more sustainable modes, we would recommend that the following text was not included: "implementation of these links should not reduce other means of access to the extent that it could jeopardise commercial activity".	Revised alternative wording already included which seeks to safeguard the interests of all road users in implementing key transport links in London.

A Strong Local Economy / Community Facilities

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
BIW1: Protection of Employment Land and Premises	No suggested changes	

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
BIW2: Principles of Business, Industrial and Warehousing Development	*Amendments to policy wording:* Penultimate bullet currently suggests that that waste generation should be maximised, presumably this should be minimised? i.e. should read: "maximising energy efficiency and minimising waste management generation".	Generally accept but suggest that "maximising energy efficiency and minimising waste generation"
	Last bullet currently suggests that mitigation measures will be minimised, could be clarified by adding "detailing appropriate" before mitigation measures.	Accepted, this will be incorporated.
	Amendments to supporting text Para 9.1.27 – amend "… high standard so that the development meets sustainable development objectives" to "… high standard so that they contribute to meeting sustainable development objectives"	Accepted, this will be incorporated.
BIW3: Reuse of Employment Land and Premises	No suggested changes	
CP TC1 Wembley Town Centre Focus	No suggested changes	
CP TC2 Other Preferred Locations	No suggested changes	
CP TC3 Exceptional Locations	No suggested changes	
CP TC4 Town Centre Opportunity Sites	No suggested changes	
CP TC5: Network of Town Centres	No suggested changes	
CT1: Promoting Leisure and Tourism	*Amendments to supporting text* Para 9.3.4 – adding a reference in the supporting text to the role of culture and the arts in skills and training would be beneficial e.g. at the end of the first sentence.	Add to first sentence in paragraph 9.3.2 "*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*

34

Policy	Suggested changes to the policy wording, or supporting text, as a result of the SA	
		overseas visitors".
CG1: Meeting the Needs of the Community	No suggested changes	