

Development Policies - Preferred Options



Development Policies - Preferred Options

Contents

1 Introduction	2
1 Promoting a Quality Environment	2
A Better Townscape - By Design	2
Towards a Sustainable Brent, 2020	30
Environmental Protection	41
Enhancing Open Space and Biodiversity	52
Promoting a Quality Environment Appendix	67
2 Meeting Housing Needs	86
3 Connecting Places	104
Connecting Places Appendice	118
4 A Strong Local Economy	126
Business, Industry and Warehousing	126
Town Centres and Shopping	130
Culture, Leisure and Tourism	145
A Strong Local Economy Appendix	151
5 Enabling Community Facilities	160
6 Monitoring and Implementation	166
1 Glossary	1

Contents

1. Introduction



1. Introduction

Purpose of the Development Policies Preferred Options

1.1 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. It also reflects, and builds upon, the Core Strategy Preferred Options which was the subject of public consultation in October- December 2006

What is a Local Development Framework?

1.2 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.

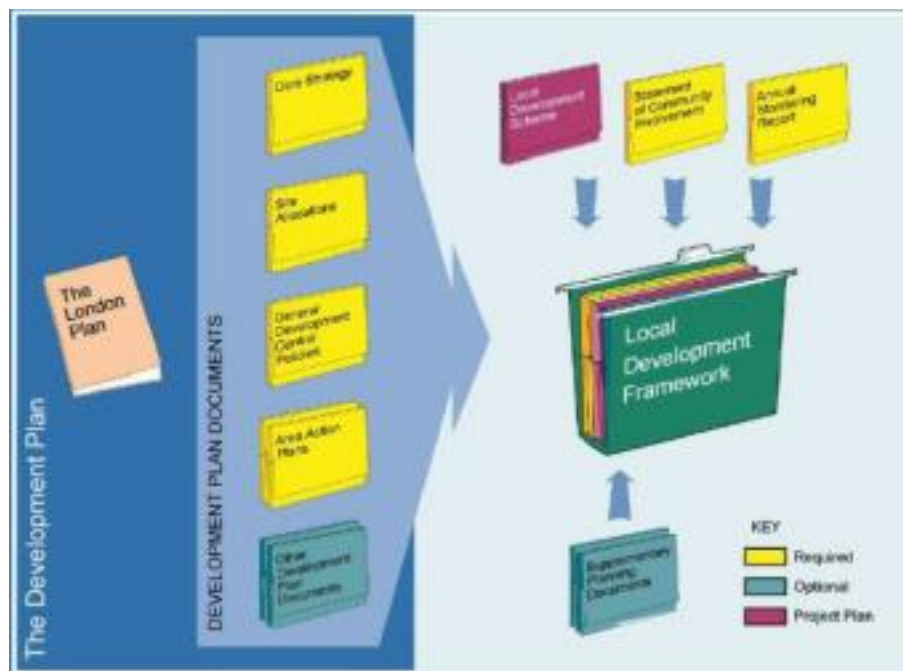


Figure 1.1 Local Development Contents

1.3 The LDF will be made up of a number of documents. This includes this Development Policies document, as well as the Core Strategy and a further document identifying the preferred development options for particular sites called Site Specific Allocations. The Council will consult on the Development Policies commencing June 13th 2007 until July 25th 2007. 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 are Development Policies?

1.4 This Development Plan Document sets out the detailed policies which will be used primarily for the determination of planning applications for development in the Borough. As with the Core Strategy, it is guided by sustainable development principles and must be subject to a sustainability appraisal.

1. Promoting a Quality Environment



1. Promoting a Quality Environment

A Better Townscape - By Design

Urban Design Quality

1.1 Urban design has been defined in various ways, but is essentially the practice of shaping the complex interactions between urban form and movement, between places and people, and between the built-environment and nature. It aims to influence the different aspects of the development process to deliver successful towns and cities that work well. The planning system has a key role in facilitating the urban design process, with greater expectations of a higher quality urban environment –especially as increasing attention is now also being paid towards environmental sustainability. The design of buildings and land use patterns have a crucial impact upon natural resources and ecological processes. The planning system, by requiring design that integrates with natural processes, using resources more efficiently, can play an important part in mitigating global climate change challenges.

1.2 The urban environment affects people in social, economic, psychological as well as physical ways, and there has been much concern expressed about the alienating nature of the modern built environment, in addition to its production and maintenance –its wasteful use of energy and resources and detrimental impact on the eco-system. The quality of much modern building is often seen as poor, using expensive, non-renewable materials, some of which adversely affect our health. Consequently, a 'good quality' environment is one that also supports healthy lifestyles and encourages within us a feeling of well being, civic pride, safety and confidence. Sustainability is thus an important dimension of urban design, (which has emerged as one way of bringing architects, engineers and planners together with the community, to find more user-friendly solutions to poor environmental conditions).

Brent's Urban Character

1.3 The built-environment within the borough is of relatively recent history; from the 19th to 20th centuries. As is typical of much of London, there is a multi-centred structure from amalgamated villages. Main roads well-defined by densely developed frontages, link the main town centre districts to each other and the wider northwest London area. The North Circular Road, however, is a significant barrier between the more affluent northwest of the borough and the poorer southeast area, and also has less frontage-definition.

1.4 Brent's development reflects its accessibility from London. The British Rail lines and the Metropolitan Railway enabled suburban 'Metroland' development boosted by the British Empire Exhibition in Wembley Park in 1924/25. Much of the architecture of Brent reflects the styles of these times. As a result, buildings in Brent display a wide variety of local design characteristics. This variety has been added to by new cultural groups who have introduced new architectural styles. An example is the Swaminarayan temple in Neasden. The wide range of environmental conditions within the Borough, includes:

- Well-planned leafy suburbs;
- Dense 19th-century inner city housing;
- 1960's & early 1970's high-rise residential estates and office blocks;
- Two of London's largest industrial estates; Wembley Stadium & Park Royal;
- A number of district and local shopping centres of varying quality.

1.5 Improvements to the environment cannot be achieved by the Council's actions alone. Co-operation between the Council, design practitioners, local communities and local businesses is essential. Brent's Local Strategic Partnership (LSP) has contributed to bringing together the interests of different sections of the community in the Community Plan. The policies in this chapter have been formulated to ensure that the spatial planning system contributes to the objectives

1. Promoting a Quality Environment

of this Plan. The Council encourages community participation at all stages of the planning and design process through measures set out within its Statement of Community Involvement (SCI)⁽ⁱ⁾, and aims to raise awareness of design-quality issues in the community.

Urban Design Objectives:

1.6 The Borough's Core Strategy aims to substantially raise design standards and thereby, the quality of the urban environment in Brent. It is recognised that as development is an incremental process, higher design standards will need to be rigorously applied to all proposals for development within the borough. The detailed development objectives are:

1. Reinforcing the attractive qualities of Brent's built-environment, to establish positive images and identities, and thus, enhance the quality of life for all residents, workers and visitors;
2. Securing the highest standard of architectural and urban design for all development, ensuring sympathetic integration within their context and respecting principal views across the Borough;
3. Promoting much needed investment in Brent's built-environment, particularly for areas identified as most needing enhancement, to improve the sustainability and effectiveness of urban areas within the Borough;
4. Preserving, managing and enhancing the Borough's built heritage;
5. Raising local awareness of urban design issues, promoting appreciation of the built environment in Brent and working, in partnership with the community, to promote a sustainable, fully accessible and safe environment.

Urban Design Assessments

1.7 In order to properly assess proposals for development, it is important for adequate information to be produced to a professional standard. The scope of information required to demonstrate design quality will depend on the complexity of the proposal and whether it is at outline, full or detailed stage. All proposals for development must be accompanied by the appropriate, scaled and annotated drawings of the proposed development shown in its context, explained in SPG/SPD1 as updated on making a Planning Application. Significant, major or complex proposals should also be accompanied by three-dimensional (3D) representations such as a perspective drawing, a CAD presentation and/or a portable scaled model.

1.8 Applicants should be aware that separate permission may also be required under the Building Regulations. It is therefore important at the outset, to seek the advice of qualified architects, designers and engineers who are experienced in dealing with design and structural work. 'Off the shelf' designs and corporate styles, whether of commercial buildings or housing, which do not reflect the specific context of a place, will not be acceptable. Government Guidance requires Design & Access Statements, and the Council's Supplementary Design Guidance 4 (SPG4 will be incorporated within SPG / SPD17 and updates) to guide applicants on how to prepare such Statements to meet local policy objectives.

1.9 Regard will also be had to the London Plan and the range of relevant detailed guidance produced by the Commission for Architecture & the Built Environment (CABE), including results of consultation advice from it and the Mayor of London.

i Brent's Statement of Community Involvement (SCI), Adopted June 2006

1. Promoting a Quality Environment

DP UD 1

Urban Design Appraisals

Major development proposals will be appraised with regard to their overall effect on urban quality, and are required to demonstrate that all the following urban design objectives (relevant to the nature and scale of the proposal) have been adequately addressed:

- A. Townscape: Local Context & Character (DP UD2);
- B. Urban Structure: Space & Movement (DP UD3 & 4);
- C. Urban Clarity, Safety & Accessibility (DP UD5 & 6);
- D. The Public Realm: Landscape & Streetscape (DP UD7- 8);
- E. Architectural Quality (DP UD9);
- F. Spatial Sustainability: Higher-Intensity, Mixed-Uses (DP UD10-11)
- G. Climate Change Mitigation / Sustainable Design & Construction (DP SD1-7).

Pre-application scoping of key site context issues will be sought, and should be agreed with Officers, using the Council's Design Quality Matrix - within a comprehensive 'Design & Access Statement' to be submitted for new development, extensions and refurbishment proposals.

Issues & objectives identified in the Design Quality Matrix (in accordance with SPG / SPD17 as updated) and the resulting scheme standards will form a key element of applying the Design Quality Protocol on major developments (as set out in Core Policy CP UD2).

On smaller-scale proposals (including significant extensions), a brief design statement, applying the same approach and standards, should be submitted.

A. Townscape: Local Context & Character

1.10 As the Borough is made up of areas of distinct identities and varying quality, a knowledge and understanding of local context (topographical, functional and visual characteristics of an area) is necessary in order to successfully integrate new development into the built-environment. In an established urban area such as Brent, development proposals on most sites should examine and respond to local design and landscape characteristics derived from the landforms and natural features, colours, materials and texture, as well as the uses, heights, scale, bulk and design of buildings. The important contextual cues depend on the scale of the proposed development. More extensive proposals need to consider a wider range of general characteristics, while single infill schemes and extensions need to respond to more detailed characteristics on the particular street on which they are located.

1.11 Buildings in Brent express a wide variety of local design characteristics, many of which are worthy of protection, and this variety of design has been added to by new cultural groups who have introduced fresh architectural styles. Modern buildings that selectively adopt some of the characteristics of existing buildings can happily fit into many settings where the environment has been built up over many generations. In addition, good architecture is often architecture that surprises, and the Council's desire to see selective adoption of local design characteristics need not preclude the introduction of innovative designs that relate well to their surroundings

1. Promoting a Quality Environment

DP UD 2

Townscape: Local Context & Character

Proposals should be designed with regard to their local context, making a positive contribution to the character of the area. Account should be taken of:

- a. The existing landforms and natural features;
- b. The need to respect or improve the quality of existing urban spaces, materials, townscape or historical features which contribute favourably to the character of an area; and
- c. The opportunity for improvement or variety within an area of poor or uniform character, by creating a new area of distinctive quality on suitable sites.

Proposals should not cause harm to the character and/or appearance of an area, or have an unacceptable visual impact on Conservation Areas, Areas of Distinctive Residential Character, Listed Buildings, Views, Landmarks, Green Chains or Metropolitan Open Land.

Application of these criteria need not preclude the sensitive introduction of renewable technologies, innovative contemporary designs and designs which reflect the cultural diversity of the area.

B. Urban Structure: Space & Movement

Spatial Organisation

1.12 A basic principle underlying the design of urban areas is the enclosure of space by built structures, primarily buildings. Enclosed urban spaces can be visually pleasing by increasing variety and visual interest, and are experienced as being more 'comfortable' for pedestrians, often contributing to a sense of 'belonging' or community, which can foster a safer, more secure environment. They can also contribute to road safety by influencing drivers' perception of speed in residential areas.

1.13 The degree of enclosure achieved in public spaces within a development should relate to the types of spaces provided. Variations in their scale, form, treatment and edges can help create streets and spaces of individual identity and varied character. Townscape features such as gateways, landmarks, level-changes, and focal points such as prominent corner sites, can also provide drama and interest, while visual linkages can be formed between streets and spaces, using vistas and framed views.

1.14 Continuity, in terms of having regard to established building lines, is important for reinforcing the edge of spaces within the urban environment. To maintain enclosure, the built frontage of the street should be as continuous as possible, without large gaps between buildings or deep setbacks from the public footpaths. Variations to the building line should only be used to denote important or public buildings, create well-defined spaces that are both useable and pedestrian friendly, or serve a townscape function such as marking a junction or helping to frame a particular view.

Movement: Permeability & Accessibility

1.15 The first major design access consideration for new development, concerns the network of public routes and spaces on the edges or within the site. An important aspect of a good urban environment is thus, its 'permeability', that is, the availability of convenient and safe, non-vehicular public routes linked to streets, facilities and amenities. The location of public spaces should help people find their way around the borough by reinforcing intersections of traffic and pedestrian routes. Any proposal which would result in the complete loss of a public route will only be acceptable if a satisfactory alternative, linked to existing facilities and adjoining public spaces, is provided, as new routes which are separated from their surroundings are more likely to be unsafe and vandal-prone.

1. Promoting a Quality Environment

1.16 It is recommended in the Government's 'Places, Streets and Movement' publication, that a Movement Framework be designed for new development, to ensure that travel on foot, by bicycle and public transport have priority, and are properly integrated within a scheme. The advantage of such a comprehensive strategy at the outset, is the safeguarding of routes for the different forms of movement, which it would be difficult or impossible to fit into the design later on.

DP UD 3

Urban Structure: Space & Movement

Urban Structure

Proposals should have regard for the existing urban grain, development patterns and density in the layout of development sites, and should be designed to ensure that:

- a. Spaces are satisfactorily enclosed by built-form. All spaces between and around buildings should be created to be functional, and attractive for their intended users;
- b. Its layout is defined by pedestrian circulation, taking the form of urban blocks;
- c. Particular emphasis is placed on prominent corner sites, entrance points, and creating vistas and public areas; and
- d. It respects the form of the street of which it is a part, by building, or responding to the established frontage line, unless there is a clear urban design or planning justification;
- e. Connections are established where appropriate, to open space and regard given to the potential for green landscaping.

Space & Movement

Development layouts should also define, an overall movement framework, which:

- i. Prioritises movement by foot, cycle and public transport –and integrate these modes with parking facilities;
- ii. Encourages convenient pedestrian access to important civic areas by retaining existing, or providing new, routes and linkages which contribute to the permeability of an area;
- iii. Minimises traffic conflicts between vehicles, pedestrians and cyclists by ensuring a clear delineation of routes and unencumbered entrances and circulation.

Access for All – Inclusive Design

1.17 The second major design consideration related to movement, concerns the equitable access to the development for disabled people. Equity is an important dimension of sustainability, and access is a major problem for large sections of the community, for whom parts of the environment can be unusable. The most acute disadvantage can be faced by disabled people and a significant proportion of the community (up to 15.6% in the 2001 census) suffer from some form of mobility disability, whether through a limiting long-term illness, age or injury. This section of the community has a basic right to use the parts of the environment that everyone else takes for granted.

1.18 There are a wide range of disabilities; in addition to those who are wheelchair-bound, there are the 'ambulant disabled', with impaired sight, hearing, speech or a combination of these. There are also those with disabling health problems, such as heart or respiratory conditions, rheumatism and arthritis. The elderly, pregnant women and parents with young children and pushchairs also tend to find access to the built-environment challenging. The various needs of all of these groups need to be taken into account in design decisions, as inconsiderate urban and building design has a considerable effect on the quality of life of these significant sections of the community.

1.19 The Disability Discrimination Act 1995, requires that buildings to which the general public are admitted, including places of employment and education, are accessible to disabled people and have suitable parking and toilet facilities. It requires all providers of facilities and services to take reasonable measures to ensure that they are not discriminating

1. Promoting a Quality Environment

against disabled people. The Planning Acts, as modified by the Disability Discrimination Act 1995, require that planning authorities draw the attention of developers to the provisions of the 1995 Act and to the British Standard BS8300: 2001 for disabled access. This, and the latest Building Regulations Approved Document M also set out minimum standards with which access provision should comply.

1.20 The Department of Communities and Local Government has published a good practice guide for the planning system, *'Planning and Access for Disabled People: A Good Practice Guide'*, 2007. Strategic developments should also have regard to the specific policy on inclusive design in the London Plan, which is supported by a Supplementary Planning Guide, *'Accessible London: Achieving an Accessible Environment'*, 2004.

1.21 The standard design guidance for access for disabled people; *'Designing for Accessibility'* 2004 edition, is a joint publication by CAE (Centre for Accessible Environments) and the Royal Institute of British Architects (RIBA). The Council will expect all developments and refurbishment schemes requiring planning permission to have regard to those standards which are incorporated in the Council's Supplementary Planning Guidance (SPG/SPD 17 as updated), but it will not impose more onerous internal requirements than those set by 'Part M' of the Building Regulations. These deal with internal building requirements and principal access from the curtilage towards it – requirements for other entrances and extensions are not as clearly delineated.

DP UD 4

Inclusive Design – Access For All

Developments open to the general public or used for employment or educational purposes shall include suitable access and facilities for disabled people, which should also be provided in schemes for changes of use, extensions and alterations unless practical considerations dictate otherwise.

Such access should not involve separate convoluted routes, undue effort, or special help from staff / other users and should enable all to participate equally in the development's mainstream activities. Proposals should include a Design & Access Statement (DP UD1), demonstrating how inclusive design, is achieved and will be maintained and managed.

These inclusive objectives should also highlight how the design ensures internal and external flexibility and adaptability of use for everyone in the long-term –helping to contribute towards sustainability (See also Core Policy CP H3 on Lifetime Homes). The policy does not apply where there are separate requirements under the Building Regulations.

C. Urban Clarity & Safety

Understandable & Well-Used Places

1.22 The 'ability of users to understand a place' and find their way around it, is very important in two ways. In order to benefit fully from the choices and qualities within a townscape, people, especially visitors, need to be able to quickly understand both the layout of a place and what goes on there. Legible layouts and activities make it possible for people to form a clear mental picture of the main physical features in a place, and of the main patterns of use of buildings and spaces. Therefore, a 'legibility analysis' of a site's context will be expected in the 'Design & Access Statement'. This involves considering the significance and clarity of existing physical features such as:

- Paths (movement channels e.g. streets);
- Edges (boundaries and barriers);
- Nodes (movement junctions and meeting places);

1. Promoting a Quality Environment

- Districts (distinct areas, quarters);
- Landmarks (visible points of reference).

1.23 The design of a new development may integrate with or reinforce these existing features, and/or form new features, to enhance or improve an area's identity. In order for a place to be understandable, it is also important for the function and ownership of spaces to be clear. The three main space-types are; public, private and semi-private, of which public spaces, such as streets, footpaths, squares and parks are the most important in urban design terms, because they can be used for civic activities by everyone. Private spaces, such as rear gardens, serve only the occupants of the related houses or flats for their private outdoor activities. Semi-private spaces include residents' parking areas, courtyards, driveways and/or front gardens, which usually form a privacy-maintaining buffer or transition zone between the public realm and buildings marking the beginning of the private domain.

1.24 If public, private and semi-private spaces are to function effectively, these differences must be clearly discernible to their users, because unclear or ambiguous spaces lack defined ownership and often do not operate as intended, leading to problems with loss of privacy, inadequate maintenance, and inappropriate behaviour. The means of distinguishing between these spaces need not always involve a barrier such as a wall or fence and can often be very subtle, using changes in level or surface textures, building edges and soft landscaping to define each area. The location of public spaces should also help people find their way around the borough by reinforcing intersections of traffic and pedestrian routes.

Community Safety & Designing-Out Crime

1.25 The fear and reality of crime is a major factor preventing the full enjoyment and use of the environment. A reputation for high levels of crime can also be a factor in hindering the economic regeneration of an area. Safety and the perception of safety is therefore an important issue. The Council, in cooperation with the police and the local community, is carrying out a Community Safety Programme to improve the safety of streets and Council premises, to minimise opportunities for crime and raise awareness of how crime may be prevented.

1.26 The large majority of all crime is committed only when the opportunity presents itself and design can play a part in deterring such crime through improved layout, lighting and more secure barriers. There is plenty of evidence that a combination of good design, management and community involvement, is a much more effective way of making the Borough safer, than the negativity of shutters, barbed wire and other physical crime prevention devices, which may provide well-fortified private spaces, but result in very hostile public spaces. The informal surveillance of public and semi-private spaces is an important community safety concept recognised by the '*Secured-By-Design*' Police initiative, and is best achieved when buildings front onto these spaces, and when these front elevations contain the main entrances.

1.27 Successful crime prevention often depends on a wide range of measures in which the planning process can assist in 'designing-out' crime at the outset of the design process. Crime prevention is a material consideration in considering planning applications, and it is the intention of the Council and Police Service to reduce the impact of crime within the Borough by ensuring that all development proposals have satisfactorily sought to design-out crime.

1.28 The Council will assess development proposals according to the criteria set out in the policy below and having regard to the ODPM document; '*Safer Places: The Planning System & Crime Prevention*', 2004 which sets out detailed design considerations, alongside the Police '*Secured-By-Design*' principles. Where appropriate, conditions will be attached to permissions, requiring the residential and/or commercial elements within a development to comply with these aims, objectives and principles in these documents.

1. Promoting a Quality Environment

DP UD 5

Urban Clarity & Safety

Development should be designed to be understandable to users, free from physical hazards and to reduce the opportunities for crime, incorporating the objectives and principles of both 'Safer Places' and Police 'Secured-By-Design' concepts, such that:

- a. Clear relationships are created between existing and proposed urban features outside and within a site, so that users know how to move into and through the development;
- b. Public, private and semi-private spaces are clearly defined in terms of their use and control;
- c. The informal surveillance of public and semi-private spaces around buildings is optimised through the positioning of fenestration, entrances and other forms of overlooking;
- d. Front elevations address the principal adjoining streets containing, where possible, habitable rooms and actively-used main entrances, with private areas to the rear of the property. Significant areas of blank walls and parking should be avoided on back-of-pavement locations.;
- e. Entrances are overlooked by development, provided with good lighting and are visible from the street;
- f. Rear gardens do not adjoin public space, or if not possible, should have a secure barrier;
- g. Parking spaces are provided within view of properties, and if not possible are made safe in other ways, and are not normally accessible via the rear gardens of residential properties; and
- h. Public spaces and routes through or adjoining a site are overlooked by development, provided with good lighting, set away from cover and provide clear sight lines, and should not run next to rear gardens.

D. The Public Realm: Landscape & Streetscape

1.29 The 'public realm', distinct from the private domain, is all the physically and visually-accessible space such as; forecourts, streets, pavements, squares, parks, open spaces and the facades of the buildings, or other structures, that define them. It is, as the main setting for social interaction, arguably, the most important part of the built-environment. However, the quality of the public realm in some locations within the Borough declined for many years; from the proliferation of fly-posting, graffiti, advertisement & signage clutter, mediocre and poorly maintained buildings, desolate public spaces, traffic congested streets and lack of pedestrian vitality particularly at night (although recent initiatives have helped stem this trend). This has led to perceptions of insecurity and an increasing tendency towards 'gated' developments in the private realm. In order to continue to reverse these trends, special attention needs to be paid to the design and maintenance of Brent's landscape and streetscape.

Trees and Tree Preservation

1.30 Trees provide many benefits besides their more obvious landscape and amenity value; they also importantly remove the greenhouse gas carbon dioxide from the atmosphere and therefore play an essential role in limiting the extent of climate change. The shade that trees provide will also become increasingly important in cooling the urban environment and mitigating against a warmer climate. By intercepting and storing water, trees lessen the impact of stormwater and reduce the risk of flooding. Trees have also been shown to create a number of health benefits such as reducing levels of asthma, skin-cancer and stress-related illnesses by filtering polluted air, reducing smog and shading out solar radiation in urban areas. Trees are also effective in reducing noise pollution. Trees and shrub cover provide valuable wildlife habitat and create habitat links for wildlife between nature conservation areas and green spaces.

1.31 A survey of the borough in the early 1990's found approximately 25 - 27,000 street trees, since then an average of 180 trees per annum, have been lost or removed. Replacement planting has not kept a pace with loss and subsequently the borough tree stock is being steadily eroded. In order to secure future benefits from sufficient tree cover, tree protection policy will apply not only to trees covered by a TPO but also trees of high landscape and ecological value.

1. Promoting a Quality Environment

1.32 Whilst trees present a number of benefits they can also come into conflict with other land uses. Large trees, particularly those in close proximity to housing, are often perceived as a threat to either the building or its occupants in stormy weather. This should be taken into consideration in the locating of new residential development, further guidance on this will be provided in supplementary planning document.

DP UD 6

Tree Protection and Promotion

The removal of protected trees, or development within their Root Protection Area (as defined by BS 5837: Trees in Relation to Construction), will not be permitted unless:

- a. Dangerous to public safety or it is necessary in the interest of best arboricultural practice; or
- b. Protective measures are undertaken to avoid damage to the health of the tree in accordance with BS 5837:2005 Trees in relation to construction – recommendations; or
- c. A replacement tree(s) of suitable size, species, location and is agreed by the Council before any felling takes place
- d. Adequate compensation is made to the Council for the loss of the tree, towards the cost of replanting and maintenance of a tree elsewhere in the borough.

Protected Trees include the following:

Trees protected by a Tree Preservation Order (TPO);

Trees and hedges within Conservation Areas;

Trees within areas of nature conservation importance including wildlife corridors;

Trees of considerable high ecological or amenity value, or contributes to the character of the area.

Landscape Design

1.33 The quality of the built environment is greatly enhanced by considering site planning and the integrated use of hard landscape (e.g. paving, street furniture) and soft landscape (trees, shrubs, grasses) treatments at an early stage in the design process. These need to be designed in relation to the arrangement of spaces, their usage, access, circulation and safety criteria, bearing in mind the overall location of a scheme. Applicants are advised to seek professional advice from a qualified landscape architect, regardless of the scale of the development.

1.34 The landscape of a site and the street frontage provide the setting for buildings and make an essential contribution to what constitutes the character of an area. Soft landscaping is at a premium within the town centres and other urban parts of the Borough. In addition to the ecological, aesthetic and micro-climatic benefits, established vegetation helps integrate architecture with the urban landscape, adding to development value.

1.35 The Council is committed to retaining and preserving the best of the Borough's landscape which has taken years to reach maturity, and will ensure that all new developments make a positive and continuing contribution to the Borough's landscape character and that as many existing landscape features as possible are retained. Ensuring adequate maintenance and management schemes for landscape is of particular importance (Circular 11/95). Existing vegetation usually needs less maintenance and management than new planting, and the species contribute to the existing character of the area. Through the use of conditions and legal agreements the Council will seek to protect and retain trees, shrubs, and hedgerows (see DP OS4).

1. Promoting a Quality Environment

1.36 Where trees and other landscape features are identified for retention, it is very important for appropriate contracting and site supervision procedures to be in place to protect them from damage during and after construction. This is an integral aspect of the design and implementation of the development. The Planning Authority will expect the details of such arrangements to be provided in a Landscape Method Statement.

1.37 The quality and suitability of new planting is also crucial to ensuring the ongoing sustainability of the Borough's landscape. Use of semi-mature or advanced nursery stock will be particularly important for screening and boundary treatments. Care will be needed with security fencing which should not create an oppressive effect and should be softened by planting. The Council will revise SPG / SPD17 to incorporate landscape design guidance, during the Plan period.

Landscape Design & Biodiversity

1.38 The widespread loss of habitats capable of supporting species diversity and maintaining ecosystems, are also a contributory factor in climate change dynamics. There is thus a need to not only maintain and enhance the surviving 'green infrastructure', but also to recover to some extent, within development elsewhere in the borough, some biodiversity value –by design. Brent's Design measures may include trees, green roofs, vertical planting, water features / SUDS, and/or the introduction of artificial nesting sites within new developments to sustain populations of nesting birds.

DP UD 7

Public Realm –Landscape Design & Biodiversity

A high standard of landscape design is required as an integral element of development schemes. This will be expected to include:

- a. A design that reflects the way the area will be used and the character of the locality & surrounding buildings;
- b. An adequately landscaped frontage (including trees & shrubs) on commercial proposals outside town centres;
- c. Retention of existing mature trees, shrubs and hedges, particularly where these form part of an area's character;
- d. New planting of an appropriate specification (species, size, density of planting) with semi-mature or advanced nursery stock;
- e. New, integrally-designed, structural landscaping on appropriate larger sites ;
- f. Boundary treatments like: fencing, railings, etc. that complement the development and enhance the street scene;
- g. Screening of access roads and obtrusive development from neighbouring residential properties; and
- h. Approval of any landscape scheme and implementation, management and/or maintenance programme, before work on site commences.

Proposals should use landscape and/or other design features to introduce / enhance biodiversity value, where feasible:

- On sites with habitats identified as likely to support protected or priority species (See DP OS5) proposals should include a baseline ecological survey of locally distinctive natural features and biodiversity value in the Sustainability Statement (See DP SD1) -setting out features to mitigate, sustain and/or, enhance it.

In assessing the adequacy of landscape schemes, regard will be had to policy DP UD6 on Trees and SPG / SPD17 as updated.

1. Promoting a Quality Environment

The Streetscape

1.39 The frontage and setting of buildings forms an essential part of the street scene, being also important environmentally particularly through the absorption of runoff and dust particles. Although the Council seeks to ensure a safe, accessible and informative street environment for all residents, visitors and tourists, in terms of suitable surfaces, adequate signage and sufficient facilities, it does not have control over parts of the street and trunk roads managed by statutory undertakers and the Highways Agency.

1.40 Lampposts, seats, traffic signs and other items of 'street furniture' are necessary and useful, but increasing numbers and poor design and siting can create clutter, detracting from the appearance of the street scene. In recognising that street furniture can add interest, provide information and make a positive contribution to the quality of the physical surroundings, the Council has made considerable efforts to eliminate clutter from the streets by reducing the number of signs and posts. The Council also aims to ensure that all such items are well designed and located. Where street furniture is the responsibility of statutory undertakers then the Council will use its influence in this regard.

1.41 In sensitive areas, such as Conservation Areas, the design of lamp posts and seating can greatly assist in preserving and enhancing local character. Regard will be had to 'Streets for All', a guide to the Management of London's Streets' prepared by English Heritage with the active involvement of the London Boroughs. It gives best practice guidance on street management issues. In the siting of street furniture the access requirements of the utility providers will be taken into account. As well as protecting the existing streetscape, the Council will endeavour to enhance street planting. This will be particularly important in the case of major developments where it is not possible to provide landscaping on site.

Residential Street Frontages

1.42 Many residential parts of the Borough have an open suburban character, which is deserving of protection. Random extensions and developments which fill in the spaces between buildings can gradually erode this character. In order to retain the open character of streets and street junctions and to retain an adequate space for landscaping, the flank and rear walls of properties should be set in from the edge of the property where this adjoins a street, unless the wall would follow the building line of an adjoining property. (The normal set-in may be reduced in densely developed parts of the Borough).

1.43 Maintaining adequate green space between a building and the road is important but there is great pressure to use this space for other purposes: hard-standings and crossovers, road widening and so on. Forecourt parking is a particular problem: the pressure to avoid on-street parking must be balanced against a number of other factors, especially the need to preserve adequate front green space. Where Permitted Parking Areas are introduced, the Council will consider the use of Article 4 Directions (see Glossary) to protect the contribution of forecourts to the street scene.

1. Promoting a Quality Environment

DP UD 8

Public Realm: Streetscape

A high quality of design and materials will be required for the street environment. The design and provision of all important street elements and furniture (including public art) will be coordinated, wherever possible, to make a positive contribution, avoid unnecessary clutter, and ensure a safe, informative and attractive environment.

Public realm improvements, including street furniture, public art and the planting of new street greenery will be promoted and encouraged. Where appropriate, through Planning Obligations, the enhancement of the public realm that forms the setting for significant and major developments, will be sought, particularly in areas requiring improvement to the public realm or with low tree coverage.

Within residential areas, the following will be resisted (both for existing and new developments) where they would detract from the character of the area:

- a. The excessive infilling of space between buildings and between buildings and the road;
- b. The loss of paving, front walls, railings or hedges of character and common to the street, which should be restored or reproduced where practical;
- c. Hard-surfacing occupying more than half of a front garden area; and
- d. Forecourt parking, where this would cause (b) or
- e. Where such parking would detract from the streetscape or setting of the property, or create a safety problem.

In Conservation Areas and in Areas Of Distinctive Residential Character, a high quality of street furniture will be required to preserve or enhance the character of these areas.

Lighting & Light Pollution

1.44 The imaginative use of lighting can be a powerful way of showcasing buildings, landscape and topographical features, defining routes and boundaries as well as emphasising views and landmark features. It can thus make a significant contribution towards the Council's objective of improving the overall experience of major areas within the Borough, beyond the daylight hours. This will require considering the lighting associated with proposals within Wembley, and other centres such as Kilburn, Harlesden and Cricklewood, taking account of their night time economy, safety, security, desired image, residential amenity, energy use and light pollution, as a whole.

1.45 Lighting is essential in many instances for security reasons as well as for traffic and pedestrian safety, and is just as important for enhancing buildings of architectural and historic significance. Poor or insensitively designed schemes can, however, lead to 'light pollution' where excessive amounts of lighting diminish the integrity of the night-time sky, and result in unnecessarily high energy consumption. Light pollution is a statutory nuisance, and where there is a danger of this, lighting should be designed to minimise glare and spillage, and kept to the minimum required for security and operational uses. Applicants are referred to the Institute of Lighting Engineers' Guidance Notes for the Reduction of Light Pollution. It may also be desirable to screen lighting installations from neighbouring residential areas and roads, and consider minimising the visual impact of lighting apparatus on daytime views through the height, width, design, location and surface treatment.

1. Promoting a Quality Environment

DP UD 9

Public Realm –Lighting & Light Pollution

Sensitively designed proposals which create and improve lighting are encouraged where it contributes to the overall spectacle and image of major areas such as Wembley and enhances the experience of town centres with significant night time uses, such as Kilburn, Harlesden and Cricklewood.

Development proposals should however, conserve energy through the use of low energy or renewable lighting systems where appropriate, and should preserve the darkness of the night time sky, particularly near Metropolitan Open Land and Public Open Spaces. Lighting should be controlled to avoid nuisance to road users, harm to residential amenity and/or detriment to local distinctiveness.

Where appropriate, conditions will be used in controlling the intensity of lighting to avoid nuisance to road users, harm to residential amenity and/or detriment to local distinctiveness.

E. Architectural Quality

1.46 The Council is seeking high quality architectural design, to improve living and working conditions and raise the profile of Brent. This section covers aspects of architectural design which can impact significantly on the quality and vitality of the spaces in between them. Although it is not appropriate for design policies to prescribe particular styles of architecture, it is still necessary to provide guidance on the main principles to be observed, for instance, in the form and elevational treatment of buildings, to ensure a good quality and harmonious composition in various locations. A surprisingly high number of buildings do not benefit from the design skills of architects, and creativity can often be stifled by clients' preferences for standard pattern book or corporate solutions. Design policies which require the exercise of architectural skill, innovation, and artistic creativity and expression, can therefore serve as a useful tool for securing more innovative, site-specific design solutions.

1.47 The Council wishes to promote respect for local character in the design of new buildings by ensuring that they are in harmony with their settings and surroundings, particularly where these affect open spaces that contribute strongly to the character of the Borough. Amongst those local design characteristics which should be assessed are the: siting, orientation, plot width, footprint, major proportions, detailing, roofscape, fenestration scale, emphasis and rhythm of adjoining development. However, respect for local design characteristics need not mean slavish replicas with no element of originality, or the use of characteristic traditional features unrelated to any overall design concept. In particular locations, including industrial and commercial areas and some main road frontages, a bold, innovative design which does not clash with the surrounding area, may serve to add visual interest. In areas with poor character and environments, the introduction of fresh architectural styles can be beneficial, and the introduction of high quality innovative designs will be encouraged where these can positively contribute to the appearance of the Borough.

Use, Civic Function & Location

1.48 Most new buildings should not dominate the townscape of established urban areas, but blend carefully into them. Notable exceptions in which the use or function of a particular building may justify a greater significance in the townscape, include important public buildings, such as town halls, libraries, theatres, religious buildings & sports centres. The size and scale of new buildings should therefore be related to their public importance and location. This does not preclude changes in scale or massing for a design purpose, such as closing a vista or corner-site treatments to provide a local landmark building.

Materials

1.49 The use of appropriate materials is also important for integrating a new building with its surroundings. The choice of facing materials should include proper consideration of their quality, fixing methods, colour, texture and profile. In all cases, durability, water run-off, and the ability to withstand weathering, must be considered, in addition

1. Promoting a Quality Environment

to their aesthetic suitability. The Council is concerned to ensure that buildings do not deteriorate in appearance because of inadequate materials and detailing, and will favour the use of durable materials wherever possible. Some finishes and elevational treatments, e.g. highly reflective glass, may therefore not be appropriate in sensitive locations such as in Conservation Areas and Areas of Distinctive Residential Character. DP SD5 deals with the sustainability aspects of materials.

Extensions & Alterations to Buildings

1.50 The design of extensions and alterations should start with an appraisal of the existing building, in order to produce a complementary and harmonious addition. The Council will need to be satisfied that matters of detail have been fully considered from the start. Extensions are covered by SPG / SPD5 as updated on: Extending Your Home. Detailed design advice on conversions and amenity considerations in new residential development is provided in SPG / SPD17 as updated on: Design Standards.

DP UD 10

Architectural Quality

New buildings, extensions and alterations to existing buildings, should embody a creative and appropriate design solution, specific to their site's shape, size, location and development opportunities, and should be designed to:

- a. Be of a scale, massing and height that is appropriate to their setting, civic function and/or townscape location;
- b. Respect, whilst not necessarily replicating, the positive local design and landscape characteristics of adjoining development, and satisfactorily relate to them;
- c. Exhibit a consistent and well-considered application of the principles of any chosen style;
- d. Have attractive front elevations which have a direct relationship with the street at ground level, with well-proportioned windows, and habitable rooms and entrances on the frontage, wherever possible;
- e. Be laid out to ensure that buildings and spaces are of a scale, design and relationship to each other, which promotes the amenity of users and visitors, providing a satisfactory level of sunlighting, daylighting, privacy and outlook for existing and proposed residents; and
- f. Employ materials of high quality and durability, that are of compatible or complementary colour and texture, to the surrounding area.

The demonstration of how the proposed design achieves these and other general or site-specific urban design objectives, should be set out (and agreed with the Council) in the Design Quality Matrix within the Design & Access Statement. The commitment to these agreed design features (with other stages in Brent's Design Quality Protocol see Core Policy CP UD2) and thus, the likelihood of the required standards being delivered on site, will be a key consideration in assessing schemes.

On key sites, the Council may also seek to secure design excellence through the use of design competitions.

Particular attention will be given to Criteria a) and b) in Areas Of Medium-High Townscape and Public Realm Quality (See 1.63), in areas abutting Green Chains and Metropolitan Open Land, and for proposals affecting Conservation Areas, and Areas Of Distinctive Residential Character.

F. Spatial Sustainability: Intensity & Mixed Uses

Higher-Intensity Development

1.51 Until recently, high density urban development has been associated with poor quality environments and the numerous social problems of the high-rise residential blocks. Increasingly however, the positive features of urban density and concentration of uses has begun to be recognised as essential to successful urban areas. Indeed, providing

1. Promoting a Quality Environment

the design is of sufficient quality, higher-intensity development produces some of the most sustainable of human habitats. Intensive urban uses allow people to live and work in close proximity, reducing car trips. In addition, they encourage economic and social interactions leading to widespread regeneration benefits. Environmentally, many of the most attractive and sought after urban areas in London, and more widely, are well-managed high-density neighbourhoods. In appropriate locations, therefore, it is important to use the intensity, or density, of development as a positive planning tool to reinforce the economic and social potential possessed by individual areas. This approach is also encouraged by government policy, and well-designed schemes will be sought.

Location, Types & Design of Mixed Uses

1.52 Mixed-use developments enhance the quality of urban areas by ensuring a vital mix of uses, which enhance the richness of experience for those living or working there. Mixed uses can also aid community safety and contribute to other planning objectives such as the provision of housing and the achievement of vital and viable town centres, as well as a reduction in car use through increased pedestrian activity. In fact, reducing the need to travel is another key benefit of developing a mix of land uses. The benefits of having a mix of land uses at the neighbourhood scale are that it enables people to walk or cycle to local facilities and may even encourage people to live and work locally. In a neighbourhood with a mix of uses not every building will have more than one use: quiet, single use residential streets still have a key role.

1.53 The sites most suitable for development with a mix of uses in Brent are those where an existing mixed-use character can be built upon, as in town centres, or where opportunities mean that they can be newly established. Selectivity is crucial because, where a development involving a mix of uses is located where it encourages cross-commuting trips by car, the benefits of a mix are lost. The policies only apply where the plan does not already stipulate a particular use or range of uses on a site. It therefore, does not normally apply in Strategic & Borough Employment Areas (SEA / BEAs), nor in Hospital and Higher / Further Education (HFE) zones (which in any event are often partially self-contained developments with a mix of uses).

1.54 The primary use will depend on design considerations, such as the prominence of a use within the site, just as much as floorspace. Where public transport improvements in the form of significant additional facilities (such as additional access points or enlarged station facilities) are provided, these will also be considered as a secondary use meeting the aims of the policy. Also where large developments of a public or institutional nature contain within them significant ancillary activities which reduce the need to travel (e.g. gift shops and cafes) these can also be said to satisfy the policy, providing the development as a whole complements the mix of uses in the area.

1.55 It is recognised that the exact mix and proportion of uses will vary in different locations and that, in some circumstances, addition of secondary uses(s) will not be practical; such as where it cannot be physically achieved on the site because of the operational needs of the primary user. The nature of a development, including the sub-categories within a use class, can also be considered as to whether a secondary use is required. The secondary use should be appropriate to the site's location e.g. a town centre use open to visiting members of the public, in or adjoining shopping centres. Occasionally, an innovative secondary use may be proposed which complements the site and area so well that those uses listed above may not be required. The Council will use phasing or other conditions to ensure secondary uses are implemented.

1.56 Careful design is necessary in higher-intensity and mixed-use developments, to preserve the quality and amenity of individual units/users and because some combinations of uses are not as compatible as others. The careful juxtaposition of uses will be crucial to the success of mixed-use schemes. Where the vertical 'stacking' of uses is the most appropriate way of achieving a mix, the issue of the design and arrangement of uses is particularly important. The relationship between food and drink (A3) uses and residential uses requires special attention (See DP TC6). Some uses require separate ground floor access to achieve the benefits of mixed uses in terms of variety and pedestrian access.

1. Promoting a Quality Environment

DP UD 11

Design-Led Intensive & Mixed-Use Design

Intensity

Proposals for higher densities than that prevalent in the surrounding area (*to optimise the potential of key sites*) will be expected in appropriate locations, which include:

- *The Housing Growth Areas;*
- The larger town centre locations in Areas of Very Good & Good Public Transport Accessibility (defined in the Transport Chapter & Core Strategy),
- Transport interchanges (DP TRN2); and
- *Local centre / transport locations within Suburban areas*

The intensities permitted in these areas will depend upon the varying ranges permitted for the location (see DP HX & SPG17)_the urban quality of the layout, its architectural quality, design function, the amenity standards achievable for occupants, and the level of operational maintenance / and management onsite.

Mixed-Uses

Proposals in these areas are encouraged to include a mix of compatible land uses. Proposals in the above locations, or for a change of use, that fail to incorporate an appropriate element of secondary use(s), where single uses would undermine the existing character or prejudice the regeneration prospects of an area, will be resisted, taking into account:

- a. The scale and nature of the proposed development relative to the mix of land uses in the surrounding area, and
- b. The feasibility of incorporating secondary use(s) given the nature of the primary use and the site characteristics.

Particular attention will be paid to the design of intensive and mixed-use developments, which should achieve a satisfactory relationship between individual units and uses in terms of their layout, stacking, the adjoining area(s) between them, and protection of the amenity of adjoining and proposed residents. For noise requirements, please see DP ENV2.

