LOCAL PLAN INTEGRATED IMPACT ASSESSMENT (IIA)

Scoping report | Stage A

Consultation Draft | February 2018

Brent

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1. Introduction

1.1 The Brent Local Plan will guide the future development of the borough where the London Borough of Brent retains responsibility as the Local Planning Authority. For some parts of the borough the Old Oak and Park Royal Development Corporation (OPDC) are currently the Local Planning Authority. The OPDC are producing their own local plan which is likely to be submitted for examination in 2018.

1.2 The Brent Local Plan timescale is not yet set. IF consistent with the draft London Plan December 2017, it will cover up to the period 2041. It will contain a number of strategic policies and site allocations. It will set out a vision, objectives, policies and proposals for meeting social, economic and environmental development aims. This Scoping Report represents the first stage of the Integrated Impact Assessment (IIA) process for the emerging Brent Local Plan.

1.3 The purpose of the IIA is to promote sustainable development. It does this through encouraging the improved integration of sustainability, environmental, health and equality considerations into the plan-making process. The IIA will be an iterative process that will run alongside the production of the Local Plan. It will make recommendations on how to enhance potential positive outcomes and minimise the negative impacts of a policy/proposal.

1.4 This Scoping Report will set out a framework for undertaking the IIA of the Plan. The framework will be the methodology in which the environmental, social and economic sustainability impacts, and the equalities, health, crime and disorder effects of emerging Local Plan policies can be assessed. The framework will include a number of objectives and indicators.

1.5 In addition to setting the scope and level of detail, this stage of the IIA process will:

- identify the relevant environmental, social and economic baseline information;
- identify the relationship between the Local Plan and relevant plans, policies, programmes and initiatives; and,
- identify the key sustainability issues within Brent.

What is Sustainable Development?

1.6 Sustainable Development is central to the planning system. The National Planning Policy Framework (NPPF) states that the presumption in favour of sustainable development is the golden thread running through the plan-making and decision-taking process. The term ‘sustainable development’ has been used since 1987. It followed the publication of the World Commission on Environment and Development (WCED) report “*Our