Uses open to visiting members of the public (such as shops and food and drink uses) should be located to have a significant ground floor window display and entrance. Residential accommodation (other than work-live) should be functionally independent of commercial or business uses and should be separately accessed at street level.

High-Rise Buildings

1.57 Intensive development on sites are not a new phenomena. They can, and have historically taken a wide variety of forms – from Edwardian terraces, to ‘ground-scrapers’, perimeter blocks, etc. High-intensity / density need not imply ‘High-rise’ / tower blocks. However, high-rise is one of the options. High Buildings are generally more than 25m high (82 feet or 9 storeys) or of any height which significantly exceeds that of the surrounding development. Different parts of the Borough are sensitive to different building heights and this is reflected in DP UD12. The Council will consult other London boroughs on proposals for buildings over 40m (133 feet) in the Wembley Regeneration Area and on proposals for buildings of over 30m (100 feet) elsewhere in the Borough.

1. Promoting a Quality Environment

1.58 Although it is recognised that high buildings can act as landmarks and focal points, and can play an important economic role, the other associated impacts (e.g. their visibility, movement / activity generation, and microclimatic modification) mean they are considered appropriate only in a few locations in the Borough where their impact can be contained and where they would contribute towards overall regeneration. In sensitive areas, the likely effect of high buildings on Listed Buildings and Conservation Areas for instance, will determine their appropriateness. DP UD12 sets out the approach for considering building heights.

1.59 The Town and Country Planning (Mayor for London) Order, requires the Mayor of London to be notified of buildings in the Borough over 30m in height. The Council will also consult the Commission for Architecture and the Built Environment (CABE), and English Heritage on proposals for high buildings in general; the Ministry of Defence for buildings covered by the Town and Country Planning (Aerodromes and Technical Sites) Direction 1992, and British Waterways for buildings in or visible from the Grand Union Canal Corridor. In the event of the Council receiving a planning application for an exceptionally high structure or building (over 91m or 300 feet), the Council will consult the Civil Aviation Authority.

1.60 The combined effect of a concern to restrict high buildings to locations where their impact can be contained and of other policies in the Plan, is to restrict tall buildings to the Wembley Regeneration Area which has very good public transport access appropriate to such development and can accommodate the visual impact of such buildings. As an Opportunity Area, specific parts of Park Royal are considered as appropriate locations for high-rise offices. A number of the other proposed Growth Areas; namely parts of South Kilburn (See NDC Masterplan & SPD) and Colindale are also suitable. Alternative areas where high buildings might be acceptable in environmental quality terms, such as the low lying areas around the North Circular Road, are not identified as appropriate for higher-intensity uses.

1. Promoting a Quality Environment

DP UD 12

High Buildings

High Buildings (over 25m) are most appropriate where their visual and other impact can be accommodated. Preferred locations are the Wembley Regeneration Area, the Park Royal Area (UDP inset plans & subsequent Area Action Plans), *identified parts of South Kilburn NDC area and Colindale*. Such proposals should:

- a. Have regard, in their location, height and design on their impact on the character (including setting) of Listed Buildings and Conservation Areas -providing, in addition to a Design & Access Statement (DP UD1) a visual impact study including photomontages and maps of areas from which the building would be visible –demonstrating how it avoids marring the skyline or intruding to the detriment of local, medium and long-distance views of important landmarks (DP UD20);
- b. Be of outstanding architectural and urban design quality, with a distinct profile and interesting roofscape, preferably emphasising a point of local civic or visual significance, a centre of local activity, transport interchange or regeneration;
- c. Be set in the context of, and be carefully related to, its surroundings, both existing and proposed, and to any other high buildings in the locality and to open space;
- d. Secure a complete and well designed setting of lower buildings and/or landscaped open space, so that it interacts in a positive manner with, and contributes to, its surroundings at street level;
- e. Demonstrate how the design achieves the highest standards of sustainability –including incorporating onsite energy generating infrastructure (renewables and CHP) (See DP SD1-9) –avoiding a significantly harmful effect on the microclimate, and amenities of the area, through turbulence, noise reflection or overshadowing
- f. Take into account, in their design and location, relationship to airports and air routes, drainage and water channels, communication and transport links, and industrial plant and chimneys –avoiding blocking important telecommunications channels, and
- g. Incorporate appropriate mixed-uses and active frontages, where possible (DP UD10).

Alternative options not selected:

DP UD1-12

These policies set out the urban design quality considerations that will inform Brent's Design Quality Protocol Methodology set out in the Core Strategy policy CP UD2.

The DC policies are adapted from the existing UDP policies which have been well supported at appeals over the past 7 years. The CP policy is more concerned with the implementation approach for securing the delivery of these design considerations.

The alternative would be to return to an even earlier, single design policy, which was far too blunt and crude to properly address the range of urban design objectives required to significantly improve existing poor urban quality within many areas of Brent - particularly in view of the projected levels of future growth.

1. Promoting a Quality Environment

Priority Areas For Townscape & Public Realm Enhancements

Urban Quality in Brent - Areas Of Low Townscape or Public Realm Quality

1.61 In past years, planning in Brent as in many other Boroughs, has tended, to focus more attention and resources, on conserving the best of its built heritage. Whilst these efforts have not had a uniform effect in all of Brent's designated conservation areas (in terms of preventing the erosion of some historical or architectural features), there has undoubtedly been a significant level of success in maintaining, and in some areas even enhancing, the quality of their townscape and public realm.

1.62 The Council's 'Urban Quality Survey' revealed the very considerable discrepancy existing in 1999 between the quality of buildings and spaces within designated heritage areas, and the predominantly poor environment in the other areas of the borough. This serves as a clear indication of the importance and success of design and planning controls in securing a quality environment.

1.63 Beyond the designated heritage areas, there are contexts of varying quality, which require a comparable level of positive design policy and development control in order to effect a higher standard of urban and building design. Priority design areas are therefore being designated to facilitate targeted policy attention. The first of these are Areas of Low Townscape or Public Realm Quality indicated in DP UD13. Areas identified as being of low quality will be prioritised for townscape and public realm enhancements and innovative contemporary building design. Within these areas, in order to encourage their environmental regeneration, planning standards (density, parking, etc.) may be more flexibly applied, provided developments are of the highest design quality. Other areas not identified on the map, are Areas of Medium-High Townscape and Public Realm Quality and, for proposals within them, the contextual criteria in DP UD2 & UD9 will be more strictly applied.

Transport Corridors

1.64 The continual upgrading of the Borough's image for visitors (including potential investors) and residents is an important prerequisite for regenerating the local economy. For many visitors the lasting impression of places in Brent is gleaned as they travel into and through the Borough. These corridors and gateways also affect the quality of life of residents who use them on a daily basis. Major transport corridors link places in Brent to the rest of London and also divide the Borough into sectors. They therefore, often serve as important paths and districts in their own right. It is important to define a 'beginning' and 'end' to corridors, in order to establish or enhance local character and identity, and create a good impression.

1.65 Public realm enhancements in designated corridors will be achieved through a combination of design and planning control (negotiating improvements to proposals) and Council initiatives (planning and highway powers or other direct actions). The Council will prepare urban design frameworks for these corridors and development briefs for key sites along them, in order to:

- Provide a better experience and first impression for visitors;
- Guide, orientate and inform visitors about areas, attractions and facilities both along the route and in the main town centres before arrival;
- Improve and/or reinforce the character and identity of parts of, or entire, corridor areas;
- Ensure co-ordinated enhancement of their public realm; and
- Promote the provision and use of public transport.

1.66 Transport corridors are indicated below:

1. North Circular Road;

1. Promoting a Quality Environment

2. Harrow Road;
3. Kilburn High Road;
4. The Stadium Access Corridor;
5. From Fryent Way, Dudden Hill Lane & Willesden High Road to Willesden Lane;
6. The Chiltern Line (between Sudbury & Willesden Green stations);
7. The Jubilee & Metropolitan line (between Wembley Park & Willesden Green stations); and
8. The Euston West Coast Line (between Willesden Junction & Wembley Central).

1.67 The enhancement of Olympic Way within the stadium precinct, is covered by policies within the Wembley Regeneration Area Inset.

Main Gateways

1.68 Gateways can help provide an identifiable definition of these qualities. In order to develop these gateways, a collaborative and co-ordinated urban design approach will be required for the purposes of:

- Creating an enhanced sense of arrival and welcome;
- Creating a series of structures to serve as landmarks;
- Identifying suitable levels of signage;
- Reflecting the enhancement strategies for individual corridors;
- Responding to development opportunities on adjacent sites;
- Enhancing the quality of the public realm;

1.69 The main gateways are at major road junctions. The Park Royal North-Western Gateway is covered by Saved UDP Policy PR6 within the Park Royal Inset.

DP UD 13

Priority Enhancement Areas

Proposals within these areas will be assessed according to Core Policy CP UD1. Areas of Low Townscape & Public Realm Quality are shown in [Map UD1](#).

The main Borough Gateways and the following Road & Rail Corridors are shown in [Map UD2](#). Where opportunities arise, attractive views and important local landmarks should be opened up from these locations.

Alternative Options not selected:

DP UD13

This policy sets out key locations that will inform Brent's Spatial Design Strategy set out in the Core Strategy policy CP UD1).

It is adapted from existing UDP policies which have been well supported at appeals over the past 7 years. The CP policy is concerned with the overall spatial approach towards these and the Housing Growth Areas.

The alternative would be to dispense with design area policies, and rely on the individual design consideration policies. However, this would not then be in conformity with the London Plan -and the particular design objectives of these areas would not be given adequate attention.

1. Promoting a Quality Environment

Urban Structures

Plant, Ventilation & Air-Handling Equipment

1.70 This includes all building services equipment likely to have an impact on the external environment. Generally, every effort should be made to accommodate all plant, equipment and ducting within existing buildings and structures, making use of all internal voids and spaces, before considering external options. All new buildings such as shops, restaurants, offices and industrial premises should include appropriately designed service ducts to provide unobtrusive ventilation, servicing and cabling.

1.71 Where external ducting and pipework is unavoidable, flank or rear wall locations are preferable, depending on their visibility and provided such equipment does not obscure windows, are not inserted within visually sensitive windows, or result in loss of daylight or outlook to neighbouring properties. Roof level equipment should not cause unacceptable damage to the character and appearance of the proposed building, or those in the locality. Where acceptable, it should be located in the least conspicuous position, include adequate screening and should be designed as an integral part of the overall form and appearance of the building. Thought should also be given to servicing and access requirements for all plant.

DP UD 14

Building Services Equipment

All air-cooling, heating, ventilation, extraction and conditional systems, as well as any ancillary plant, ducting and equipment likely to be visually intrusive, should in the first instance, be accommodated within the internal envelope of proposed buildings.

Where this is not practicable they should be located in visually inconspicuous positions, with a minimal effect on the use, character & appearance of proposed and nearby buildings, and local amenity.

Where building services equipment cannot be satisfactorily relocated or designed-out through the use of passive systems, then it should be incorporated within an overall integrated architectural design feature.

Regard will also be had to the noise / vibration effects of such equipment in locating them - and mitigation measures will be required where local amenity is negatively impacted.

Telecommunications Equipment

1.72 Telecommunications are a rapidly growing and increasingly essential component of modern economic infrastructure. London's future will be increasingly dependent upon it being a hub of a world wide information network. Government advice on Telecommunications is given in Planning Policy Guidance Note 8 (PPG8) revised in 2001; this seeks to balance the need to foster the growth of telecommunications with the protection of amenity. It requires development plans to be alive to the growth and characteristics of modern telecommunications.

1.73 Most satellite dishes and other minor telecommunications developments do not require planning permission, being permitted under the Town and Country Planning General Development Order (GPDO) 1995. Planning permission is required in Conservation Areas that are subject to Article 4 directions. Quite different considerations apply to proposals by licensed telecommunications operators. These run a national public service network with many systems operating on a line of sight basis requiring frequent base stations and relays. Preferably, such equipment should be located on existing tall buildings but, when masts are to be used, the Council will expect the potential for mast sharing to be explored fully in order to avoid their proliferation.

1. Promoting a Quality Environment

1.74 The Council will, with information from the Radio-communications Agency and Radio Sites Databank, draw up a register of existing masts and other structures (such as roof sited base stations), to which new telecommunication apparatus could be attached. It is also recognised that the location of such equipment on residential tower blocks can give rise to radio and television interference. PPG8 makes it clear that such interference is a material planning consideration when not covered by other legislation. Regard will be had to the potential impact of development on those sites. Site-sharing, rather than mast sharing, may be more appropriate in some cases for environmental or planning reasons. Technical or design factors may, in other instances, also indicate a new site entirely. Particular attention will be given to screening and planting, and sites will need to be large enough to accommodate such landscaping.

1.75 To protect visual amenity in sensitive areas, where it is deemed preferable for mast development to be confined to one site, the Council may, where practicable, encourage operators to enter into a planning obligation with the relevant landowner to ensure the site remains available for sharing. Where a ground-based mast is to be erected within Brent's Conservation Areas or Sites of Special Scientific Interest, the amendments to the regulations have now introduced a requirement for operators to make 'An application for the Planning Authority's determination concerning prior approval of siting and appearance'. This is also required before the installation of certain apparatus under permitted development rights. The Authority has a fixed 56-day period in which to determine whether or not 'prior approval' is required, and notify the operator of its decision.

1.76 It is a condition of the prior approval procedures that equipment should be sited so as to minimise its effect on the external appearance of any building on which it is installed. This will particularly apply in those sensitive areas listed in the Policy below. If, in the view of the Council, the equipment has not been so sited then it may require its re-siting. The installation of such apparatus on listed buildings will require listed building consent which, if this damages the character of the building, will not be given.

1.77 The Government-commissioned Stewart Report (May 2000) from the Independent Expert Group on Mobile Phones, considered effects from their use and from associated technology. It concluded "the balance of evidence indicates that there is no general risk to the health of people living near to base stations on the basis that exposures are expected to be a small fraction of the guidelines." It recommended a precautionary approach on the basis of gaps in current scientific knowledge. A follow-up statement by Lord Stewart in 2005 re-affirmed the need for the 'precautionary approach' in relation to children. The Government accepted this and requires all new facilities to meet guidelines by the International Commission on Non-Ionising Radiation Protection (ICNIRP). Local authorities may not set their own unilateral moratoriums or limits on such development.

1. Promoting a Quality Environment

DP UD 15

Telecommunications

In considering applications for telecommunications apparatus, the following will be taken into account, in so far as is technically and legally feasible, whether:

- a. The operator has explored the possibility of erecting antenna on existing buildings or other structures – and of sharing an existing mast, replacing it with one suitable for joint use, or of erecting one suitable for joint use;
- b. So far as practicable, any mast and/or equipment is sited and designed so as to minimise their visual impact on the skyline and setting and particularly upon Listed Buildings, Areas Of Distinctive Residential Character and Metropolitan Open Land.
- c. Technologies to miniaturise and or camouflage equipment have been fully explored and reasonable steps have been taken to ensure the minimum number of pieces of apparatus are erected;
- d. The proposal includes a statement stipulating that the facility when operational will not exceed INCIRP guidelines for public exposure; and
- e. There is clear evidence that significant electromagnetic interference will arise, or will probably arise, and that no practical remedy is available.

Proposals to locate ground-based masts within Conservation Areas or Sites Of Special Scientific Interest, or in close proximity to sensitive locations (for which a precautionary approach is needed) such as schools or hospitals, must be accompanied by adequate information for assessment and special justification for such a location demonstrating that there are no alternative sites.

Advertisements

1.78 As PPG19 (Outdoor Advertisement Control) emphasises, outdoor advertising is essential to commercial activity, but advertisements tend by their nature to be prominent and can be unsuitable in some locations. They can, however, enliven drab surroundings, screen eyesores and sometimes may offer an opportunity to improve the environment, for example by including landscaping on the site. The Council will assess advertisement schemes solely by the statutory criteria of amenity and public safety. The policies below give an indication of the key amenity and safety issues relevant in the Supplementary Planning Guidance on Advertisements published by the Council.

1.79 Poorly located advertisement hoardings can be particularly obtrusive and may in some cases pose a danger to traffic. It is therefore necessary to restrict the types of location where such hoardings will be permitted. Supplementary guidance (SPG7& updates) on Shop-fronts & Shop-signs deals with shop advertisements & security features.

1.80 As explained in Brent Supplementary Guidance (SPG8 & updates): Advertisements other than Shops, advertisement hoardings are only likely to be acceptable if they enhance the appearance of an area. Freestanding hoardings and hoardings on buildings must therefore satisfy the criteria within DP UD16 and SPG8. The acceptability of other types of advertisement (on street furniture, pole signs, etc) also depends on their ability to make a positive contribution to the local environment and criteria are set out in the guidance document.

1. Promoting a Quality Environment

DP UD 16

Building-Mounted & Freestanding Advertisements

On Buildings

Advertisements (including awnings) on buildings will only be approved when designed to be in keeping with the scale and character of the building, and surrounding area, and limited to avoid an excessive display.

Large signs on flank walls at a high level will not be approved. Shop signs should be confined to fascia level and no more than one small projecting box sign per frontage will normally be allowed (see DP TC11).

Freestanding

Advertisement hoardings and other freestanding advertisements will only be approved where they enhance the appearance of an area. Public realm enhancements, such as landscaping or public art, will be sought by a planning obligation, as part of advertisement hoarding schemes. They will not be approved in the following areas:

- a. Predominantly residential areas;
- b. On or adjacent to conservation areas and listed buildings;
- c. On open space, or where they would block important views across it, or where they would obscure other important views, landscaping or groups of trees;
- d. Where it would lead to advertisement clutter, detract from public realm enhancements within the area and/or prejudice regeneration initiatives;
- e. On railway embankments; and
- f. On major roads and road junctions where distraction to drivers could be prejudicial to highway safety.

Alternative options not selected:

DP UD14-16

The alternatives to these policies are:

- a) Not to have them and rely instead on the individual urban design considerations. However, the individual policies are concerned with main plot-specific development -and do not address the specific issues relevant to these very different, and peripheral, service structures - that nonetheless can detract from the quality of the townscape, if not carefully integrated.
- b) Condense them into a single policy. These 3 policies have already been rationalised down from 5 original policies. Further rationalisation would mean the relevant service-related issues for each would either be lost, leading to lack of clarity and ineffective application, or a rather unwieldy policy would result.

Urban Heritage Conservation

Brent's Heritage

1.81 The Council has as a key aim the need to enhance the architectural heritage of the Borough. Conserving the best of the borough's built environment is of major importance and policies, strategies and work programmes are designed to achieve just this. There is a need to conserve the best of our built heritage against pressure for redevelopment and unsympathetic alteration. This is achieved through considered application of both national and local policies.

1. Promoting a Quality Environment

1.82 The London Borough of Brent forms part of London's suburban fringe and reflects a complex and varied mix of styles linking, and sometimes obliterating, earlier village settlements. The development of the Metropolitan Railway from 1863 encouraged suburban development, (as did the 1924-1925 British Empire Exhibition at Wembley Park). Such was the intensity of inter-war development that, in the 1930s Middlesex was the fastest developing county in the country.

1.83 The architectural styles of Brent therefore date from these periods. There is a wide range of architectural styles from the simple to the ornate, from Victorian Italianate and Gothic Revival to Sub-urban 'Arts & Crafts' and planned "village" settlements. Such a diverse heritage is an essential part of the character of the Borough. Furthermore, street scenes and leafy lanes, with their trees and gardens, have matured in the course of sixty or so years to give a variety of residential environments, some of which are particularly attractive and worthy of preservation.

Listed Buildings - Statutory Listed Buildings

1.84 Compared with other London Boroughs, Brent has few notable buildings. The Council is therefore particularly concerned that all those buildings or groups of buildings of architectural or historic interest that are on the Statutory List should be preserved and enhanced.

1.85 In accordance with Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Secretary of State for Culture, Media and Sport is required to compile lists of buildings of special architectural or historic interest, known as Statutory Lists. Appendix UD4, Page 75 provides details of buildings in the Borough that are included in the Statutory List. Further appropriate buildings will be recommended to the Secretary of State for Culture, Media and Sport, for inclusion in the Statutory List. Buildings on these lists are classified in Grades to show their nationally assessed importance:-

- GRADE I: These are buildings of exceptional interest: Brent has one such building;
- GRADE II* (six in Brent);
- GRADE II: These are buildings of special interest which are classified.

1.86 There is a general legal presumption in favour of the retention of listed buildings. The fact that a building is listed however, does not mean that no changes can be made to its appearance or its physical fabric: but it does mean that proposals for demolition (including alterations involving demolition of a material part) of a listed building, and for changes which affect its character as a building of special architectural or historic interest (and this includes objects or structures fixed to it or buildings in its grounds) must obtain 'listed building consent' from the Local Planning Authority.

1.87 PPG15 provides advice on the identification and protection of historic buildings and lists the tests that must be passed for loss of a listed buildings to be acceptable. Listed building consent will only be granted in exceptional circumstances, when this meets the specific criteria of paragraphs 3.17-3.19 in PPG15 including: (a) the condition of the building(s), the feasibility of repair and maintenance in relation to its importance and continued use value; (b) the adequacy of efforts made to retain the building in use; and (c) exceptionally, the merits of alternative proposals for the site.

Locally Listed Buildings

1.88 In addition to those buildings found to have exceptional or special architectural or historic interest on a national scale, there are other buildings of particular importance locally but which do not quite meet the listing criteria set down by the Department of Culture, Media and Sport. Such buildings to be held in 'guardianship' by the Council in lieu of changing listing criteria, form the subject of a local list. Buildings on a local list enjoy no statutory protection but the compilation of the list by the Local Planning Authority provides a means whereby attention can be drawn to the particular character or importance of a building in the local street scene when it is affected by some form of development proposal. The Council first established such a list in December 1975. The Local List is kept under review. A list of the properties currently on the Local List can be found in Appendix UD4 Schedule of Listed Buildings, Page 75.

1. Promoting a Quality Environment

1.89 Where a locally listed building is within a Conservation Area, DP Policy UD17 and the provisions of PPG15 apply. The Council will give full consideration to the justification for the redevelopment of any building on the local list affected by development proposals. The Council will expect to see clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find new uses, and these efforts have failed; that preservation in some form of charitable or community ownership is not possible or suitable or that redevelopment would produce substantial benefits for the local community which would decisively outweigh the loss resulting from demolition. The Council would not expect to give consent for redevelopment simply because this is more economically attractive to the developer than repair and re-use or because the developer acquired the building at a price that reflected the potential for redevelopment rather than the condition and constraints of the existing building.

Listed Buildings 'at Risk'

1.90 English Heritage maintains a register of statutory listed buildings that are 'at risk' through neglect and decay, or vulnerable to becoming so. Very few buildings were on this register in 1999, but it included the Grade I Old St Andrews Church, which has been vulnerable to vandalism, and the derelict Palace of Arts (which has now been removed from the Listed Building Schedule).

1.91 Brent is preparing action plans for Listed Buildings at risk. The plan contains site specific proposals for all buildings on the list lacking a beneficial use. Where possible, the Council will endeavour to work with individual owners to restore and rehabilitate Listed Buildings at risk. However, where it is deemed necessary, the Council will not hesitate to invoke its powers under Section 48 and 54 of the 1990 Listed Buildings and Conservation Act to serve 'Urgent Works Notices' and 'Building Repair Notices'.

DP UD 17

Locally Listed Buildings

The special character of buildings on the local list will be protected and enhanced. Proposals for the unsympathetic alteration of locally listed buildings (including parts of buildings) will be resisted. Permission will not be granted for demolition (see DP H1) and redevelopment of a locally-listed building unless:

- a. Prior contact is made with the planning authority to discuss the proposed replacement, prior to any demolition;
- b. A viability statement is submitted (addressing alternative uses considered, and demonstrating that the planning benefits for the community substantially outweigh the loss from demolition)
- c. The proposed replacement provides a building of greater architectural quality, which enhances the special character of its predecessor's contribution to the locality;
- d. In consideration of its merit, role & contribution to local distinctiveness, construction of any replacement is brought forward expediently, avoiding a long-term 'gap site' in the locality.

To facilitate the viability of retention and reuse of locally-listed buildings, sympathetic extensions with higher density may be permitted. Agreed design standards & community benefits may be secured through a Planning Agreement.

Conservation Areas

1.92 Conservation Areas are "areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". They are identified on the Proposals Map and listed in Appendix UD1, Page 67. The number and extent of Conservation Areas will be kept under review. More detailed policies are presented in Conservation Area Design Guides.

1. Promoting a Quality Environment

Conservation Area Strategy and Management

1.93 There is no standard specification as to what constitutes a Conservation Area and they will naturally be of many different kinds. The Council has a duty to decide which parts of the Borough should be designated as Conservation Areas and to keep the question of designating further areas under review. Conservation areas have been designated in the past when they were under threat or under local pressure. Therefore, the date of designation is in no way representative of the relative quality of the area.

1.94 From 1999/2000 Brent carried out a comprehensive review of its heritage assets, resulting in the de-designation of 10 Conservation Areas, in which the special character had become eroded. The review had the aim of ensuring a more consistent basis of designation and that those features and areas that deserved to be conserved had manageable and justifiable controls in place. This has enabled a consistent approach whereby the best areas, representative of certain key forms of development (e.g. architect designed garden suburbs), are designated.

1.95 Since 2003, there are now 22 Conservation Areas in Brent, which range enormously in character, from the stucco Victorian Villas of South Kilburn to the thatched cottages of Buck Lane. The Council's first Conservation Area was designated at Roe Green Village in 1968. The Borough is particularly blessed with attractive and unusual suburban estates, such as Sudbury Court, Mount Stewart and Northwick Circle, built during the expansion of London in the '20s to '30s. From an earlier period, attractive Victorian estates are protected in areas such as Mapesbury and Queens Park.

1.96 Brent was one of the first Boroughs in the country to produce Character Appraisals for all its Conservation Areas, and as part of the overall analysis a Management Plan which describes the strategies and processes by which the Council will work with residents to manage the future of their areas.

DP UD 18

Conservation Areas

To protect the overall prevailing character in particular Conservation Areas from unsympathetic alterations, the Council will declare 'Article 4 directions' to control certain types of 'permitted development', after due public consultation.

Consent will only be given for the demolition of a building, or part of a building, in a conservation area where it actively detracts from the character or appearance of the Conservation Area. Any resulting gap site, will require a full planning application (showing details of what is to be substituted) to accompany the application for Conservation Area Consent.

Landscaped areas, gardens, trees, hedges and boundary treatments, character of buildings and frontages forming an integral part of the Conservation Area's character or appearance, will be expected to be retained. In particular, PVC windows will not be acceptable. Contributions for additional planting to enhance street scenes will be sought.

Applications for development in Conservation Areas will not be accepted in 'outline' form only.

Areas of Distinctive Residential Character

1.97 Although Brent has several residential areas with a pleasant character, there are a number of well-established residential estates which possess readily identifiable and distinctive characteristics and a high standard of residential amenity which would be particularly threatened by unsympathetic development. Their coherent design and pleasant setting warrant designation as Areas of Distinctive Residential Character (ADRC) so that a more co-ordinated approach to design control may be achieved.

1. Promoting a Quality Environment

1.98 This is not to suggest that other areas are not of merit, only that the forms of development which the planning system has powers to control present a particular danger to the character of those areas designated as ADRC's. In addition to the normal design and housing policies, and their associated standards, particular considerations apply in the areas designated in DP UD18. ADRC's are identified on the Proposals Map and the properties affected are listed in Appendix UD3.

1.99 These include the 10 Areas de-designated during the Conservation Area review. The aim is to ensure that what remains of their character is not further degraded through unsympathetic alterations or redevelopment, so that they continue to contribute to a higher quality environment than that which obtains in some neighbouring areas within the Borough, that have been identified as needing enhancement, to improve their poor quality.

DP UD 19

Areas Of Distinctive Residential Character

Particular attention will be paid to the design, height and space between buildings in Areas Of Distinctive Residential Character, as shown on the Proposals Map, in order to protect their individual higher qualities and distinctive local character within Brent's Townscape.

Views and Landmarks

1.100 Because of the undulating nature of the Borough there are many fine views of nearby open spaces, groups of trees, significant buildings and other features. These landmarks and the views to them are a valuable amenity to the Borough and need to be considered and protected when new developments are proposed that may affect them.

1.101 Views of Wembley Stadium, and of St. Mary's Church, Harrow-on-the-Hill are considered to be particularly important views worthy of protection. A general indication of these views is shown on [Map UD4](#). Detailed maps of the viewing corridors for these views will be produced by the Council as Supplementary Design Guidance. These views are in addition to views across the areas of open character set out in [DP OSX](#).

1. Promoting a Quality Environment

DP UD 20

Views & Landmarks

In co-operation with other London Boroughs, the Planning Authority will, in assessing development proposals, have regard to any impact on views of those Local Landmarks and from those Local Viewpoints that are set out in Appendix UD5, Page 79. Particular regard will be had to the impact of development proposals on the listed views of the important landmarks of:-

1. St. Mary's Church, Harrow-on-the-Hill; and
2. Wembley Stadium (See Saved UDP Policy [WEM19](#)).

Assessment of impact will include that on the backdrop and setting of these views.

Alternative options not selected:

DP UD16-20

The alternative to these policies is not to have any Conservation policies -and instead, rely entirely upon national legislation / policy. This would not be beneficial for locally-designated assets deemed important to Brent, or in the case of only having 1 such policy - would again, be too blunt to be effective.

These 5 policies have been rationalised down from the original 13 UDP policies to focus particularly on locally-relevant heritage assets which do not enjoy the level of protection afforded the preservation of statutory Listed Buildings and Conservation Areas.

Towards a Sustainable Brent, 2020

Climate Change Mitigation & Adaptation – Sustainable Design & Construction

What Are The Problems & Why Does It Matter?

1.102 The Government's 2002 UK Climate Impacts Programme (UKCIP) Climate Change Scenarios for the UK posited a number of future scenarios of varying severity, including the following changes (some of which have already begun):

- Hotter, drier summers & milder wetter winters
- Increased storms and wind speeds in winter
- More frequent, extreme winter rain/snow/sleet
- Sea level rise & increase in sea storm surge
- Significant decrease in soil moisture
- Intensification of urban heat island effect

1.103 Extended scenarios that give further consideration to the complex interactions of ocean and air currents, also raise the prospect of the severest effects above including, paradoxically, the possibility of a mini 'ice age' in parts of the northern hemisphere. is compelling evidence scientific consensus that human activity is changing the world's climate and it is generally accepted that major action is needed now if real progress towards avoiding potentially catastrophic climate change is to be made.

1. Promoting a Quality Environment

Need for Carbon Reductions

1.104 Due to the climatic changes already occurring, and the urgent need to cope with these and ultimately halt further catastrophic changes, there have been a series of recent reviews, strategies, initiatives and policy proposals at sub-regional, London wide and National levels highlighting measures to address carbon emissions and related factors through environmental health, planning, building control and fiscal mechanisms.

1.105 Nationally, these include the UK Sustainable Development Strategy, 2005, the Treasury's Stern Review, 2006 which concluded that failing to act now would incur devastating economic consequences. It was followed by a draft Climate Change Supplement to Planning Policy Statement 1 (PPS1), and a National Code for Sustainable Buildings, which sets sustainability levels (serving as a rating system for the performance of homes, with an indicative trajectory for future improvements to the Building Regulations, the emissions standards of which were revised in 2006). Most recently, the Government's draft Climate Change Bill sets out a legally binding UK target of 60% emissions reduction by 2050. The aim is to build 'Zero-Emissions Development' (ZED) homes as standard from 2016.

1.106 A high standard of sustainable design and construction (at least Code level 3) will be sought on development proposals throughout the Borough. However, the significant scale of projected growth in Brent over the next 10 years, and the need for higher quality design within the Borough, also present significant opportunities to optimise their carbon performance. Thus, within the Housing Growth Areas and the Wembley Energy Action Area (EAA) higher Sustainable Homes Code levels (4-5) will be sought for major schemes, based on the scale of development, subject to scheme feasibility:

1.107 Where applications / build-out of proposals on a site in these areas, are brought forward piecemeal or phased, the overall scale of the final development will determine the standard / level sought.

Reducing Brent's 'Ecological Footprints': Promoting Sustainable Lifestyles

1.108 The critical issue of climate change while highlighting important *carbon emissions* is often discussed in ways that ignore the complexity and interdependence of various ecosystems –on which our survival also depends. There is thus, a need locally, to provide greater linkages between current sustainable policies / practices –resulting in more joined up thinking and working, and greater efficiency and effectiveness of actions.

1.109 There is a growing recognition that delivering genuine sustainability goes beyond the physical aspects of new development and the technical solutions required by Planning and Building Regulations. The operational use of a site based on the lifestyle of its occupants are also critical factors.

1.110 Promoting more sustainable lifestyles involves considering & drawing together all aspects of sustainability as an approach to living. This includes issues such as: accounting for the impact of food on our lives and environment; incorporating fitness into everyday living e.g. through combining exercise and travel – walking or cycling instead of driving for some journeys, as well as facilitating different / reduced consumption – including opportunities to locally exchange unwanted / secondhand items, facilitate home deliveries, access to farmers markets, etc.

1.111 The City Limits: Resource Flow & Ecological Footprint of London found that in 2000:

- London's 'Ecological Footprint' was 42 times its bio-capacity; and
- Londoners rely on 6.3 global hectares (gha) of land and sea to support them, while only 2.18 gha is available for everyone –worldwide.

1.112 A localised '*Resources Accounting for Sustainable Consumption & Production*' (REAP) report, 2006 has indicated that Brent's Ecological footprint is 5.41gha. For developments including housing, to be genuinely Low/Zero Carbon, a range of appropriate measures should also be promoted to encourage sustainable lifestyles.

1. Promoting a Quality Environment

1.113 The London Plan requires each Council in London to designate a site for a ZED and the Mayor of London has proposed further alterations to address climate change and related sustainability issues in developments. In addition, the Mayor's recent Climate Change Action Plan sets out further initiatives for London to meet its targets. In order to kick-start 'Low-Carbon' & 'Zero-Emissions Developments' (ZEDs) in Brent, the following 2 sites have initially been designated within the Site Specific Allocations:

1. Alpine house, Honeypot Lane; and
2. Abbey Estate, Beresford Avenue, Alperton.

Adaptation by Design

1.114 According to the Environment Agency, the costs to a modern house of flooding starts from approximately £15-30,000 (for building repairs) and £9,000 (for damaged goods). However, the social effects are incalculable, as it has wider-ranging, and longer-term effects in people's lives.

1.115 Planning has an important role to play in not just managing risks, (through zoning) but also in minimising them –through seeking surface water runoff reductions generally, as well as adaptation measures / design strategies appropriate to the 3 levels of risk (Zones 1-3). The requirement for flood adaptation measures are set out in policy DP ENV6 and elaborated in the forthcoming DCLG publication; *'Flood Resilient & Resistant Construction –Guidance for New Build'*.

1.116 Flooding is only one of the possible climatic effects that development will need to adapt to. Further guidance on other adaptation measures are set out in the *'Adapting to Climate Change: A Checklist for Development –designing developments in a changing climate'* produced by the London, East of England & SE Climate Change Partnerships. These need not be expensive compared to the long-term risks – for instance, adaptation measures in new buildings to address subsidence in the south of England may only cost less than one-tenth of the annual cost of damage claims, if action is not taken.

1. Promoting a Quality Environment

DP SD 1

Climate Change Mitigation & Adaptation

All major proposals ($\geq 1,000 \text{ m}^2/10$ dwellings) should submit a Sustainability Statement demonstrating how sustainable design & construction measures are used to mitigate, and adapt to climate change, including addressing the following related issues at the design stage:

- Energy demand, renewables & efficiency (DP SD3)
- Water demand (DP SD4)
- Materials resource efficiency (DP SD5)
- Air quality (DP SD6)
- Operational waste (DP SD7)
- Environmental protection (DP ENV1-4 & ENV6-7)

Particular regard will be given to adaptation measures for proposals in/adjacent to flood-risk areas (Core Policy CP ENV 1). The Statement should support, and be accompanied by, a completed Sustainable Homes Code (residential) and/or forthcoming Sustainable Commercial Code (non-residential) Checklist. In all areas a minimum rating of Code level 3 should be achieved.

Within the Wembley Energy Action Area (EAA) and in the Housing Growth Areas, major schemes are required to achieve higher rating standards in relation to the Sustainable Code Ratings, commensurate with their scale. Low-Carbon / Zero-Carbon schemes should include in their statement, wider measures, where feasible, for influencing operational lifestyle issues.

Alternative options not included:

DP SD1

The alternative to this policy approach is to continue to seek only Brent's currently required EcoHomes / BREEAM 'Very Good' equivalent of Code Level 3 across the Borough in future, relying on changes to the Building Regulations to deliver the required ZED standards by 2016. However, this would fail to meet the objectives of the Wembley Energy Action Area, as well as failing to deliver the much needed improvements in sustainable design quality within the Growth areas, sought in the Core Strategy. It would also fail to capitalise on the higher values generated by this growth, recently proposed Government Stamp Duty exemptions for ZEDs, and the economies of scale possible in larger developments.

Small Scale and Householder Development Standards

1.117 There are various drivers for improving the contributions towards climate change mitigation, and the sustainability of smaller scale and householder developments. These range from the Home Energy Conservation Act (HECA) target for local authorities to reduce energy consumption in homes by 30% by 2010, the EU Environmental Performance of Buildings Directive (EPBD), 2002, the Government's target of 4.2 million tonnes carbon savings in households by 2010, to the WWF influential campaign for a million sustainable homes. The domestic sector alone consumes a third of energy generated, and is responsible for a third of UK carbon emissions. A 2005 research study by Oxford university 'The 40% house' demonstrated how the domestic sector could deliver on the four key principles of the Energy White Paper - for a 60% reduction by 2050, affordable warmth, security of energy supply and a competitive energy industry.

1. Promoting a Quality Environment

1.118 In Brent, sustainability criteria have been applied to major developments since 2003. The Council's Sustainable Development Checklist submitted with such planning applications has been a key tool for ensuring major new developments make a positive contribution to measures which counteract the effects of Climate Change and lead to a more sustainable future. This approach had concentrated on major applications partly because of the steep learning curve for both officers and developers, and the sheer volume of other (smaller & householder) applications.

1.119 A Householder's Guide to Sustainable Design & Construction, and a summary leaflet had been produced, which is available on Brent's website, and in selected local DIY stores, but was only a voluntary guide for residents to consider (if they wished) in their alterations, conversions and extensions. Although each householder application is small in scale, the cumulative effect of these and other small development is considerable, as development activity affects up to 2.5% built area per year –up to a quarter of the built environment in Brent may be renewed in some way over a 10 year period.

1.120 Major developments each have a bigger impact, but together, account for only a relatively small amount of the development taking place throughout the Borough (there are nearly 4,000 planning applications decided each year, and only about 75-100 of these are major applications). These alone, are not sufficient to mitigate climate change, thus it is reasonable for smaller and householder applications to be expected to include sustainability measures. Earlier consultation revealed support for sustainability to be included in assessing householder applications, though a flexible approach will be taken by the Council to encourage local residents.

1.121 Although in some cases, this may result in extra costs for the householder in the short term, there are also likely to be medium to long term savings. Some measures are of low/no cost while others may even save money up-front. There are funding and technical support initiatives available to facilitate uptake of energy conservation and renewables measures –nationally from the Energy-Saving and Carbon Trusts, regionally from the Mayor of London, and locally, from Energy Solutions Northwest London.

1. Promoting a Quality Environment

DP SD 2

Sustainable Small-Scale & Householder Developments

Small-Scale

Proposals for less than 1000 sqm or less than 10 dwellings / conversions of 5-9 units, should:

- Submit a completed Brent Small-Medium Proposals Sustainability Checklist; and
- Include a supporting brief Sustainability Statement

These should show how relevant energy –including 10% renewables potential, as well as how water, materials and waste issues are being addressed. Schemes should achieve minimum of 'Very Positive' on Brent's Small-Medium Proposals Checklist (and/or a minimum Code level 2 standard).

To protect the special character of Listed Buildings, the renewables target will be more flexibly applied, taking into account, heritage preservation considerations.

Householder

Proposals for extensions, and conversions of 1-4 units should:

- Submit a completed Brent Householder's Sustainability Checklist;

In assessing such schemes, regard will be had to the Householder's Sustainability Guide / SPD (as updated), and schemes should include a minimum of half the relevant measures on the Checklist, with renewables being particularly encouraged, where feasible.

While encouraging renewables within Conservation Areas, regard will be had to Brent's guidelines for renewables based upon the visual impact, and available roofspace / frontages not visible from main roads.

Alternative options not included:

DP SD2

The alternative to the approaches set out in the policy, is to continue to focus only on major development - and rely on encouragement of voluntary measures in smaller-scale and household proposals. However, that option would lead to an outcome falling far short of the range of contributions needed to deliver ZED homes by 2016 - along with the need to use the opportunity provided by householder applications, to progressively upgrade existing homes towards higher standards.

Reducing Demand, Generating Renewables & Efficient Use of Finite Fuels

1.122 The UK Energy White Paper: *'Our Energy Future - Creating a Low Carbon Economy'* in 2003, set out targets and long-term objectives on the future of sustainable energy generation, as mentioned earlier. This was followed by a new Planning Policy Statement on renewables (PPS22) in 2004, including a detailed companion guide with case studies. More recently, there have been several initiatives aimed at stimulating take up of renewables - ranging from revisions to the Building Regulations in 2006 to proposed changes to permitted development rights for householder micro-generation in 2007.

1. Promoting a Quality Environment

1.123 The Government's PPS1: *Delivering Sustainable Development* in 2005 also highlights, as one of its key principles, the requirement for planning policies to address climate change by, amongst other measures, promoting the development of renewable energy resources.

1.124 At regional level, the Mayor of London produced a London-wide Energy Strategy, which introduced an 'energy hierarchy' along with a renewable energy toolkit and guides for planners, developers, housing associations, and Members. The Mayor has also designated the first 6 Energy Action Areas (EAAs) across London, of which the Wembley Regeneration Area is one. The proposed Further Alterations to the London Plan set out a 20% renewables target for major development. The TCPA also produced a guide for sustainable communities; 'Sustainable energy by design' in 2006 with useful policy and project case studies.

1.125 Local authorities are expected to take the lead, acting as catalysts for change, for instance by using their purchasing power to stimulate demand for energy efficient buildings and renewable energy, e.g. leasing arrangements and building specifications, supporting the development of community heating networks, and through securing energy best practice in their own buildings/ housing stock and services. This will enable local planning authorities to credibly use their regulatory powers to require developers to embody the necessary mitigation measures in their development proposals.

DP SD 3

Energy –Demand, Renewables & Efficiency

The design of development, and Sustainability Statement should demonstrate how the energy management approach applies the Mayor of London's 'Energy Hierarchy' by:

- **Reducing** energy demand through energy conservation measures (e.g. passive solar, insulation, materials, landscaping). These should be designed to take account of the increased future need for summer cooling;
- **Generating** onsite renewable energy (solar hot-water collectors, PV panels, wind, biomass, etc) for $\geq 20\%$ in Major developments (i.e. $\geq 1,000 \text{ m}^2/10$ dwellings); and
- **Supplying** residual energy needs efficiently using decentralised, low carbon technologies such as CHP, district heating, ground-source heat pumps, air-to water heat pumps, etc. (including summer cooling, as well as winter heating capabilities).

This renewables proportion will be required unless there are exceptional, site-specific reasons why their incorporation is unfeasible. In such instances, up to 10% of demand may be met onsite and/or in-lieu contributions may be accepted towards renewables generation on other sites in the Borough.

Water Management -Demand Reduction

1.126 Water use has risen by 30% in the last 30 years, and the UK population is projected to rise by 2.8 million (1996-2016). In this time there is a prediction that there will be 3.3 million new households in England and Wales of which 72% will be 'single person' who typically use 40% more water than individuals within a family. New high water appliances (e.g. hot spas, aerated / overflow baths) and drier conditions continue to increase water use –and are projected could lead to a doubling of demand by 2025.

1.127 The UK average usage per person is 150 litres per day –increasing to 160 litres in the South-east (35% of which is flushed away). Thus, the 267,000 people in Brent (2001 census) use up to 42,720,000 litres (i.e. 42,720 m^3 / 42.72 mega litres) per day. Yet the BRE has established that simple, no-cost/low cost measures with more efficient water fittings / fixtures can deliver at least 30% saving in water use. The sub-metering of dwellings and commercial units also produces an immediate 10% reduction in water usage, but only one-third of homes have thus far been metered.

1. Promoting a Quality Environment

1.128 Thames Water currently supply 2.8 billion litres per day, which is projected to rise by 280 million litres by 2030. In view of the projected housing / population growth in Brent (and the rest of the south-east) over the next 10 years, it is important to set challenging, but meaningful targets to ensure this growth can be sustainably accommodated. By careful attention to landscaping requirements, and designing-in simple water capturing, and/or recycling mechanisms, it is already possible for domestic savings of up to 50% (on current usage) to be achieved.

1.129 The Government's draft '*Water Efficiency in New Buildings*' document has set out some of the challenges and possible means of addressing these, including through minimum levels in the Code for Sustainable homes. The Mayor of London's recent draft Water Strategy has also proposed a useful hierarchy to be used in achieving objectives.

DP SD 4

Sustainable Water -Demand & Efficiency

In all areas, the design of development, and Sustainability Statement should demonstrate how the approach to reducing water demand applies the Mayor's draft 'Water hierarchy':

1. Install water fixtures and fittings that are as efficient as possible, whilst retaining performance;
2. Promote water conservation measures; and
3. Use reclaimed water –by including mechanisms for capturing rainwater & recycling grey water.

Particular regard will be had to demand management in Major developments within the Wembley Energy Action Area (EAA) the Growth Areas, and in water-intensive uses elsewhere – for which significant reduction targets (on current usage levels) will be sought, and set out in SPG/SPD19 as updated.

Resource Efficiency – Sustainable Building Materials

1.130 Natural resources such as aggregates, wood and metal cause environmental pollution in their extraction, manufacture and transport. Reusing these materials significantly reduces their environmental impact and contribution to global issues such as climate change. Construction and demolition materials accounted for up to 57% of the UK's materials consumption and 58% of waste generated (2000) making it the single most significant industry sector in terms of environmental impact and carbon emissions.

1.131 Just as for instance, timber sourced from UK forests will generally have a lower environmental impact than timber sourced from outside the UK, from reduced transport-based emissions, so also, where materials from demolition can be recovered and used on the same site, (or reprocessed locally for use on other sites in the locality) haulage movements are minimised, with costs and carbon footprints reduced.

1.132 The Waste & Resources Action Programme (WRAP) have demonstrated in their 'Quick Wins' publication, the feasibility of sourcing at least 10% of overall project values from materials with recycled content, using commonly available material components and specifications.

Resource Efficiency – Sustainable De/Construction

1.133 It has been estimated that the current level of recycling (primarily of aggregates for low-level uses) in the industry, saves 10-15 million tonnes of Carbon emissions per year (equivalent of taking 3.5 million cars off the road). The potential therefore, with further savings and higher level uses within new-build of a wider range of recovered materials could make a significant contribution to mitigating climate change.

1.134 The ICE Demolition Protocol is a project management tool which ensures that the right questions are asked –in terms of managing materials efficiently from demolition and refurbishment. By requiring designs to assess the potential for incorporating recovered materials, environmental and cost benefits can often both be achieved.

1. Promoting a Quality Environment

1.135 The Protocol was adopted by Brent in 2003 and included in the Supplementary Planning Guidance on Sustainable Design, Construction and Pollution Control (SPG19) and has subsequently incorporated in the London Mayor's (GLA's) Supplementary Planning Guidance (2006) on sustainable design and construction, identified as the Mayor's 'preferred standard' for the procurement and use of materials.

1.136 A pilot study in Wembley (WRAP funded) in 2005, and case studies in Wembley (London Remade / Brent-funded) in 2006, have demonstrated its benefits, feasibility and achievability - findings replicated by projects within a number of other local authorities.

1.137 Construction waste minimisation / management has been less well developed, though a number of voluntary methods for Site Waste Management Plans, have been developed by BRE/DTI and more recently, by WRAP. These have thus far, not been widely adopted nor their achievement properly monitored, and there is now a need to ensure locally, that the current 20-30% wastage of new materials on construction sites is effectively minimised to ensure regenerative growth in Brent, is more sustainably achieved.

DP SD 5

Resource Efficiency –Sustainable Materials & De/Construction

The design of development, and Sustainability Statement should demonstrate how the environmental impact of specified materials have been taken into account, using the following hierarchy:

- a. Giving preference to natural, renewable, primary materials from sustainably managed resources. e.g. FSC timber;
- b. Applying the ICE Demolition Protocol methodology to maximise recycled content in key new-build materials -a minimum of 10% of inputs for key standard components, should come from recovered sources; and
- c. Giving preference to components and systems designed & detailed for future deconstruction (and reuse);

A Construction Management Strategy (CMS) will be sought which uses the Demolition Protocol to set targets for maximising recovery and reuse of materials from any deconstruction / demolition, and/or includes a Site Waste Management Plan, with targets for minimising materials waste over the construction phase.

Poor Air Quality Effects -Adaptation

1.138 More than half of Brent is currently designated as Air Quality Management Areas (AQMAs). Indoor air quality is, and will become increasingly important as external air quality is set to worsen in many areas, as car ownership increases –unless measures to reduce the need to travel by car, can be effectively enforced. In the next chapter, policy DP ENV1 sets out long-term measures to monitor and mitigate the impact of development on air quality in Brent. In the short-medium term, however, there is a need to cope with the health effects of poor air quality on sensitive users in health, education and housing developments.

1.139 According to studies carried out by the BRE and other research, the toxicity of many specified building materials can mean that in highly sealed buildings the quality of the indoor environment can often be poorer than outdoor. These problems may be exacerbated in AQMAs, as the justifiably, more stringent requirements in the Building Regulations for air-tightness of buildings (to conserve energy) could also however, heighten such effects.

1.140 Such external and internal factors mean that unless measures are put in place to properly address the indoor environment, more airtight buildings may increasingly lead to conditions contributing to a worsening of already rising levels of asthma (1 in 6 people in UK) and other respiratory illnesses.

1. Promoting a Quality Environment

1.141 The recent Air Quality Expert Group report to DeFRA, 2007 on '*Air Quality & Climate Change: A UK Perspective*', concluded that there is also a close relation between air quality and climate change pollutants, and there is a need to tackle them together in 'win-win' scenarios. They recommend that particular climate change mitigation measures (such as domestic energy conservation and efficiency improvements) can and should be used to secure reductions in air quality pollutants.

1.142 This requires, amongst other options - such as mechanical ventilation (with heat recovery) / filter systems in living areas - considering more energy efficient, simpler, passive and wider measures, including vegetative planting barriers, green roofs, etc. as set out in updated Supplementary Planning Guidance / Document 19 on sustainable design, construction & pollution control.

DP SD 6

Poor Air Quality Effects -Adaptation

Particular regard will be had to poor air quality effects in / near Air Quality Management Areas (AQMAs).

The design of development, and Sustainability Statement should demonstrate how adaptation measures are designed-into development proposals for sensitive uses (health, education & housing) within / adjacent to AQMAs, to protect the indoor environment from poor external air quality.

Those proposals which are significantly above the major development threshold ($\geq 1,000$ sqm /10 dwellings) may otherwise, be required to achieve a higher level (or minimum level 4) in the Energy/ CO₂ category of the Code for Sustainable Homes.

Operational Waste Management

1.143 Most of our waste, from communities and businesses, is put in landfill sites. Each year, the amount of waste increases, whilst the number of available landfill sites decreases. Landfilling waste causes environmental pollution and also removes materials and resources from beneficial use. More sustainable means of dealing with waste have to be introduced to reduce the current amounts that are being sent to landfill from London.

1.144 National planning guidance, requires all developments to follow the 'Waste Hierarchy'. This is applicable to development materials and plans, as well as infrastructure design to make it easier for residents, building users and visitors to the borough to follow the hierarchy. Government planning policy states that planning policies should:

- treat waste as a resource;
- enable sufficient and timely provision of waste management facilities to meet needs of local communities;
- help secure recovery or disposal of waste without harming human health or harming the environment; and
- ensure waste is disposed of as near as possible to its place of production.

Brent's Municipal Waste Management Strategy:

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

1.146 The Government has set national targets for recovering and/or recycling waste, and also reducing the amount of waste that goes to landfill:

1. Promoting a Quality Environment

Target Year	Municipal waste (to be recovered in some way)	Household waste (to be recycled or composted)	Target Year	Biodegradable waste (reductions required)
2005	40%	18%	2010	To 75% of 1995 levels
2010	45%	30%	2013	To 50% of 1995 levels
2015	67%	33%	2020	To 33% of 1995 levels

Table 1.1 National targets: Recovering and/ or Recycling Waste Categories & Reducing Biodegradable Waste to Landfill

1.147 Municipal waste means all waste that is produced in the Borough from all sources – residential (household), commercial, industrial. The targets here are for recovering some use from total waste arisings. Examples of recovery include: re-using the waste in its current form, recycling it into other products, incinerating it for energy recovery, composting to create a useful by-product. Household waste means all waste produced by householders.

Targets – Reducing waste going to landfill

1.148 Organic wastes properly managed in a community composting scheme are more sustainable than landfilling in sites outside Brent. Brent’s Municipal Waste Management Strategy contains more detailed targets on waste diversion, recycling, composting and the Landfill Allowance Trading Scheme (LATS) which is available on the Council website at: www.brent.gov.uk/streetcare.nsf

1.149 Brent has produced a Draft Supplementary Waste & Recycling Guide to provide detailed information about operational requirements to support Brent’s Municipal Waste Management Strategy & LATS targets (as well as reducing the level of non-hazardous, commercial waste arisings and amount of this sent to landfill).

1. Promoting a Quality Environment

DP SD 7

Operational Waste Management

The design of development, and Sustainability Statement should demonstrate how areas of waste storage for separate material types (organic wastes, dry recyclables and residual wastes) are integrally designed-into individual units and external areas. Major commercial developments should adopt the principles and procedures in the *RSC Waste Infrastructure & Management Code of Practice* as a basis for

- Estimating the types and volumes of operational waste arisings; and
- Setting out how they will reduce / manage these waste streams -including in housing schemes, how they will manage a proportion of their wastes on-site, e.g. by organic waste composting;

The introduction of innovative systems (such as vacuum, etc.) for high density, urban waste segregation, storage and collection will be encouraged, where this helps secure high rates of recycling, and quality urban design outcomes.

Alternative options not included:

DP SD3-7

The alternative to these policies would be to continue the current UDP approach of a single policy for all these issues. This currently does not properly reflect their significance for climate change, not has it provided the required level of certainty for developers about the Council's expectations. The lack of UDP targets in particular, has made it more difficult to negotiate for instance, on renewables. These expectations should not be left for future inclusion in SPDs, due to the much longer timescale for updating and/or producing these, and the policy vacuum that would result in the meantime.

The selected option clearly sets out the targets and/or Council's objectives on these sustainability issues and the range of design options for achieving them can later be set out in SPD or extracted from other currently available detailed guides, such as the Mayor's SPG.

Environmental Protection

Air Quality

1.150 Air Pollution can have significant effects on human health and also impacts upon local ecosystems and vegetation. The Council recognises the importance of trying to improve local air quality to improve the environment and health of its residents and has produced an Air Quality Action Plan (2005) which sets out how it is proposed to achieve this. Air quality is a significant problem in Brent, as emissions from motor vehicles on the busy roads running through the borough (e.g. A406, Harrow Road) have led to exceedances of the National Air Quality Standards in these areas and the declaration of an Air Quality Management Area in 2002 (see Map 1.1 'Location of Air Quality Management Area'). National and regional planning policy requires local authorities to prevent potentially harmful development and mitigate the impact of potentially polluting development. These policies also require development to be located so as to limit pollution and dust to levels specified in National Air Quality Strategy (NAQS) objectives, which is particularly an issue in Air Quality Management Areas. The levels of nitrogen dioxide, ozone and particulate matter (PM10) were in excess of these NAQS objectives in several locations in Brent during 2006. These exceedances are particularly concerning in light of the review of the National Air Quality Strategy and potential revised targets for some pollutants.

1. Promoting a Quality Environment

The new draft strategy, published in July 2006, predicts that targets for some pollutants will not be met, particularly in urban areas with busy roads such as Brent. The council will review its air quality requirements of developments to facilitate meeting more stringent targets if they are eventually implemented in the final version of the strategy. SPG19 (and any subsequent revision) provides details of air quality measures that should be considered in any planning application and promotes alternative modes of transport and infrastructure for clean fuel vehicles to help to reduce emissions from motor vehicles and other mitigation measures such as tree planting and greening of development. Pre-application discussions with planning officers and environmental health officers are advised where the development is in an AQMA or likely to have a significant impact upon air quality.



Map 1.1 Location of Air Quality Management Area

1.151 Air Quality Assessments will be required where a major development is located in an Air Quality Management Area or for any development that is likely to generate significant amounts of traffic along with transport assessments required by Policy TRN1. An Air Quality Assessment will also be required for incineration schemes due to the potential release of particulates and other pollutants associated with combustion. In addition, any energy generation projects would also require an Air Quality Assessment. This will enable the council to quantify the potential impacts of these processes on local air quality. The council will also consider the cumulative impact that could arise from the addition of a new potentially polluting development to an existing pollution source. The council will take into account any advice given by its Environmental Health Officers, the Environment Agency or any other relevant external body.

1. Promoting a Quality Environment

DP ENV 1

Air Quality

The potential impact of proposed developments on air quality will be taken into account when assessing planning applications, and where significant adverse impacts are predicted which cannot be satisfactorily mitigated, development will not be permitted. A formal assessment of the effects upon air quality will be required in the following circumstances:

- where a major development is located within an Air Quality Management Area (AQMA);
- any developments likely to generate significant levels of traffic;
- incineration schemes;
- industrial activities known to pollute; and
- energy generation projects.

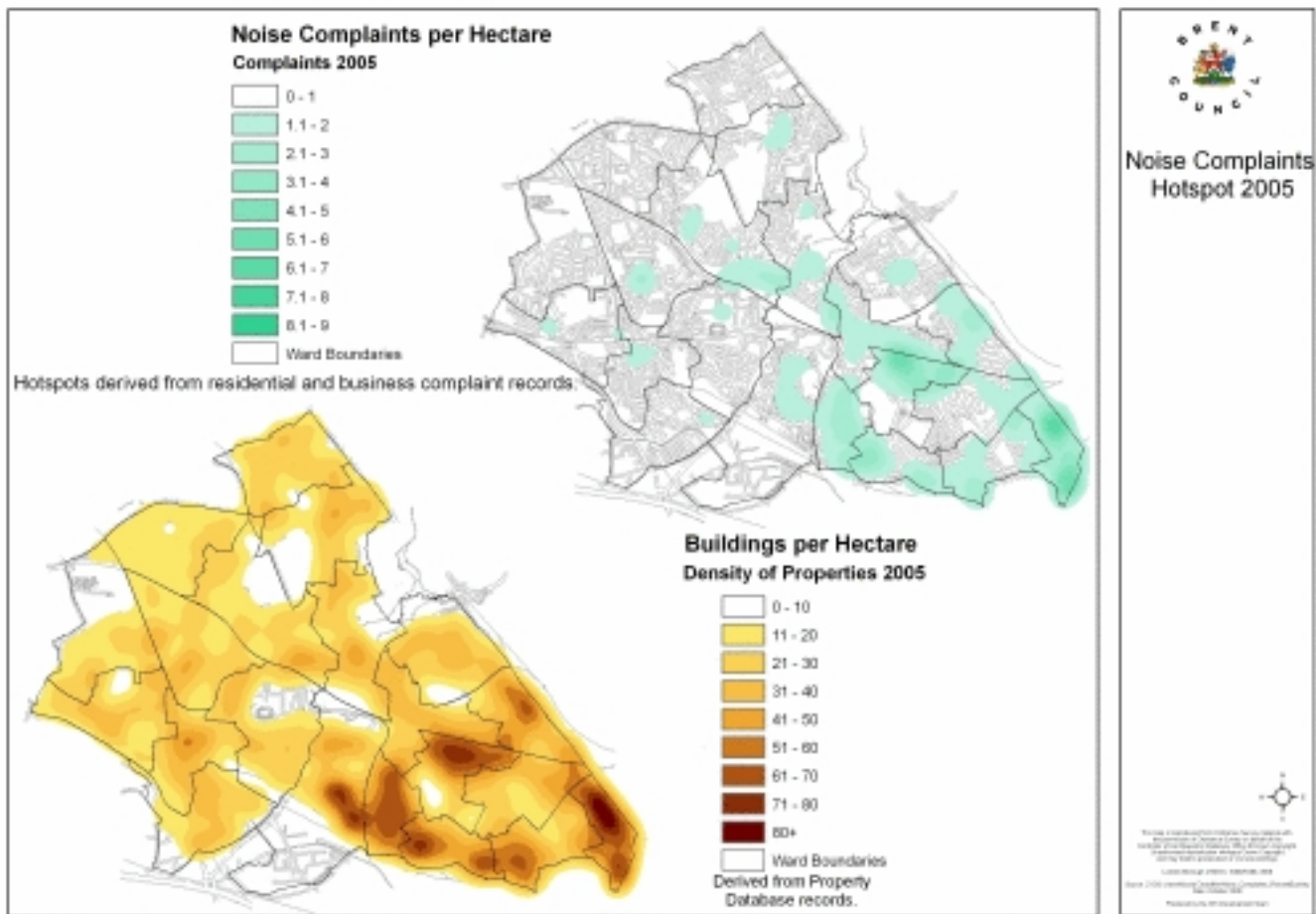
For major developments which affect air quality, infrastructure for alternative fuels to encourage cleaner vehicles and contributions towards air quality monitoring and mitigation will be sought as part of planning obligations or conditions.

Noise & Vibration

1.152 Noise and vibration is a common problem in Brent mainly arising from domestic and other nuisance noise, roads, railway and industrial/ commercial noise. PPG24 states that the planning system's role is to guide development to the most appropriate location, wherever practicable separating noise sensitive developments and major sources of noise. The EU Environmental Noise Directive 2002/49/EC is the key legislation seeking improvement to the noise environment in the UK. Unfortunately it appears that the noise situation in Brent is worsening over time as noise complaints are increasing. In 2002/03 2,198 complaints were received, in 2003/04 this increased to 2,647 complaints, rising to 2,925 complaints in 2004/05 and up to 3574 in 2005/06. This may be attributed to a number of factors, although one of the contributing factors could be the increased density of housing, which results in more people living in closer proximity to each other. Map 1.2 'Noise Mapping & Housing Density 2005, Source: Environmental Health Department & Brent GIS, December 2005' below illustrates the relationship between noise complaints and density. The noise hotspots clearly correlate with density levels across the borough. Therefore noise mitigation measures will be required where development would result in significant noise impacts upon existing residents/ nearby occupiers and also within/ between the proposed units. Applications may be refused where the impacts cannot be acceptably mitigated. Actual noise levels across the borough are in the process of being mapped by the Environmental Health Department at Brent, and noise maps will provide more information to inform planning decisions, and noise generating development will be directed away from known "quiet areas" of the borough as encouraged by PPG24. Further information on noise and methods of reducing or mitigating its impacts can be found in Brent's SPG19 (or subsequent revisions).

1.153 Noise reduction in the wider neighbourhood will be taken into account in assessing the design of applications for development. The planning and design of late night eating, drinking and entertainment venues should aim to prevent nuisance to established and prospective noise-sensitive uses. In addition roadside noise can be reduced through designing development to screen noise. Also developments themselves can be screened from noise through improving boundary design and through locating less noise sensitive uses adjacent to the boundary. This sort of approach will be encouraged by the council and is promoted in the Mayor's Ambient Noise Strategy (March 2004). It should be noted that developer contributions (S106) may be sought towards the cost of noise reduction measures, especially where this may allow greater intensity of development.

1. Promoting a Quality Environment



Map 1.2 Noise Mapping & Housing Density 2005, Source: Environmental Health Department & Brent GIS, December 2005

DP ENV 2

Noise & Vibration

When considering development proposals, the council will take into account the cumulative impact of noise pollution on a locality. Where potential development will result in a significant adverse effect upon existing residents/ nearby occupiers and also within/between the proposed units in terms of noise or vibration generation, it will not be permitted unless acceptable mitigation measures are undertaken. In high density developments, particular regard should be given to the minimisation of noise levels between proposed units.

Potentially noise-generating developments should be located away from existing or proposed noise sensitive land uses and noise sensitive development will not be permitted close to existing sources of significant noise.

Pollution & Amenity

1.154 Development could potentially cause pollution other than noise and air pollution. Smell, dust, light and visual pollution or involve hazardous substances/operations or other *statutory nuisances (*defined in the Environmental Protection Act 1990), could result directly or indirectly from development and be detrimental to the local environment or amenity. The location of potentially polluting developments should protect the amenity and character of the

1. Promoting a Quality Environment

surrounding area. The council will require adequate information on the potential polluting impacts of developments that are likely to result in these problems to make an informed assessment of the application. Any mitigation measures required will be sought through planning conditions or obligations.

1.155 Directive 96/82/EC (SEVESO II Directive) seeks to prevent major accidents which involve dangerous substances and to limit their consequences in terms of health and the environment through appropriate siting of new development. The Health and Safety Executive and the Environment Agency are both responsible for the implementation of these regulations. The Planning (Hazardous Substances) Act 1990 requires consent to be obtained for the presence or use of hazardous substances from the hazardous substances authority. Planning controls play a complementary role to that of the hazardous substances authority through the control of any residual risks. Notifiable installations are also covered by the Directive. There is only one notifiable installation in Brent (in 2007) which is the Transco High Pressure Pipeline (consultation distance of 6m) the majority of which runs underneath roads (see proposals map). The Council will consult with the Health and Safety Executive where applications are received within the vicinity of this installation. Development is only likely to be impacted if foundations would affect the pipeline or where there are surface installations.

DP ENV 3

Pollution & Amenity

Where a development is likely to result in a significant detrimental impact upon the local environment or amenity in terms of smell, dust, light and visual pollution or involve hazardous substances/operations or other statutory nuisances*, it will not be permitted unless the problems can be overcome by mitigation measures. In addition permission will not be granted for development adjacent to a potentially polluting source unless mitigation measures make the environmental and amenity impacts acceptable.

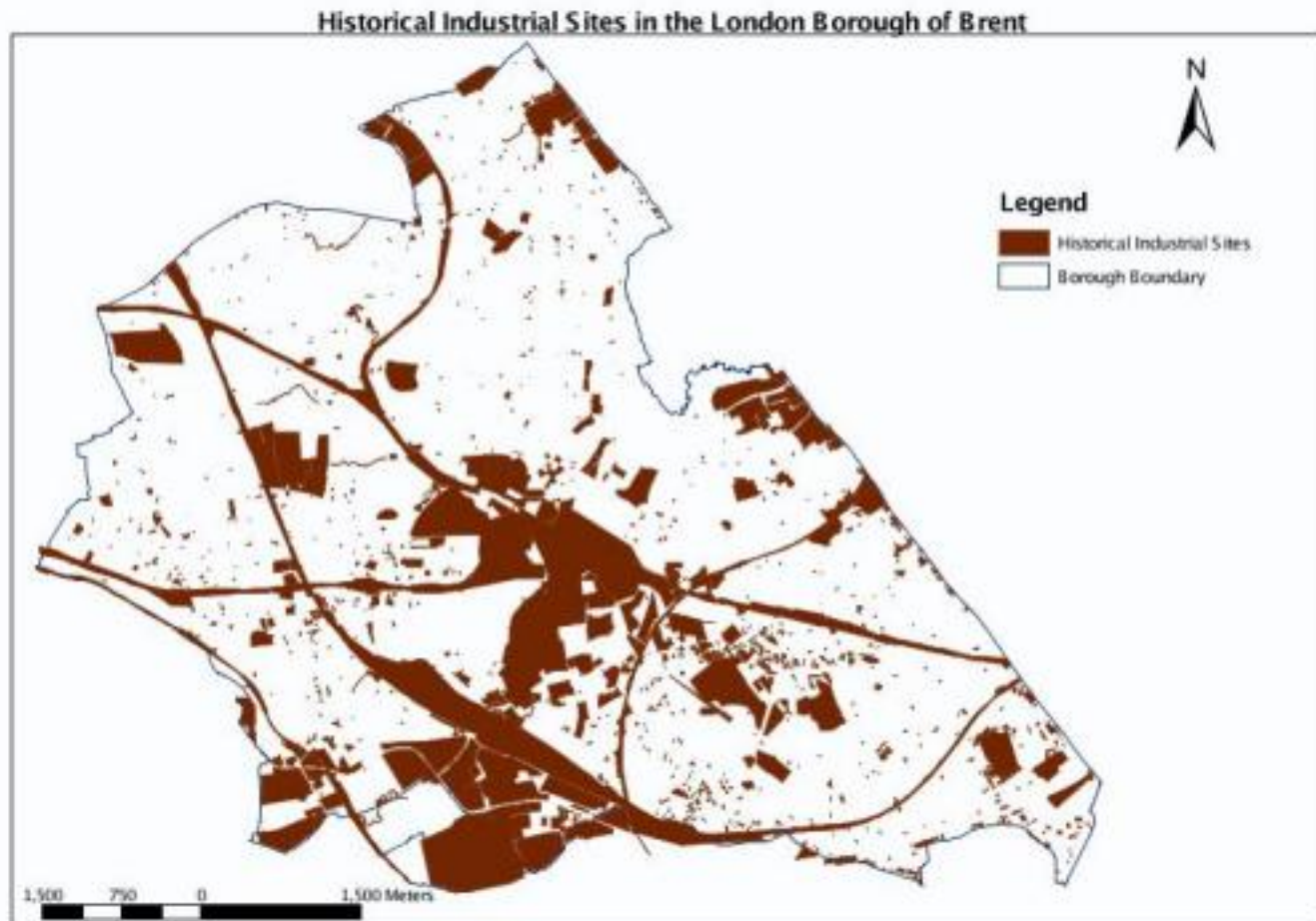
When considering proposed developments falling within the defined consultation distance of a notifiable installation the council will consult with the Health and Safety Executive and where it is considered the proposals would result in unacceptable risks, planning permission will not be granted.

* As defined in the Environmental Protection Act 1990

Contaminated Land

1.156 The council will encourage the re-use of previously developed (brownfield) land in accordance with national Government objectives. Brownfield land may have been contaminated by its former uses, which may affect or restrict the beneficial use of the land. Development may represent an opportunity to deal with the risks arising from the contamination effectively through requiring remedial measures to be undertaken through the planning system. 10,299,975 sqm of land (both brownfield and greenfield land) in Brent is potentially affected by contamination which is illustrated in the map 1.152 (identified in the contaminated land survey undertaken in 2005). When considering applications on sites associated with potentially contaminated uses the Council will liaise with the Environment Agency, pollution control authorities and Environmental Health. Applicants should refer to guidance on the procedures for investigating potentially contaminated land available from Environmental Health and also guidance produced by the Environment Agency.

1. Promoting a Quality Environment



Map 1.3 Historic Industrial Sites in Brent, Source: Brent Council Environmental Health Department – December 2005

1.157 An initial desk top study will be required to establish the nature and extent of any contamination, and subsequently on-site investigations may be required where necessary, prior to the commencement of development. Requirements to undertake remediation measures, on-site investigations, monitoring and adequate disposal of contaminated soil will be outlined and secured through planning conditions.

DP ENV 4

Contaminated Land

Development on potentially contaminated sites will be permitted where the extent of contamination is known and mitigation measures and subsequent management measures will render it acceptable for the proposed use. In such circumstances, initially the Council will require a desk top study investigating the nature and extent of any contamination, and subsequently on-site investigations may be required where necessary, prior to the commencement of development, and will be secured by condition.

Invasive & Noxious Plant Control

1.158 Invasive plants such as Japanese Knotweed can cause serious structural problems for buildings and hard surfaces. They also smother less vigorous native flora reducing biodiversity. Noxious plant species can be harmful to both wildlife and people. Under the Wildlife and Countryside Act 1981 it is a criminal offence to plant or cause

1. Promoting a Quality Environment

listed species to grow in the wild. Sites can be contaminated by invasive plant species present on a neighbouring site as the plant can extend laterally underground. Developers are therefore under a legal obligation not to allow the spread of an invasive species where it is found on or adjacent to a site. Knotweed is also classified as a 'controlled waste' under the Environmental Protection Act 1990 and must be appropriately disposed of. The Environment Agency provides guidance on the effective management and disposal of knotweed on development sites.

Water

1.159 Brent is home to a number of watercourses. The main river running through the borough is the River Brent from which the borough took its name, and there are also a number of tributaries such as the Wealdstone Brook (classified as a main river by the Environment Agency). Part of the Grand Union Canal and its feeder also cut through the south west corner of the borough which are managed by British Waterways along with the Welsh Harp Reservoir to the north of the borough. Water is a valuable resource in terms of its amenity and recreational value and also its contribution to biodiversity which Brent will seek to promote and enhance.

1.160 The Water Framework Directive (Directive 2000/60/EC) became law in the UK in 2003 and introduced a new integrated approach to water protection, improvement and sustainable use and applies to all water bodies. The main aims of the directive include preventing the deterioration in water quality, restoring good water quality by 2015 and reducing pollution from certain substances. In the UK the Environment Agency is charged with implementing the directive, and as part of this will be producing River Basin Management Plans for each River Basin District. Once published, the management plan for the Thames area will apply to the watercourses in Brent and the objectives of which will be taken into consideration in future policies and applications. The Council will consult the appropriate agency (British Waterways, Environment Agency or other bodies) where development proposals are adjacent to or in close vicinity of a watercourse.

Water Quality

1.161 The current condition of Brent's watercourses is variable, with parts of the water courses suffering from pollution and poor sewerage connections largely through cross connection from households. The council will protect the quality of the borough's watercourses in line with Government Guidance and the Environment Agency's requirements and aim to achieve the general water quality assessment class D (fair quality) or above. The stretch of Brent River to the north of the borough has the worst water quality in the borough, and in the period 2003 – 2005 was classified as Class F (bad quality) in terms of water chemistry which means the river has a severely restricted ecosystem at this point and is very polluted. Therefore any development which poses a risk to water quality will be resisted and measures to improve water quality will be encouraged.

1.162 Currently the majority of the River Brent is classified by the Environment Agency as 'at risk' from 'diffuse source pollution', which in an urban area such as Brent would be mainly as a result from urban land uses and surface water run-off. It is also 'probably at risk' from physical or morphological alterations and 'alien species' which are non-native organisms with the potential to alter the biodiversity of the river. The River Brent is not considered at risk from 'point source pollution' such as discharges from sewage works and industrial processes. In addition there are no significant areas of groundwater that are at risk of pollution.

1.163 All water discharged into the borough's watercourses should be uncontaminated and should be capable of being accommodated in the water system. For any new major developments there should be adequate sewerage infrastructure capacity and water supplies available (see policy DP SD 4 'Sustainable Water -Demand & Efficiency') . In addition the use of sustainable drainage systems (SUDS) to reduce the amount and intensity of surface water run-off will be encouraged (see policy DP ENV 6 'Flooding'). The Council will take account of advice from the Environment Agency, who can also advise applicants on appropriate techniques to improve surface water run-off quality.

1.164 The culverting or impounding of rivers or watercourses in Brent effectively removes all natural interest therefore will be resisted. Part of the River Brent at the Brent River Park was naturalised in 2003, with the aim of encouraging wildlife and plants and to enable access to the water at certain points. Any enhancement of the water environment will be encouraged. Development adjacent to main rivers should retain an 8 metre undeveloped buffer strip and a 5

1. Promoting a Quality Environment

metre strip for ordinary watercourses (see also DP Policy OS2). This will allow access for maintenance and flood defence works, and also improve the water quality and allow wildlife to move up and down the river corridor as advised by the Environment Agency.

DP ENV 5

Water

Development that would lead to the pollution of groundwater or surface water through discharge or increased surface water run-off will not be permitted. The use of sustainable drainage techniques for the control of the quality of surface water run-off will be required for major developments and encouraged in all developments.

Development should not result in the impounding or culverting of surface waters or restrict access to the waterside. Developments adjacent to water courses should retain an 8 metre undeveloped buffer strip at main rivers or 5 metre strip for ordinary watercourses (also see DP Policy OS2)

Major new developments will not be permitted unless there is adequate sewerage capacity and water supply available to serve them. The cumulative impact of development proposals and existing developments upon water supply and sewerage will be taken into consideration when considering planning applications.

Flooding

1.165 One of the most significant predicted impacts of climate change is the increased risk of flooding from rising sea levels. The risk of flooding in urban areas is exacerbated by the increase in hard surfaces through concreting/paving gardens, patios, extensions and driveways of individual homes which cumulatively impact on the volume and intensity of surface water run-off. This combined with surface water run-off from roofs, hard landscaped areas, roads and car parks in both new and existing developments is becoming an increasingly significant issue in terms of flood risk. This surface water run-off can also contain contaminants which cumulatively can result in poor water quality in rivers and groundwater and impact upon wildlife habitats. Therefore sustainable drainage is important in the management of flood risk and water quality in the borough. The council will consider applying Article 4 Directions to areas where permitted development threatens to have a direct, significant and adverse effect on a flood risk area, or its flood defences and their access, or the permeability and management of surface water, or flood risk to occupants. This would require planning applications to be submitted for specific permission to carry out any development in these particular areas.

The Environment Agency has classified 3 flood risk zones:

- **Zone 1** - Low probability (less than a 1 in 1000 chance of flooding in any year)
- **Zone 2** – Medium probability (between 1 in 100 and 1 in 1000 chance of river flooding and between 1 in 200 and 1 in 1000 chance of sea flooding in any year)
- **Zone 3** – High probability (1 in 100 or greater chance of river flooding and a 1 in 200 or greater chance of flooding from the sea in any year)

1.166 Flood zone 1 is outside of the floodplain (i.e. not in zones 2 or 3) and constitutes all land outside of flood risk areas zones 2 and 3. Brent has flood risk areas zones 2 and 3 in the flood plains of the River Brent and Wealdstone Brook which dissect the borough. A number of properties and areas of open space fall into these zones, therefore any future development in these areas will need to adhere to the procedures and guidance outlined in Planning Policy Statement 25 (PPS25) which provides the overarching planning guidance for development and flood risk.

1. Promoting a Quality Environment

1.167 The council will consult the Environment Agency on any application in a flood risk zone and will guide development away from flood risk areas. The sequential test as outlined in PPS25 should be applied to any development in a flood risk area, and applicants should demonstrate that there are no suitable sites for the development in areas within low flood risk areas. Table D.1 in PPS25 details the forms of development appropriate for each flood risk zone. The exception test should be applied where the sequential test requirements cannot be met.

1.168 Planning applications will be expected to demonstrate a sustainable approach to drainage through the layout and form of development and through the application of Sustainable Drainage Systems (SUDS). Measures will be sought to minimise the potential for flooding and surface water run-off and include SUDS, green roofs, grey water re-use and rainwater harvesting which are detailed in Brent's supplementary guidance (SPG19 or subsequent replacement).

1.169 A Strategic Flood Risk Assessment (SFRA) will be completed to inform local development documents and future planning applications. The Environment Agency is also developing a Flood Risk Strategy for the River Brent which will provide more detailed information on potential flooding across the catchment, and potential inter borough impacts. Flood risk assessments (FRAs) will be expected to be submitted with planning applications in flood risk zones 2 and 3 (as shown on the proposals map and subsequent revisions by the Environment Agency) and a brief FRA is required for all development proposals for sites of 1 ha or above in size.

1.170 Where opportunities arise to utilise open space in the floodplain for flood risk management this can provide an important flood risk management tool and the open space should be designed for this use. Where development occurs in areas with residual flood risk developments should have flood resilience designed in.

DP ENV 6

Flooding

The council will resist any development that has the potential to contribute to flood risk (individually or cumulatively), have an adverse impact on river channel stability or cause damage to wildlife habitats. Development proposals in flood risk zones 2 and 3 (as identified by the Environment Agency & shown on the proposals map) and all development proposals for sites of 1 ha or above in size should be accompanied by a Flood Risk Assessment. The sequential test should be applied to any development in flood risk areas, and the exception test will be applied where it does not meet its requirements. Following these tests, where development is still proposed in areas with residual flood risk, flood resilience should be designed into the development.

Measures will be sought wherever possible to minimise the potential for flooding and surface water run-off such as SUDS, green roofs, grey water re-use, rainwater harvesting and other techniques. Opportunities to appropriate open space in the flood plain should be utilised for flood risk management

Energy & Renewable Energy Generation

1.171 The use of renewable energy is becoming increasingly pertinent in light of dwindling fossil fuel resources and the potential impact of climate change. PPS22 encourages renewable energy because of its reduced carbon dioxide production compared to conventional sources of energy and therefore reduced impact upon climate change. The planning system has an important role to play in promoting and encouraging renewable energy generation projects and also through securing a proportion of energy generation in major developments from renewable sources.

1.172 The Draft Further Alterations to the London Plan seek the long-term reduction of carbon dioxide emissions by 60% by 2050. Boroughs should seek to achieve: 15% reduction by 2010; 20% by 2015; 25% by 2020; and 30% by 2025. The Mayor's Energy Strategy (February 2004) requires boroughs and developments to maximise their own generation of renewables and decentralise energy production. In addition, the Mayor seeks the creation of at least one zero carbon development in every London Borough by 2010. The council will therefore encourage the development of renewable energy sources and the development of at least one zero carbon development in the borough to fulfil

1. Promoting a Quality Environment

these objectives. The strategy also encourages the creation of Energy Action Areas, to show case low-carbon communities. The West London Sub Regional Development Framework highlights Wembley as a potential Energy Action Area, which it has now become and also Park Royal.

1.173 The use of biofuels, wind power, waste-to-energy plants, combined heat and power stations, hydroelectricity, active and passive solar designs to generate energy will be encouraged in appropriate locations in Brent. Renewable energy generation may cause local problems with visual, light, smell, air-borne or noise pollution. Therefore when considering applications for new renewable energy generation the visual and noise effects should be minimised through the careful siting, layout, landscaping, colour and design of schemes. Detailed information on renewable energy generation and its design can be found in Brent's SPG19 or subsequent replacement.

1.174 DP SD 3 'Energy –Demand, Renewables & Efficiency'

1. Promoting a Quality Environment

DP ENV 7

Energy & Renewable Energy Generation

Development proposals for new renewable energy generation projects will be encouraged where:

- there will be no significant detrimental impact on local amenity in terms of visual, light, noise, smell or air-borne pollution which cannot be mitigated; and
- the siting, layout, landscaping, colour and design of the scheme minimises any impacts upon local amenity.

Other forms of energy generation may be permitted where there is a demonstrable need, and where it can be demonstrated that renewable energy generation cannot be viably undertaken on the site. The implementation and operation of Energy Action Areas within Park Royal and Wembley will be supported and encouraged.

Alternative options not selected:

The following section describes the alternative options for the policies outlined in this section.

Air Quality - The alternate option for this policy is not to consider air quality impacts as part of planning applications. However as this would not contribute towards meeting National Air Quality Standards or towards the general improvement of the environment and meeting of climate change objectives.

Noise & Vibration - An alternative to this option would be to not require noise generating equipment to be located away from existing or proposed noise sensitive land uses. However this would be detrimental to the amenity of the noise sensitive uses.

Pollution & Amenity - Legislation requires councils to have planning policies on development and hazardous substances. An alternative option would be to not restrict development which is likely to have a significant detrimental impact upon the local environment, however this would not be beneficial to the overall objective of improving Brent's environment and residents quality of life.

Contaminated Land - An alternate option for this policy would be to not allow any development on contaminated land, but this would not fulfil the national objective of directing development to brownfield land and would not assist in the remediation of potentially contaminated land.

Water - An alternative option for this topic area would be to not take into consideration the effect of development upon the quality of water. However this would not work towards the improvement of Brent's water environment and general biodiversity.

Flooding - The need to consider the potential impact of development upon flood risk is dictated by Planning Policy Statement 25 and flood risk is an increasingly important consideration due to the implications of climate change, therefore this policy is considered to be an appropriate option.

Energy & Renewable Energy Generation - The alternative option would be to restrict any other form of energy generation other than renewable energy, however at this point in time, technology is still being developed in terms of renewable energy generation, and it is not prudent to restrict conventional energy generation until this is more developed and secure.

1. Promoting a Quality Environment

Enhancing Open Space and Biodiversity

Introduction

1.175 Open Space plays an important role in the urban environment. It provides a place for natural habitats to form, increases biodiversity and nature conservation value, and improves the quality of urban environments through air and soil, and creation of distinct urban landscapes. It also enhances the quality of life for residents, workers and visitors to participate in outdoor activities and be amongst nature and open surroundings. Protecting and maintaining sufficient areas of open space is particularly crucial in urban environments where open areas of land is scarce and there is high demand for housing and other high value economic interests.

1.176 Brent has over 1,000 acres (412 hectares) of public open space, including Local Nature Reserves at the Welsh Harp (Brent Reservoir) and Fryent Country Park, and district parks at Barham, Gladstone and Roundwood. There are also a number of sports and recreation grounds, allotment gardens and local, small local and pocket parks.

1.177 Although the Borough contains some large areas of open space, which provide substantial breaks in the built-up area, it also suffers from a considerable deficiency of local parks and small areas of public open space. Southern Brent has the greatest open space deficiency in the Borough, and Brent as a whole is under-provided with built sports facilities.

1.178 Brent and many other London boroughs are under growing pressure to develop private and educational sports grounds, which are no longer required by their owners. This trend has seen a loss of over 43 hectares of open space in Brent since 1993, and the Council recognises this loss is not sustainable. Therefore, the Plan's emphasis is to conserve, protect and enhance the remaining open space within the Borough.

Protection of Brent's Open Space

1.179 Core Strategy Policy CP OS1 sets out the Council's intention to protect all open space from inappropriate development and to enhance open space for the benefit of residents, visitors, and people working in the borough and for the promotion of wildlife and natural habitats. Open space comprises both public and private land and is defined in PPG17 *Open Space, Sport and Recreation* to include: parks and gardens, natural and semi-natural urban greenspace, green corridors, outdoor sports facilities, amenity green space, play provision for children and young people, allotments, community gardens and city farms, cemeteries and churchyards and civic spaces.

1.180 All areas of open space in Brent are considered important, particularly as many parts of the borough are deficient in different forms of open space. London Plan standards show that at district level, a large proportion of the south is deficient in public open space (further than 1.2km from a public park of at least 20ha in size), and wide areas of the borough are deficient at a local level (further than 400m from public parks >2ha size). These areas of deficiency are shown in Map 1 *Local Level Open Space and Public Open Space Deficiency*.

1.181 There is also known to be an uneven distribution of playing pitches across the borough, with particular undersupply in the east and south, as highlighted in the Brent Playing Pitch survey in 2003. Brent also has one of the lowest participation rates in sport and physical activity in England as highlighted by Sport England's Active People Survey 2005-06.

1.182 School playing fields have recently come under threat with the need for schools to finance and accommodate new school buildings, as with private sports facilities falling into disrepair from lack of maintenance. However it is still considered a priority to protect these for outdoor recreational use, as once these are developed, the open space potential and opportunities for outdoor recreational use are marginalised. In helping to reduce child obesity and help promote healthy living, it would be negligent to further reduce opportunities for exercise and physical activity by redeveloping sites for alternative uses.

1. Promoting a Quality Environment

1.183 In recent years there has also been increasing popularity for allotment plots. With much of Brent built up, and few households with access to any garden space, many residents have taken up the offer of allotment plots resulting in full uptakes and waiting lists for some areas, particularly in the south of the borough. The distribution of allotments and other types of open space are shown in Map 2

1.184 While there is a presumption against the incremental loss of open space, there are instances where development of small-scale structures on open spaces may be appropriate. Primarily this is aimed at ancillary and complementary uses, such as interpretation centres, changing room or public toilet facilities, clubhouses, refreshment facilities, shelters etc.

1.185 Large open areas which are particularly prominent and visible from the road network contribute positively to the overall urban amenity of the borough. These areas will be protected to maintain the sense of openness and pleasant character within our urban environment. Examples include: Vale Farm, fronting East Lane; Roe Green Park, Kingsbury Road; London Transport Sports Ground, Forty Avenue; John Billam Playing Fields, Woodcock Hill; Barham Park, Harrow Road; and Sports Grounds fronting The Mall.

1.186 Any development on open space needs to be sensitive to its local context, and thus should be small in scale. Any development should be sensitively designed to meet sustainability objectives, utilising locally sourced, natural or renewable materials and sustainable urban drainage systems where appropriate. Applicants should refer to SPG 19 Sustainable Design, Construction and Pollution Control for further guidance on sustainable design considerations. Policies DP SD1 and DP ENV6 should also be referred to.

1.187 Regard to species protection and other designated areas of SSSI and SINCs should also be taken into consideration to ensure habitats and breeding grounds are not harmed. Where appropriate these areas should be enhanced.

1.188 Public footways should also be left open and free from barriers to encourage people to access Brent's valuable open spaces. Where applicable, consideration will be given to safe access and movement while designing out crime.

1. Promoting a Quality Environment

DP OS 1

Open Space and Outdoor Recreation

All areas of open space*, not already covered by open space designations OS2-OS5, will be protected and enhanced for the enjoyment of Brent residents and visitors and/or a place for wildlife and biodiversity.

Small-scale structures may be permitted where it can be demonstrated that all the following criteria are met:

- a. The open character is maintained, particularly along open areas prominent or visible from the main road network, and the open space is enhanced for amenity and outdoor recreation use and/or a place for plant and animal habitats;
- b. The development is ancillary and complementary to the use of land as open space resulting in its enhancement;
- c. The development is of an appropriate size and scale suitable to its setting and consideration is given to sustainable design, particularly renewable materials and urban drainage (SUDS);
- d. Any potential adverse effects on natural habitats and species, biodiversity and surrounding sites are nil or negligible, most importantly on Sites of Special Scientific Interest, Sites of Importance for Nature Conservation and Protected or Priority Species;
- e. Access along public footpaths is maintained and where possible improved, particularly those routes which form part of the Brent's Metropolitan Walks Network. Consideration shall also be given to safe access and movement;
- f. Any other potential negative impacts of the proposal are avoided, reduced, or mitigated.

*This excludes private residential amenity space which exceeds provision standards set out in Policy H10 *New Housing Development: External Amenity Provision*

Metropolitan Open Land (MOL)

1.189 The designation of Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces within the built environment. These are generally the very best examples of open space, providing a clear break in the urban form to contain features or landscape of historic, recreational or nature conservation value. These sites can vary in size and in function and are of strategic or regional significance, serving a wide catchment area and drawing visitors beyond the borough boundary.

1.190 There are five areas designated as MOL in Brent. These are listed below and shown on the proposals map:

- Fryent Country Park, including Barn Hill open space and adjoining sports grounds and allotments at Old Kenton Lane;
- Welsh Harp, Silver Jubilee Park and Neasden Recreation Ground;
- Northwick Park including the Ducker Pond;
- Alperton Cemetery; and
- Gladstone Park.

1. Promoting a Quality Environment

1.191 Metropolitan Open Land is afforded a high level of protection against all inappropriate development, securing its primary use as open space and maintaining its open character for future generations. Inappropriate development is considered to be any development harmful to the use or purpose as open space. In accordance with the London Plan, Policy DP OS1 supports the presumption against inappropriate development, allowing only development which maintains the MOL's open character, and is ancillary and essential to MOL primary uses.

1.192 All development considered to be appropriate should also minimise any adverse impact on MOL by being small in size and scale without undue adverse impact on the surrounding environment. Any development should also be sensitively designed to meet sustainability objectives, utilising renewable materials and sustainable urban drainage systems where appropriate. Applicants should refer to SPG 19 Sustainable Design, Construction and Pollution Control for further guidance on sustainable design considerations.

1.193 Areas of MOL usually have some wildlife and biodiversity interest and may also contain a Site of Special Scientific Interest, Site of Important Nature Conservation and priority species habitats. These habitats and species require special protection and applicants should also refer to Policies DP OS3, DP OS4 and DP OS5.

DP OS 2

Metropolitan Open Land (MOL)

The predominantly open character, **including views** into or out of MOL, will be protected from inappropriate development.

Small-scale structures may be permitted within MOL provided all the following criteria can be met:

- a. the open character of the land is preserved and its purpose for inclusion as MOL is maintained;
- b. the development is ancillary or essential to the MOL uses listed below and will result in the enhancement of the MOL;
- c. the development is small in scale and consideration is given to sustainable design, particularly renewable materials and urban drainage (SUDS);
- d. any potential adverse effects on natural habitats and species, biodiversity and surrounding sites are nil or negligible, most importantly on Sites of Special Scientific Interest, Sites of Importance for Nature Conservation Importance and Protected or Priority Species;
- e. any other potential negative impacts of the proposal are avoided, reduced, or mitigated.

Appropriate MOL uses may include:

- public and private open space and playing fields;
- agriculture, woodlands and orchards;
- rivers, canals, reservoirs, lakes, docks and other open water;
- golf courses;
- allotments and nursery gardens;
- cemeteries; and
- nature conservation.

1. Promoting a Quality Environment

Green Chains and the Blue Ribbon Network

1.194 Green Chains and the Blue Ribbon Network are important open spaces, providing a visual and physical network of open space through the borough and beyond. In Brent, Green Chains are linked to the Blue Ribbon Network as these follow rivers and canals linking into green spaces in adjoining boroughs.

1.195 Green Chains are designated to protect networks of open space from development and to maintain and promote access for informal recreation. They are also protected to enhance visual amenity and maintain their nature conservation value. It is a long term aim of the Council to enhance the network for informal recreation activities such as walking, cycling and jogging, and provide links where the chain is interrupted. To achieve this aim, development along the Green Chain network will be required to positively contribute to the network, enhancements may include improvements to access and the provision of landscaped open space.

1.196 The Blue Ribbon Network as defined by the London Plan includes all of the capital's river, streams, and canal network. It also includes London's open water spaces such as docks, reservoirs and lakes. Covered waterways also form part of the Blue Ribbon Network.

1.197 The Grand Union Canal runs for approximately two miles through Brent. Throughout its length it represents an important recreational and ecological resource. Although the character of the canal-side environment can be poor, it offers great potential for quality waterside developments and the Council is intending to conduct a canal corridor study in conjunction with British Waterways to explore this potential further. UDP Policy [PR4](#) covers the canal in Park Royal. Opportunities to create moorings may arise through the development process, particularly in the major canal-side redevelopment areas covered in the Park Royal Chapter (Chapter 13). Non-residential moorings do not require planning permission but they can be regulated through planning obligations associated with canal-side developments.

1.198 The policy below aims to improve the attractiveness of the Blue Ribbon Network for investment through appropriate waterside development and regeneration. Development alongside Brent's waterways will be expected to take address this valuable resource through its design, with views and development facing the waterway, and taking advantage of opportunities for enhancement of biodiversity. This will also include the restoration of the network and creation of new links.

1. Promoting a Quality Environment

DP OS 3

Green Chains And The Blue Ribbon Network

Green Chains and the Blue Ribbon Network will be protected and enhanced, particularly for their biodiversity and landscape value. Regard will also be given to Policies DP OS4-OS6.

Development **on and public access routes adjoining** the Blue Ribbon Network (canals, rivers and waterways) will only be permitted where:

- a. It serves a water dependent purpose or;
- b. The proposal is for the opening of culverts and naturalising river channels; or
- c. It improves the quality, accessibility and provision of open space along the watercourse; and
- d. Biodiversity is enhanced and there is no loss, fragmentation or isolation of existing habitats; and where appropriate, natural habitats are increased; and
- e. Canalside moorings on the non-towpath side of the canal and new basins or marinas, will not interfere with navigation, recreational potential, heritage, or biodiversity value of the canal setting or other uses of the bank.

Development **adjoining or visible** from Green Chains & the Blue Ribbon Network will be required to demonstrate all of the following:

- a. Be further than 8 metres away from the Brent Reservoir, River Brent and Wealdstone Brook or 5 metres for any other tributary, measured from the mean high water mark (MHWM). Reference should also be made to DC Env 6 Water;
- b. Maintain and improve the continuity of the green-chain, whilst protecting the open character and biodiversity of the natural environment;
- c. Incorporate the waterway feature into the development design, complementary to the canal setting;
- d. Prevent any surface run-off and any potential contaminants from entering into the waterway;
- e. Not interfere with the navigation, recreation potential, or heritage value of the canal or encroach into the towpath unless it is to improve accessibility;
- f. On land adjoining the River Brent and the towpath side of the Grand Union Canal, provision is made for a landscaped area of public open space adjacent to the waterway incorporating a public footpath and cycle way and screening of any unsightly features abutting the area;
- g. Be designed to benefit from and complement canal-side settings through, development 'facing' the Canal—enhancing or creating views through and from, the development, towards the Canal and providing landscaping and pedestrian routes to parts of the development site adjoining the waterside

Where, exceptionally, e) and f) above cannot be provided in full, the Council will seek contributions to improvements on the Blue Ribbon Network as a whole.

Sites of Special Scientific Interest (SSSI)

1.199 PPS9 states that Sites of Special Scientific Interest (SSSI), as nationally important sites, should be designated the highest level of planning protection in a hierarchy of nature conservation. The Brent Reservoir is currently the only SSSI in the Borough (see Proposals Map for extent of SSSI).

1. Promoting a Quality Environment

1.200 The Brent Reservoir has been designated a SSSI due to the valuable habitat it provides for breeding wetland birds and in particular the significant number of nesting Great Crested Grebes found at the reservoir. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special regional importance. Development should not have any adverse impact on these special interest features of the SSSI.

1.201 In accordance with Section 28 of the Wildlife and Countryside Act 1981, the Council will consult with Natural England concerning proposed development that affects the SSSI.

DP OS 4

Sites Of Special Scientific Interest (SSSI)

SSSIs are of national importance to biodiversity and geological conservation, and will be protected. Development **on or adjacent to** SSSIs will only be permitted where it is clearly demonstrated that there will be nil or negligible adverse effects on biodiversity and nature conservation. The Council will consult with Natural England in the determination of any application.

Local Nature Reserves

1.202 In addition to nature conservation designations, the Council, in partnership with Natural England, has designated two Local Nature Reserves (LNR), and will seek to designate further areas in the future. LNRs are places of both special wildlife interest and areas where local people can enjoy and learn about conservation. Management committees have produced LNR management plans to secure a successful balance between nature conservation and recreation. The current two LNRs designated in the Borough are the Welsh Harp and Fryent Country Park.

1.203 The Welsh Harp reservoir, with its associated waterfowl, surrounding meadows, woodland and parks has been designated a LNR in recognition of its unique environmental and recreational assets. The Welsh Harp Joint Consultative Committee has been established as a partnership between Brent Council, Barnet Council and British Waterways to secure the long-term future of this valuable resource. The area is an important and attractive centre for various forms of informal recreation, including walking, jogging and bird watching, as well as water based recreation such as sailing. It is also an area of rich wildlife and habitat value and has been designated a SSSI.

1.204 Fryent Country Park is a unique conservation area, valuable for its hay meadows (with Soil Association Organic Standard), 11km of restored hedgerows, woodland area at Barn Hill which was laid out by Humphry Repton in 1793, orchard and several ponds.

1.205 Due to the extent of unique wildlife habitats these reserves enjoy, the Council will afford the same level of priority and protection to LNRs as sites of Metropolitan and Borough (Grade I) Nature Conservation importance. LNRs are also protected and conserved for appropriate forms of informal recreation which do not conflict with wildlife conservation objectives.

Sites of Important Nature Conservation

1.206 The Council and the London Biodiversity Partnership have identified further areas of nature conservation value. These are Sites of Important Nature Conservation (SINC), which underwent a recent review in 2007 whereby all sites of nature conservation value were surveyed using procedures detailed in the Mayor's Biodiversity Strategy.

1.207 There are four grades of site, the first, Sites of Metropolitan Importance are of London-wide significance and are identified by the Mayor as the best examples of London's habitats containing protected and rare species. There are three Metropolitan sites designated in Brent, these are Fryent Country Park, Brent Reservoir and the Grand Union Canal.

1. Promoting a Quality Environment

1.208 Sites of Borough (Grade I) nature conservation importance are important at the borough level for their intrinsically rich wildlife habitats, there are 13 sites in the Borough (including 8 rail sideway sites). Sites of Borough (Grade II) importance do not necessarily have such intrinsically rich wildlife habitats but remain important at Borough level. Sites of Local importance are of particular value to nearby residents or schools. There are 17 Borough (Grade II) and 30 Sites of Local Importance. All SINCs are shown on the proposals map and Map 2 *Sites of Important Nature Conservation and Areas of Wildlife Deficiency* and are listed in Table 1.2 'Sites of Important Nature Conservation'. Full details of Brent SINCs are available on the [London Wildweb](#).

1.209 Enhancements to nature conservation features can be made through measures such as appropriate landscaping and/or integral design features including sustainable urban drainage and green roofs.

1.210 In exceptional circumstances, where the benefits of a proposal are demonstrated to clearly outweigh the importance of biodiversity conservation and adverse impacts can not not be suitably prevented or mitigated against, compensation measures will be negotiated through conditions and obligations to prevent any net loss of biodiversity value. Due to the intrinsically high conservation value of Local Nature Reserves, Metropolitan and Borough I Importance for Nature Conservation, proposals harmful to wildlife will not be deemed to outweigh the conservation value of these sites.

DP OS 5

Local Nature Reserves and Sites Of Important Nature Conservation

Development **on or adjacent to** Local Nature Reserves and Sites of Important Nature Conservation must conserve and enhance the special interest features appropriate to the hierarchy of designation, with Local Nature Reserves, Sites of Metropolitan and Borough I Importance given the highest priority.

Any proposed development must clearly demonstrate all of the following:

- a. There will be no adverse effect on nature conservation values or protected/ priority species, particularly where this would result in the loss, fragmentation or isolation of existing habitats and species;
- b. The development cannot be reasonably located on alternative sites where there would be less or no harm to nature conservation or protected/priority species;
- c. The proposal will preserve and enhance nature conservation through sensitive and creative design to prevent and/or mitigate any potential adverse effects of the proposal, and promote biodiversity;
- d. On sites other than Local Nature Reserves, Metropolitan and Borough I Importance for Nature Conservation, where harm to biodiversity or nature conservation cannot be prevented or adequately mitigated against, and the reasons for the development clearly outweigh the nature conservation value of the site, appropriate planning conditions or obligations will be required to compensate for the harm;
- e. Access along public footpaths is maintained and where possible improved, particularly those routes which form part of the Brent's Metropolitan Walks Network. Consideration shall also be given to safe access and movement;
- f. In regard to Local Nature Reserves; the unique environment of the area is conserved; and public access for the local community is improved with particular attention to the needs of visitors with limited mobility; and the area is protected for predominantly informal recreation.

1. Promoting a Quality Environment

Species Protection

1.211 Several species and their habitats are protected by law. There are also species and habitats identified in national and local biodiversity action plans as priority for direct action to halt their decline. The Council will seek to ensure that all development does not harm protected or priority species, that there is no net loss of biodiversity and that enhancements are made to biodiversity throughout the borough in line with local targets set by the Brent Biodiversity Action Plan.

1.212 There are a number of legislative provisions which provide statutory protection to particular species and their habitats. These protected species include plants, reptiles, animals and birds listed under the European Union Habitats Regulations 1994 and the Wildlife and Countryside Act 1981 (as amended). Badgers and their setts are also protected under their own specific act, the Protection of Badgers Act (1992).

1.213 Further species and their habitats are afforded protection by planning policy contained in PPS9. PPS9 includes provisions for the protection of UK Biodiversity Action Plan (BAP) Priority Species. The London BAP identifies those priority species occurring in London.

1.214 The Brent BAP is concerned with biodiversity throughout the borough including both its greenspaces and the urban built environment. It lists local species of conservation concern, species of local interest and more common species of butterflies, birds, and wild grasses which the BAP seeks to enhance, raising overall biodiversity value throughout the borough. For the purpose of this DPD, species of conservation concern and local interest listed in the Brent BAP will be considered priority species for protection.

1.215 All species relevant to Brent are listed in [Could not find task_124_ID_68](#). The likelihood of protected or priority species being present on a development site will be influenced by a number of factors including the site's relationship with nearby designated nature conservation areas or the occurrence of particular supporting habitats. [Could not find task_124_ID_68](#) lists statutory protected species, London BAP priority species and locally listed Brent BAP species, by their supporting habitat.

1.216 The presence of protected or priority species and their habitat is a material consideration in assessing a proposal. Where a protected or priority species is known or suspected to be present on a site then an ecological survey should be conducted. In the first instance, proposals should seek to avoid potential harm to the species and its habitat, and then where this is not possible, mitigation measures should be taken. Compensatory measures may only be taken as a last resort, where the benefits of development are considered to outweigh the potential harm to the species or its habitat.

1.217 Development affecting all species and habitats listed in the UK, London, and Brent BAP should demonstrate measures to ensure and enhance the habitat of these locally occurring species. Enhancements to overall biodiversity value in the borough is also covered by DP UD 7 'Public Realm –Landscape Design & Biodiversity' and DP OS 7 'Provision And Enhancement Of Open Space And Nature Conservation', which set out requirements for biodiversity design features in all development, and the provision for nature conservation areas in major developments, respectively.

1. Promoting a Quality Environment

DP OS 6

Species Protection

Permission will not be granted to proposals which have a significant direct or indirect adverse impact on protected or priority species and habitats identified in UK, London and Brent Biodiversity Action Plans* unless it can be demonstrated that such adverse impacts are fully prevented or mitigated against. Proposals affecting BAP species should ensure measures are taken to enhance the habitats of these species, increasing biodiversity throughout the borough.

Where harm cannot be prevented or adequately mitigated against, and the reasons for the development clearly outweigh the harm to a protected or priority species or habitat, appropriate planning conditions or obligations will be required to compensate for the harm.

*Reference should be made to [Could not find task_124_ID_68](#)

Wildlife Corridors

1.218 The protection of biodiversity cannot be achieved solely by the designation of individual sites of nature conservation value. Wildlife requires links between habitats which they can move freely between in order to secure their survival. Wildlife Corridors are open spaces which form links between sites of nature conservation and create a network of natural habitats. They are vital in preventing wildlife isolation and habitat fragmentation. In Brent, railway embankments, the Wealdstone Brook, the Canal Feeder and some allotments have been identified to create this network of wildlife corridors. Wildlife corridors will be protected from fragmentation to prevent the isolation of habitats and species.

1.219 Development on or adjacent to wildlife corridors are required to enhance features of wildlife conservation value. Biodiversity objectives should therefore be incorporated at the initial stages of design. Enhancements to nature conservation features can be made through measures such as appropriate landscaping/ vegetation and/or integral design features including sustainable urban drainage, green roofs, vertical planting, and bat boxes.

1.220 Mitigation strategies aim to minimise impact and retain the value of wildlife habitats in situ. Simple measures can make a big difference such as leaving old trees on a development site or the retention of hedgerows and rough grassland. Further guidance on preventing, mitigating and compensating for wildlife harm can be found in the RTPIs *Planning for Biodiversity*, TCPA's *Biodiversity by Design*, CIRIA's *Working with Wildlife* and the Association of Local Government Ecologist's *Developing Naturally*.

DP OS 7

Wildlife Corridors

Development **on or adjacent to** wildlife corridors will be required to incorporate as part of their design, features which will enhance biodiversity and wildlife habitats without severing or unacceptably harming the importance for species and wildlife habitats.

Enhancing Open Space and Nature Conservation

1.221 As housing and employment grows, there will be increasing demand for open space and pressure on the borough's wildlife resources. Ensuring the future adequate provision of open space (including outdoor sports provision) and areas of nature conservation will contribute both to better quality of life and the attractiveness of the borough as a place to live, work and visit. Enhancements to open space and nature conservation can be made in a number of

1. Promoting a Quality Environment

ways. New provision will be prioritised in areas of deficiency. Where this can not be achieved, improvements to or refurbishment of existing facilities, and improved access, will lessen the lack of open space or wildlife provision. Contributions will be sought from major applications in accordance with the forthcoming S106 Planning Obligations Supplementary Planning Document. Where proposals include significant onsite provision of suitable open space the council may reduce the level of contribution that is required.

1.222 Areas of local public open space deficiency is shown on Map 1 *Local Level Open Space and Public Open Space Deficiency*, and is considered to be any site further than 400m walking distance from a public park of 2ha or more. This map is indicative only and does not reflect actual walking distances, but a radial measurement from the edge of the park, and should be measured accurately on a site by site basis, taking into account park entrances. Map 3 *Open Spaces by Type* also reflects all different areas of open space in the Borough, and can be used to identify sites for further enhancement.

1.223 Areas of wildlife deficiency are urban areas more than 1km walking distance from Metropolitan or Borough (Grade I or II) sites which provide good access to nature (see Map 2 *SINC and Areas of Wildlife Deficiency*). The creation of new wildlife habitats will be sought in areas of deficiency. In particular Sites of Local Importance can play an important role in alleviating wildlife deficiency and the Council will seek habitat enhancements and/or accessibility improvements to Local sites where these occur in areas of wildlife deficiency.

1. Promoting a Quality Environment

DP OS 8

Provision And Enhancement Of Open Space And Nature Conservation

Adequate provision for new or improved open space, and sites for nature conservation will be required from all major developments. Where this cannot be provided, compensation will be sought through appropriate conditions or contributions towards the value of new or enhanced provision, as well as built sports facilities, elsewhere in the borough. Where new open space is to be provided on-site, consideration will be given to the following:

- **Location and security** – The open space should be easily accessible and passively overlooked to ensure it is a safe and well used space. Clear sightlines particularly at entry and exit points should also be considered to avoid a sense of enclosure. Areas should be clearly defined between public, private, or semi-private use;
- **Layout and design** – The open space should have usable and practical spaces, well suited for a variety of users. Good linkages and permeability will encourage good movement within the site;
- **Habitat Creation** - consideration will be given to the creation of habitats which assist in achieving Brent BAP targets, particularly sites within areas of wildlife deficiency;
- **Ownership** – Preferably local communities will have worked in partnership with the developers to meet their local needs and had input into the design of the open space to help promote a sense of ownership, respect, territorial responsibility and community;
- **Long term maintenance** - A long term maintenance program needs to be implemented to ensure that the open space continues to be a high quality space well utilised by present and future generations.

Alternative options not selected

The above policies all follow directly from Core Strategy policies CP OS1- Protection and Enhancement of Open Space and Biodiversity and CP OS2 Promotion of Biodiversity and Nature Conservation . Alternative options not selected for the protection and enhancement of open space and biodiversity have already been appraised in the Core Strategy document.

Children's Play

1.224 Play is a fundamental part of children's development. Children learn through play and play has been demonstrated to have a number of benefits including improvements to health and physical fitness, raising educational achievement and reducing crime and anti-social behaviour. Brent has a youthful population and its children and young people need free and accessible spaces for play and informal recreation. Play spaces can also benefit the wider community by providing a focal point for parents/ carers to meet and interact, promoting greater social inclusion. Play space is an intrinsic element of delivering high quality housing development as recognised in PPS 3.

1.225 In recent years, Brent's Parks Service have improved many of its 41 play spaces to meet European Safety Guidelines and Audit Commission Guidelines. While these have an above average rating when assessed against the Green Flag Award Standard, it could be argued that many equipped areas of play are not meeting the wants of children in the borough due to fear of safety and liability issues. Often standardised areas of play lack creativity, challenge and stimuli to make them fun areas for play. From the consultation carried out for Brent's Play Strategy 2005-2008, it would appear children prefer challenging environments which offer an element of risk and excitement,

1. Promoting a Quality Environment

and this is reflected in the high level of responses for a supervised adventure playground in the Borough, being the single most desired facility among Brent children. Issues also raised through this consultation is the lack of park based equipment suitable for children with disabilities.

1.226 Other play areas not maintained by the Parks Service are generally located within housing estates and are generally in poor repair. These privately maintained parks require greater ownership by local residents, funding and maintenance agreements to bring these up to a higher standard. For future provision for new play areas the Council will seek to ensure newly laid out play spaces continue to be of high quality throughout time, through appropriate community involvement which can lead to a sense of ownership and care, creative design and long term maintenance agreements.

1.227 National Playing Fields Association Standards recommend pre-school children's play areas (LAP 0-4yrs) to be located within 150m of family dwellings, 400m for junior play areas (LEAP 4-8yrs), and 1,000m for older children (NEAP 8-14yrs). These should be accessible without having to cross main road. When these areas are combined with high levels of child density, there are significant areas deficient in play space throughout the borough. The Brent Play Strategy 2005 – 2008 identified Stonebridge, Harlesden and Queensbury particularly as having very low playground provision in relation to child density.

1.228 Significant housing development such as development in identified growth areas will give rise to further deficiencies in the borough. Development which increases demand on existing play facilities will therefore be required to contribute to play provision.

1. Promoting a Quality Environment

DP OS 9

Children's Play Facilities

The provision and maintenance of adequate areas for children's play, or contributions towards their provision will be sought, as appropriate, in new residential developments with a significant family component or major mixed use developments, particularly in areas deficient in public play facilities. Play provision should be proportionate to the size, scale, and location of the development proposed and will need to consider the following:

- **Inclusive play provision** - The play facility should cater for a wide range of ages, from small children through to young adults, and children with a physical impairment;
- **Location and security** - The location of the play area should be easily accessible and passively overlooked, allowing a safe and secure place for children to play;
- **Safe routes to play** – traffic calming and suitable lighting should be introduced to provide accessible and safe routes to the play facility;
- **Innovatively designed** - The facility should be creative and innovative in design to stimulate the interest of children, incorporating natural landscapes and materials where possible;
- **Ownership** – Preferably local communities will have worked in partnership with the developers to meet their local needs and had input into the design of the play space to help promote a sense of ownership, respect, territorial responsibility and community;
- **Long term maintenance** - A long term maintenance program needs to be implemented to ensure that the play area continues to be a high quality space well utilised by present and future generations.

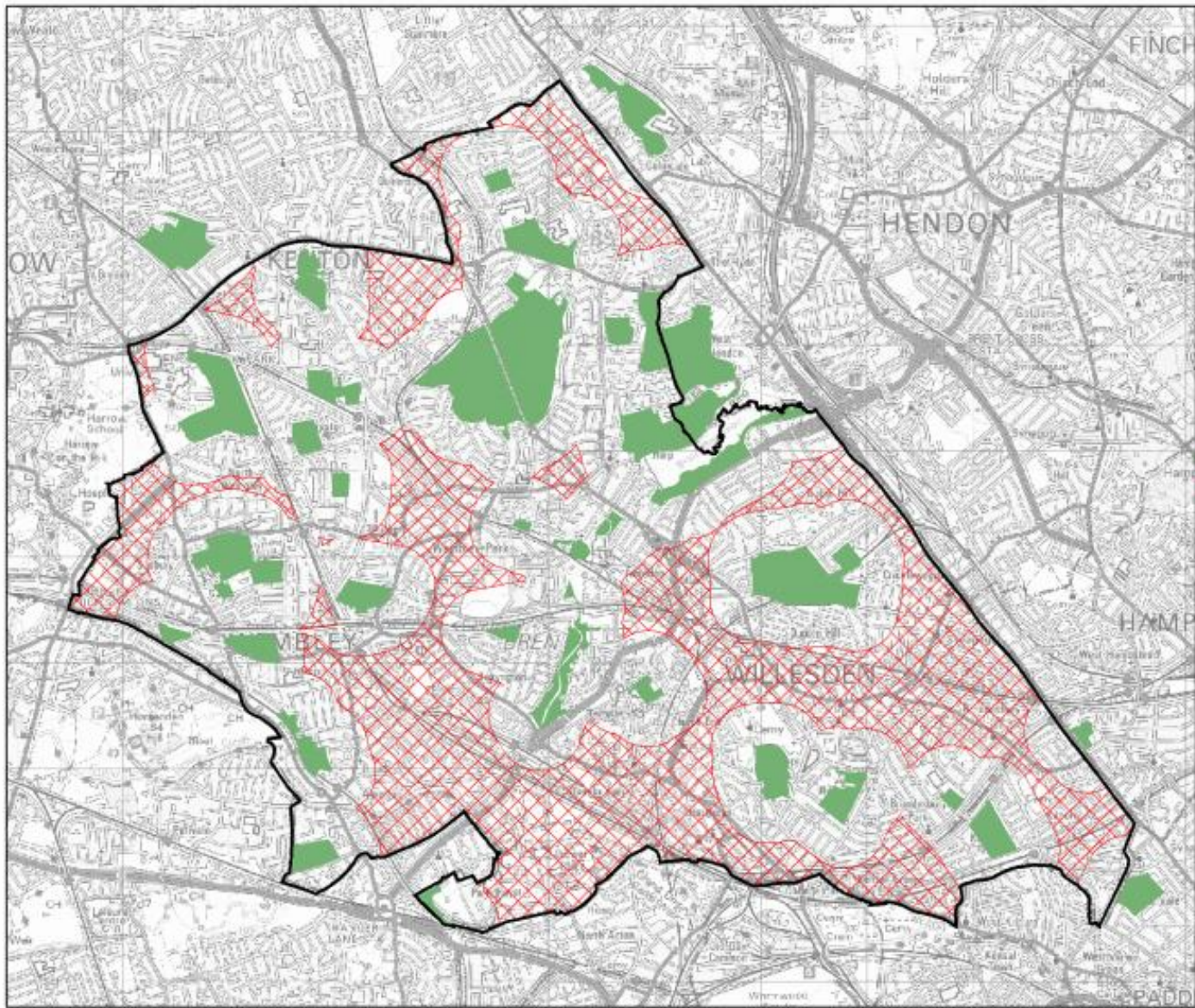
Alternative options not selected

a) no requirement for provision and maintenance of, or contributions towards, children's play facilities: the requirement for children's play facilities is in general conformity with PPG17, PPS3 and the Further Alterations to the London Plan

b) require provision and maintenance of, or contributions towards, children's play facilities only in areas of deficiency -major development will give rise to increased local demand, putting pressure on existing facilities...

c) require all developments to make contributions towards children's play facilities -this could be in the form of a space requirement like the Mayor's SPG but...

1. Promoting a Quality Environment



Picture 1.1 Local Level Open Space and Public Open Space Deficiency

1. Promoting a Quality Environment

[1] As identified by London and Brent Biodiversity Action Plans and in [Could not find task_124_ID_64](#)

[2] As identified by London and Brent Biodiversity Action Plans and in [Could not find task_124_ID_64](#)

[3] As defined by PPG17 Planning for Open Space and Recreation, ODPM 2002

Promoting a Quality Environment Appendix

APPENDIX UD1: SCHEDULE OF PROPERTIES IN CONSERVATION AREAS

(A) Remnants Of Former Villages Now Surrounded By Urbanisation

1. SUDBURY COTTAGES (Designated in January 1993)

A satellite settlement of Sudbury once on the edge of Sudbury Common. A small group of eighteenth and nineteenth century cottages survives at the junction of medieval lanes in an otherwise suburban setting.

Elms Lane 114,116

Sudbury Court Road 96-110

2. WEMBLEY HIGH STREET (Designated in March 1990)

The original hamlet of Wembley but the properties were rebuilt about 1880. Not to be confused with Wembley High Road.

Dagmar Avenue Green Man P.H.

High Street 3-12 (consec.) and Land adj.

Wembley Hill Road 119-125, 131-135

Manor Court 1-4 (consec.)

(B) Attractive Estates Of Victorian/Edwardian Houses, Townhouses And Villas

3. BRONDESBURY (Designated in March 1990)

The Conservation Area represents a slice through Victorian suburban development in the period 1872-1899 townhouses of decorative and attractive designs for the emerging middle classes.

Cavendish Road 5-27, 4-24

Chatsworth Road 32

Christchurch Avenue 37-53, 34-50 and adj. land R/O 41-51

Mapesbury Road 1-15, 2-8, 12-16, Thanet Lodge

Mowbray Road 1-45, 2-14

4. KILBURN (Designated in January 1993)

Designers include: Solomon Barnett, George German, AC Hendry Watkin and GH Wickes

Part of the Brondesbury Estate which was developed in four different periods between 1850 and 1899. The pedimented doorways in Brondesbury Road (by Wickes) and Watkin's terracotta work are particular features. The Victorian architecture is attractively varied.

Brondesbury Road 25-107, 2-116

Brondesbury Villas 1-109 and land adj, 2-146 and land adj.,

Honiton Road 1-36 (consec.)

Lynton Road 1-38 (consec.)

5. MAPESBURY (Designated in December 1982)

Builders include: Charles Cheshir, John Neal and Company, Callow and Wright, CWB Simmonds, GAC Bridge

1. Promoting a Quality Environment

One of the largest of the Conservation Areas in Brent which comprises a mostly unaltered town-house development of 1895-1905. Parts of the estate, however, date from the late 1870s and other streets from 1920. The attractive brick houses with their pleasing detailing are set in a well-treed street scene of low front boundary brick walls and tall square entrance pillars.

Design Guide and Direction in force.

Anson Road 3-61, 2-48, Anson Hall

Chichele Road 85-99, Alexandra Mansions and Doral Court

Dartmouth Road 1-153, 2A, 2-118 Westly Crt.

Dawlish Road 1-4 consec, out-building

Exeter Road Byron Court, 1A, 3A, 1-87, 2A, 2-48, Exeter Mansions, Mondesfield and Nigel Court

Hoveden Road 1-35, 2-18

Keyes Road 1-37, 6-50

Lydford Road 10-22

Mapesbury Road Teignmouth Crt, 17-45, 22-50

Petrie Close 1-12

St. Gabriel's Road 1-97, 2-64

Teignmouth Road Teignmouth Lodge, 1-89, 4-114

Walm Lane 129-197, 110-226, St. Gabriel's Church

6. NORTH KILBURN (Designated March 1994)

Architects: William J Watts, George German, W.A. Prior

The Waterloo Estate built between 1886 and 1896 by several builders; fine ornamental movement terraces on Torbay and adjoining roads contrast with Gothic town houses on Dyne Road and ornate three storey houses on the streets off Kilburn High Road.

Design Guide and Direction in force.

Buckley Road 1-59, 2-48

Burton Road 1-31, 2-32

Calcott Road 1-81, 2-54

Clarence Road 1-19, 2-10

Dunster Gardens 1-23, 2-44

Dyne Road 1-93, 10-82

Plympton Avenue 1-25, 2-26

Plympton Road 1-45, 2-64

Streatley Road 1-51, 2-48

Torbay Road 1a-91, 2-78

Willesden Lane 144-160

7. QUEEN'S PARK (Designated in July 1986)

Attractive late Victorian and Edwardian houses (1895-1905) complement the character of a 30-acre park, opened in 1887. The surrounding streets of mixed pleasant design provide a "frame" defining and enhancing the park itself.

Design Guide and direction in force.

Brooksville Avenue Salusbury House, Wimborne House, 1-31, 2C-40

Carlisle Road 1-47, 2-34

Chamberlayne Road Kensal Rise Primary School

Chevening Road 1-75, 77-195, 2-74*, 6-122, Vicarage, The Stone Hall

Creighton Road 1-37, 2-38

Dudley Road 1-15, 2-12

Dunmore Road 1-5 (consec.)

Harvist Road 13-71, 71A, 73-193, 195-265*, 6-70, 72-116*

Hopefield Avenue 1-43, 2-44

Kempe Road 1-47, 29-97, 2-46, 48-130

Keslake Road 1-41, 43-125*, 2-40, 42-114

1. Promoting a Quality Environment

Kingswood Avenue 1-45 (consec.), Park Lodge
 Milman Road 1-47 (consec.)
 Montrose Avenue 1-43, 2-44
 Peplow Road 1-15
 Radnor Road 1-11, 2-12
 St Laurence's Close 1-25 (consec.)
 Summerfield Avenue 1-43, 2-40
 Tiverton Road 2
 Windermere Avenue 1-43, 2-44

8. SOUTH KILBURN (Designated in February 1979)

Builder: James Bailey

Part of the Kilburn Park estate of stucco and stock brick villas dating from 1861-1873, many of which are listed. They display ornate architectural designs of Italianate origin which the builder took from pattern books of the period. Most of the properties are listed .

Kilburn Park Stn.
 Cambridge Avenue 2-56
 Cambridge Gardens 1-25 Consec.
 Cambridge Road 61-63
 Canterbury Road 111
 Chichester Road Chichester House, 55, 2-14, 50-60
 Kilburn High Road 41-61
 Manor Mews
 Oxford Road 2-52
 Princess Road 9-67, 22-84
 (C) Workers Cottage Estates

9. NEASDEN VILLAGE (Designated in November 1987)

This is a village estate of two-storey stock brick terraced houses built in 1882-83 and 1904-5 to house workers of the Metropolitan railway and power company. The grid iron street pattern is now providing the setting for a high quality cottage development by Paddington Churches Housing Association.

Design Guide and Direction in force. (N.B although the direction only covers part of the conservation area permitted development rights are removed for the remainder of the conservation area through a planning condition).

Aylesbury Street 1-77, 2-78
 Chesham Street 1-51, 2-20
 Neasden Lane North Brill House, Chalfont House, 391-409
 Quainton Street 1-103, 2-84
 Verney Street 1-77, 2-78
 (D) Historic Cemeteries And Properties Associated With Them

10. KENSAL GREEN (Designated in March 1990)

This includes a grouping of listed Georgian properties, the earliest being about 1820 but the majority dating from the opening of the cemetery (1832) which lies opposite.

Harrow Road 776-864

11. PADDINGTON CEMETERY (Designated in January 1993)

Cemetery by Thomas Little (1855) for London Cemeteries Company.

The Cemetery and its listed chapels and ornate buildings in Willesden Lane (including James Brooks' school) form an important Victorian group.

Cemetery including entrance lodges in Willesden Lane.

Willesden Lane 134-136, 138/ Christchurch,
 Brondesbury School

1. Promoting a Quality Environment

The Prince of Wales PH
(E) Well-preserved Victorian Town Centres

12. HARLESDEN (Designated in March 1994)

Attractive grouping of victorian parades focussed around Jubilee Clock. Contains a number of listed buildings, All Souls Church (E.J.Tarver) and The Green Man Public House and adjoining terrace (Harrison and Ward) are of note. Design guide in force.

High Street 1-85, 2-104, 97-109, The Royal Oak PH and The Green Man PH
Station Road All Souls Church and Vicarage
Wendover Road Post Office
Manor Parade 1-18
Acton Lane Church and Presbytery of Our Lady of Willesden
The Croft 1
Tavistock Road Methodist Church

13. WILLESDEN GREEN (Designated in January 1993)

A Victorian commercial centre with buildings of note by several well-known architects: James Brooks, Newman and Newman and Gabriel contributed St Andrews Church, the library and the bank premises respectively. Sexton's Spotted Dog (1881) and Clark's faience-tiled Met. Station of 1924 are worthy of note.

Heathfield Park 1-41, 2-10, Synagogue
High Road 1-151, 2-108, St Andrew's Church, former Library, Willesden Green Baptist Church, The Spotted Dog, Stevens Cottages
Huddlestone Road Huddlestone Hall
Linacre Road 41
St Andrews Rd Vicarage, Social Services Offices
Walm Lane 1a-47, 58-92, Willesden Green Station and 1-24 Rutland Park Mansions
Willesden Grn Stn Parade
1,3,5
Willesden Lane Electric House, 275-293, Presbyterian Church of Wales, 1-9 Queens Parade, 265-273,
(F) Areas Associated With The Architect E G Trobridge

14. BUCK LANE, KINGSBURY (Designated in February 1979)

Ash Tree Dell 1-51, 2-64
Buck Lane 1-45, 2-48, 86-104, Upminster House, Highfort Court, Stonegate Court, The Triangle
Hay Lane 56-68
Hayland Close 1-21 (Consec.)
Highfield Avenue 46-66, Mountaire Court, Shirley Court, Tudor Gates Pear Close 1-18 (Consec.)
Wakemans Hill Ave. Rochester Court, Whitecastle Mansions

15. ST ANDREWS (Designated in December 1983; extended January 1993)

Attractive street with mock-Tudor buildings by Simmonds, one of the Mapesbury Area architects, and fanciful brick flats with exquisite detailing by Trobridge similar to his Buck Lane style. Also included is a 13th Century church (Grade I listed building) with medieval ditch and embankment. The Conservation Area, which includes a cul-de-sac of bungalows by P. Rains (1927) and flats of the Kingsbury Park estate by Samuel Yeo (1937) is centred on the "new" church of St Andrews (grade II*), a striking church of major importance by Daukes, transferred from the West End to this site in 1933-34.

Birchen Grove 49-51
Church Lane St. Andrew's New Church, Church Hall and Vicarage
Church Walk 1-12, 14-16
Leith Close 2-32, 1-35
Old Church Lane 1-29, 6-28, 40-44, 1-4 Orchard Lodge, St Andrew's Old Church and Cemetery, The Lodge, rear of Old St. Andrews Church

1. Promoting a Quality Environment

St Andrews Rd 1-23, 2-24, Hazledene
 Tudor Gardens 1-5, 2-2a
 Tudor Close 1-26 (consec.), Tudor Lodge, Sandon
 Wells Drive 1-31, 2-32
 (G) Architect designed Garden Suburbs

16. HOMESTEAD PARK (Designated in January 1993)

Designer: William E Sanders

An unusual cluster of twenty cottages this, arranged in triplets (1926). The hedgerows are an outstanding feature of the layout.

Direction and special policy in force.

Homestead Park 1-23 and 2-18

17. ROE GREEN VILLAGE (Designated in November 1968)

Architect: Sir Frank Baines

An estate of two-storey cottages built in 1918-1920 by the Government's Office of Works in a Garden Village style. The mixed use of materials - bricks and render, tiles and slates - and details of design, including rainwater goods, chimneys, and cottage windows create an attractive village scene.

Design guide and Direction in force.

Bacon Lane 2-50

Goldsmith Lane 1-95, 2-58

Roe End 1-26 (consec.)

Roe Lane 1-59, 2-98

Scudamore Lane 1-7, 2-8

Shortscroft 1-17, 2-24

Stag Lane 316-364

(I) Suburban Estates By Renowned Inter-War Developers

18. BARN HILL (Designated in March 1990 and January 1993)

Builders: Haymills

Mock-Tudor housing estate of 1926-29 on a steep hillside on which remnants survive of a Landscape by Repton (1792). The street scenes, landscaping and views between buildings are especially important.

Design guide and Direction in force.

Barn Hill 1-99, 2-46, 46a, b, c, Barn House, 48-88

Barn Rise 3-53, 55-73*, 2-50, 52-60*, 62-66

Barn Way 1-35, 37- 69*, 2-48 ,50-76*

Basing Hill 1-55*, 2-70*

Beverley Gardens 1-55*, 2-58*

Brampton Grove 1-37*, 2-28*, 46-64*

Charlton Road 1-12*

Corringham Road 1-53, 2-42

East Hill 1-31*, 2-18*

Eversley Ave 1-33, 2-34

Forty Avenue 1-18 Grand Parade*

Grendon Gardens 1-7, 15-45, 2-10, 12a, 12-34

Mayfields 1-41*, 2-40 *

Mayfields Close 1-16 (consec.) *

Midholm 1-23, 2-26, 28-32*

The Crossways 1-29, 2-32

West Hill 43-71*, 66-104*, 106

Wickliffe Gardens 1-9, 2-12

*indicates addresses not covered by the direction.

1. Promoting a Quality Environment

19. MOUNT STEWART (Designated in January 1993)

Builders: F & C Costin

Part of the John Lyon Farm Estate developed by the Costins using their pattern book of high quality mock-Tudor designs. There is an extensive range of bay windows, leaded lights and brickwork and a high standard of joinery. Design Guide and Direction in force.

Abercorn Gardens 21-27

Bouverie Gardens 1-19, 2-22

Carlisle Gardens 1, 2-8

Grenfell Gardens 1-17, 2-18

Mount Stewart Ave. 1-37, 2-84, Mount Stewart School

Shaftesbury Avenue 1-103, 2-104

Sheridan Gardens 1-19, 2-26

Trevelyan Crescent 1-67, 2-74

20. NORTHWICK CIRCLE (Designated in April 1989)

Builders: F & C Costin

An excellent example of suburban town planning in mock-Tudor style, incorporating a focal point and radiating street pattern. Substantial gardens add to the open character.

Ashridge Close 1-11, 2-12

Briar Road 1-35, 39-55, 2-44

Dovedale Avenue 1-21, 2-22

Draycott Avenue Gardens r/o 37-39

Draycott Close 1-7, 2-12 and adj. premises

Greystone Gardens 1-21, 2-40

Lapstone Gardens 1-41, 2A, 2-26

Mentmore Close 1-11, 2-12

Norcombe Gardens 2, 4

Northwick Circle 1-34 incl.

Upton Gardens 1, 2-22

Wellacre Road 1-9, 2-20

Winchfield Close 1-21, 2-26

Woodcock Hill 6, 68 and St Johns Church

21. SUDBURY COURT (Designated in January 1990 and January 1993)

Builders: Comben and Wakeling

This is one of the best mock-Tudor estates in the Borough. Dating from 1929-1935, the houses have a distinctive appearance with many fine features. Mature hedges, trees and shrubs are a significant feature of the street scenes of this garden suburb.

Design Guide and Direction in force.

Abbotts Drive 91, 111-197, 76-158

Audrey Gardens 1-39, 2A, 2-46

Blockley Road 33 - 83, 93, 42-108

Campden Crescent 1-27, 2-28

Carlton Ave West 83-145, 100-188, 204-212

East Lane 198-264, 1-18 Court Parade

Hill Road 1-7, 2-8

Holt Road 1, 2-6

Norval Road 1-107, 131, 12-74, 96

Pasture Close 1-30 Consec.

Pasture Road 1-91, 2-60

Paxford Road 41-119, 42-118

Stapenhill Road 1-31, 2-32

1. Promoting a Quality Environment

The Crescent 1-19, 2-24
 The Fairway 1-137, 2-138
 The Green 1-3, and adj. open space
 Watford Road 232-234, 268-278
 (K) High Quality Pre-War Modernist Flatted Development

22. LAWNS COURT (Designated June 1995)

Architects: Cashmaill Day and Lander
 Dignified white maisonettes by noted architects around matured landscape setting, strong horizontal emphasis with art-deco detailing.
 Lawns Court, 1-50 (all) the Avenue Wembley

APPENDIX UD2: SCHEDULE OF PROPERTIES IN GRAND UNION CANAL POLICY AREA

Canal, towpath and public open space, footpaths and adjoining cycleways. The Grand Junction Arms PH and Pleasure Boat PH. Buildings fronting canal, Atcraft site. Langholm, Waxlow Road and adjoining yard.

APPENDIX UD3: SCHEDULE OF PROPERTIES IN AREAS OF DISTINCTIVE RESIDENTIAL CHARACTER

Alverstone Road

Alverstone Road 1-23, 2-14
 Sidmouth Road 1-25, 18-44
 Milverton Road 45-53, 50-60

Blenheim Gardens NW2

Blenheim Gardens 1-67, 2a and 2-98
 Grosvenor Gardens 1-17 and 22
 Stanley Gardens 1-23 and 2-22
 Walm Lane 71-127

Blenheim Gardens HA9

Blenheim Gardens 1-50
 East Lane 16-30

Chelmsford Square

Chelmsford Square 1-41 and 2-40
 Phillimore Gardens 1-35, 2-16

Dobree Estate

Bryan Avenue 1-19
 Peter Avenue 1-55, 18-52
 Alexandra Avenue 3-37, 2-38
 Dobree Avenue 1-39, 2-28
 Rowden Avenue 1-27, 2-20

Dudding Hill Estate

Aberdeen Road 1-31, 2-37, Fairlight and Kingsway House
 Dewsbury Road 1-57 and 2-58
 Dudden Hill Lane 111-143
 Ellesmere Road 1-59 and 2-64
 Fleetwood Road 1-57 and 2-42
 Geary Road 1-35 and 2-20
 Hamilton Road 1-69 and 2-70

1. Promoting a Quality Environment

Lancaster Road 1-27 and 2-72
Mulgrave Road 1-37 and 2-52
Normanby Road 1-65 and 2-48

Elms Lane

Bengeworth Road 1
Elms Lane 13-99, 18-108, One Hundred Elms Farmhouse and Elmwood Rec. Ground

Elmwood Court Land to rear

Rowan Close 1-12, 12a
St. Andrews Ave 1-7, 2-8
St. Georges Close 1-12
Sudbury Court Road 77-85, 86-92

Keswick Gardens/Princes Court

Keswick Gardens 1-26 (all)
Park Lane Park Lane Primary School
Princes Court 1-41 (all)

Laing's Queensbury Estate

Brinkburn Close 1-14 (all)
Brinkburn Gardens 1-67 and 2-96, All Saints Church and Church Hall
Beverley Drive 1-193 and 2-186
Calder Gardens 1-51, 2-40
Dryburgh Gardens 1-75 and 2-74
Girton Avenue 65-123 and 58-126
Holyrood Gardens 1-75 and 2-92
Melrose Gardens 1-34 (all)
North Way 21-73 and 30-76
Sandhurst Close 119-133
Sandhurst Road 111-145 and 122-138
Sherborne Gardens 1-37 (all)
Stag Lane 78-150, 244
Tewkesbury Gardens 1-69, and 2-82
Tintern Avenue 1-99, and 2-80
Waltham Drive 1-23 and 2-6
Whitby Gardens 1-19 and 2-20
Wimborne Drive 1-3 and 2-36

Littleton/Pebworth Roads

Amery Road 1-69 and 2-54
Littleton Crescent 2-34
Littleton Road 1-49 and 2-38
Mulgrave Road 1-17 and 4-38
Pebworth Road 1-59 and 2-76
Watford Road 243-269

North Wembley Station Area

East Lane 159-163, The Chequered Flag
Llanover Road 59-137 and 66-130 Peel Road 1-53 and 2-78
Pembroke Road 48-54

Okehampton Road

Crediton Road 1-49, 2-50
Dundonald Road 1-43, 2-44

1. Promoting a Quality Environment

Okehampton Road 17-65, 2-56
Wrentham Avenue 1-65, 2-86

Salmon Street

Kingsmere Court 5-14
Salmon Street 101-305, 100-284, 1-15 Paddocks Green (incl)
Slough Lane 37-107, 38-128

Sudbury Court East

Abbotts Drive 1-89, 2-74
Blockley Road 1-31, 2-40
Carlton Ave West 1-81, 2-98
Dean Court 1-25, 2-20
East Court 1-56 consec
East Lane 184-196
Holt Road 3-29, 8-48
Langham Gardens 1-51, 2-36
Nathans Road 1-75, 2-100
Norval Road 133-179, 98-146
Oldborough Road 1-67, 2-82
Paxford Road 7-39, 8-40
Shelley Gardens 7-45, 8-46
Spencer Road 1-55, 2-52
West Court 1-33 consec

APPENDIX UD4: SCHEDULE OF LISTED BUILDINGS

Although the Council has made every effort to ensure that this schedule is accurate and up to date it does not supersede the statutory list document itself which is liable to alteration. As buildings may sometimes change their name or address if there is any doubt whether a building is listed, then you should check with the Brent Planning Service.

Harlesden/ Willesden Green

Statutory List

105-109 High Street (Harlesden) Grade II
All Souls Church, Station Road Grade II*
Brent Viaduct Railway Bridge,
North Circular Road Grade II
Christchurch, Willesden Lane Grade II
Church of Our Lady of Willesden, Acton Lane Grade II
Church of St Mary, Neasden Lane Grade II*
Church of St. Andrew, High Road Willesden Grade II*
Jubilee Clock, High Street (Harlesden) Grade II
St Matthew's Church, St Mary's Road Grade II
St. Andrew's Church Schools, St Andrew's Road Grade II
St. Andrew's Vicarage, St. Andrew's Road Grade II
Stonebridge Park P.H., Hillside Grade II
St Michaels Church, St Michaels Road Grade II
The Green Man P.H., High Street (Harlesden) Grade II

The Local List

'Hurworth', 2 Morland Gardens
1 and 2 Church Cottages, Neasden Lane
15-19, 45 Brondesbury Park

1. Promoting a Quality Environment

163 and 167 Willesden Lane
175 High Street
Willesden Green United Synagogue, Heathfield Park
247 Willesden Lane
97-103 High Street,
Bank Premises, 86 Craven Park Road
Barclay's Bank, 5 High Road, Willesden
Brondesbury Mews and adjoining public lavatories, Willesden Lane
Drill Hall, Pound Lane
Hindu Temple, Willesden Lane
Royal Oak P.H., High Street
Services Rendered Club, 1 Morland Gardens
Stonebridge Primary School, Shakespeare Avenue
The 'Spotted Dog' P.H., 38 High Road, Willesden
Former Willesden College of Technology Annexe, Dudden Hill Lane
Willesden Green Library, High Road
Willesden Green Station, Walm Lane
Willesden Seventh-Day Adventist Church, Pound Lane
Willesden Vestry Hall, Neasden Lane

Kilburn/ Kensal

Statutory List

1-6, 12-18 (Consec) Cambridge Gardens Grade II
10, 18-56 Cambridge Avenue, Kilburn Grade II
12-52 Oxford Road Grade II
22-84, 9-29, 33-41, 45-67 Princess Road Grade II
61-63 Cambridge Road Grade II
842 Harrow Road Grade II
Gaumont State Cinema,
195-199 Kilburn High Road Grade II*
Kilburn Park Underground Station,
Cambridge Ave. Grade II
Cambridge Hall, Cambridge Avenue Grade II
Prince of Wales P.H., 11 Cambridge Gardens Grade II
Telephone Kiosk, Harvist Road Grade I
The Chapels, Paddington Cemetery,
Willesden Lane Grade II
Queen Park Bandstand Grade II
Kingsley Court, Willesden Green Grade II

The Local List

10 Brondesbury Road
134-136 Willesden Lane
Electric House, Willesden Lane
2-14 Chichester Road
253 Kilburn Lane
259-267 Kilburn High Road
325 Kilburn High Road
41-61 Kilburn High Road
50-60 Chichester Road
6-10 Oxford Road
76-82 Brondesbury Road
810 Harrow Road

1. Promoting a Quality Environment

822-834 Harrow Road
 836-840 Harrow Road
 850-856 Harrow Road
 858-864 Harrow Road
 95-115 Malvern Road
 96-98 Brondesbury Road
 Bandstand in Queens Park, Kingswood Avenue
 Canterbury House, Canterbury Road
 Christchurch School, 138 Willesden Lane
 Duke of Cambridge P.H., 71 Cambridge Road
 Foresters Hall, 269 Kilburn High Road
 Kilburn Library, 42 Salusbury Road
 Kilburn Polytechnic, 24-34 Glengall Road
 Prince of Wales P.H., Willesden Lane
 The Brondesbury P.H., 111 Canterbury Road
 The Cock P.H., 125 Kilburn High Road
 The Goose & Granite P.H., Kilburn High Road
 The Stone Hall, Chevening Road
 West Kilburn Baptist Church, Carlton Vale

Kingsbury/ Kenton

Statutory List

152, 154 (Midcot), 156 (Hayland), Slough Lane Grade II
 Kingsbury Manor, Kingsbury Road Grade II
 Brent Town Hall, Forty Lane Grade II
 148 Slough Lane Grade II
 142 Slough Lane Grade II
 1/1a-5/5a, gatepiers between 5/5a & 6/6a, 6/6a-7/7a, 8/8, 9/9a, 10-10a, 11/11a & 12/12a Old St Andrews Mansions,
 Old Church Lane Grade II
 Church of the Holy Innocents, Kingsbury Road Grade II
 New Church of St. Andrew, Church Lane Grade II*
 Old Church of St Andrew, Old Church Lane Grade I
 Tombs of Sir Timothy Wetherilt, Henry Wetherilt, William Frederick Ashton, Edwin Austen Abbey, Thomas Raworth
 and Joseph Finch, Old St Andrews Churchyard, Old Church Lane Grade II
 Telephone Kiosk, Stag Lane Grade II
 Top Rank Bingo Hall, 1, Burnt Oak Broadway Grade II
 Mecca Bingo Hall, Burnt Oak Broadway Grade II

The Local List

12, 15-16 Hayland Close
 134 Slough Lane
 299-313 Preston Road
 3-5, 43-45 Buck Lane
 345-351 Stag Lane, Kingsbury
 Dam Keeper's Cottage, Birchen Grove
 Snooker Club, Edgware Road, Colindale
 Kenton Grange & Stabling Block, Kenton Road
 Kilburn Polytechnic Annexe, Edgware Road
 Kingsbury Manor walled garden and Veterans Club, Kingsbury Road
 Tudor Gates, Whitecastle Mansions, Highfort Court, Buck Lane
 Rochester Court, Stonegate Court, Buck Lane/Wakemans Hill
 Shell Cottage, 44 Kingsbury Road
 The Trough, Old Kenton Lane

1. Promoting a Quality Environment

Symal House, Holmstall Avenue

Neasden/ Cricklewood

Statutory List

Church of St. Gabriel, Walm Lane Grade II

Dollis Hill House, Dollis Hill Lane Grade II

Dollis Hill Synagogue and Railings, Parkside Grade II

St Francis Church, Fleetwood Road Grade II

St Michaels Church, St Michaels Road Grade II

The Grange, Neasden Lane Grade II

The Old Oxgate, Coles Green Grade II *

Local List

112-114 Dollis Hill Lane

63-65 Shoot-up-Hill

Former Post Office Research Station, Gates & Bunker, Brook Road

Metropolitan Water Board Pump House & Chimney, St Michael's Road

The Castle, Riffle Road

Church of St Paul, Dollis Hill

Gladstone Park Primary School

Wembley/ Alperton

Statutory List

96-98 Sudbury Court Road Grade II

971-977 Harrow Road Grade II

Church of St. John, Boundary Walls & Lych Gate Grade II

Church of St. John, High Road Grade II

Garden Walls etc., Barham Old Court Grade II

Outbuilding, Hundred Elms Farm, Elms Lane Grade II *

St. Andrews Church Hall, Harrow Road Grade II

St. Andrews Church, Harrow Road Grade II

St Georges Church and adjoining vicarage

Harrow Road Grade II

Sudbury Town Station Grade II

Telephone Kiosks (3) Empire Way Grade II

Wembley Arena, Empire Way Grade II

Wembley Park Lodge, 114 Wembley Hill Road Grade II

Local List

1-3 Stanley Avenue

Charles Goddard House, Harrow Road

Wembley United Synagogue, Forty Avenue

106-110 Sudbury Court Road

170-184 Watford Road

2-4 Stanley Avenue

2-4, 12-16, 114-116 Elms Lane

Wembley Fire station and Cottages 591-593, Harrow Road

Old Police Station, Harrow Road, Wembley

595 Harrow Road

797-807, 854-868 Harrow Road, Sudbury

Barham Old Court

Canal Cottage, Twyford Abbey Road

Cyprus Works, Third Way

1. Promoting a Quality Environment

Hundred Elms Farm
 Wrigleys Factory, East Lane
 Alperton Underground Station, Ealing Road
 The Greyhound, P.H., Oakington Manor Drive

APPENDIX UD5: VIEWS AND VIEWPOINTS

Views of Important Landmarks -

- (a) Mill Hill Park to St Mary's Church Harrow-on-the-Hill
- (b) Wakeman's Hill to St Mary's Church Harrow-on-the-Hill
- (c) Gotford Hill to St Mary's Church Harrow-on-the-Hill
- (d) Barnhill to St Mary's Church Harrow-on-the-Hill
- (e) Golders Hill Park to St Mary's Church Harrow-on-the-Hill
- (f) Parliament Hill to St Mary's Church Harrow-on-the-Hill
- (g) King Edward VII Park to St Mary's Church Harrow-on-the-Hill
- (h) One Tree Hill to St Mary's Church Harrow-on-the-Hill
- (i) Elmwood Park to St Mary's Church Harrow-on-the-Hill
- (j) Guinness Open Space to St Mary's Church Harrow-on-the-Hill
- (k) Swaminaryan Temple, Brentfield Road

Policy WEM17 lists views of Wembley Stadium.

Local Landmarks

Cadbury Schweppes Building, Dollis Hill Lane
 Christchurch, Willesden Lane
 Pumping Station, Gladstone Park
 Guinness Brewery, Park Royal
 Jubilee Clock, Harlesden High Street
 Kilburn State Cinema
 New St Andrews Church
 Poplars, Ridge of Barn Hill
 St Augustines Church (in Westminster)
 Swaminarayan Temple, Brentfield Road
 Welsh Harp Reservoir

Local Viewpoints

Barn Hill
 Bridgewater Road
 Elmwood Park
 Gladstone Park
 Gotford Hill
 King Edward VII Park
 One Tree Hill Recreation Ground
 Silver Jubilee Park
 Wakemans Hill (Crest of)

Views of Wembley Stadium are listed in policy WEM20.

Viewpoints over Brent from adjoining boroughs are identified in the UDP's of those authorities.

1. Promoting a Quality Environment

Appendix OS1: Sites of Important Nature Conservation

Table 1.2 Sites of Important Nature Conservation

Site Ref	Sites of Metropolitan Nature Conservation Importance
M006	Grand Union Canal
M035	The Welsh Harp
M036	Fryent Country Park
Site Ref	Sites of Borough (Grade I) Nature Conservation Importance
BrBI01	Quainton Street Open Space
BrBI03	Northwick Park and the Duck Pond
BrBI04	Old St Andrews Churchyard, Kingsbury
BrBI05	Brent River Park
	Railside Habitats:
BrBI06a	Silverlink Metro between Brondesbury and Willesden Junction
BrBI06b	Metropolitan line between Kilburn and Neasden
BrBI06c	Dudding Hill Loop between Cricklewood and Harlesden
BrBI06d	Harlesden to Wembley Central, including Wembley Brook
BrBI06e	Piccadilly line between River Brent and Sudbury Hill
BrBI06h	Chiltern Line between River Brent and Sudbury Hill Harrow
BrBI06g	Jubilee Line from Stanmore Junction to Queensbury
BrBI06h	Northwick Park and Kenton railsides
BrBI07	Diageo Lake and Landscaping
Site Ref	Sites of Borough (Grade II) Nature Conservation Importance
BrBII01	The Canal Feeder
BrBII02	Paddington Cemetery
BrBII03	Gladstone Park
BrBII04	Roundwood Park and Willesden New Cemetery
BrBII06	Harp Island
BrBII07	Abbey Road Mound and Bestway Park
BrBII08	Coronation Gardens
BrBII09	Grange Roundabout Nature Area
BrBII10	St John's Old Burial Ground
BrBII11	Wealdstone Brook

1. Promoting a Quality Environment

BrBII12	St Mary's Churchyard, Willesden
BrBII13	One Tree Hill
BrBII14	Roe Green Park
BrBII15	Willesden Reservoir
BrBII16	Queen's Park
BrBII17	Dollis Hill Reservoir
BrBII18	Brent River west of Stonebridge
Site Ref	Sites of Local Nature Conservation Importance
BrL02	Meadow Way Copse
BrL03	The White Garden at Kingsbury Hospital
BrL05	Brentfield Open Space and Leicester Road
BrL06	Grove Park and Tramway Brook
BrL07	The Pimple
BrL08	Queens Park
BrL09	The Old Orchard
BrL10	Elmwood Park
BrL11	Alperton Cemetery and Clifford Road Allotments
BrL12	Barham Park
BrL13	Wembley Park Wood
BrL15	Barham Primary School Wildlife Area
BrL16	Byron Court Primary School Nature Reserve
BrL17	Malorees School Orchard
BrL18	Tookey Close Open Space
BrL19	Preston Park Primary School Wildlife Area
BrL20	Griffin Close Scrub
BrL21	Elmwood Green
BrL22	Sudbury Hill Sports Ground & Elms Court Allotments
BrL23	Preston Manor School Roughs
BrL24	Woodcock Park north
BrL25	Grand Avenue Verges
BrL26	Oakington Manor Primary School Wood
BrL27	Coniston Gardens road bank

1. Promoting a Quality Environment

BrL28	Alperton Community School scrub
BrL29	The Dell Doorstep Green
BrL30	Heather Park Drive embankment
BrL31	River Slade
BrL32	Abbey Estate Wayleave
BrL33	Wembley Hill Sports & Social Club

Appendix OS2: Brent Species by Habitat Type

Table 1.3 Brent Species by Habitat Type

Habitat	Plants	Insects	Birds	Animals
Woodland & Hedgerows	<u>Black Poplar Tree</u>	<u>Stag Beetle</u>	<u>Bullfinch</u>	Common pipistrelle bat
	Bluebell	Barred hook-tip moth	<u>House and Tree Sparrows</u>	Daubenton's bat
	Green Hellebore	Dusky-lemon swallow moth	Dunnock	Noctule bat
	Earthstar Fungi	White-letter hairstreak butterfly	Firecrest	Soprano pipistrelle bat
	<i>Wild grasses</i>	<i>Brimstone butterfly</i>	Goldcrest	Badger
	<i>Lichens</i>	<i>Gatekeeper butterfly</i>	Hobby	Hedgehog
	Narrow-leaved bitter-cress	<i>Holly blue butterfly</i>	Lesser redpoll	Common Shrew
			Mistle thrush	Pygmy shrew
			Stock dove	Common Frog
			Tawny owl	
			Willow warbler	
			<i>Blue & Great tit</i>	
		Swift		
Gardens & Allotments	Bluebell	<u>Stag Beetle</u>	<u>House and Tree Sparrows</u>	Badger
	<i>Clover</i>	<i>Brimstone butterfly</i>	Dunnock	Great crested newt
	<i>Lichen</i>	<i>Gatekeeper butterfly</i>	<i>Blue & Great Tit</i>	Slow worm
	<i>Wild grasses</i>	<i>Holly blue butterfly</i>	Swift	Common pipistrelle bat
	<i>Fruit Trees</i>	<i>Bees</i>		Soprano pipistrelle bat
				Common frog
			Hedgehog	
Reservoirs, Rivers, Streams & Canals	<u>Black poplar tree</u>	<u>Crane fly</u>	Common Tern	Daubenton's bat
	Arrowhead	Ruddy darter dragonfly	Kingfisher	Soprano pipistrelle bat
	Ivy-leaved water-crowfoot		Teal	<u>Water vole</u>
	Slender tufted-sedge		Mute Swan	
Grasslands	Great Burnet	Chimney sweeper moth	<u>House and Tree Sparrows</u>	Common lizard

1. Promoting a Quality Environment

Habitat	Plants	Insects	Birds	Animals
	Smooth Brome	Bee-wolf bee	<u>Linnet</u>	Hedgehog
	<i>Wild grasses</i>	Roesel's bush-cricket	<u>Skylark</u>	Common frog
	<i>Clovers</i>	Dog's tooth moth	Meadow pipit	
		Wormwood moth	Swift	
		<i>Gatekeeper butterfly</i>	Kestrel	
		<i>Holly blue butterfly</i>		
Parks	<u>Mistletoe</u>	<u>Stag Beetle</u>	<u>House and Tree Sparrows</u>	Common pipistrelle bat
	Earthstar fungi	Dusky-lemon swallow moth	<u>Song thrush</u>	Noctule
	Bluebell	<i>Brimstone butterfly</i>	Dunnock	Soprano pipistrelle bat
	<i>Wild grasses</i>	<i>Gatekeeper butterfly</i>	Green woodpecker	Great crested newt
	<i>Lichens</i>	<i>Holly blue butterfly</i>	Tawny owl	Common frog
			Mistle thrush	Hedgehog
			Swift	
Churchyards & Cemeteries	Poplar knight fungi	<u>Stag Beetle</u>	<u>House and Tree Sparrows</u>	Slow-worm
	Bluebell	<i>Brimstone butterfly</i>	<u>Song thrush</u>	Common pipistrelle
	<i>Wild grasses</i>	<i>Gatekeeper butterfly</i>	<i>Blue & Great tit</i>	Daubenton's bat
	<i>Lichens</i>	<i>Holly blue butterfly</i>	Swift	Soprano pipistrelle
				Hedgehog
Wasteland		<u>Buttoned snout moth</u>	<u>House Sparrow</u>	Common pipistrelle bat
		Dog's tooth moth	<u>Linnet</u>	Daubenton's bat
		Wormwood moth	Lesser redpoll	Soprano pipistrelle bat
		Bee-wolf bee		
Wetlands & Reedbeds		Hoverflies	<u>House and Tree Sparrows</u>	Great crested newt
		<i>Dragonflies</i>	<u>Reed bunting</u>	<u>Water vole</u>
			Pochard	Common frog
			Teal	
			<i>Great crested grebe</i>	
Built Environment	<i>Lichens</i>	Privet hawk moth	<u>House and Tree Sparrows</u>	Common pipit bat
		<i>Brimstone butterfly</i>	<u>Starling</u>	Daubenton's bat
			House martin	Soprano pipistrelle bat
			Kestrel	
			<i>Great & Blue tit</i>	
			Swift	

1. Promoting a Quality Environment

Habitat	Plants	Insects	Birds	Animals
Streetscene, Railside Habitats & School Grounds (*railside & school grounds habitats only)	<i>Wild grasses</i>	<i>Brimstone butterfly</i>	<u>House and Tree Sparrows</u>	Common pipistrelle bat
	<i>Lichens</i>	<i>Holly blue butterfly</i>	<i>Great & Blue tit</i>	Daubenton's bat
		<i>Gatekeeper butterfly*</i>	Swift	Soprano pipistrelle bat
				Hedgehog

Key

Bold text: Species with European or National statutory protection

Underlined text: Priority species listed in National and London Biodiversity Action Plan

Plain text: Priority species listed in Brent Biodiversity Action Plan

Italic text: Species listed in Brent Biodiversity Action Plan to be encouraged and enhanced

Note - this table is a guideline and not a definitive list of all protected or priority species that may be found in the borough.

2. Meeting Housing Needs



2. Meeting Housing Needs

INTRODUCTION

The policies in this Chapter are structured around and thematically linked to the four Housing Core Policies in the LDF Core Strategy and are intended to enable the implementation of these strategic policies by providing the detailed criteria under which planning applications for housing development will be determined. The Housing Core Policies and the complementary detailed policies in this Chapter are intended to ensure :

1. An adequate supply of new housing
2. Sustainable housing development
3. A balanced housing provision to meet population needs
4. Affordable housing

Housing Provision: Sources Of Supply (Policy CP H1)

Objectives

2.1 The Plan is required to satisfy both the Government's strategy to substantially increase the supply of new housing, through prioritising the use of developable land for residential development, and the specific requirement of the London Plan to enable the development of at least an additional 9,146 flats and houses (and a further 1,000 non-self contained homes) between 2007 -2017.

Core Strategy Policy SS3 has identified the Wembley Opportunity Area and the regeneration areas of South Kilburn, Church End, Alperton and Burnt Oak/Colindale (including estate regeneration programmes) as particularly suitable for the sustainable location of larger housing and more intensive residential developments. Housing development in these Growth Areas, which are characterised by their proximity to good public transport links and local shopping facilities, should also make a very beneficial contribution to the overall regeneration of some of these areas

2.2 The Kilburn, Harlesden, Willesden Green, Cricklewood, Kingsbury and Neasden town centres have also been identified as appropriate locations for higher density mixed use development schemes. Development proposals in such locations will be expected to maximise their potential sustainable housing provision opportunities.

2.3 Achieving the Core Strategy's challenging housing target will require the protection of the existing housing stock (c 106,000 flats and houses) to ensure that there is no further loss unless it is absolutely necessary as detailed in Policy H1.

2.4 It is equally important to ensure that the proposed new housing is not provided at the expense of existing open space so that both the new and existing residents have satisfactory access to the type and level of open space necessary to ensure a reasonable residential environment. Policy H2, therefore, aims to ensure that new housing is only built on the previously developed land, (ie) sites which have, or had, buildings on them. Such sites are commonly called 'brownfield land'.

2.5 A substantially smaller, but important, source of new housing will be provided through the subdivision or conversion of existing large houses into flats (Policy H4) and the redevelopment of obsolete and unneeded commercial buildings, or the residential use of vacant floors above shops as detailed in Policy H5.

Maintaining The Existing Housing Stock

2.6 Maintaining the existing housing stock and, thereby, increasing the housing supply requires a general presumption against net housing loss unless justified by the requirements of a regeneration objective or where the site is required to provide an essential community facility. Given the particular shortage of affordable housing in Brent, it is essential to retain the existing affordable housing stock, including non self contained accommodation meeting identified needs, unless its redevelopment would result in more affordable housing, or a higher standard of affordable accommodation.

2. Meeting Housing Needs

DP H 1

Resisting Loss Of Housing

Development should not result in the net loss of residential accommodation, including affordable housing, where such accommodation can still be viably used, with or without adaptation, for permanent residential purposes; or loss of land within the boundary of sites in housing use to non-housing uses. Unless :

- a) It is necessary to meet a regeneration objective, or provide an essential community facility.
- b) The property is incapable of being brought up to Housing Act or Building Regulations standards
- a) This is the only means of securing essential improvements to the quality of affordable housing remaining / rebuilt on-site, or its suitability for residents in priority need,

Alternative options not selected:

Uncontrolled loss of existing housing stock, including affordable, would be unsustainable.

Building Housing On Brownfield Sites

2.7 New housing development should be prioritised on brownfield sites in accordance with Government strategy and London Plan requirements. And thereby ensure the protection of existing open space, which is essential to enable a good residential environment and quality of life. The choice of a minimum 95% brownfield land target prudently recognises the technical difficulties arising from the wide ranging definitions of 'non -brownfield' land and the problematic issue of the temporary loss of open space to enable regeneration programs which will ultimately reprove a higher quality of open space amenity.

DP H 2

Housing On Brownfield Sites

The Plan aims to ensure that at least 95% of new homes are provided on previously developed land (brownfield) by :

- a) Identifying sites and premises suitable for housing development (including mixed use development) in the Sites Specific Allocation schedule
- b) Identifying housing as the priority use on previously developed land which the Plan does not protect for other land uses.
- c) Encouraging residential change of use in formerly non residential premises no longer capable of viably providing their original use and not otherwise protected by the Plan
- d) A general presumption against housing development on open spaces of amenity value.

Alternative options not selected:

Prioritising new housing development on 'greenfield' sites, the obverse of brownfield, would be highly unsustainable.

2. Meeting Housing Needs

Sub Division of Houses; Flat Conversions

2.8 The conversion of larger houses into several flats can provide both additional housing and a range of accommodation sizes. However, it is necessary to ensure that this is not at the expense of maintaining the existing stock of family accommodation, hence the minimum spatial size threshold. It is also necessary to restrict conversions of houses located in an area where the proposed additional flats would generate additional on street parking requirements which would result in further traffic flow congestion problems.

DP H 3

Sub Division of Houses; Flat Conversions

The subdivision of houses and the conversion of dwelling houses into flats, will be permitted, unless:

- a) The property has an original (unextended) floor area of less than 110sqm or of less than 140sqm if the property is in a location where conversions are restricted so as to avoid further traffic flow congestion (see Connecting Places Appendix 2);
- b) The property has direct access onto a Trunk Road (the North Circular Road) or where vehicles would access or egress onto a London Distributor Road in reverse gear (see Connecting Places Appendix TRN1) ;
- c) The configuration of the property does not lend itself to conversion.

Alternative options not selected:

A higher conversion floor space threshold may be difficult to justify given the long standing 110sq.m minimum. Reduction of the locational criteria could generate detrimental congestion and traffic flow problems.

Change of Use To Housing

2.9 Commercial and other buildings and sites which are no longer required for their original use offer a potentially significant source of new housing opportunities. However, it is necessary to protect buildings and sites which are still capable of viably providing essential non residential uses, such as employment opportunities. Or to prevent residential developments on specific sites which would endanger the continued non residential use of adjacent buildings and sites. To enable increased housing supply while not endangering commercial use and retail unit operation.

2. Meeting Housing Needs

DP H 4

Change of Use

Proposals to change the use of non residential premises to residential will be permitted in principle if in accordance with other Plan policies.

Proposals to convert accommodation above shop premises into self contained residential units will be permitted subject to the conversion not involving excessive extension. All flats should be accessed independently from the shop unit.

Alternative options not selected:

Not permitting appropriate change of use and the residential use of upper floors would unnecessarily restrain housing supply.

Sustainable Housing Development (Policy CP H2)

Objectives

2.10 All new housing should be sustainably located, designed and constructed so as to provide an attractive high quality residential ambience with the minimal environmental impact and use of non renewable resources, in accordance with the Plan's urban design strategy and, in particular, Policies U2, UD3 and UD5.

2.11 A sustainable housing development should be 'future proofed' in so far as possible as to mitigate anticipated climatic change in accordance with Policy CP ENV1.

2.12 A sustainable housing development will provide the most appropriate number and type of housing that makes the best possible use of the specific opportunities that a particular site and its wider location affords, while recognising any specific constraints, as set out in Policy H5.

2.13 The wide ranging external design sustainable housing objectives, as detailed in Policy H6, and elaborated in SPG 17, emphasise the overriding need to create attractive, safe and secure environments with a distinct sense of identity and community. These design criteria also reflect the need to 'design for climatic change', including the active discouraging of excessive hard surfacing so as to promote better drainage and reduce rainfall water 'run off' into the sewerage system.

2.14 Sustainable housing provides accommodation which so satisfies the current needs of its residents as to reduce, highly unsustainable, moves to more desirable housing. Accommodation which provides sufficient internal space and is flexibly designed to meet the needs of its occupiers, as detailed in Policy H7, as elaborated in SPG 17. Satisfactory internal storage space will also beneficially enable and promote waste separation and recycling.

2.15 While all new housing development should aim to satisfy the general principles of sustainable development, as detailed in Policies SD2, SD3, SD4 and SD5, Policy H8 recognises the 'economies of scale' that should enable very large developments (one hundred or more dwellings) to maximise their potential contribution to sustainable housing provision. Such developments should aim to achieve an 'exemplar' level over a very wide ranging set of sustainability objectives.

2. Meeting Housing Needs

Making The Best Use Of A Housing Site

2.16 The shortage of land on which to provide the number and type of new housing that Brent needs means that it is necessary to ensure the best use of the site's location and potential opportunities while recognising the limitations imposed by any specific constraints. This assessment requires an objective evaluation process in which the specific site characteristics are appraised against the locality's accessibility to public transport, shopping facilities and townscape character.

2.17 The density (or intensity) of a housing development is assessed by the number of 'habitable rooms' (all rooms used for living and sleeping purposes, with the exception of small kitchens). The site's accessibility to public transport is measured by its Public Transport Accessibility Level (PTAL), with close proximity to rail and underground stations meriting a 4- 6 PTAL rating and infrequent bus services only a 1-2 PTAL rating.

DP H 5

Scale And Density Of New Housing: The Locational Approach

New housing development should be designed to realise its potential residential capacity, without detriment to adjacent amenities and the local townscape, by making the best use of its general locational and particular site opportunities. The appropriate density and built form (height and massing) of a housing proposal will be primarily assessed with reference to a matrix of the site's proximity to public transport (PTAL), town centres and the character and quality of the adjacent townscape.

Note

2.18 SPG/D 17 sets out an illustrative matrix. This generally indicates that proposals for suburban housing developments of less than 150 habitable rooms per hectare are unlikely to be acceptable, while developments of more than 700 habitable rooms per hectare are unlikely to be acceptable outside the larger town centres and major transport interchanges.

Alternative options not selected:

Employing a lower density range would be contrary to the London Plan. A higher density range could be unsustainable.

Sustainable Housing Design : External

2.19 New housing must be sustainably designed so as to ensure a high quality new residential environment and townscape. This requires the employment of appropriately detailed policy criteria, elaborated by supplementary guidance.

2.20 Some types of proposed new housing sites, such as those in 'backland' locations, with minimal street frontages, or 'infill' proposals for existing residential streets will have to be particularly stringently assessed to ensure that the proposed homes would not be detrimental to the existing environment, townscape and adjacent occupiers amenities.

2.21 A balance must be struck between providing the level of vehicle car parking reasonably required to meet residents needs, including the delivery services that increasing purchase of goods through the Internet is likely to require, and ensuring a townscape character that is not dominated by large expanses of hard surfaces.

2.22 The urgent need to reduce, highly unsustainable, domestic waste disposal to landfill sites, requires that all new housing development should maximise the potential for recycling by making adequate provision for waste separation and recycling facilities

2. Meeting Housing Needs

2.23 Access to an appropriate level and type of external amenity space, including childrens play facilities, is a key factor in creating an attractive residential environment. It is important to ensure that new residents have reasonable access to private external amenity space appropriate to their number and needs. External amenity space is likely to become an even more important need as climatic change intensifies.

2.24 Where flatted schemes cannot viably provide a suitable amount of ground level external amenity space, consideration will be given to the extent to which this could be compensated by roof terrace and usable balcony provision and/or financial contributions to improvements in local public space.

DP H 6

New Housing: External Design, Layout and Amenity Space

New housing should be designed and laid out so as to provide :

- a) a safe, secure and pedestrian friendly residential environment, with a distinct sense of 'local place', in accordance with Policies UD3, UD5 and UD9.
- b) boundary treatments and landscaping in accordance with Policies UD6, UD7 and SD7
- d) parking provision in accordance with Policy TRN7 and the Parking Standards (see Connecting Places)
- e) refuse and recycling storage space and facilities in accordance with Policy SD8
- f) external private amenity space of a sufficient size and type to satisfy its proposed residents needs in accordance with SPG 17 standards. .
- g) childrens play facilities in schemes providing more than 10 family sized houses and flats in accordance with Policy OS8

Alternative options not selected:

Lower requirements would not provide the requisite level of sustainability. Higher requirements may be unduly prescriptive.

Not requiring external amenity space and children's play facilities would impose additional stress on existing public provision. More stringent amenity requirements could be unduly prescriptive

Sustainable Housing Design : Internal

2.25 New housing should provide sufficient internal space and amenities to meet their residents needs. Unfortunately, far too much housing has been built in the last twenty years with insufficient space to meet its residents needs, hence it is necessary to ensure minimum dwelling sizes in accordance with SPG 17 (as endorsed by the Mayor of London 'Housing Space Standards' research).

2.26 Houses and flats should be as flexibly designed as possible to enable accommodation to be adapted to meet future occupiers needs, which may be significantly different from current requirements. Much of the Borough's housing stock is no longer internally configured as originally constructed as successive generations of residents have made adaptations that better met their needs and lifestyles.

2. Meeting Housing Needs

2.27 The growing practice of 'working from home', for at least part of the work period, can beneficially promote sustainability by reducing commuting and so housing developers have been strongly encouraged in the Code For Sustainable Homes to provide sufficient space to enable this.

2.28 Properly constructed roof spaces and basements can provide potential opportunities for future storage use or conversion to provide additional living space to meet occupiers increased needs without having to move.

DP H 7

New Housing Development : Internal Layout And Amenity

All new housing should provide sufficient space (including storage) and incorporate an internal layout, circulation space, visual aspect and daylighting access, together with an arrangement of rooms, that will provide a satisfactory level of accommodation for its occupiers, in accordance with SPG 17.

Where possible, new housing should be flexibly designed and laid out so as to permit a wide range of residential uses, including 'working from home' (in compliance with Policy BIW4) . And to facilitate potential requirements for future additional habitable accommodation and storage space. For example, roof spaces and basements should be designed and constructed to enable subsequent enhancement for storage purposes, or conversion to provide additional living space.

Alternative options not selected:

Not to include this specific policy could lead to unsatisfactory housing provision and possible detrimental overdevelopment. More stringent requirements could be unduly prescriptive.

Very Large Housing Schemes

2.29 Very large housing development schemes, particularly those involving phased construction, require a systematic 'master plan' type approach to their design. Such large scale housing developments involve much more than simply constructing/ refurbishing dwellings if they are to provide a satisfactory residential environment. The considerable economies of scale normally associated with large residential construction/ refurbishment projects should enable an exemplar approach to sustainability issues, as set out in Policy H8.

2. Meeting Housing Needs

DP H 8

Very Large Housing Schemes (Including Major Estate Regeneration Areas)

Proposals for the construction, re-provision or refurbishment of one hundred or more dwellings, including Major Estate Regeneration Areas (as shown on the proposals map), should be implemented by :

- a) The employment of an urban design strategy and implementation framework demonstrating how the development will be designed and phased in a coordinated manner
- b) The employment of a comprehensive landscape design framework demonstrating a proper balance between private and public open space, including children's play space
- c) By providing an appropriate mix of house types/tenures, land uses, and community, facilities to help secure mixed and balanced communities
- d) Exhibiting an exemplary approach towards design, telecommunications, use of renewables, energy and water consumption, re-use of materials and measures to reduce the use of the car.

The Council will expect developers to avail of the 'economies of scale' to ensure the maximum feasible installation of sustainability enhancing equipment and processes.

Alternative options not selected:

Not having a specific policy for very large schemes could lead to unsustainable development. A lower threshold or more stringent requirements could be unduly prescriptive.

A Balanced Housing Stock (Policy CP H3)

Objectives

2.30 New housing development should make an appropriate contribution towards ensuring Brent's strategic objective of a balanced housing stock capable of satisfactorily accommodating a very diverse range of household needs.

2.31 Brent has a particular shortage of family sized accommodation in all tenurial categories. Arising from its significantly greater than average household size and corresponding very high overcrowding levels; exacerbated by the fact that three quarters of the new housing provided under the previous Plan (UDP) was no more than two bedrooms in size (the then definition of a family unit; the proportion of which was not specified).

2.32 The Policy H9 definition of a family unit as a dwelling capable of providing three or more bedrooms will better address the potential supply of new family housing; while permitting a substantial flexibility in internal configuration and and usage (eg) enabling a 'work from home' facility if the current occupier prefers.

2.33 Policy H9's requirement to provide a minimum of 30% family accommodation on sites with a capacity of ten or more dwellings flexibly recognises that some sites will not be able to provide this level, or possibly even none, of family accommodation owing to their unsuitable location and /or built form, which is incapable of providing for a 'child friendly environment'. Policies H11 and H12 further recognise the need to protect existing family accommodation.

2.34 Policy H11 recognises that sheltered housing schemes, providing self contained accommodation for older persons, need to be assessed against specific locational and amenity criteria. It will facilitate the appropriate provision for older persons' specialised housing needs, while ensuring that this is not at the expense of existing family accommodation. .

2. Meeting Housing Needs

2.35 In addition to the need to provide the above types of self contained accommodation, a balanced housing stock also requires a range of non-self contained accommodation types. Policy H11 sets out the criteria for assessing proposals to provide Houses in Multiple Occupation (HMO) and those Hostels which do not provide the level of residential care and support identified in Policy H12.

2.36 For some Brent residents and habitual visitors, providing a balanced housing stock does not actually involve the physical provision of housing but simply a serviced site to satisfactorily accommodate their caravans and mobile homes. Policy H12 accordingly enables the provision of sites suitable for the nomadic cultural needs of Travellers, Gypsies, Roma, Sinti and the off-season requirements of Travelling Show People.

Dwelling Mix : An Appropriate Range of Dwelling Sizes

2.37 It is essential that the Plan is able to ensure the maintenance and provision of a dwelling mix appropriate to the Borough's particular household needs. New housing schemes of ten or more self contained units will therefore be expected to provide an appropriate range of dwelling sizes, subject to any specific site or locational constraints or particular planning requirements.

2.38 Brent has a specific need for family accommodation, particularly to accommodate large household sizes but less than 25% of the new housing provided in recent years has been more than two bedroom units. Furthermore, a significant proportion of private housing capable of accommodating families has 'leaked' through the recent rapid growth of the 'buy to let' sector into non-family occupation.

2.39 While recognising that the majority of the housing demand in the private purchase sector will be for units to accommodate small households, it is necessary to ensure that the smallest units, and particularly studio apartments, are not permitted to over predominate the dwelling mix of new housing without justifiable reasons.

DP H 9

Dwelling Mix (Self Contained Housing)

New, general needs, housing development, will be expected to make an appropriate contribution to the Borough's diverse household needs through a mix of dwelling sizes and types. New housing should provide, subject to locality/site characteristics and suitability of design, layout, built form and level of external amenity space, :

- a) A minimum of 30% family accommodation (capable of providing three or more bedrooms) on sites with a capacity of ten or more self contained units. Provision for larger family accommodation (capable of providing four or more bedrooms) should be made on sites with a capacity of twenty or more units.
- b) No more than 50% one bedroom size accommodation, including studio apartments (single habitable room units), in a development of ten or more units unless to meet an identified occupancy need.
- c) A minimum of one family unit in a house subdivision/conversion scheme

Schemes involving the demolition of large family housing, to enable additional new housing construction, will be expected to at least reprovide the number and bedroom size of the original family units unless this would require an inappropriate design, layout or built form.

Alternative options not selected:

Not requiring an appropriate dwelling mix would lead to a housing provision that would not meet the Borough's household needs as would retaining the current UDP definition of a family unit as only comprising two bedrooms. Higher requirements could be unduly prescriptive.

2. Meeting Housing Needs

Sheltered Housing

2.40 The development of sheltered housing, by definition, requires more specific consideration and the use of particular criteria, than general self contained accommodation, to ensure that it will satisfactorily meet the specific needs of older residents, with possible reduced mobility.

DP H 10

Sheltered Housing (Self Contained Accommodation)

New sheltered housing will be permitted in principle, unless the scheme would involve the unacceptable loss of existing family accommodation, in locations particularly suitable to meet the needs of their intended residents, including :

- a) areas with moderate or better public transport accessibility (PTAL)
- b) availability of local shopping facilities within 400m by an older pedestrian-friendly route.

New sheltered housing schemes should provide a standard of amenity, including external amenity space, and communal facilities appropriate to meet the needs of prospective residents.

Occupation will be restricted to elderly persons, disabled people, carers, dependent persons who are cared for by these, and their partners, by planning condition.

Alternative options not selected:

Not providing an enabling policy would ignore a specific housing need. Imposing no restriction on the loss of existing family housing would exacerbate the current shortage of family accommodation. More detailed requirements could be unduly prescriptive.

Non-Self Contained Accommodation

2.41 Policy H11 makes appropriate provision for small households with limited incomes unable to access self contained accommodation. It also ensures that non self contained accommodation is not occupied by children as this type of accommodation is usually incapable of providing the requisite range of amenities for children, including external space.

2. Meeting Housing Needs

DP H 11

Non-self Contained Accommodation

New non-self contained accommodation, which does not provide an element of care and support for its residents, including Houses in Multiple Occupation (HMO) and Hostels, will only be permitted for childless household occupation and where its development :

- a) meets an identified Borough housing need
- b) does not involve the loss of existing self contained accommodation
- c) is located in an area with good public transport accessibility (PTAL)
- d) provides a standard of accommodation and amenity that complies with the Council's HMO Registration Scheme requirements.

Housing Providing Care

2.42 Policy H12 enables the provision of new housing for care in appropriate locations without detriment to existing residential amenities. This category of housing covers a very wide range of accommodation with support needs, ranging from small hostels where a high level of support to large nursing homes.

2. Meeting Housing Needs

DP H 12

Housing Providing Care

New housing which meets an identified Borough need to provide care and support for residents, incapable of independent living, will be supported in principle, in residential areas and on suitable sites in or adjoining town / district centres, unless the development would require:

- a) an unacceptable loss of existing family accommodation,
- b) a scale of the development incompatible with the character of the area and/or inappropriate in terms of the impact of the proposed client group on residential amenity

Care housing proposals will not be acceptable in locations and sites where

- c) The site lacks suitable access for any necessary ambulances and / or minibuses;
- d) The site, other than for a client group totally dependent on carers, lacks potential pedestrian-impaired access to local shopping / public transport facilities within 400m ;
- e) Over-concentration of these facilities would harm local amenity;
- f) The proposed client group would overstress local health and / or social services;

Alternative options not selected:

H11 Not having a policy would fail to provide for a particular housing need. Imposing no restriction on the loss of existing family housing would exacerbate the current shortage of family accommodation. More detailed requirements could be unduly prescriptive.

H12 Not providing a policy would fail to make provision for this particular housing need. Not restricting child occupancy would result in children being unsatisfactorily housed. A policy with more requirements could be unduly prescriptive.

Sites For Nomadic Peoples

2.43 This category covers a wide range of distinct ethnic and cultural groups of peoples, but who have a common ethno-cultural derived nomadic need for sites to accommodate their caravans and mobile homes..

2.44 in Brent, the primary historical occupiers of nomadic sites have been semi-permanent Irish Travellers and off-season Travelling Showpeople. However, the relevant British and European legislation requires that consideration must also be given to the potential accommodation needs and preferences of Scottish Travellers, English and Welsh Gypsies and the more recent Roma and Sinti communities.

2.45 As most of the Irish Travellers who have historically resorted to settlement within Brent lack the resources to purchase their own sites, their accommodation needs can effectively be regarded as a specialist type of 'affordable housing' provided with the assistance of public sector funding , as on the Lynton Close Site.

2.46 A key consideration in determining the suitability of the potential site will be the prospective residents ancillary requirements for space and facilities to undertake the range of employment and entrepreneurial activities often associated with or resorted to by Travellers, Gypsies, Roma, Sinti and Travelling Showpeople.

2. Meeting Housing Needs

DP H 13

Sites For Nomadic Peoples

Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Showpeople should:

- a) Meet a need for such accommodation which is not being met in the Borough or elsewhere in London, whilst avoiding an over-concentration of such facilities in Brent in comparison to other boroughs
- b) Be located on a site and in an area both environmentally acceptable for residential occupation and - where the prospective occupiers require – suitable for the undertaking of employment and entrepreneurial activities without detriment to adjacent occupiers' amenities
- c) Have acceptable road and pedestrian access and be accessible to local services and public transport
- d) Be suitably landscaped, with appropriate boundary treatment.

Alternative options not selected:

Not providing a specific policy to enable this specialised accommodation need would be contrary to Government strategy and London Plan requirements. Furthermore, the absence of an enabling policy to accommodate recognised ethnic minorities, who have been subject to historical discrimination and prejudice, could represent indirect discrimination contrary to Human Rights and Anti-Discrimination legislation.

Affordable Housing Provision (Policy CP H4)

Objectives

2.47 The Plan must ensure that new housing schemes, on sites with a capacity, for ten or more dwellings, make an appropriate contribution towards the Borough and London Plan targets that 50% of all new housing should be affordable to persons whose incomes are insufficient to access market housing.

2.48 Viability is the key factor in assessing the reasonableness of the proposed affordable housing provision and so Policy H14 sets out detailed 'viability assessment' criteria to determine the 'maximum reasonable proportion' of affordable housing that a specific site can provide without jeopardising the overall viability of the proposed housing development.

2.49 To ensure that all suitable housing sites make their appropriate contribution to addressing the Borough's affordable housing needs, Policy H14 embodies a presumption that the affordable housing obligation will be provided 'on site'. However, as this may not be feasible or desirable on all sites, Policy H16, therefore, sets out the circumstances in which the affordable housing obligation could be implemented 'off site' on either an alternative site or a 'commuted payment' basis.

2.50 Affordable housing provision aims to address a very wide range of housing needs and tenurial preferences and so encompasses both a range of rental accommodation, involving various levels of public subsidy, and various routes to home ownership. However, the predominant Brent affordable housing need is for Social Rental accommodation, provided or managed by Registered Social Landlords (housing associations), usually with the aid of grant assistance from the Housing Corporation..

2. Meeting Housing Needs

2.51 To ensure that all suitable housing sites make their appropriate contribution to addressing the Borough's affordable housing needs, Policy H14 embodies a presumption that the affordable housing obligation will be provided 'on site'. However, as this may not be feasible or desirable on all sites, Policy H16, therefore, sets out the circumstances in which the affordable housing obligation could be implemented 'off site' on either an alternative site or a 'commuted payment' basis.

Requirement For Affordable Housing

2.52 Given Brent's pressing affordable housing needs, it is essential to ensure that all housing developments of more than 10 self contained dwellings make the maximum viable contribution to the Borough's acute housing needs. Policy H14 details the viability assessment criteria.

DP H 14

Requirement For Affordable Housing

All new self contained housing developments capable of providing 10 or more units gross, or of 0.3 Ha or more in size (irrespective of the number of units), will be required to provide the maximum reasonable proportion and amount of affordable housing on the development site (subject to the exemptions specified in Policy H16).

The Council in determining a scheme's viability to provide the maximum reasonable affordable housing contribution will have regard to :

- a) The size and type of the scheme, including the number of residential units and any mixed use elements
- b) Any exceptional site development and/or construction costs
- b) The estimated market value of the scheme (including non residential elements)
- c) The availability and level of public subsidy
- d) The cost of satisfying any other Plan objective and /or requirement

Applicants will be expected to assist viability assessment by providing relevant information.

The artificial subdivision of sites with the effect of circumventing this policy will not be permitted

The affordable element should be available for occupation at the same time as other elements or sooner as may be appropriate. And be available to Borough residents (both initial and subsequent occupiers).

Note

2.53 The affordable housing provision will normally be assessed on a habitable room basis, as this is more amenable to evaluating the larger unit contribution.

Alternative options not selected:

Retaining the current UDP threshold of 15 units would not generate the required additional affordable housing and would also not be in conformity with the emerging Revised London Plan. Reducing the threshold below 10 units would be contrary to Government guidance. Not considering the affordable housing viability factors would be contrary to Government strategy and London Plan requirements. Continuing the current UDP specified expectation of affordable housing provision within the 30%-50% range would be essentially incompatible with the proposed 'viability' dependent principle.

2. Meeting Housing Needs

Type Of Affordable Housing

2.54 Given Brent's priority need for social rental family accommodation, Policy H16 incorporates the London Plan tenure mix of 70% Social Rental and 30% Intermediate Housing, which includes both part purchase /part rent 'Shared Ownership' type tenures and 'Sub Market' rental schemes. And sets out the exceptions which may permit a different ratio and types of affordable housing provision.

DP H 15

Type Of Affordable Housing

Affordable housing should provide a range of dwelling types and mix of sizes in accordance with policy DP H9. Affordable housing should be designed to promote socially inclusive mixed communities and so the tenure of different elements of a scheme should not be apparent from the siting, design, layout or built form.

Affordable housing should provide a tenure mix appropriate to the Borough's need, normally within the ratio of 70% Social Rental (predominantly two or more bedrooms) and 30% Intermediate Housing (such as shared ownership) unless :

- a) The site's locality and constraints, and/or design/layout. built form and external amenity space would not provide a reasonable residential environment for households with younger children
- b) A different type of affordable housing mix is required to satisfy a regeneration objective
- c) The applicant is a Registered Social Landlord who can demonstrate an identified specific affordable housing need
- d) The scheme has been specifically advanced by or on behalf of a Brent Key Worker employer or higher education provider.
- e) The availability and level of public subsidy will not support a high level of Social Rental provision.

The Council will expect recipients of public subsidy to so use it as to maximise the provision of Social Rental units, particularly for family accommodation and may therefore require justification for any need to subsidise Intermediate Housing provision, particularly for providing smaller units.

Alternative options not selected:

Not specifically distinguishing Social Rental and Intermediate Housing and specifying a 70%:30% ratio would be contrary to London Plan requirements. Not providing for exceptions would render the sought affordable housing non viable or unsuitable for specific providers needs. Imposing more stringent requirements could be unduly prescriptive.

Off-Site Affordable Housing Provision

2.55 Although there is a very strong presumption that the affordable housing obligation will be implemented ,in full, on the development site, it is necessary to set out the exceptional circumstances where this will not be possible or desirable.

2. Meeting Housing Needs

2.56 In such exceptional circumstances, the affordable housing obligation should be implemented on a suitable alternative site. Unless the Council determines that a better affordable housing outcome could be secured through the developer either making a commuted payment, to be employed to enable another affordable housing scheme. Or by the developer purchasing existing housing, usually providing larger family accommodation.

DP H 16

Off-site Affordable Housing - 'Provision In Lieu'

All affordable housing obligations should be implemented on the development site except where :

- a) The site is incapable, because of its locality, constraints, design, layout or built form, of providing a reasonable residential environment for households with younger children
- b) The development is for a Category 1 Sheltered Housing scheme and the primary Borough requirement is for a higher category affordable provision.

The agreed alternative affordable housing should be provided on an acceptable alternative site within the locality of the primary development site in so far as possible. Unless the Council decides that a 'commuted payment', or purchase by the developer of existing larger family market housing, would enable a more beneficial affordable housing provision.

Alternative options not selected:

Not providing this type of policy would be contrary to Government guidance and London Plan requirements. Permitting more exemptions could lead to an under provision of affordable housing given the shortage of suitable sites.

2. Meeting Housing Needs

3. Connecting Places



3. Connecting Places

Assessing & Mitigating the Impact of Transport

Assessing Transport Impacts

3.1 Planning applications for development will be supported by a Transport Assessment and a draft Travel Plan in accordance with Best Practice Guidance on the Validation of Planning Applications issued by the Department of Communities and Local Government. The only exceptions will be when a development is not likely to have a significant effect on either the local road network or public transport services.

3.2 Environmental Protection policies highlight that air quality, noise and pollution are a common problem in Brent. Although transport impact of a development may be acceptable to the Highway Authority, the council will consider the wider environmental impact and sustainability of any scheme for future users.

Making Transport Impact Acceptable

3.3 Where significant impacts arise mitigation measures should be proposed and the residual impacts assessed. Planning obligations may be sought to fund mitigation measures or conditions may be imposed on a planning permission to restrict impacts. These measures will be related to the specific development, but it is unlikely that every development proposal can be made acceptable in transport terms.

3.4 The range of mitigation for which planning obligations may be sought includes but is not restricted to the following:

- Public transport improvements sufficient to service the scheme or to integrate it with the surrounding area
- The extension or bringing forward of on-street parking controls or waiting restrictions due to an unacceptable impact on road safety, emergency vehicle access or traffic management
- Improvements to pedestrian and/or cycle facilities
- Traffic calming measures
- Acceptable road safety and essential highway improvements, not necessarily restricted to the immediate development area
- Programs to reduce car usage (car pooling, car clubs, travel plans).

3. Connecting Places

DP TRN 1

Transport Assessment

Developments which will have a potentially significant impact on the transport network should submit a Transport Assessment (TA) as part of the planning application and an accompanying Travel Plan. For small schemes this should outline the transport aspects of the proposal, for major schemes the assessment should outline the accessibility of the site by all transport modes and the likely modal split of journeys to and from the site. This should incorporate proposed traffic reduction measures, including improvement of access by public transport.

Where a development is likely to have a significant impact on the operation of the local highway network, public transport services or other transport facilities, and these cannot be satisfactorily mitigated, then the application will be refused. Significant impacts are considered to comprise:

- Vehicle flows generated by the development compromise the safe or efficient operation of local roads or junctions.
- The proposal would have unacceptable environmental impacts (see policies ENV1-3)
- The development would not provide convenient and safe access for pedestrians and cyclists
- The development is located in an area that cannot be readily accessed by public transport
- There would be an unacceptable increase in parking in areas where this would reduce spaces available to residents or cause congestion
- Where the capacity of the highway network is unable to cope with the predicted additional traffic, especially on the Strategic Road network and London Distributor Roads

Where transport impact is unacceptable, measures will be considered, individually or in combination, which would acceptably mitigate impacts and, where necessary, at the developers expense. A full Travel Plan will normally be secured by a planning obligation or condition.

Alternative options not selected:

Transport Assessments

An alternative approach would be to not request Transport Assessments and accompanying Travel Plans for developments likely to cause significant impacts. This would consequently be detrimental to the environment, transport systems and safety if appropriate mitigation is not secured, whilst national planning guidance and London Plan policy request DPD policies to request such information. Core policy CP TRN1 also request contributions sought from development to promote more sustainable modes whilst supporting regeneration and growth.

Sustainable Modes of Transport

3.5 As noted in the environmental protection chapter, road transport is responsible for growing emissions in Brent. The London Plan emphasizes that this impact should be reduced by the encouragement of fewer and shorter journeys made by the private car and the promotion of more journeys made through sustainable forms of transport including public transport, walking and cycling.

3.6 The borough's 'Streets for People' scheme is aimed at reducing car dependency and improving environmental quality and safety which is targeted in areas of high deprivation where the negative effects of traffic are the greatest. The sustainability accessibility audit procedure aims to ensure that all schemes affecting the highway must avoid and mitigate any adverse effects with regard to the hierarchy of street users.

3. Connecting Places

Public Transport Integration

3.7 Planning Policy Guidance 13 (PPG13) and White Paper 'The Future for Transport: a network for 2030' aims to deliver an environmentally sustainable transport system which reduces the need to travel. The London Borough of Brent aims to promote an integrated transport system by shaping patterns of development in terms of location, scale, density and mix of land uses. Forms of development should minimise the need to travel and encourage the use of non-car modes of access.

3.8 Intensive development supporting a mix of land uses is supported at the key transport interchanges. In addition, Brent's Local Implementation Plan has highlighted the following interchanges which are in urgent need of major improvement: Queen's Park, Stonebridge Park, First Central (Park Royal), Kenton and ongoing improvements at Wembley Central. For further information on interchanges please see policy DP UD10.

DP TRN 2

Public Transport Integration

Development should benefit and not harm the operation of the public transport network, and should be located where public transport accessibility is sufficient to service the scale and intensity of use, in particular where:

- The capacity of the public transport network, within safe walking distance should be sufficient to accommodate any increase in passenger trips,
- The increase of traffic generated should not cause harm to the efficiency of bus services, especially the London Bus Priority Network,
- Proposals should take full opportunity for interchange facilities between public transport services.

Buses

3.9 Road based public transport will play an increasing role in meeting access needs in London as a more sustainable form of public transport than the private car. Bus services provide important connections between the main residential areas of the borough and areas for employment, leisure, shopping and community facilities. In Brent 80 million trips are served by buses each year, with an estimated 70 million of these journeys starting, finishing or totally within the borough. Policy DP TRN1 requires certain developments to provide contributions to public transport improvements. Brent's Core Strategy prioritises implementation of the London Bus Priority Network (LBPN) therefore development on, or adjacent to it should have regard to it.

3.10 The borough has five bus garages: Cricklewood, Alperton, North Wembley, Willesden Junction and Willesden. In the event that a garage is no longer needed by a bus operator the council will expect the possibility of use by another operator to be fully explored before their loss is considered. Some garages require substantial upgrading to bring them up to modern standards, which the council will encourage and support.

3. Connecting Places

DP TRN 3

Bus Improvements/ Connections

Where appropriate, developments that abut the London Bus Priority Network will, be required to provide for the efficient operation of bus services, including bus facilities, highway improvements, and/or service improvements (following consultation with TfL) depending on additional patronage that would be generated.

The loss of existing bus garages will be resisted where this would result in the deterioration of the frequency, coverage, or reliability of bus services.

Alternative options not selected:

The above policies DP TRN2 and DP TRN3 follow directly from Core Strategy policies CP TRN2 Reducing the Need to Travel and CP TRN4 Transport Links in London. Alternative options not selected have already been appraised in the Core Strategy document.

Cycling & Walking

3.11 The Council is committed to improving road safety and developments will be expected to contribute towards improving the pedestrian environment. A 'walkable' development should offer safe, convenient and direct routes for pedestrians. Brent's Road Danger Reduction Plan aims to improve conditions for walking and cycling in the borough and thus increase usage of sustainable modes.

3.12 Brent's London Cycling Plan aims to encourage cyclists to become actively involved in the design of schemes which will contribute to make the cycling environment safer and more convenient. In addition to design and direct routes for cyclists there should be the provision for safe and secure cycle parking which should be undertaken in accordance with the London Cycling Design Standards (LCDS) as set out by TfL.

3.13 The 'Living Streets' Community Audit which identifies not only permeability issues but also the quality of provision. Developers should consider opportunities for expanding the permeability of the pedestrian and cycle network.

3. Connecting Places

DP TRN 4

Cycling & Walking Environments

Developers should ensure that proposals are designed in accordance with best practice to ensure safe and convenient access for pedestrians and cyclists whilst considering opportunities to expand the permeability of the pedestrian and cycle network. Where necessary, the Council will seek improvements from developers to ensure that access and facilities are adequate. Poor sight-lines, hiding places and long narrow paths and passages should be avoided wherever possible, pedestrian routes should follow desire lines and minimise walking distances to local facilities. Cycle and pedestrian routes should not be isolated from other activity.

Design for cycle facilities should be in accordance with London Cycling Design Standards. Sufficient cycle parking (PS10) should be provided in new developments and town centres.

Alternative options not selected:

The above policy DP TRN4 follows directly from Core Strategy policy CP TRN2 Reducing the Need to Travel. Alternative options not selected have already been appraised in the Core Strategy document.

Brent's Road Network & Highway Design

3.14 Brent aims to create environments which are visually attractive and safe. Brent's Road Danger Reduction Plan forms the basis of most of the borough's work towards the design and implementation of schemes.

3.15 The increasing demand from householders to form crossovers for off-street parking (56 applications in 2003 and 103 applications in 2005) results in the reduction of space available for on-street parking. If the street is heavily parked (see Appendix TRN2, Page 120) the loss of on-street parking is likely to be unacceptable as it could impact on highway safety and traffic management.

3.16 Detailed guidance is available providing information on crossovers for householders and developers together with detailed guidance on forming an access onto a road (currently SPG's 3 & 13) and in draft Brent's Public Realm Design Guide. Please also refer to DfT Manual for Streets (2007), national design policy document and English Partnerships 'Car Parking: What Works Where' (2006).

3. Connecting Places

1

Brent's Road Network

Brent's road network consists of:

- North Circular Road A406 (TLRN/ GLA Road)
- TfL's Strategic Road Network
- London Distributor Roads
- Local Distributor Roads
- Local Access Roads

PPG13 advises against new accesses onto primary routes as this would conflict with their strategic role of carrying through traffic, but acknowledges that this may be necessary to secure regeneration.

The Road Safety Action Plan 2001 (TfL) advises that a preliminary safety audit should be submitted with all major development proposals and the associated transport changes on the Transport for London Road Network (TLRN/ GLA)

Proposals which would affect TfL's Strategic Road Network, which includes the Edgware Road and Harrow/Watford Road corridors, shall require consultation as TfL have a strategic management function in minimising congestion on such roads.

Brent's London Distributor Roads generally have to provide access to adjacent land uses, but their primary function must be to act as part of the network for through traffic.

Refer to Appendix TRN1, Page 118 for the above information.

3. Connecting Places

DP TRN 5

Highway Design and Forming an Access to a Road

New highway layouts, visibility splays and accesses to and within development should be designed to a satisfactory standard in terms of safety, function, acceptable speeds, lighting and appearance.

For a site with a new road network the proposal should have efficient internal circulation as well as integrating with the existing road network in a convenient manner; including for emergency service vehicles, pedestrians, cyclists and where appropriate buses.

Proposals to create an access from a dwelling to the highway (other than on the North Circular Road) will be acceptable where there is adequate visibility and where it would be visually acceptable. On heavily parked streets the proposal should not result in the loss of more than one on-street space, or the creation of more off-street spaces than permitted by the parking standard.

New accesses onto the North Circular Road will be resisted in all cases; similarly new accesses on London and Local Distributor Roads should be resisted where alternative access is available to the side or rear and turning facilities should be provided where possible. A preliminary safety audit must be submitted with all major development proposals which abut the TLRN.

Alternative options not selected:

Highway Design and Forming an Access to a Road

An alternative approach would be less restrictive and exclude new accesses onto the North Circular Road and London Distributor Roads. This would however, be detrimental to public safety and could hinder the circulation of traffic and therefore this approach should be dismissed.

Freight

3.17 The London Plan (including further alterations), PPG13, and TfL London Freight Plan (draft 2006) stress the importance of recognising freight in local development documents and management plans. Road freight is, and will remain the largest sector of freight activity in London, however, due to concerns over congestion and its impacts Brent should encourage and maximise the use of rail and water modes. Improved provision for freight in urban areas can also aid to reduce congestion and support town centre regeneration. Proposals should recognise and balance the interests of residents, industry and employment.

3.18 The council is keen to ensure continued use, improvement and further development of rail sidings at: Royal Mail Stonebridge Park, Willesden, Brent Yard and Neasden. The West London Freight Partnership (WLFQP) including member boroughs Ealing, Hammersmith and Fullam, Hillingdon, Harrow and Hounslow aim to develop understanding of distribution issues and problems in the West London sub-region and promote constructive sustainable solutions which reconcile the need for access for goods and services, with local economic, environmental, safety and security concerns. Membership to the Partnership is free and open to businesses or business groups who subscribe to the objectives and have involvement in freight issues in West London.

3. Connecting Places

DP TRN 6

Freight

Sites specifically allocated for industry, or uses that include the transport of freight, should have adequate links to major transport routes and should minimise night disturbance. Appropriate freight loading and parking facilities are required in accordance with parking standards. Developments and proposals should, where practicable, include maximisation of rail and water modes for freight activities.

The development of existing sidings will be resisted where practicable.

Alternative options not selected:

Freight

An alternative approach would be to not promote the maximisation of rail and water modes but ensure that all development which requires freight facilities to locate in areas which minimise disturbance and are close to major transport routes. This however, would contradict the London Plans' sustainable transport policy and guidance in PPG13 in the protection, and development of, rail and water modes.

Parking in Brent: Residents, Business, Commuters

Parking Standards: Residential & Non Residential Developments

3.19 The Council will in accordance with PPG13 and the London Plan, ensure that on-site parking for new developments is provided at or below the maximum level as set by its parking standards. As indicated in Brent's Core Strategy, lower standards generally apply in areas with greater public transport accessibility and affordable housing units.

3.20 Road safety should be a priority when proposals affect heavily parked streets and transport interchanges (Appendix TRN2 Page 120).

3. Connecting Places

DP TRN 7

Parking and Servicing: Residential and Non-Residential Developments

In assessment, of the level of parking provision proposed, consideration will be given to existing on-street parking and road safety in the area around the site. Where feasible, and subject to public consultation, developer contributions towards extending or introducing on-street parking controls may be sought, but where this is not practical, planning permission will not be granted if the impact is shown to be unacceptable.

Please consider the following:

- Non-residential development should make provision for vehicular parking in accordance with the maximum standards, depending on the level of public transport accessibility
- The level of parking should not be below minimum operational standards (including required disabled persons parking)
- Development likely to attract significant members of the public should include adequate taxi and coach parking facilities, subject to Transport Assessment, where this does not obstruct the public highway
- New car parks should be designed to be safe, appropriately screened and have convenient pedestrian links to the development and surrounding uses.
- The provision of servicing facilities is required in all development covered by the documents standards, and the loss of these will be resisted.
- A lower level of parking will be considered in proposals which incorporate car clubs, to be included within the Travel Plan.

Off-Street Parking

3.21 Brent recognises that some forms of off-street parking do meet an essential need and therefore have to be provided and protected. The approach is to identify the minimum necessary amount of such parking which discourages dangerous and/or inconvenient on-street parking whilst not over-providing as to detract from more sustainable modes.

DP TRN 8

Off-street Parking

Development which results in the net loss of essential off-street parking will be resisted.

Proposals for public off-street parking will only be allowed where it can be shown to meet an essential parking need and providing that the applicant enters into an agreement for a management regime and pricing structure. Five percent of all spaces should be for disabled persons and applications for 10 or more spaces will be subject to a condition preventing charging for car parking. This will not apply to parking dedicated to the rail and tube stations serving the National Stadium.

Under review, the loss to alternative use of off-street parking will be permitted where the transport impact of this loss is acceptable.

3. Connecting Places

Parking in Town Centres

3.22 Standards and enforcement for parking in town centres are controlled by the Transportation Department and are highlighted in the Transport Implementation Plan. Large developments within and near town centres should ensure that movement of pedestrians and cyclists are not hindered by excessive on-street parking. Developments at the Wembley complex, for example, require thorough management plans to control the movement of public transport, pedestrians and cyclists.

DP TRN 9

Parking in Town Centres

When considering development proposals in town centres regard will be had to the impact of any generated on-street parking on the operation of the centre and the availability of on and off-street public parking spaces within easy walking distance of the site. The maximum additional amount of parking provided by individual development shall be no greater than the maximum standard for freestanding development, unless existing parking spaces are being relocated from a worse location.

Alternative options not selected

The above policies DP TRN7 to DP TRN9 follow directly from Core Strategy policy CP TRN3 Parking & Traffic Restraint. Alternative options not selected have already been appraised in the Core Strategy document.

Car Parking Standards

Parking Standards Applied

3.23 Maximum and minimum parking standards are provided in the following Parking Standards (PS) and will be applied in the consideration of all planning applications. The standards make provision for adequate levels of parking and servicing, the disabled and pedal cycles in all new developments. These standards are related to parking policies TRN7 & TRN8.

3.24 Where a change of use is proposed, the traffic impact and parking standards applying to the previous and proposed uses will be compared. For mixed use schemes regard would be had to shadow parking between uses at different times of day.

3.25 For outline applications parking areas and layout will be part of the siting reserved matter (unless the parking is structured then it will be part of design reserved matter). A condition should be put on the outline application setting a maximum parking level for the site - where uses and floor areas are known. Where these are not known a condition will be placed on the outline application requiring details of parking (at no greater levels than the revised standards) to be submitted with applications to discharge reserved matters on uses and siting.

3.26 The minimum normal parking space dimension is 2.4m wide by 4.8 in depth. The normal standard, minimum for a parking bay is provided in SPG12: Access for Disabled People: Designing for Accessibility & SPG13: Layout Standards for Access Roads.

Maximum and Minimum Standards

3.27 Minimum parking standards apply to disabled, bicycle and servicing parking, with maximum parking standards relating to staff, visitors and residents.

3. Connecting Places

3.28 Operational parking is part of the overall parking maximum (not additional) and does not include provision for commuter or visitor trips. Assessment of the necessary minimum operational parking is proposed to be made on a case by case basis. Where an acceptable proposal comes forward to intensify the use of a site in an area with very good public transport accessibility with a controlled parking zone then the maximum standard will not be increased, so as to not increase car use.

Essential Parking

3.29 It may be allowed to replace/ relocate parking, which is classed as essential (TRN10), in an alternative location providing they are within easy walking distance.

PS1: Employment uses (B1, B2, B8, A2)

Table 3.1 Non- Residential Employment (B1,B2,B8 & A2) Maximum Parking Standards

PTAL score	Maximum Parking Standard: based on GFA
1 to 2	1 space per 150m ²
3 to 4	1 space per 300m ²
5 to 6	1 space per 600m ²

An increase of 50% more parking than would be given in the above PTAL will be assessed in Park Royal and the eastern sector of the Wembley regeneration area providing applicants can demonstrate that the proposal is supportive of regeneration projects, the associated impacts are acceptable and the proposal secures significant/ sufficient public transport/ walking and cycling improvements and/ or contributions to on-street parking controls.

Servicing Standards:

- Units under 100m² Gross Floor Area will be required to provide a loading bay that can accommodate a transit sized vehicle.
- Work-Live units will normally be required to provide a loading bay that can accommodate a transit sized vehicle depending on the number of units and use/s. Shared use of bays between several work-live units in a development will be acceptable, as long as the location of the bay is convenient for all of the units it is intended to service.
- Units between 100m² - 280m² Gross Floor Area must have loading bays that can accommodate at least an 8m rigid vehicle.
- Where units less than 280m² are proposed the development as a whole must be capable of handling full-sized vehicles. This applies to unloading and turning in particular.
- Units 280m² - 2000m² Gross Floor Area must have at least one full sized loading bay and units larger than 2000m² must have at least two full sized loading bays.
- B1 office units need only be served by an 8m rigid vehicles, although such developments over 5000m² should have provision for the maximum sized rigid vehicles.
- All service bays for car repairs (B2) should provide one off-street parking space for vehicles awaiting repair/ delivery.

PS2: Retail (A1)

Table 3.2 Maximum A1 Retail Parking- Major Town Centres

Retail Land Use	Maximum Standard
Smaller Food Store (up to 500m ² GFA)	1 space per 200m ²
Food Supermarket (up to 2,500m ² RFA/ 4000m ² GFA)	1 space per 150m ²
Food Superstore (over 2,500m ² RFA/ 4000m ² GFA)	1 space per 100m ²
Non-Food Warehouse	1 space per 100m ²

3. Connecting Places

Garden Centre	1 space per 100m ²
Town Centre/ Shopping Mall	1 space per 150m ²

3.30 The lower provision within major town centres reflects the levels of public transport accessibility in these areas compared with the rest of the borough.

Table 3.3 Maximum A1 Retail Parking- Borough-wide

Retail Land Use	Maximum Standard
Smaller Food Store (up to 500m ² GFA)	1 space per 150m ²
Food Supermarket (up to 2,500m ² RFA/ 4000m ² GFA)	1 space per 75m ²
Food Superstore (over 2,500m ² RFA/ 4000m ² GFA)	1 space per 50m ²
Non-Food Warehouse	1 space per 50m ²
Garden Centre	1 space per 50m ²
Town Centre/ Shopping Mall	1 space per 100m ²

Servicing Standards:

3.31 Units less than 2000m² Gross Floor Area-one full sized lorry bay is required per 1000m², or part thereof. Existing servicing facilities may be taken into consideration provided they are convenient and availability for use by the proposed development can be ensured. Where development consists of a number of small shop units, full sized lorry bays sufficient for the total floor area of the development should be provided (bays shared amongst units). In addition a bay suitable for transit sized vehicles should be provided for every 2 units.

- Where shop units are not provided with individual full size bays, particular attention should be paid to refuse collection facilities.
- These servicing requirements will be applied to open areas that are proposed to retail markets.

Units greater than 2000m² Gross Floor Area-one full sized lorry bay for each 2000m² GFA or part thereof.

PS3: Food and Drink (A3)

3.32 A lower level of parking provision will be provided for food & drink establishments (A3, A4, & A5). No additional parking will be permitted over and above operational standards within existing town centres of Wembley and Kilburn.

Servicing Standards:

3.33 Public houses need to be served by 10m rigid vehicles. Other A3 uses are generally able to be serviced by transit sized vehicles, but consideration should be given to the needs of refuse collection vehicles which are generally 10m rigid vehicles.

PS4: Assembly & Leisure (D2)

3.34 Where usage varies over the course of the day, parking should be provided for the maximum usage at any one time to prevent additional on-street parking. Cinemas, theatres and conference facilities should provide parking based on maximum capacity, similar to those recommended for places of worship.

3.35 A maximum parking provision (excluding sports facilities) of one space per ten seats based on maximum capacity at any one time. This allocation includes the provision for employees. Where public transport accessibility is very good (PTAL 5-6) this standard of parking provision should be reduced to one space per 20 seats.

3.36 Where sports facilities are known, the levels of parking provision should be based on maximum patronage at any one time, 10% of total patrons.

3. Connecting Places

3.37 Where venues have a capacity above 500, the parking provision will be determined on an individual basis with a detailed Transport Assessment.

3.38 PS5: Hotels (C1)

3.39 A maximum of 1 space per 5 bedrooms for new hotels outside Major Town Centres of Wembley and Kilburn. Within these centres only employee parking should be provided based on a Transport Assessment justification.

3.40 A maximum of one coach parking space should be provided for every 100 bedrooms but should be justified within a Transport Assessment.

3.41 Additional parking may be considered in areas where public transport accessibility is low. This should, however, be justified through a detailed Transport Assessment with a clear parking management plan.

Servicing Standards:

3.42 Hotel developments must provide facilities for at least 8m rigid vehicles. Where a major public bar is included, the requirement will be as for A3 uses.

PS6: Non-Residential Institutions (D1)

3.43 This category covers a range of uses such as places of worship, public halls, health centres, nurseries, museums and educational facilities. These will have varying parking requirements. Therefore car parking requirements should be assessed on an individual basis using a Transport Assessment.

3.44 With regard to Transport Assessment, Health Centres and day nurseries will require short stay visitor parking, long-stay will be deterred, while Education facilities will usually require one space per five workers.

3.45 Places of worship (D1) should provide parking based on their maximum capacity. However, these venues can often be based in relatively residential areas where high levels of on-street parking during services would not be appropriate. Where venues have a capacity greater than 500, event day management plans will be implemented to manage transport and access during high attendance events.

Table 3.4 Maximum parking standards for places of worship

PTAL Score	Maximum Parking Provision
PTAL 1 to 3	30% Maximum Capacity
PTAL 4 to 6	20% Maximum Capacity

PS7: Residential Institutions (C2)

3.46 *Hospitals* should be assessed individually due to the differing nature of parking demands depending on the treatments/ service on offer. Visitor parking is discouraged but may be considered in areas where public transport accessibility is low. This should be accompanied with a thorough Transport Assessment and an accompanying Travel Plan to ensure visitor and employee parking will be well managed.

3.47 *Elderly persons accommodation* requires a lower demand for parking by residents. There should be a reduction of up to 50% in parking provision compared with residential developments. This reduction does not apply to the provision of disabled parking which shall remain at minimum levels.

3.48 *Other residential institutions* e.g. hostels, student housing, and residential schools and colleges, parking provision is based on the number of bedrooms. A maximum of 1 space per 10 bedrooms. Visitor parking may be acceptable provided adequate justification is provided in a Transport Assessment.

Servicing Standards:

3. Connecting Places

3.49 Hospital developments must provide facilities for at least 8m rigid vehicles. Suitable sized facilities should be provided for buses and / or ambulances catering for the client group.

PS8: Residential Development (C3)

Table 3.5 Maximum Residential Car Parking Standards

Housing Type	4+ Bed Units	3 Bed Units	1-2 Bed Units
PTAL 1 to 3	2 spaces per unit	1.5 spaces per unit	1 space per unit
PTAL 4 TO 6	1.5 spaces per unit	1 space per unit	0.75 spaces per unit

3.50 Standards have been adapted based on the accessibility of the development to public transport to take account of the variation across the borough.

3.51 A lower standard of up to 50% can be made for affordable housing by a registered social landlord. Developments may be proposed as 'car free' in areas where Controlled Parking Zones are in place and a 'car free agreement' can be established with the residents as part of a wider Travel plan. A car free agreement will be required where less than 50% of the maximum standard is to be provided.

PS9: Parking For Disabled

3.52 Standard wide bay parking should be allocated for disabled people, SPG12 Access for Disabled People: Designing for Accessibility sets the minimum standard for a parking bay.

- For new dwellings (C3) 1 space per wheelchair unit, next to the dwelling. A minimum of one space will be required for developments of 10 or more units.
- For all other use classes, 5% of spaces (1 minimum) should be dedicated for disabled use. In larger public buildings a number of spaces should be wide enough to accommodate mini-buses.

PS10: Cycle Parking

Table 3.6 Minimum bicycle parking standards will be applied to new developments in accordance with the London Plan and TfL Guidelines.

Use Class	Space
Food Retail (A1)	1 space per 125m ²
Non-Food Retail (A1)	1 space per 300m ²
Pubs/ Wine Bars (A4)	1 space per 100m ²
Take Away (A5)	1 space per 50m ²
Restaurants, Cafes (A3)	1 space per 20 seats with minimum 2 spaces
Theatres and Cinemas (D2)	1 space per 50 seats with minimum of 2 spaces
Leisure/ Sports Centres/ Swimming Pools (D2)	1 space per 10 staff plus 1 space per 5 staff for visitors
Schools - primary/ secondary	1 space per 10 staff/ secondary staff and students
Doctors/ Dentists Surgeries, Health Centres & Clinics	1 space per 5 staff plus 1 space per 5 visitors
Libraries	1 space per 10 staff plus 1 space per 10 for visitors
Other, universities/ colleges	1 space per 8 staff/ students
Business Offices, Financial and Professional Services	2 spaces minimum per 125m
General Industry	2 spaces minimum per 500m

3. Connecting Places

Student Hostels	1 space per 2 students
Residential Institutions	1 space per 8 staff
Housing	1 space per unit
Sheltered	1 space per 5 staff

Developments should provide for appropriate and secure motorcycle parking in accordance with PPG13 and DfT Advisory Leaflet 02/02, as determined by Transport Assessment.

Connecting Places Appendice

Appendix TRN1: Brent's Road Network

Transport for London Road Network/ GLA Roads	
A406 North Circular Road	
Transport for London Strategic Road Network	
Edgware Road	Harrow Road (excl. Harrow Road west of Sudbury District Centre)
Watford Road	
Include corridors: Kilburn High Road, Shoot-Up Hill, Cricklewood Broadway, Harlesden High Street, Manor Park Road, Cravern Park Road, Hillside, Brentfield and Wembley High Road.	
London Distributor Roads	
Blackbird Hill	High Street Harlesden
Brentfield	Hillside
Bridge Road	Honeypot Lane
Bridgewater Road	Kenton Road
Burnt Oak Broadway	Kilburn High Road
Cravern Park (southern arm)	Kingsbury Road
Cravern Park Road	Manor Park Road
Cricklewood Broadway	Neasden Lane North (between Blackbird Hill & North Circular Road)
Dudden Hill Lane	Salmon Street (between Fryent Way and Blackbird Hill)
Empire Way	Shoot-Up-Hill
Forty Lane	Station Road (Harlesden)
Fryent Way	Sudbury Court Drive
Harrow Road (not West of Watford Road)	Watford Road
High Road Wembley	Wembley Hill Road (from Empire Way to Harrow Road)
High Road Willesden (between Dudden Hill Lane and Willesden Lane)	Willesden Lane
Local Distributor Roads	
Abbey Road	Kilburn Park Road (south of Carlton Vale)
Acton Lane	Knatchbull Road
Beresford Avenue	The Mall

3. Connecting Places

Beverly Drive	Manor Farm Road (east of Bilton road)
Brentfield Road	Mapesbury Road
Bridge Road	Mordant Road (between Winchelsea Road and Acton Lane)
Brondesbury Park	Mount Pleasant
Carlisle Road	Neasden Lane (between Dudden Hill Lane and High Road Willesden)
Carlton Vale	Oxgate Lane
Chamberlyne Road	The Paddocks
Chaplin Road	Park Parade
Chichele Road	Pound Lane
Church Lane, Kingsbury	Preston Hill (south of The Mall)
Church Road (south of High Road)	Preston Road
Copland Avenue	Queensbury Station Parade
Coronation Road	Rainsford Road
Cravern Park (northern arms)	Robson Avenue
Crawford Avenue	Roe Green
Crest Road	Salisbury Road
Cumberland Road	Sidmouth Road
Dollis Hill Lane	South Way
Donnington Road (NW10)	Stag Lane
Drury Way	Tanfield Avenue
East Lane	The Avenue
Empire Way	Tudor Gardens
Engineer's Way	Twyford Abbey Road (between Hanger Lane & Coronation Road and Rainsford Road and Abbey Road)
Fifth Way	Walm Lane (between Willesden Lane and Chichele Road)
First Way	Wembley Hill Road
Fourth Way	Wembley Park Drive
Forty Avenue	Wembley Park Lane
Great Central Way	Whitby Avenue
Harlesden Road (between Park Parade and Robson Avenue)	Winchester Avenue
Harrow Road (between Sudbury Court Drive and Watford Road)	Winchelsea Road
Harrowdene Road	Woodcock Hill
High Road Willesden (between Neasden Lane & Dudden Hill Lane and Church Lane and Neasden Lane)	Wrottesley Road
Kilburn Lane (between Chamberlayne Road and Harrow Road)	
*All other roads are local access roads	

3. Connecting Places

Appendix TRN2: Heavily Parked Streets

A	
<p>Aberdeen Road Abbots Drive Acland Road Ada Road Aldershot Road Allington Road All Soul's Avenue (between Holland Road and Phillimore Gardens) Alric Avenue Ambleside Road Amery Gardens Ancona Road</p>	<p>Anson Road (between Cricklewood Broadway and Chichele Road) Ash Grove Ashburnham Road Ashcombe Park Ashdon Road Ashford Road Ash Tree Dell Aspen Drive Attewood Avenue Avondale Avenue Aylesbury Street</p>
B	
<p>Baird Close Balmoral Road Ballogie Avenue Barnham Close Barrs Road Bathurst Gardens Bayford Road Beaconsfield Road Beatrice Avenue Belmont Avenue Belton Road Berens Road Bermans Way Brendon Avenue Brentfield Close</p>	<p>Brenthurst Road Briar Road, NW2 Bridgeway Brondesbury Road Brondesbury Villas Brownlow Road Brooksville Avenue Bruce Road Buchanan Gardens Buckingham Road Buckley Road Burns Road, NW10 Burrows Road Burton Road Buxton Road Byron Road, Wembley</p>
C	
<p>Cairnfield Avenue Cambridge Road (between Kilburn Park Road and Stafford Road) Canterbury Terrace Callcott Road Carlyon Close Caple Road Carlisle Road NW6 Casselden Road Cedar Road Chadwick Road Chalfont Avenue Chambers Lane Chandos Road Chaplin Road (Wembley) (between Ealing Road and Scarle Road/Napier Road) Chaplin Road NW2 Chapter Road Charlton Road NW10 Charteris Road Chatsworth Avenue Chesham Street Chestnut Avenue Chestnut Grove Chevening Road (between Salisbury Road and Kingswood Road) Chichele Road Chippenham Avenue Chippenham Gardens</p>	<p>Chipstead Gardens Church Drive Cholmodeley Avenue Churchill Road Churchmead Road Clarence Road Clayton Avenue Clifford Gardens Clifton Road Clifton Way Cobbold Road (between Roundwood Road and Franklin Road) Codling Way Colin Road College Road NW10 Colwyn Road Colyton Close Compton Road Conley Road Cooper Road Croxden Close Craigmuir Park Cranhurst Road Crediton Road Creighton Road Cromwell Road Crummock Gardens Crouch Road</p>
D	

3. Connecting Places

<p>Dagmar Gardens Deacon Road Dean Road Denmark Road Deanscroft Avenue Denzil Road Dewsbury Road Dimsdale Drive Dollis Hill Lane (between Edgware Road and Coles Green Road) Donaldson Road Doreen Avenue Dors Close</p>	<p>Douglas Avenue Douglas Road Doyle Gardens (between College Road and All Souls Avenue) Dunster Drive Durand Way Drayton Road Dudley Road Dundonald Road Dunmore Road Dunster Gardens Dyne Road</p>
E	
<p>Eagle Road Ealing Road (Cromwell Court) Eden Close Earlsmead Road Egerton Road Elgar Avenue Ellesmere Road (between Aberdeen Road and Hamilton Road) Elm Way</p>	<p>Elmwood Crescent Elton Avenue Eric Road Esmond Road Essex Road Evelyn Avenue Exton Crescent Eyhurst Close</p>
F	
<p>Fairfields Close Fairlight Avenue Fairview Avenue Felixstowe Road Fembank Avenue Fleetwood Road (between Lancaster Road and Hamilton Road)</p>	<p>Field Way Finch Close Forest Gate Fortune Gate Road Foxlees Furness Road (between Harrow Road and Holland Road)</p>
G	
<p>Gardenway Garnet Road Geary Road (between Lancaster Road and Hamilton Road) Georgian Court Girton Avenue (between Winchester Avenue and Wimborne Drive) Gladstone Park Gardens Glendale Gardens Glengall Road Glynfield Road Goldsmith Lane Gorefield Place</p>	<p>Gowan Road Grand Avenue East Greenhill Park Greenhill Road Gresham Road Greyhound Road Grittleton Avenue Grovelay Grove Road Guilsborough Close</p>
H	
<p>Halstow Road Harley Close Hamilton Road Hanover Road Hardinge Road Harlesden Gardens Harrowdene Close Hartland Road Harvist Road (between Milman Road and Chamberlayne Road) Harwood Close Hawthorn Road Haydon Close Hazeldean Road Hazelmere Road Hazel Road Heber Road Henley Road Herbert Gardens</p>	<p>Herne Close Highcroft Highfield Avenue, Wembley Highfield Avenue, NW9 Highfield Close Hiley Road Hillcroft Crescent Hillfield Avenue Holden Avenue Holland Road NW10 Holly Close Hollycroft Avenue Homefield Close Honeywood Road Honiton Road Hopefield Avenue Howard Road Huddleston Road</p>

3. Connecting Places

I	
Ilex Road Inman Road Ivy Road	
J	
Jackman Mews	
K	
Kathleen Avenue Kelceda Close Kempe Road Kenilworth Road Kenwyn Drive Keslake Road	Kilburn Park Road Kings Drive (between Greenhill Way and end) Kingsley Road Kingsmead Avenue Kingswood Avenue Kingthorpe Road
L	
Lancaster Road Lancelot Avenue Lane Close Langler Road Langdon Court Lansdowne Grove Larch Road Larkway Close Lechmere Road Leeland Way Leghorn Road Leigh Gardens Leighton Gardens	Leith Close Lennon Road Leopold Road Lewis Crescent Leybourne Road Liddell Gardens Linacre Road Linden Avenue NW10 Litchfield Gardens Lovat Close Lushington Road Lyon Park Avenue (between Hillfield Avenue and Mount Pleasant) Lyndhurst Close Lynton Road
M	
Magnolia Court Malvern Road Manor Close Mardale Drive Marloes Close Marian Way Marquis Close Maybank Avenue (between The Rise and Rosebank Avenue) Maybury Gardens Mead Plat Meadow Way, Wembley Meadow Way, NW9 Meadowbank Road	Melrose Avenue Meyrick Road Midstrath Road Minet Avenue (between Bramshil Road and Harley Road) Minet Gardens Mitchellbrook Way Monks Park Monks Park Gardens Monson Road Montrose Avenue Mora Road Mortimer Road Mount Road Mount View Road
N	
Napier Road NW10 Neasden Close Neville Close Newcombe Park Newton Road NW2	Nicoll Road Nightingale Road Normans Close Normanby Road Normansmead Northview Crescent
O	

3. Connecting Places

<p>Oakdale Avenue Oak Tree Dell Oakington Manor Drive (between Victoria Avenue and Chalfont Avenue) Oakleigh Court Oaklands Road</p>	<p>Odessa Road Okehampton Road Oldfield Road Olive Road Orchard Close, Wembley Osborne Road Oxgate Gardens</p>
P	
<p>Page Close Palermo Road Park Avenue NW2 (between St Pauls Avenue and High Road) Park Chase Park Close Park Road NW10 Park View Parkfield Road Peel Road Pember Road Perkin Close</p>	<p>Pine Road Plympton Avenue Plympton Road Poplar Grove Preston Gardens Princes Court Princess Road Priory Close Priory Park Road NW6 Prout Grove Purves Road</p>
Q	
<p>Queen Victoria Avenue Queensbury Road, NW9</p>	
R	
<p>Radcliffe Avenue Radnor Road Rainham Road Randall Avenue (between North Circular Road and Tanfield Avenue) Ranelagh Road NW10 Ravensworth Road Redfern Road Reeves Avenue Regent Street Ridge Close Ridley Road Riffel Road</p>	<p>Riverside Gardens Rockhall Road Roe End Rosebank Avenue Rosecroft Walk Roundwood Road Rowley Close Rucklidge Avenue Rudolph Road Rupert Road Russell Close Rustic Place</p>
S	
<p>Saint Julian's Road Sandringham Road Seaton Road Selbie Avenue Sellons Avenue Selwyn Road Severn Way Shorts Croft Sidmouth Road (between Willesden Lane and Brondesbury Park) Southview Avenue Spezia Road Springwell Avenue St. Alban's Road St. Andrew's Close, NW2 St Georges Close St. James' Gardens St Johns Avenue St. John's Close St Margarets Road St Marys Road St Paul's Avenue St Thomas's Road</p>	<p>Stancroft Stafford Road Stapleford Avenue Stanley Road Stanley Park Drive Station Approach Station Crescent Station Terrace Stoll Close Stonebridge Way Stonebridge Park Streatley Road Stracey Road Strode Road Sudbury Crescent Suffolk Road Summerfield Avenue Sunleigh Road Sunny View Sunnymead Road Swinton Close</p>
T	

3. Connecting Places

<p>Talisman Way Tanfield Avenue Tatam Road Temple Road Tennyson Road The Boltons The Chine The Circle The Close (Barnhill Road) The Dell The Glen The Grange The Grove</p>	<p>The Retreat The Rise The Ridgeway, NW9 Thurlby Road Tiverton Road, Wembley Torbay Road Tower Road Trevyan Gardens Tudor Court North (East) Tubbs Road Tunley Road Tylers Gate Twybridge Way</p>
U	
Uphill Drive	
V	
<p>Valley Gardens Vane Close Victoria Court Victoria Mews Victor Grove Victor Road</p>	<p>Victoria Road (between Salusbury Road and Honiton Road and Kilburn High Road and Donaldson Road) Village Way Villiers Road Vincent Road Vine Court</p>
W	
<p>Wakemans Hill Avenue (between Summit Close and Buck Lane) Wakeman Road Walm Lane (between Dartmouth Road and St. Gabriel's Road and between Keyes Road and Hoveden Road) Waylett Place Wells Drive Wembley Way Wendover Road Wellington Road Westbury Avenue West Ella Road Westbury Road Westview Close West Way Whitmore Gardens</p>	<p>Willesden Lane (between Kilburn High Road and Tennyson Road) Whitby Gardens Winchester Avenue Windermere Avenue NW6 Windermere Grove Windsor Crescent Windsor Road Winslow Close Woodheyes Road Woodside Avenue Woodside Close Woodside End Woodville Road Wotton Road Wrentham Avenue Wyld Way (between Vivian Avenue and Park View)</p>
Y	
Yewfield Road	

4. A Strong Local Economy



4. A Strong Local Economy

Business, Industry and Warehousing

4.1 This set of policies builds upon the strategic context set out within the Core Strategy chapter “Business, Industry and Warehousing”. That context includes a set of Core Policies that establish the hierarchy of industrial land; the principles of development of industrial operations and offices; and the conditions of redevelopment of industrial land and premises and offices.

4.2 The Core Strategy establishes the hierarchy of industrial employment land in Brent as Strategic Employment Areas and Borough Employment Areas, while recognising a portfolio of more local sites called Local Employment.

Regeneration of Local Employment Areas

4.3 Outside of the hierarchy of Strategic Employment Areas and Borough Employment Areas, a number of smaller sites that are often within residential areas or in proximity to town centres are recognised as being Local Employment Areas and these are not identified upon the proposals map.

4.4 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 experience for pedestrian users. However, economic activity in proximity to residential areas or town centres can provide local opportunities for employment while contributing to the vitality of neighbourhoods by generating movement and activity.

4.5 The Council accepts that enabling residential development may be required to lead to the overall commercial regeneration of industrial estates but insist that such areas are for primarily for generating economic activity and providing local employment and not for meeting housing targets.

DP BIW 1

Regeneration of Local Employment Areas

Local Employment Areas are protected for operations that fall within use class B1 and B2 or closely related Sui Generis uses except:

- Where mixed use development proposals include new workspace, including Managed Affordable Workspace.
- Where it can be demonstrated that there is no effective demand for the site, or that the location is not suitable for employment development to modern operational standards.
- Where an off site contribution is made that is commensurate with the loss of local employment workspace in order to facilitate Managed Affordable Workspace or meet the Council’s training objectives.

Understanding demand

4.6 As explained within the Core Strategy, the Council’s approach towards assessing demand is considers evidence and the cumulative impact of land release. A 2006 Employment Land Demand Study established that overall there is demand for industrial floorspace.

4.7 Prospective developers that identify opportunities of industrial employment land may argue that there is no effective demand for the floorspace and therefore should be considered as a suitable site for housing development. The cumulative impact of piece meal loss of industrial employment land may be the loss of land and premises for which there is evidence of demand (and that cannot be replaced) and the unplanned increase of demand on public and community services as a result of local population growth.

4. A Strong Local Economy

4.8 Brent Council generally encourages the regeneration of industrial land and premises to provide a supply of workspace that can operate to modern industrial standards, including Managed Affordable Workspace. However, there may be land parcels that physically do not support the provision of workspace alongside residential development (for example due to the size of overlooking of adjoining properties) but that nonetheless the Council may feel would benefit from regeneration.

4.9 If prospective developers wish to demonstrate that there is no effective demand for the premises in continued use, the Council will require demonstration that:

- The site or premises have been actively marketed for a period of 1 year; or
- The site or premises have been vacant for a period of 3 years.

4.10 If prospective developers cannot include new workspace as part of proposals, and cannot demonstrate a lack of demand as discussed above, they will be required to make contributions to off site development of workspace or to local training schemes.

Managed Affordable Workspace

4.11 The Council has developed partnerships with organisations that are able manage and occupy workspace for creative industries, artist studios and office space for charities and social enterprise. These organisations can play a significant role in maintaining or reintroducing a “working element” of part of a mix of uses within new developments upon previously industrial employment land or premises.

4.12 The concept of Managed Affordable Workspace seeks to subsidise such space from the development value created from residential development. Prospective developers will be expected to enter into discussions with providers in order to ascertain their needs and specification for any particular development opportunity.

Facilities for Employees

4.13 *Strategic and Borough Employment Areas* are generally located away from town centres or from shopping services and local facilities. In order to attract and retain business activity and employees, and to reduce the need to travel by car, some services and facilities need to be accessible to such locations. In addition, the rising female participation in employment and increased numbers of male lone parents require that child care facilities be located in proximity to places of work.

4.14 Therefore, the principle of a limited amount of non-industrial development within designated areas is acceptable in the interests of the sustained viability of the area and to not discriminate against certain sections of the population.

DP BIW 2

Facilities for Employees

Exceptions to Core Policies BIW1 and BIW2 (Strategic and Borough Employment Areas) will be considered for the development of small scale leisure, eating, shopping and child care facilities (of generally less than 200sqm gross), provided that:

- the proposed facility will primarily meet the needs of workers in the vicinity; and
- does not attract significant levels of visitor traffic and does not exacerbate exiting local traffic conditions.

The Council will use planning obligations to provide child care facilities for proposals of at least 5000sqm or employing more than 150 staff.

4. A Strong Local Economy

Work-live development

4.15 Work/live is the combination of living accommodation (Use class C3) with workspace (Use class B1, but not B2 or B8) within a single self contained unit. Work/live is a means of supporting new business start ups by reducing costs; supports the principal of a range of workspaces for which there is demand; and allows the mix of residential and industrial development by acting as a buffer zone between land uses. Conceptually therefore, work/live offers considerable gains in terms of sustainability.

4.16 The concept of work/live has proved problematic for the planning system however. After completion of work/live development, the work element may be dominated by the live element so that the unit resembles a dwelling house. In addition, because capitol returns on work/live development are generally less than would be secured through general residential development, the Council has generally accepted a lower provision of affordable housing. It is important therefore that work/live development is not proposed simply to provide a lower proportion of affordable accommodation.

4.17 Work/live should not be located in areas that would otherwise be suitable for mainstream residential development and should preferably be located in Local Employment Areas because:

- Work/live units tend not to be suitable for family residential accommodation;
- Work/live can help to manage the interface between exiting industrial buildings and new residential development; and
- There is no potential net loss of residential development.

DP BIW 3

Work-live Development

Subject to Core Policies, proposals for work-live development (composite B1 / C3 uses) will be permitted within Local Employment Areas. Work-live will not normally be permitted within areas where general residential development may otherwise be permitted, except if stipulated within the Site Specific Allocations Development Plan Document.

The work areas must be of a design and sufficient size, and have adequate floor loading to take the full range of B1 uses, including light industry, as well as having separate servicing. The residential element should be subsidiary to the work element - an indicative ratio of 70:30 in favour of the work element will be sought.

The units must be managed by an organisation committed to their long term management so as to maintain their use primarily for employment, supported by a management plan agreed by the Council.

Conditions will be applied that remove residential permitted development rights to ensure that work areas are maintained as such and to ensure that those living there also work there. Section 106 agreements may also be sought in this respect.

Home-working

4.18 Work patterns are changing and innovations in information technology mean that it increasingly possible and popular to work from home. In the interest of increasing the level of economic activity in the borough, home-working is encouraged and considered to be consistent with the Council's employment objectives. In addition, such working practice contributes to achieving the sustainability objective of reducing the need to travel.

4. A Strong Local Economy

4.19 Small and medium enterprises that constitute the majority of employment in the UK are often established at home, but where the employment use becomes intrusive or the dominant use, planning permission should be required and may be refused. This is in accordance with the Planning Policy Guidance Note 4: Industrial, commercial development and small firms.

4.20 Such practice will require planning permission depending on the nature and scale of activity, parking and vehicular movement to and from the premises and the hours of operation. These are the issues that may determine that the activity is inappropriate and conflicts with surrounding residential uses. The policy approach intends to support and facilitate small scale home-working but manage large scale activities or those that would cause environmental nuisance, detriment to residential amenity or take the dwelling out of residential use.

DP BIW 4

Home-working

Planning permission will be granted (normally for a temporary period) for a change of use from residential to mixed residential and employment use, if the residential character of the area is not harmed, including meeting all of the following criteria:

- The home-working is carried out by those who live in the same residential unit;
- Adequate sound proofing is provided where the proposal involves the operation of noisy equipment (only one such item of equipment per dwelling is allowed);
- The proposal does not fall within the B2 or B8 Use Class and can be carried out without detriment to the amenity of that area;
- The proposal does not lead to a significant increase in traffic generation, parking or servicing activity;
- There is no permanent loss of a residential unit;
- The use reverts to residential use once the home-working ceases; and
- The use can be properly serviced by utilities.

Park Royal

4.21 Park Royal is the largest Strategic Employment Area in Brent and the vast majority of the land is designated by the London Plan as being Strategic Employment Location/ Strategic Industrial Location. The London Plan also identifies Park Royal as being an 'opportunity area' referring to its capacity to support significant numbers of new jobs.

4.22 The Council has contributed to the preparation of the Park Royal Opportunity Area Planning Framework along with London Boroughs of Ealing and Hammersmith and Fulham, the GLA, the LDA, TFL under the umbrella of the Park Royal Partnership. The Council will endorse the framework as a material consideration for applications for development.

4.23 The Framework refers to Gateways and the Heart of Park Royal. The Northern and Western Gateways, and a small section of the Heart are within Brent. Development opportunities are identified within the Framework and reflected by the Site Specific Allocations preferred options document.

4. A Strong Local Economy

DP BIW 5

Park Royal

The Council endorses the Park Royal Opportunity Area Planning Framework as a material consideration for applications for development within Park Royal.

Alternative options not selected:

Regeneration of Local Employment Areas

The Council could allow the redevelopment of Local Employment Areas for residential development without asking for a demonstration of demand nor requiring the provision of new workspace that is fit for modern operational standards. The effect of this approach would be the widespread loss of opportunities to develop small workspaces for which the Council is satisfied there is demand. This would result in a loss of local employment opportunities and limit business development.

Facilities for Employees

An alternative approach would be to not permit such facilities within Strategic and Borough Employment Areas. The effect of this would be for users to travel into town centres from industrial estates to access these services. This would be less sustainable and may exacerbate road congestion within industrial estates and town centres. Facilities that are located within the estates can be accessed by foot.

Work-live Development

An alternative approach would be to allow permitted development rights for changing the work-live unit into a residential dwelling. This would result in the loss of the working element of the developments, defeating the object of work/live.

Home Working

An alternative approach would be to not manage home working. This could lead to dwelling house being used as business premises that may have a detrimental impact on surrounding residential properties by virtue of traffic impact and noise pollution.

Park Royal

An alternative approach would be to not recognise the Park Royal Opportunity Area Planning Framework. This would mean that policy direction would be given from the saved UDP policies, the Core Strategy and Site Specific Allocations document only. The Opportunity Area Planning Framework is a useful planning document that provides further detail and establishes cross borough working in the interests of maintaining the status of the estate.

Town Centres and Shopping

4.24 Shopping remains an activity integral to people's lives, fulfilling essential needs such as buying food and clothes as well as facilitating other social needs.

4. A Strong Local Economy

4.25 Town Centres thus serve as the community focus not only of most shopping facilities, but also of services, leisure and cultural venues – thereby also providing a range of retail, service and arts-based employment. As a result, town centre policies cover the full range of A class uses as well as B1a, C1, C3, D1 & D2 Use Classes⁽ⁱⁱ⁾. A proactive approach to the appropriate location of these should help ensure that Brent's town centres meet the objective of enhancing and regenerating their services and environment to meet the needs and aspirations of residents and local businesses.

Retail Need & Capacity

4.26 The Brent Retail Need & Capacity Study (Feb. 2006) revealed significant requirements for new floorspace, particularly for comparison goods (non-food), over the next ten years. As indicated in the Core Strategy, it has been recommended that these requirements (for approximately 34,000 sqm of Comparison floorspace and 11,000 sqm of Convenience floorspace) should be allocated according to:

- national guidance and London plan policies, including the sequential approach to site selection
- the town centre hierarchy;
- the results of the Brent health-check, household and shopper surveys included in the Retail Need & Capacity Study, 2006; and
- existing retail commitments, including proposals for Cricklewood/ Brent Cross.

4.27 Taking these factors into account it was recommended, and the Council has accepted, that new large scale retail development should be proportionally directed to the centres as indicated in DP TC1 below. To meet this need, an initial list of town centre opportunity sites has been identified (See Core Policy CP TC4) in the Site Specific Allocations DPD – and it is anticipated that further opportunities may come forward during the plan period.

4.28 It is also recognised that proposals may come forward on sites which overlap/ adjoin the Borough boundary –in centres shared with Barnet, Camden and Harrow –namely in Cricklewood, Colindale, Burnt Oak, Kilburn, Kingsbury and Kenton –such proposals may also contribute towards meeting the identified retail need.

4.29 Kilburn, for example, has recently experienced a significant increase in convenience goods provision in 2006, with its existing independents and two main supermarkets, being joined by three new outlets (two of which are on the Brent side –a 'Local' and two 'Express' formats) –though one of the existing supermarkets has subsequently closed. But, along with new independent stores, this still represents a near doubling of such floorspace, demonstrating the level of need and capacity in the town centres.

4.30 Although major leisure developments are directed towards Wembley town centre (See Core Policy CPTC1), other such proposals may locate in or adjoining Kilburn and the District Centres (in accordance with the sequential approach, and the scale/ nature of the centres).

ii Use Classes Order (UCO) 2005. Also see Glossary for a description of these use classes.

4. A Strong Local Economy

DP TC 1

Brent Retail Need Allocations

Hierarchy of Comparison Floorspace Allocations: (Subject to sequential approach in CP TC1 - 3)

- a. Up to 41-47% of the requirement should be met in Wembley (See CP TC1)
- b. Up to 26-32% of the requirement should be met in Kilburn
- c. Up to 23% should be divided up between each of the District Centres (See CP TC5)

Hierarchy of Convenience Floorspace Allocations:

- a. Wembley
- b. District Centres which currently lack a large food superstore, such as Cricklewood, Kingsbury and Harlesden
- c. Neasden – as a local centre in need of regeneration

Alternative options not selected:

DP TC1: Brent Retail Need Allocations

This policy is a quantification of the Retail Need and hierarchical allocation preference in policies CP TC1-2 in the Core Strategy (and will subsequently be moved into that document in the submission version). The rationale for not selecting alternative options have already been given in the Core Strategy.

Neighbourhood Centres

4.31 The function of neighbourhood centres (see Appendix TC2 Page 157) and parades is largely to meet the day-to-day needs of local residents. They are particularly valuable for disabled people and the less mobile. It is important, therefore, to ensure that local shopping facilities remain easily accessible to local residents, especially those who do not live close to town centres.

4.32 In view of the limited size of neighbourhood centres it is essential policy should seek to retain retail uses or services in these centre to meet local needs. However, it is equally important to ensure that service uses do not over-dominate and the proportion of these will be controlled. Consequently only appropriate Neighbourhood Centre uses will be allowed. The range of uses it is considered important to retain include general store, newsagents, post office, chemist/ doctor's surgery, greengrocer, baker, butcher, hairdresser, pub/ restaurant/ cafe, and bank. Proposals for changes of use to residential will be considered on the same terms as those in secondary shopping frontages.

DP TC 2

Neighbourhood Centres

Change of use from retail use to non- retail use will be permitted where it provides an essential local service or the use is considered appropriate , as identified in DP TC 5 'Non - Retail Uses' or and will result in no more than 35% of the centre being in non-retail use.

Exceptions may be allowed for extensions to existing business, or a proposal extending the range of local services.

4. A Strong Local Economy

Other Shopping Parades & Units

4.33 Outside the town centres and local shopping parades, there are a number of isolated shop units, mainly in residential areas, which provide a useful service to the locality. These shops should remain in retail use if possible, particularly where there are no protected frontages (i.e. frontages designated as 'Primary' or as part of a Neighbourhood Centre within 400 metres).

DP TC 3

Other Shopping Parades & Unites

Other Shopping Parades

In shopping parades outside the primary and secondary areas and protected Neighbourhood Centres identified in the shopping frontage schedule, change of use to appropriate alternative use will be permitted. The priorities for alternative uses are residential, community or B1, and subject to maintenance of a quality residential environment – a more flexible approach to development standards will be applied.

Isolated Shop Units

Proposals for new isolated shop units in areas more than 400m away from protected frontages, should comprise a maximum of 100 sqm gross floorspace. Change of use of isolated shop units to non-retail use will not be permitted if there are no other protected retail frontages within 400 metres. Where an isolated shop has been vacant for over a year appropriate alternative uses will be permitted. In considering applications for such uses, particular regard will be paid to the possible effect on the amenity of adjoining residential properties.

Car - boot/ Other Recycling Sales

4.34 Car-boot sales can often be a popular means for the local community to recycle unwanted articles, socialise informally, and for those on low-incomes to purchase second hand goods at well below shop prices. They tend to be held in school car parks and playground areas, often in closer proximity to residential areas, being located outside existing centres. Thus, problems associated with car boot sales relate to these activities in predominantly residential areas which may cause disturbance to local residents, particularly when there is excessive noise at unsociable hours as well as unsightly (permanent) advertisements, litter and significant traffic and parking stress.

4.35 Management plans for the operation of such sales (on a regular basis) should satisfactorily address the following considerations:

- 4.36** (a) The scale of activity, in terms of the number of pitches, is not excessive;
 (b) Any additional traffic generated by the sales would not cause unacceptable impact on residential amenity on the existing road network nor constitute a safety hazard;
 (c) Provision for the parking of all trading vehicles is made on-site with 20% of the site area reserved for customer parking and facilities for additional parking in close proximity;
 (d) The proposal should include adequate arrangements for the control of noise, the storage and/or collection of litter during the sales, as well as the disposal of rubbish afterwards; and
 (e) The access and parking arrangements for both trading and customer vehicles would not cause noise disturbance to nearby residents at unsociable hours.

4.37 An acceptable management plan should include: i) a site layout plan showing vehicle trading areas, maximum number of vehicles, spacing and aisle widths (a minimum of about 20% of the total site area for circulation and an area of not less than 45sqm per car will be assumed, in addition to any spatial constraints imposed by other criteria) ii) Commencement time and duration of the sale, iii) arrangements for marshalling access into the site and safety measures that will be put in place to prevent or deal with accidents, iv) for large sales, a pre-booking system for not less than 50% of pitches, and v) signage, with arrangements for the display and/or collection of sellers' details as a best practice measure.

4. A Strong Local Economy

DP TC 4

Car- boot / Other Recycling Sales

Proposals for regular Car-boot / other recycling sales will be assessed with regard to their overall impact, and will not be permitted unless a Management Plan is produced and agreed, securing the delivery of arrangements including hours of operation, maximum trading area, noise, parking, servicing, and refuse storage/ disposal – as part of the application. Where acceptable, these will be secured by Condition.

Any permission granted would be for a limited period only (normally 18 months). Permission will also be subject to a Planning Obligation waiving an appropriate proportion of permitted development rights, on the cessation of the planning permission, equivalent to the period of the calendar year for which the sale has been operational.

In all cases, permission will be made personal to a named person or persons, to ensure the responsibility and arrangements for the operation of the sale do not change without the knowledge and express consent of the Planning Authority.

Alternative options not selected:

DP TC2: Neighbourhood Centres

This policy safeguards the local access to essential retail uses and services for local residents to meet their daily needs. An alternative approach allowing unrestricted changes to non-retail could quickly lead to neighbourhood centres with little or no retail provision or to the more rapid loss of essential services.

DP TC3-4: Other Parades / Units & Car boot / Recycling Sales

An alternative approach would be to have no protection for these retail uses and essential services outside town centre boundaries. This could lead to a loss in these uses as a result of high level in change of use to residential developments. Such loss would subsequently increase the need to travel for local residents to go to the next nearest local shops to meet their daily needs. This is considered an unsustainable option.

DIVERSITY OF TOWN CENTRE USES

Town Centre Frontages and Uses

4.38 The Council has designated boundaries to protect and promote town centre vitality and viability. Changes within these areas will be managed to achieve a healthier centre with a range of uses. The designated town centres include Primary, Secondary and other town centre frontages which are defined on the proposal map and listed in the Appendix TC1 Primary & Secondary Shopping Frontage Schedule Page 151. Policy aims to protect the Primary frontage as the core shopping areas with a high proportion of retail uses and generally allow a more flexible and diverse range of town centre related uses in the Secondary and other town centre frontages.

4.39 Policies DP TC5, TC6 and TC7 apply to proposals for additional non-retail uses and change of use from retail to non-retail uses that are confined to A2, A3, A4 and A5 use classes under the 2005 Use Classes Order (UCO). Certain uses falling outside the 'A' Use Class, including D1 and D2 (Arts, Culture, Entertainment (ACE)), and other night time uses are recognised as main town centre uses ⁽ⁱⁱⁱ⁾. The Council also considers 'Police Shops' to be

iii Planning Policy Statement 6 (PPS 6)

4. A Strong Local Economy

appropriately located in town centres. Such uses are considered suitable for the periphery of town centres and are complementary to the retail function at the core of a centre. Guidance for these uses is also included in the Culture Leisure and Tourism section.

Preferred Location for Non- Retail Uses

4.40 It is crucial to maintain a healthy diversity of retail and non- retail uses within centres to protect the function and characteristics of a centre. However, whilst the Council appreciates that non-retail uses are complementary to the function of town centres, excessive levels of non-retail use is often a sign of a declining centre where shops close down, and/or extensive lengths of 'dead frontage' result, thus minimising the retail choice available for shoppers. To prevent potential development being diverted elsewhere, and to help retain retail uses, non-retail use proposals will initially be expected, to seek to occupy appropriate sites within the designated town centre.

4.41 In order to attract quality multiples through floorspace expansion within the Major and District centres, the subdivision of larger units within their Primary Frontages will be prevented, while their amalgamation/ redevelopment into larger footprints will be encouraged.

DP TC 5

Non - Retail Uses

In order that non- retail uses remain complementary to the core retail function, they will be acceptable within town centres provided the following criteria are met:

- a. Where available, use is made of existing vacant units
- b. As a result of the proposal, no more than 30% of the Primary Shopping Frontage length of Major Centres would be in non- retail use and no more than 35% of non- retail use in District and Local Centres
- c. In District and Local Centres where vacancy levels are greater than 10%, up to 50% would be acceptable in non-retail uses
- c. Large units are not subdivided and are retained in retail use for large retail outlets
- d. The proposal would not result in an extended break in the Primary Shopping Frontage
- e. The proposal provides, or maintains, any active daytime frontage and complies with DP TC 11 'Design and Infrastructure'

Non - Retail Use Management

A3, A4 and A5 Uses

4.42 The growth trend in arts culture and entertainment facilities, is one that seems set to continue for the foreseeable future. As contributors towards expectations of a better quality of life, through their social and cultural effects, they help generate a diversified range of local activity and economic opportunities for the local community.

4.43 They can be significant generators of trips, enhancing the vitality and viability of town centres, through increased pedestrian presence and extended opening hours, beyond the standard 'office day'. However, with a poor quality/ managed public realm, these may be adversely affected by perceptions or problems of safety and crime. A thriving and diverse, evening and night-time economy can, by providing alternative attractions to the traditional pub & club based culture, encourage people who currently do not use the centres in the evenings because of fear of crime – the increased levels of activity contributing towards safety and social inclusion. They are important 'town centre uses' which require careful integration into centres to benefit the local economy whilst safeguarding the amenity of neighbouring residents.

4. A Strong Local Economy

4.44 The Council aims to deliver an active, inclusive and safe town centre that provides quality services to pursue the vitality and viability of town centres both day and night. Food and drink services can make a major contribution to the viability and of a town centre. Where this type of services is under provision, visitors would be forced to shop and use services at other centres, vice versa, over provision of such services could cause severe environmental problems due to the function of the businesses. Managing A3, A4 and A5 uses proposal should refer to DP TC 6 'Managing A3, A4 and A5 Uses' as well as making reference to DP TC 5 'Non - Retail Uses'.

DP TC 6

Managing A3, A4 and A5 Uses

Proposals for A3, A4 and A5 uses in town centres will be determined taking account of the following considerations relating to their impact on local amenity:

- a. the level of parking and traffic likely to be generated;
- b. the effect on air quality and noise levels; and
- c. the likelihood of nuisance and anti- social behaviour resulting from the proposed use including any cumulative impacts.

Where appropriate, conditions will be applied to permissions to minimise the negative impacts of the proposed use. Such conditions could be related to the opening hours, use of forecourts, the disposal of refuse, orientation of extract ducting, ventilation and noise insulation.

Food & Drink (Cafe) Quarters

4.45 The Council has designated areas within certain town centre boundaries on the proposal map, where development giving higher proportion and concentration of A3 and A4 uses will be sought. The need to encourage these uses at the particular locations is informed by Brent Retail Need & Capacity Study 2006 findings that in these locations there are greater needs for such services or they have potential for further growth in such uses to increase the vitality and viability of the centre.

DP TC 7

Food & Drink (Cafe) Quarters

Proposals for A3 and A4 uses in the designated cafe quarters in Wembley and Queen's Park (as identified on the Proposals Map) will be supported providing that they are of an appropriate scale and design, and in conformity with DP TC 11 'Design and Infrastructure'.

Proposals for A3 uses are supported within the Neasden Cafe Quarter.

Pavement cafe activity, including use of forecourts in accordance with policy DP TC 11 'Design and Infrastructure', will be encouraged.

Amusement Centres and Mini- cab Offices

4.46 Certain town centre uses such as amusement centres, mini- cab offices and similar operations, are considered to be acceptable only if located in secondary frontages. This is mainly because of the potential adverse impacts these uses may have on neighbouring uses.

4. A Strong Local Economy

DP TC 8

Amusement Centres and Mini-Cab Offices

Amusement centres will be acceptable only in Secondary Shopping Frontages, subject to amenity considerations. They should be located away from sensitive uses such as schools and religious buildings.

Mini-cab offices and similar operations will only be permitted if they would not cause traffic safety problems, and sufficient off-street parking can be provided, otherwise, consent may be for radio-controlled operation only, on a temporary basis to enable monitoring.

Town Centre Living & Working –Commercial and Residential Development

4.47 Commercial and Residential accommodation are also recognised as significant components of the diversity of uses within centres – as well as being important contributors to regenerative efforts, in Wembley, for instance –for improving their vitality and viability.

4.48 There is a demand for accommodation above shops from commercial uses such as shops themselves, restaurants or small office occupiers such as solicitors or accountants, all of which require a Town Centre location. Therefore, an exception (to the general presumption against loss of residential accommodation) is made for vacant residential units above the ground floor of the Primary and Secondary Shopping frontage of the Borough's major town centres, i.e. Wembley and Kilburn.

4.49 In Secondary frontages, in these centres, change of use from residential above shops, will be allowed only if the proposed use is ancillary to the use below. In this way, existing shops and other businesses will be allowed to expand to upper floors, thus encouraging their retention in a centre. This will also encourage new businesses, which require more accommodation than the ground floor can provide, such as for staff facilities, to locate in these centres.

DP TC 9

Offices & Residential Above Shops

1. Retail and/or leisure developments in town centres will be expected, where feasible, to be mixed-use, by including new residential and/or commercial accommodation on upper floors.
2. In Wembley and Kilburn town centres, the loss of long-term vacant residential accommodation above the ground floor in designated shopping frontages, will be permitted (subject to the amenity of neighbouring residential occupiers) where:
 - a. The proposed alternative use is a commercial or community use which will help to sustain or enhance the vitality and viability of the town centre;
 - b. Independent direct access is provided enabling the proposed non-residential upper floor use to operate separately from that on the ground floor;
 - c. For secondary shopping frontages, only if the proposed alternative use is ancillary to the ground floor use;
 - d. There is no loss of a modern, purpose-built flat, or of a flat that has a separate balcony access;

4. A Strong Local Economy

Retail, Specialist and Farmer's Markets

4.50 Retail markets add vitality and character to existing shopping centres, and help to attract more shoppers. The existence of stall holders in retail markets and non-licensed traders such as news-vendors and flower-sellers, complements the range and variety of retail provision in the Borough. These can make a positive contribution to the vitality of shopping centres and provide interest and colour to the street scene, adding to the identity and character of the shopping areas where they are situated.

4.51 They can provide a retail presence in areas deficient in local shops and catering units, and variety where trading from conventional shop premises would not normally be viable or suitable. Such trading is either 'on-street' (requiring a license to trade on the public highway), or 'off-street' (by agreement between landowner and trader). They are also important starting points for the establishment of new businesses by local residents, particularly by ethnic minority groups.

4.52 The market in Kilburn Square is the only one with permanent stalls in the east of the Borough. It is an integral part of Kilburn town centre, adding to its character and vitality. The Sunday Market held in Wembley Stadium's car park is the biggest in north London after Camden Market. Although well served by buses and Wembley Park underground station, it also generates a significant amount of vehicular traffic within the area.

4.53 Further proposals for markets should be in line with the Mayor of London's Food Strategy and the Council's shopping strategy, which is primarily designed to improve the shopping services within the Borough by directing new investment to existing town centres. However, the scale of such development should be in keeping with the size of the centre and should have regard to the impact on the surrounding area and on other centres. In addition, any sites chosen should be physically suitable: they should be hard surfaced with adequate servicing and parking arrangements for stall holders and not subject to any highway limitations.

4. A Strong Local Economy

DP TC 10

Existing and New Markets

Existing Markets

The retention of existing retail markets will be sought and, where affected by development proposals, their replacement in town centre locations will be required.

The improvement of environmental conditions associated with existing retail markets will also be sought, including storage and preparation space for traders to meet public health requirements

New Markets

Favourable consideration will be given to proposals for new specialist, crafts and farmer's markets, which help diversify the scales and types of provision, as well as extend the range of goods, particularly in Wembley, Harlesden and Neasden.

New off-street, covered, or street markets (including farmer's markets) or individual market stalls will be encouraged on sites in or adjacent to the Major & District Centres, subject to:

- a. the scale and operation of the market does not have an adverse effect on the vitality and viability of a town centre as a whole, nor on local residential amenities;
- b. access to the market does not result in a loss of shoppers' car parking; and
- c. highway safety, as well as recycling and refuse considerations are properly addressed.

Alternative options not selected:

The designation of Primary and Secondary shopping frontage is to ensure appropriate town centre uses are located at the most desirable location within town centre to enhance the vitality and viability of a centre.

DP TC5-8: Diversity of Uses -Non-Retail Uses

The alternative option was to allow non- retail uses to occur in town centre locations regardless the frontage designations. This option was not chosen because of its likely adverse impact on the vitality of centre and it also departed from PPS 6 requirements (see paragraphs 2.16 and 2.17) and the London Plan Policy 3D.1.

DP TC9: Commercial / Residential above Shops & Markets

Alternative policy to TC9 was to protect residential above ground floor against commercial uses in Major town centres. This means a consistent approach would apply to every town centre that only residential uses above shop would be acceptable. However, this approach would offer no flexibility and would not be beneficial to the vitality of the borough Major centres, thus option was not selected.

The Shopping Environment

Design and Infrastructure

4.54 If the Council's objective of maintaining and enhancing the vitality and viability of established town centres is to be achieved, then, as well as regenerating them by securing major development, there is also a need for other measures which will make the centres more attractive to shoppers and businesses. These include measures to alleviate traffic congestion, to reduce vehicle/ pedestrian conflict and to improve rear servicing and car parking facilities and public transport accessibility.

4. A Strong Local Economy

4.55 Such measures are made more effective through town centre management, which can bring together public agencies, residents, businesses and investors and ensure the proper co-ordination and development of services to the town centre. General environmental improvements, such as upgrading shop fronts, tree and shrub planting and the provision of seating and amenity areas are also required.

DP TC 11

Design and Infrastructure

1. Site Layout

In or adjoining town centres, development should be orientated towards the street. Where a deviation from the established frontage line is accepted, this should not be used for parking.

2. Shopfront Design

New shopfronts should respect the shopfront designs of adjoining properties and:

- a. avoid excessive advertising and encroaching on upper stories;
- b. have appropriate materials and proportions; and
- c. should allow a view of the shop during closed hours (except in the case of open-fronted shops).

3. Front Extension, Private forecourts and Rear Servicing

The council will use its powers to provide, retain and, where necessary, improve facilities for rear servicing by vehicles of retail and service outlets.

Shop extensions should:

- d. retain adequate space for rear servicing and secure storage for waste materials; and
- e. not breach the established building line within existing shopping parades, including that on upper storeys.

Planning permission for forecourt trading will be granted only where such development (including any means of enclosure that may be required by the relevant licensing authority) will not cause obstruction to pedestrians, prams and wheelchairs nor result in an adverse effect upon the character and appearance of the area in which it is to be located. The council will consider taking private forecourts into the public highway where this would improve the shopping environment and pedestrian safety

4. Public Realm

Regard will be had to urban design DP UD 1 'Urban Design Appraisals' and Supplementary Planning Guidance/ Documents to ensure proposals maintain a coordinated approach in design, in the choice of materials and street furniture –and/or to include the nature and level of contributions to infrastructural improvements, commensurate with the scale of the development, where regenerative initiatives have been identified.

Alternative options not selected:

DP TC11: Design and Infrastructure

This policy is a rationalised composite of 6 existing UDP policies. An alternative is to rely upon policies within the Urban Design Chapter. However, the design-related issues here are specific to town centres, and would not be easily addressed using generic design policies.

Another alternative is to move it into that chapter -but its more easily picked up by both applicants & officers (thus likely to be more effective here), and would, in any case, not fit well into the design themes by which the Urban design Chapter is organised.

4. A Strong Local Economy

Town Centre Management and Specific Centres

Town Centre Initiatives

4.56 The dependence of most people on town centres for access to shopping, entertainment, leisure, culture, public services and transportation, highlights their importance as focal points for local governance and public administration, as hubs of local infrastructure and natural locations for trade and commerce.

4.57 Town Centre Management is a pro-active and locally developed and coordinated initiative aimed at making town centres prosperous, attractive and safe places. The initiative is a public and private partnership bringing together a wide-range of key stakeholders and agencies.

Currently Brent has 3 town centres (Wembley, Harlesden and Willesden) with dedicated Town Centre Managers, and some coverage on certain of its other centres (Kilburn). As initiatives working on centres of different scale, they are naturally varied in terms of their remit and activities. What they have in common is their increasing effectiveness in promoting the vitality and viability of centres and helping maintain their key role as the heart of its community.

DP TC 12

Town Centre Initiatives

The Council promotes and supports Town Centre Management (TCM) to help enhance the shopping environment and business opportunities within the Borough. The TCM programme will co-ordinate activities geared towards the town centres in all aspects of service delivery to centres.

Four programmes are currently being progressed primarily in Wembley, Kilburn, Willesden Green & Harlesden. These include:

- a. Business advice & support;
- b. Shopfront improvements; and
- c. Business Improvement District (BID) in Wembley; and
- d. Area Based Schemes (ABSs) such as the pilot in Harlesden to address the street environment.

In considering development schemes within these centres, contributions, including from S106 agreements, may be sought where feasible, to implement key elements of Brent's Town Centre Strategy (particularly for centres in DP TC13-15).

Specific Centre Strategies

4.58 Centres in Brent reflect the diversity of the Borough as a whole. Certain medium sized or smaller centres are relatively prosperous and, despite traffic congestion problems and poor pedestrian environment for shoppers, are generally bustling and full of vitality. Others have not fared so well and require support and pro-active intervention to arrest decline and find/enhance niche roles within Brent to enable them better serve their local community.

4.59 Neasden as one of the larger district centres, has suffered from community severance due to the North Circular, and has been declining in terms of comparison and convenience retail provision due to the proximity of Brent Cross (1970s), of Tesco at Brent Park (1980s) and Asda at Wembley Park (1990s).

4.60 Ealing Road town centre especially, has grown in status and evolved as a specialist centre for the large Asian community, serving not only the local area but also the wider area of North-West London.

4. A Strong Local Economy

4.61 On the other hand, apart from the major centres of Wembley and Kilburn, certain of the district centres in the Borough, such as Harlesden and Willesden Green are less prosperous. Although continuing to provide a valuable service for the local community, they are in need of an injection of new investment, especially the provision of new shopping or leisure facilities and environmental, parking and traffic improvements, if they are to continue to fulfil their role.

4.62 Although Harlesden benefited from the City Challenge initiative, a programme of ongoing management and improvements are needed to prevent a deterioration of gains and attract much needed further investment into the centre.

4.63 Consultants were commissioned in 2005 to conduct shopper's surveys in Wembley, Harlesden and Willesden, as well as to advise on improvements. They recommended that to make progress in marketing these centres, strategies should exploit their individual multicultural characters and their environment enhanced to emphasise this distinctiveness to attract visitors.

4.64 In order to recognise existing niche roles and promote other locally-relevant, specialist uses, the Council is therefore identifying appropriate areas within specific town centres in need of targeted assistance, for encouraging the diversity and quality of offer to residents, visitors and workers. In subsequent policy reviews, the Council will work with those in the business community to identify further potential niche markets or preferential uses within Brent centres (or specific areas within them).

Neasden Town Centre

4.65 The Council commissioned consultants in 2002 to assess the problems of the centre and devise a strategy for its improvement. The Neasden Retail Study, 2003 proposed a range of public realm improvements and development opportunities to reverse the centre's decline. These findings were reinforced by consultants advising on the Boroughwide retail Needs Study in 2006.

4.66 The Council has since carried out the recommended environmental improvements, providing a quality public realm for Neasden centre. What is now needed is comparable private investment to introduce new uses and develop available sites to ensure its economic regeneration. In particular, a modest foodstore is sought on a site allocated within the Site Specific Allocations.

DP TC 13

Neasden: Regeneration Opportunities

To facilitate the vitality and viability of Neasden, the following uses are promoted on further sites below:

1. Western End of Neasden Lane / North Circular Road – for Community Use;
2. Neasden Parade –for 'Café quarter' uses (See DP TC 7 'Food & Drink (Cafe) Quarters')

A new weekly market (specialist, farmer's, etc.) would also be encouraged (See DP TC 10 'Existing and New Markets') within the centre.

Distinctive Multi-Cultural Centres - Enhancing & Celebrating Attractions of Brent's Diversity

Ealing Road Town Centre

4.67 Benefiting from a successfully developed Asian-led shopping and leisure offer, Ealing Road is a healthy and thriving district centre. Its jewellery quarter for instance, (part of which is also located at the western end of Wembley town centre) is a significant draw. However, it also suffers from growth associated problems i.e. illegal parking, heavy congestion and air pollution, mainly due to the lack of rear service facilities.

4. A Strong Local Economy

4.68 The Council thus, considers it necessary to continue the enforcement of a restrictive policy to prevent town centre expansion in Ealing Road but at the same time to encourage regeneration and improvement to promote Ealing Road town centre to be a key attraction not only to the Asian population in north west London, but as a visitor destination in Wembley.

Harlesden Town Centre

4.69 Harlesden continues to require support from the planning system to maintain its role as a district centre. In the 1990s Harlesden benefited from the City Challenge scheme. However, those improvements have not been adequately maintained and Harlesden now requires renewed attention to the public realm. In addition, the centre suffers from traffic congestion and relatively poor links to the main station, Willesden Junction, 500 metres away and similarly to Harlesden underground station.

4.70 The Council will encourage and promote appropriate town centre development to help improve the diversity and quality of the town centre's offer. Both shops and leisure uses on sites within or adjacent to the centre in accordance with the sequential approach to development will be encouraged.

4.71 Harlesden has a strong African-Caribbean population and culture, reflected in the multicultural offer in shops (e.g. fashion / clothes) and services (e.g. beauty) which the Consultant's survey showed are a magnet for African-Caribbean visitors. The designated town centre is now extended to include further existing shopping frontages southwards (See proposals Map). These frontages towards Willesden junction have also developed a range of Mediterranean (Portuguese) uses, the distinctiveness of which could be further enhanced to contribute towards the visitor appeal of the centre.

4.72 Harlesden Plaza is identified in the Site Specific Allocations as an opportunity for a mixed retail (A1) & leisure (D2) re-development, which should also incorporate open space / greenery, both of which are lacking in the centre.

The Council will produce Integrated strategies for the co-ordination of shopfront and public realm enhancements within these centres, in subsequent Local Development Documents (LDDs).

4. A Strong Local Economy

DP TC 14

Brent's Distinctive Multi-Cultural Centres

Brent's two most distinctive multi-cultural centres are being promoted to maintain their vitality, enhance their special local roles, and support their regeneration. Regard will be had to the strategies for these centres, and development proposals should contribute in frontage and public realm design, towards these objectives:

Ealing Road

- The Council will seek to strengthen the distinctive role of the specialist Asian-led centre in Ealing Road through partnership with local stakeholders to promote the centre as a key visitor attraction in Wembley.

Development and public realm proposals that contribute to the enhancement of the character of Ealing Road will be encouraged by the Council, providing that it will not result in any further expansion beyond the existing town centre boundary.

Harlesden

- The Council will also seek proposals that enhance the distinctive character within the central area (north of the clock), and near Willesden Junction (southern end of town centre) to regenerate their Caribbean-led & Mediterranean-led offer respectively –seeking where feasible, the inclusion of community uses that contribute towards its multicultural vibrancy.

A new weekly market (multi-cultural crafts, etc.) would be encouraged (See DP TC 10 'Existing and New Markets') within the central area of Harlesden, to help enhance its role and provide local creative, start-up opportunities.

Willesden Town Centre

4.73 Willesden town centre is one of three managed towns in the London Borough of Brent. The area is known for its historically Irish population; however, Willesden is now very multi-cultural in character. Willesden suffered bomb damage during World War II and went into decline in the decades following the war due to lack of investment and development.

4.74 Willesden Green is perceived as one of the Council's healthier town centres, especially in terms of its food and drink offer. However, Willesden's public realm requires attention and the town centre is lacking quality non-food retailers. The perception of crime is also a growing concern in Willesden, especially amongst shop keepers.

4.75 The town centre has a number of strengths, including strong public transport connections, a major food store, and a good range of restaurants and bars. It is also the home of Brent's largest library, the Willesden Green Library Centre, which was built in 1989 and refurbished in 2005. The library centre, which also houses a small cinema, art gallery, bookshop, café, and meeting rooms, created a much needed space for the community and helped to arrest some aspects of Willesden's decline. It has recently also become the location of Brent's Grange Museum.

4.76 Willesden will benefit from a three year funding stream, '*Enhance Willesden*', to improve shopfronts in the town centre. In order to maximise the positive impact of the improvements, the Council will encourage quality shopfront designs for premises throughout the town centre. As part of the town centre is a conservation area, it is expected that shopfront designs in that area will be in keeping with its established character. A comprehensive design for street furniture improvements would also bolster Willesden's image and sense of place.

4.77 To build on the strength of Willesden's food and drink establishments, new development incorporating quality restaurants, cafes and public houses will be promoted if the site is appropriate to these uses. The development of a vibrant evening economy in Willesden, balanced by adequate late night transportation and facilities, would be welcomed.

4. A Strong Local Economy

4.78 Further regeneration aspirations for Willesden Green should focus on the library and the open space surrounding it, which are currently in poor condition. The courtyard in front of the library could, with some refurbishment, host a range of outdoor activities and markets. Drawing on the focus on art already established by The Gallery in the library, this area could support an arts and crafts market, murals, and interactive landscape features.

4.79 The Willesden Lane/ Walm Lane triangle site is identified within the Site Specific Allocations as an opportunity for new retail development.

DP TC 15

Willesden Arts Quarter

Willesden is promoted as a key arts destination in Brent. Development Proposals which contribute to enhancing the streetscape to reflect the creative arts associated with its diverse population will be encouraged.

The Council will actively support schemes that would have a positive impact on the usability and attractiveness of the Library Centre and its forecourt as a community arts space for the town centre, and will seek S106 contribution towards these.

Schemes should take into account traffic management around the High Road, contributing towards a safer, less congested, and more pleasant environment.

Alternative options not selected:

DP TC12 -15: Town Centre Initiatives; and Centre-Specific Policies

An alternative option was to have no specific town centre policies. This approach was not selected because it unconfirmed the London Plan Policies 3D.1 and 3D.4 which require development plan documents to include policies to support town centre management, promote and enhance culture through designating cultural quarters in centres.

Culture, Leisure and Tourism

Introduction

4.80 Culture, leisure and tourism activities make Brent a unique and exciting place to live, work and visit. They contribute to the vitality and diversity of Town Centres- during the day, in the evening and at night, and are important to the local economy. They also help bring Brent communities together and can improve one's physical and mental well being by providing relaxation and pleasure time away from the working environment.

4.81 As a host borough for the 2012 Olympic and Paralympic Games, opportunities for culture, leisure and tourism activities will become increasingly important, in both provision and impact. Wembley National Stadium, and Brent as a whole will be on display around the world, encouraging tourism and investment opportunities to a wide international audience. It is therefore key, that there is sufficient provision and facilities for culture, leisure and tourism activities, which maintains a good well-balanced environment for both visitors and locals in the short and longer term future.

4.82 Culture, leisure and tourism uses are wide ranging and link with many other sections of the plan. While encompassing historic, archeological, cultural and ethnic minority values, this chapter oversees uses associated with the arts, culture, leisure and tourism, such as indoor sports and recreation facilities, cinemas, concert venues, bingo halls, nightclubs, snooker halls, hotels, museums, art galleries, meeting and event venues, theatres, and public toilet

4. A Strong Local Economy

provision. These generally include D2 and C1 uses and some D1 and Sui Generis uses. Shopping, eating and drinking establishments (cafes, restaurants and bars) are also considered leisure pastimes but are dealt within the Town Centres and Shopping Chapter, while policies relating to open space and outdoor passive recreation can be found in the Enhancing Open Space chapter. A number of facilities may also be considered as community facilities, which are covered in the Enabling Community Facilities chapter, and buildings of historic or conservation importance are also covered within A Better Townscape - By Design chapter.

Culture, Leisure and Tourism Uses

4.83 As a destination, Wembley has been identified as a Strategic Cultural Area by the Mayor, with its major attraction being the new National Stadium. This has been a catalyst for regeneration in Brent, and is estimated to generate £229 million of annual visitor spend [Visit London 2006]. With its close proximity to Heathrow Airport, excellent transportation links to Central London, and enormous potential for other culture, leisure and tourism activities to develop, Wembley is set to be an international tourist destination in its own right. In assessing a proposal within the Wembley Opportunity Area, Wembley Regeneration Area policies of the Adopted Brent UDP 2004 and supplementary planning guidance should also be taken into account.

4.84 Outside of Wembley, culture, leisure and tourism uses are best located within town centres where they can be supported by other complementary uses and good public transportation links. They are also recognised for the dynamism and liveliness they can bring to the Town Centre, as well as stimulating a range of employment opportunities. If the development cannot be accommodated within the town centre, edge of centre locations should be considered, with preference given to sites well connected to the centre, followed only then by out of centre sites, with preference given to sites well served by a choice of means of transport which are close to the centre and with a high likelihood of forming links with the Centre (sequential test in accordance with CP CLT1 and CP TC2).

4.85 Hotels and other visitor accommodation such as aparthotels, guesthouses, bed and breakfast accommodation, self-catering facilities and youth hostels will be supported in Town Centres and in areas with good public transport access to central London. Part M, 2004 of the Building Regulations requires 1 in 20 bedrooms to be wheelchair accessible, and the Council supports this approach for all new, changes of use, or extensions to existing accommodation, due to the lack of supply for those disabled or mobility impaired.

4.86 Sports facilities (often built next to open spaces) and uses which serve more of a community function (which serve a local need), will be also be encouraged in areas easily accessible by walking, cycling and public transport. Brent's sports provision is one of the worst in London, and not surprisingly Brent also has one of the lowest participation rates. The significant benefits of sport for health, physical and mental well being, can improve people's quality of life and the Council will seek to promote new and retain existing sports facilities in the borough. These should also be encouraged in areas where there is no existing sport provision or public park within reasonable walking distance.

4.87 Some culture, leisure and tourism uses can also serve a community function, by bringing communities together and developing a sense of place, pride and well being. Often with large scale developments, local distinctiveness is overlooked, and the importance of community is not recognised. Therefore facilities, which build in a community element will be encouraged and supported. In addition multiple use should be made of facilities where it could benefit schools or commercial organisations. Dual use of facilities for education also corresponds to policy DC CF1.

4.88 Some of Brent's Town Centres have developed distinct local characteristics, which are a part of Brent's identity and culture. As such, Willesden, Ealing Road and Harlesden Town Centres have been identified as cultural quarters in Brent. Willesden Cultural Quarter has developed an arts focus, with the Grange Museum, library, cinema, art gallery and cafe, while Harlesden and Ealing Road Cultural Quarters are recognised for their distinctive African-Caribbean, Mediterranean, and Asian population and character. Oriental City on Edgware Road was recognised for its unique Far East Asian character and it is anticipated through its redevelopment this will again become a thriving cultural quarter. Further reference should also be made to the Town Centres and Shopping chapter.

4. A Strong Local Economy

4.89 Other considerations for the development of culture, leisure and tourism facilities include their size and scale relative to their surroundings, provision for disabled persons and other target equality groups, traffic generation and safety including provision for taxi and coach parking for large scale schemes, impacts on residential amenity and whether the proposal promotes a quality environment. Late night uses will be need to be considered carefully, due to their sensitivity and potential disturbance to local amenity (particularly in isolated or residential areas), commonly in regards to excessive noise, light pollution, drunken and disorderly behaviour and perception of crime. Where appropriate, conditions restricting their hours of use will be imposed, as measures to control any adverse effects.

4.90 For major tourist generating activities, where appropriate, provision or contributions will be sought for improved infrastructure, culture, arts, public realm and training opportunities. As the impacts of large numbers of visitors falls outside of the immediate development site, it is considered of benefit to both the developer and the locality that improvements are made, increasing the quality and overall appeal as a visitor destination.

4.91 In order to help meet local employment needs, it will also be expected that large scale leisure and hotel development include recruitment programmes or training/ upskilling schemes to enable opportunities for local unemployed to get back into the workforce.

4. A Strong Local Economy

DP CLT 1

Promoting Culture, Leisure and Tourism Uses

Culture, leisure, and tourism uses will be encouraged in Wembley and in town centres in accordance with the sequential approach and TC policies. Sports facilities or facilities serving more of a community function will also be encouraged in accessible areas of good public transport, walking and cycling.

In addition, proposals will be supported where:

- i. The development increases tourism/ visitor opportunities and adds value to the town centre;
- ii. The facility also serves a community function and improves the health and well being of local people. This may include multiple use of facilities, including those of schools and commercial organisations;
- iii. The scale and use of the facility is appropriate to its location;
- iv. Appropriate provision has been made for all sections of the community, including disabled people, the elderly, young persons and other target equality groups. At least 5% of visitor accommodation is designed for independent use by disabled people;
- v. The extent of additional traffic liable to be generated, proposed parking and traffic access, is without detriment to pedestrian or highway safety. All developments should be supported by Green Travel Plans, and where appropriate, include adequate taxi and coach parking facilities.
- vi. All *Promoting a Quality Environment* policies are satisfied, and the character and amenity of the surrounding area is maintained or enhanced, particularly in regard to residential areas;
- vii. For late night uses, appropriate light and noise reduction measures are imposed, and any potential disturbance to the amenity of adjoining residents are avoided, reduced or mitigated;
- viii. Any other potential adverse impacts generated from the proposed activity are avoided, reduced or mitigated. i.e. noise, air quality, waste disposal, etc;

Where appropriate, provision or contributions will be sought from major developments towards local improvements, improved infrastructure, culture, arts and public realm in the locality.

Alternative options not selected:

The policy could have included a separate policy on hotels and visitor accommodation. However, it was considered that the effects of hotel development could adequately be assessed under the same policy for all culture, leisure and tourism uses. The policy conforms with the core strategy.

Protection of Brent's Cultural Assets

4.92 Brent's cultural identity is unique, and the Council seeks to preserve its cultural assets for local people, visitors and the range of employment opportunities they provide in Brent. Brent's cultural assets tend to include: historic and archeological buildings, sites and monuments; art, culture and entertainment (ACE) activities such as cinemas, theatres and visual arts; major tourist attractions; and indoor and outdoor sports facilities. Examples include the old Gaumont State Theatre in Kilburn, Wembley Stadium, Tricycle Cinema and Theatre, Wembley Arena, the Stables Gallery and Art Centre in Gladstone Park, and Willesden Sports Centre. Brent's historical character is also preserved through architectural quality of listed buildings which can be found under policy DP UD16.

4.93 While Wembley is a strategic cultural area and an ideal location for creative industries to locate, there is still general difficulty in locating spaces for local artists to work, perform and display art in the Borough. This is because competition from other land uses can outbid such uses, particularly in Town Centres. As well as establishing employment opportunities, arts and culture as expressed in different media and forms (visual and performing) are

4. A Strong Local Economy

considered important for education and expressing cross cultural differences. This is particularly so for festivals where communities come together and celebrate their beliefs, origins and heritage. This gives communities a sense of pride and well being, and others an appreciation of arts and cultural diversity.

4.94 Facilities themselves, such as cinemas and theatres which have existed for a long time are often important landmarks and give added character to areas, as well as possess integral cultural and historic significance. Public displays of art also add to the public realm and help to rejuvenate areas. For these reasons the Council will seek to protect its arts, cultural, and entertainment assets.

4.95 As mentioned previously, compared to other Boroughs, Brent has existing poor provision and low participation rates for sport. The Borough will therefore seek to improve participation and provision by protecting all indoor (and outdoor sports) facilities, whether in public or private use. Only where a robust PPG17 *Open Space, Sport and Recreation* assessment has been undertaken will an exception apply, and an appropriate contribution is made towards new or improved facilities elsewhere in the Borough.

DP CLT 2

Protection of Brent's Cultural Assets

Wembley will be protected and enhanced as a Strategic Cultural Area for London. In other areas, the Council will seek to retain and promote its existing cultural assets for the creation, performance or display of art and culture, sports provision and facilities serving more of a community function. Only where the applicant has provided robust evidence supporting the loss or alternative use and demonstrated wide support by the community of its proposal, may an exception apply. Where appropriate, compensation will also be sought towards new or improved facilities elsewhere in the Borough.

Alternative options not selected:

The policy does not have to protect its existing cultural assets, as the focus could be entirely on developing new Culture, Leisure and Tourism uses. However, in terms of existing resources, Brent already has a number of assets, and it is these that are recognised such as its diverse communities, and art and entertainment facilities that should be acknowledged and protected. By allowing the loss of sports facilities would not be in accordance with national guidance.

Sites and Monuments of Archaeological Interest

4.96 Archaeological remains constitute the principal surviving evidence of the Borough's past but are a finite and fragile resource that is vulnerable to modern development and land use. Once removed, that part of the Borough's past is lost forever. The Council considers that the archaeology of the Borough is a cultural asset as an educational, recreational and tourist resource.

4.97 Brent has adopted a comprehensive policy identifying a number of archaeological sites of interest and endorsed the Code of Practice on archaeological rescue work agreed between the British Property Federation and the Standing Conference of Archaeological Unit Managers.

4.98 Preservation of this archaeological resource is a legitimate planning objective, against which the needs of development must be balanced and assessed. The destruction of such remains will be resisted and should never take place without prior archaeological assessment, (which may include excavation) and record. These principles are embodied in Planning Policy Guidance 16 on Archaeology (PPG16).

4. A Strong Local Economy

4.99 Where development may affect land of archaeological importance, the Council expects a preliminary site evaluation to take place. This requirement applies both to 'Archaeological Priority Areas' which are known, or to likely sites of prehistoric settlement and to 'Sites of Archaeological Importance' where there have been important or concentrated finds in the past. Archaeological sites should be properly investigated and excavated by a recognised archaeological organisation such as, the Institute of Field Archaeologists (IFA) before development takes place.

4.100 In appropriate cases, the most important archaeological remains and their settings should be permanently preserved. Interpretation and presentation to the public is a key part of this process. The Council will therefore seek provision for the analysis and public display of finds.

4.101 Sites of Archaeological Importance and Archaeological Priority Areas are listed in [Appendix UD5](#). Archaeological Priority Areas are also shown on the Proposals Map. Further information on archaeological sites is contained in the publication 'Archaeology in Brent'. A computerised and mapped databank is provided by the Greater London Sites and Monuments Record operated by English Heritage

4.102 While there are no scheduled Ancient Monuments in the Borough there are structures of local interest which the Council intends to safeguard.

DP CLT 3

Archaeological Sites & Monuments

Archaeology

For developments involving groundwork on Sites Of Archaeological Importance or in Archaeological Priority Areas, the following is required:

- (a) That applicants have the archaeological implications of their proposals assessed by means of a recognised archaeological group (if necessary by a preliminary site investigation);
- (b) Nationally important archaeological remains and their settings are permanently preserved in situ, and where practicable, made available for public display and access;
- (c) For archaeological remains of regional importance, the desirability of this will be weighed against other factors such as the need for the proposed development;
- (d) Otherwise provision is made so that sites are properly investigated and excavated before development begins; and
- (e) Landowners & developers conform with the British archaeologists' & developers' code of practice.

Monuments

The fabric and setting are protected of the following four Ancient Monuments of local importance:

- (a) Medieval ditch and embankment, Old Church Lane, Kingsbury;
- (b) Sarsen Stone, Slough Lane, Kingsbury;
- (c) Hell lane/Elderstrete; and
- (d) Old Wood Lane (boundary stone and ditch).

4. A Strong Local Economy

A Strong Local Economy Appendix

Appendix TC1: Primary & Secondary Shopping Frontage Schedule

*Designated Food & Drink Quarters (See DP TC 7 'Food & Drink (Cafe) Quarters')

Major Town Centres

Wembley Major Centre Boundary

Primary Frontage	
Wembley High Road	444-548, 397-501
Central Square	1-43
Park Lane	6-8, 1-11
St Johns Road	1-9
Secondary Frontage	
Wembley High Road	313-337, 367-395, 503-569, 326-354, 386-442, 390-406*, 412- 444*, 550-612
Wembley Hill Road	1-19, 23-31
Neeld Parade	1-12
Ealing Road	2-60, 3-17
Plaza Parade	Unit 1-10
Coronet Parade	Unit 1-6
Sevenex Parade	Unit 1-8
Lancelot Parade	Unit 1-5
Wembley High Road	442-386
Other town centre related frontage	
Harrow Road	293-311, 300-324, 399
Wembley High Road	341 -345, 349, 356-358, 365, 370*, 388, Elizabeth House
Ecclestone Road	1-25
Rosemead Avenue	2-28
Lonsdale Road	63-66
London Road	22-28, 36-44, Telephone Exchange, Lily House, Wembley Hotel, Patidar House
St Johns Road	11-27
Station Grove	5, Lodge Court, Ramsery House
Montrose Crescent	1-8
Ealing Road	35, Ealapatheeshwarar Temple, Parit Hall, Ealing Road Library

Kilburn Major Centre Boundary

4. A Strong Local Economy

Primary Frontage	
Kilburn High Road	79-205
Kilburn Square	Fronting High Road 92-94 (include at ground floor level) inclusive
Secondary Frontage	
Kilburn Bridge	1-12
Kilburn High Road	41-63, 67-77, 207-405
Kilburn Square	96-109 inclusive
Willesden Lane	11-85, 2-70
Exeter Road	2-8
Oxford Road	2-4
Coventry Close	1-3
Cambridge Avenue	6-10
Glengall Road	1-5, 2-8
Priory Park Road	2-4
Dyne Road	2b-2f
Other Town centre Related Frontage	
Cambridge Avenue	1A-3
Kilburn High Road	409
Shoot Up Hill	101-711, Jubilee Heights
Exeter Road	Jubilee Business Centre
Willesden Lane	72-100

District Town Centres

Burnt Oak District Centre Boundary

Primary Frontage	
Burnt Oak Broadway	33-51
Secondary Frontage	
Burnt Oak Broadway	15-31
Allied Carpets	
Holmstall Parade	1-15
Other Town centre Frontage	
Burnt Oak Broadway	Theoco Renault, Mecca Bingo, 297-301

Harlesden District Centre Boundary

Primary Frontage	
Harlesden High Street	2-114, 1-93

4. A Strong Local Economy

Bank Buildings	1-11 (inclusive)
Manor Parade	All properties
The Croft	All properties
Acton Lane	2-6
Harlesden Plaza	Units 1-6
Secondary Frontage	
Harlesden High Street	116-122, 95-109
Craven Park Road	10-86, 23-59, Library Parade
Manor Park Road	158-166
Park Parade	1-9 (inclusive)
Other Town Centre Related Frontage	
Craven Park Road	Willesden Court House, St Margarets Presbyterian Church, 63-65, Halesden Library
Tavistock Road	1-9, 2-4, Tavistock Lodge
Harlesden Plaza	Unit 7
Manor Park Road	Gwalia Workingmens Club, 59-41, 95-61, 94-140, 146-156
Charlton Road	1-3
Harlesden High Street	1-15, 86, 139, 147-163, 168-200, 175-179,
Crownhill Road	1-5
Manor Park Road	Park House
Wendover Road	1-2
Avenue Road	2-8
Park Parade	1-12, 75, Design Works, St Josephs Court
Rucklidge Avenue	Ex Willesden Social Club

Cricklewood District Centre Boundary

Primary Frontage	
Cricklewood Broadway	83-217
Secondary Frontage	
Cricklewood Broadway	7-81, 219-241
Other Town Centre Related Frontage	
Cricklewood Lodge Hotel	

Willesden Green District Centre Boundary

Primary Frontage	
Willesden High Road	2-88, 1-121
Walm Lane	1-47, 58-92

4. A Strong Local Economy

Queens Parade	1-12
Willesden Lane	291-293
Secondary Frontage	
Willesden High Road	147-167, 100-142
Station Parade	2-26
Walm Lane	53-69
Other Town Centre Related Frontage	
Willesden High Road	Sainsbury, St. Andrew Church, Willesden Green Library
Walm Lane	104-112, Chesham House
Lechmere Road	1-5
Dartmouth Road	Westly Court
Grange Road	Unit 1-15 George Furness House

Ealing Road District Centre Boundary

Primary Frontage	
Ealing Road	160-242, 99-141
Secondary Frontage	
Ealing Road	134-158
Other Town Centre Related Frontage	
Ealing Road	85-97, Gospell Hall, Shri Sanatan Hindu Mandir

Wembley Park District Centre Boundary

Primary Frontage	
Bridge Road	7-55
Stadium Retail Park	Units 1-3
Secondary Frontage	
Wembley Park Drive	87-147, 100-126
Empire Way	10-16
Grand Parade	1-18
Other Town Centre Related Frontage	
Bridge Road	Torch Public House
Stadium Retail Park	Unit 4
Empire Way	Empire House, Total Service Station
Wembley Park Drive	128-130, 151, Premier Travel Inn
North End Road	Arena House

Kingsbury District Centre Boundary

4. A Strong Local Economy

Primary Frontage	
Kingsbury Road	449-573, 532-660
Kingsbury Arcade	1-22
Secondary Frontage	
Kingsbury Road	419-447, 510-530
Fryent Way	1-5
Other Town Centre Related Frontage	
Kingsbury Road	N/T 417, 660b, R/O 646, Prince of Wales

Local Centres

Colindale Local Centre Boundary

Primary Frontage	
Edgware Road	167-223
Secondary Frontage	
Edgware Road	225-295
Other Town Centre Related Frontage	
Watling Gate	Units 2-5

Preston Road Local Centre Boundary

Primary Frontage	
Preston Road	197-279, 192-296
Secondary Frontage	
Preston Road	298-308, 314-324, 176-190
Carlton Parade	1-5
Other Town Centre Related Frontage	
Preston Road	161, Land N/T 230, Twinstar Car Sale, 312,
Lincoln Parade	Units 3-7

Kenton Local Centre Boundary

Primary Frontage	
Kenton Road	177-235
Secondary Frontage	
Kenton Road	85-137
Other Town Centre Related Frontage	
Nash Court	
Kenton Station	

4. A Strong Local Economy

Queen's Park Local Centre Boundary

Primary Frontage	
Salisbury Road	26-36, 43-73
Secondary Frontage	
Salisbury Road	46-62, 75-101
Other Town Centre Related Frontage	
Salisbury Road	40-44, St Andrew Church, Salisbury Road Car Park* , Cullen House* , Kilburn Library, Kilburn Police Station,
Kilburn Lane	341*
Claremont Road	50*
Albert Road	1

Kensal Rise Local Centre Boundary

Primary Frontage	
Chamberlayne Road	47-101
Station Terrace	21-30
Secondary Frontage	
Chamberlayne Road	37-45, 52-78
Bridge House	1-4
Station Terrace	15-20
Keslake Mansions	1-7
Other Town Centre Related Frontage	
Chamberlayne Road	80-96
Kensal Rise Primary School	
Station Terrace	1-3

Sudbury Local Centre Boundary

Primary Frontage	
Harrow Road	784-822,757-779
Secondary Frontage	
Harrow Road	781-797, 824-830
Watford Road	2-36
Other Town Centre Related Frontage	
Harrow Road	751

Neasden Local Centre Boundary

Primary Frontage	
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4. A Strong Local Economy

Neasden Lane	270-352,237-299
North Circular Road	560-570
Secondary Frontage	
Neasden Lane	232-260*,301-309*
North Circular Road	536-540*,572-580
Other Town Centre Related Frontage	
Birse Crescent	Kenny House
The Grange Museum	

Appendix TC2: List of Neighbourhood Centres

A	K
ACTON LANE Acton Lane 75-99	KINGSBURY GREEN Kingsbury Road 235-275 KILBURN LANE Kilburn Lane W9 291-305
B	M
BLACKBIRD HILL Blackbird Hill 25-51 BURNLEY ROAD Burnley Road 78-82	MALVERN ROAD/SHIRLAND ROAD Shirland Road 197-201 Malvern Road 1-41 MONKS PARK Harrow Road 2-74
C	N
CANTERBURY ROAD Peel Precinct 1-7, 16-24 CARLYON ROAD Carlyon Road 36-50 CHURCH LANE SOUTH Church Lane 151-177, 216-232, 244-282 COLLEGE PARADE Salisbury Road 12-20 CHURCH END Church Road 132-190, 179-224, 207a - 235 COLLEGE PARK Harrow Road 994-1020, 1074-1104 COLLEGE ROAD College Road 104-120	NORTH WEMBLEY East Lane 181-215
D	O
DUDDEN HILL PDE Dudden Hill Parade 1-4	OXGATE Oxgate Parade, Coles Green Rd. 1-9 QUEENSBURY Queensbury Stn Parade 1-26
E	R
EAST LANE The Broadway 1-20	ROE GREEN VILLAGE Stag Lane 338-346
G	S

4. A Strong Local Economy

<p>GLADSTONE PARADE Gladstone Parade 4-9 (Edgware Road)</p> <p>GOOSEACRE Kenton Road 425-447</p>	<p>SIDMOUTH ROAD Sidmouth Parade 1-10 Sidmouth Road 27</p> <p>SOUTH KENTON Ennerdale Court 1-4 Mariel House 1-4 Windermere Ave 118-128</p> <p>STATION ROAD Station Road 25-63, 46-60</p> <p>ST JOHNS AVENUE St Johns Avenue 88-96</p>
<p>H</p>	<p>W</p>
<p>HAMILTON ROAD Hamilton Road 1a-1d</p> <p>HARROW ROAD Harrow Road 875-881</p> <p>HAY LANE Hay Lane 5-27</p> <p>HEATHER PARK Heather Park Parade 1-10</p>	<p>WATFORD ROAD Watford Road 201-223</p> <p>WATFORD ROAD Court Parade 1-17, 32-38</p> <p>WEMBLEY HILL Harrow Road 293-311, 300-322</p> <p>WILLESDEN HIGH RD Willesden High Road 254-290, 271-285</p> <p>WILLESDEN LANE Willesden Lane 72-98</p>

5. Enabling Community Facilities



5. Enabling Community Facilities

Focusing on Brent's Community Needs

5.1 Brent's key strategy for the borough is to ensure sufficient community facilities are provided to meet Brent's diverse and growing population. Community facilities are wide ranging and include a number of uses, mainly falling within the D1 use class, but also some D2, C2 and Sui Generis uses. Examples include:

- Medical and health services such as doctor surgeries, hospitals; and outpatient care
- Educational facilities, such as schools, training centres and colleges;
- Places of worship including religious instruction and church halls;
- Social facilities such as community halls, social clubs, libraries, crèche/ nurseries, day centres, and youth clubs;
- Emergency services, such as police stations, ambulance services and fire stations;
- Public houses serving a community function.
- Community sports facilities and their ancillary uses such as clubhouses and meeting rooms, and these are also cross referenced to in the Culture, Leisure and Tourism Chapter.

5.2 Brent has a unique population demographic with relatively high levels of need. It is one of the most multi-cultural boroughs in Britain, and one of two London boroughs where majority of its residents are from black and minority ethnic groups. It also contains both relatively high and low levels of deprivation (5 neighbourhoods in the top 10% most deprived in the UK), and consists of a proportionately young population, with 44% under 30 years of age.

Location and provision of new or extended community facilities

5.3 With a range of differing needs, sufficient facilities should be located within easy reach of those who need them. As well as ensuring facilities develop alongside population growth these need to be located in areas of good public transport accessibility (PTALs 4-6) and a range of transport means, i.e. walking, cycling, public transport and the private car. Wembley regeneration area, key growth areas, and town and neighbourhood centres are preferred locations as these already have good accessibility or have potential to improve, and allow for population or development growth.

5.4 Where major/ significant developments are proposed, there may be an identified need for the provision of new community facilities. The Council will work in close partnership with provider organisations to ensure that Brent residents have adequate access to a range of facilities, and ensure these are provided for where new population is envisaged. Where a need is to be provided on-site this will be expected to form an integral part of the development proposal.

5.5 Community facilities vary in size according to their use and number of people it serves. Large or small these need to be proportionate to its location, with proposals attracting large numbers of the community being located in the first instance in town centres (excluding ground floor areas in the primary shopping frontage), followed by edges of town centres, and proposals serving more of a neighbourhood or district function being located in or adjoining a town or local centre followed by out-of-centre sites. Buildings should be easily adaptable to account for changing needs and multi-use to enable a wide range of community uses. Importantly, facilities should also be designed to be fully accessible to all members of the community, including disabled people, the elderly, and people with young children and other target equality groups.

5.6 A number of potential adverse effects may also arise from new or extended community facilities and these need to be appropriately assessed. Particularly in regard to traffic safety, loss of priority land uses (residential dwellings, employment sites, open space), sustainable building construction and design, noise and waste disposal. Generally child care facilities and medical practices should only be located within residential premises where there is an identified

5. Enabling Community Facilities

need, and the loss of residential accommodation outweighs the need for the alternative facility. The property should be large enough (min 110m² un-extended floor area) to lend itself to conversion whilst providing adequate external amenity area and any proposed extensions should not result in an over intensive use of the premise.

5.7 Where new educational facilities are proposed, playing fields will be protected in accordance with Policy DP OS6 Open Space and Outdoor Recreation, and opportunities for schools and their facilities (including their playing fields) are to be made available for wider community use. CP SS9 and CP OS1 protects all areas of open space in the borough including school playing fields, while dual use of facilities allows more effective use of existing resources, and for all levels of the community to benefit.

DP CF 1

New Community Facilities and Extensions to Existing

New or extended community facilities will be encouraged in accessible locations and where there is an identified need as part of major developments. Preferred locations will be in Wembley and key growth areas, as well as town and neighbourhood centres (excluding ground floor areas in Primary Shopping Frontages).

In addition, community facilities will be supported where:

- I. The scale and use of the facility is appropriate to its location, and meets a local community need. Buildings should be adaptable, multi-use and practical to meet changing needs and a range of uses, with particular regard to access for disabled persons, elderly, young persons and other target equality groups;
- II. The extent of additional traffic liable to be generated, proposed parking and traffic access is without detriment to pedestrian or highway safety. All proposed developments should be supported by a Green Travel Plan;
- III. Other priority land uses are not lost unless the community facility meets an essential local need that outweighs its loss, and there is no other suitable site in the local area;
- IV. All *Promoting a Quality Environment* policies are satisfied, and the character and amenity of the surrounding area is maintained, particularly in regard to residential areas;
- V. Any other potential adverse impacts generated from the proposed activity are avoided, reduced or mitigated. i.e. noise, air quality, waste disposal, etc;
- VI. In regard to educational facilities, dual use of facilities and playing fields will be sought for wider community use outside of normal school hours.

Where major / significant developments result in the additional need for community facilities, these will be expected to form an integral part of the development.

Alternative options not selected:

While community facilities are wide ranging, these could be further subdivided into topics with individual policy assessments of each. However it was considered that there are potential impacts common to all community facilities and these should be included within a single all encompassing policy. This policy also conforms with the core strategy policy which encourages community facilities to be located within accessible areas. This policy also assures that a proper assessment is made of all potential effects this may have on the wider environment.

Protection of Existing Community Facilities

5.8 Community facilities are generally high priority uses with high levels of demand, but have limited supply and low economic return. This remains a problem on the open market, where higher value uses such as housing or commercial uses dominate, thereby limiting opportunities for new community facilities to establish and leaves existing facilities to

5. Enabling Community Facilities

become liable to redevelopment. Many existing facilities also struggle to remain financially viable as many are non-profit organisations, and serve a local need. In order to secure community facilities for the benefit of all people living, working and visiting Brent, there is a need to protect all community facilities from alternative uses to ensure adequate provision is maintained for present and future generations.

5.9 While all community facility uses are protected, the council wishes to ensure these are well utilised and fit for purpose. The loss of any facility would only be supported where it is adequately replaced and built to suit modern standards, or re-provided for elsewhere which better meets the needs of the community. To enable renewal of existing facilities, full replacement with a joint facility complementary to the community use may be encouraged, as a means to fund the maintenance or replacement of an existing facility.

5.10 While the loss of community facilities will generally be resisted, exceptionally there may be circumstances where community uses are no longer required. Normally this is where a particular community use has ceased due to new and sufficient provision elsewhere, or the site has been left vacant for many years and after thorough marketing efforts there is no community demand. Any proposal falling into this category must demonstrate this lack of effective demand by providing robust supporting evidence to prove the community facility is no longer needed, before any change of use will be accepted. Evidence may include, the vacancy of comparable land or premises in the vicinity, or the lack of success in finding an occupier or owner after a rigorous marketing campaign, despite having made substantial marketing efforts for the last 1-2 years.

5.11 Isolated Public Houses which have been long established are recognised as having an important community function. Some examples include the Preston PH (Preston Rd), Windermere PH (Windermere Ave), William the Fourth PH (Harrow Road), Honeypot PH (Honeypot Lane), Greenman Hotel (Dagmar Ave), John Lyon PH (Watford Rd) and Blarney Stone PH (Blackbird Hill). With people constantly moving residence and leading busy lifestyles, there are few opportunities for people to know their community or their neighbours. Isolated public houses are generally localised, have heritage value, and provide a place where people can meet and socialise with other local people, without feeling intimidated or committed to joining a particular group or organisation. Whilst not necessarily in the most accessible locations, these often add value to local residential neighbourhoods and are considered worthy of protection.

5. Enabling Community Facilities

DP CF 2

Protection Of Existing Community Facilities

Existing community facilities will be safeguarded for the use and benefit of the community. Where a particular community use ceases, the Council will encourage an alternative community use. Consideration for the loss of the community facility would only occur where:

- A replacement facility is provided for on-site and is rebuilt to suit modern and future needs. This may be in the form of a joint facility; or
- The facility has suitably re-located to another premise within the Borough which better meets the existing and future needs of the community; or
- Exceptionally, the applicant has clearly demonstrated there is no longer a need for the facility in its existing location either in its current use or any other alternative community use, and adequate compensation is made towards the value of new or improved provision elsewhere in the Borough.

Alternative options not selected:

The policy accords with the Core Strategy, however allows for an exception to the loss of facilities where evidence supports an exceptional circumstance, and that adequate compensation is made for elsewhere. This could have been excluded from the plan, however it is considered that the policy intent still protects all community facilities, and some allowance should be made for exceptional circumstances.

Developer Provision and Contributions Towards Community Facilities

5.12 In parallel with housing and employment growth, adequate provision for community facilities will also need to be considered. Without undue pressure on existing resources, a growing population will need sufficient access to educational facilities, sports facilities, health services, libraries, youth clubs, employment offices and other community facilities, which all contribute to a better quality of life. Contributions are therefore sought in all relevant major and significant applications in accordance with the forthcoming s106 Planning Obligation Supplementary Planning Document.

5.13 Particularly pertinent is the pressure for new school places in the borough and the need for additional facilities and infrastructure. Brent residents are currently facing considerable school place shortages, with all Brent secondary schools currently at capacity and many primary schools also full. This is reflected in the Brent School Organisation Plan 2005-2010. By 2016 Brent is projecting to face a shortfall of school places across both primary and secondary age ranges in the order of 13 and 16 forms of entry respectively. Brent's Children and Young People's Plan 2006-2009 has prioritised the need for additional secondary school places, and in particular, aims to set up a new academy by 2009 to help alleviate the this pressure.

5. Enabling Community Facilities

DP CF 3

Developer Provision And Contributions Towards Community Facilities

Provision or contributions towards additional or improved community facilities will be secured in all relevant major/ significant applications where a need arises as a result of the development. In particular, contributions towards education facilities will be required where new housing development would worsen or create a shortage of school places, and will be based upon the number of children generated by the proposed development.

Developers will be expected to contribute to community facilities in accordance with the draft s106 Planning Obligation Supplementary Planning Document.

Alternative options not selected:

The above policy accords with the core strategy policy. Contributions are sought for a wide range of community facility uses, such as education, health, sports facilities, and youth clubs, and these could have been prioritised. This is not considered equitable at this level as one community use has different needs over another use, and should be dealt with on a case by case basis.

6. Monitoring and Implementation



6. Monitoring and Implementation

1. Glossary

Glossary

Article 4 (2) Direction

A direction granted by the local planning authority following public consultation under the Town and Country Planning (General Permitted Development) Order 1995. It can be used to remove 'Permitted Development' rights for certain forms of household development in conservation areas. The removal of permitted development rights outside these categories and/ or outside conservation areas still requires the confirmation of the Secretary of State for The Environment under Article 4(1).

Contaminated Land

Sites which have previously accommodated a polluting industrial use or which have had a history of landfill, are potentially contaminated.

Convenient Goods

These are items usually purchased from shops on a regular basis, by virtue of availability and convenience, rather than as a result of the comparison of products.

Comparison Goods

These are items usually purchased from shops on a non- regular basis.

Energy Action Area

Area Low- carbon communities.

Wildlife Corridor

Strips of open spaces i.e. railway embankment and allotments, which are conserved and managed to create a network for natural habitats where wildlife can move freely between to secure their survival.

Biodiversity Action Plan

A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

Blackland development

Development of 'landlocked' sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.

Usable balcony

Houses in Multiple Occupation (HMO)

Housing occupied by members of more than one household, such as student accommodation or bedsits.

Road Danger Reduction Plan

The Road Danger Reduction Plan sets out an authority's approach to reduce the amount of danger on the borough's road networks.

Road Safety Plan

A document prepared for area to create a safer street for people.

Gross Floor Area

Gross Floor Area, as defined in the Royal Institute of Chartered Surveyors (RICS) code of measuring practice. Reference to the types of development conforms to the Use Classes specified in the Town & Country Planning (Use Classes) Order 1987, as amended.

Permitted Development

Minor development which, by virtue of the General Permitted Development Order, does not require planning permission.

Primary Shopping Frontage

That area of a shopping centre which is generally the busiest, and contains the largest shop units and major multiples. These are primary use Class A1. (Also see Secondary Shopping Frontage)

1. Glossary

Secondary Shopping Frontage

That part of a shopping centre outside the Primary Frontage usually on the fringe, where units are generally smaller and there is a higher proportion of non- retail uses. (See Primary Shopping Frontage)

Shopping Parade

Shopping frontage identified outside town centre boundary.

Viability of town centre

The capability of a town centre to achieve commercial success.

Green Travel Plan

A document submitted as part of a transport impact assessment setting down proposed measures by the developer to deliver sustainable transport objectives, including: measures for reducing car usage (particularly single occupancy journeys) & promoting and securing increased use of walking, cycling and public transport.

Archaeological Priority Area

Sites contain prehistoric settlement.

Site of Archaeological Importance

Sites contain important or concentrated finds in the past.

Site of Special Scientific Interest

Sites of the nationally significant wildlife and conservation value designated by Natural England.

Protected Species

Plant, animal and insect species protected by European Law and the Wildlife and Countryside Act 1981.

Priority Species

Plant, animal and insect species identified in national, regional and local Biodiversity Action Plans.

Open Space

Open space is land, airspace or a body of water or a combination of these elements which is relatively free of buildings and/or surface infrastructure. It comprises both public and private open space and may include any of the following:

- i) parks and gardens;
- ii) natural and semi natural green spaces – including woodland, scrub, grasslands, wetlands, open and running water;
- iii) green corridors, including river and canal banks, cycleways and rights of way;
- iv) outdoor sports facilities (with natural or artificial surfaces);
- v) amenity green space - including informal recreation spaces, greenspaces in and around housing, domestic gardens;
- vi) provision for children and teenagers – including play areas, skateboard parks, outdoor basketball hoops, and other informal areas;
- vii) allotments, community gardens and city farms;
- viii) cemeteries and churchyards;
- ix) accessible countryside in urban fringe areas; and
- X) civic spaces, including civic and market squares, and other hard surfaced areas designed for pedestrians.

Abbreviation

NAQS - National Air Quality Strategy

IFA - Institute of Field Archaeologists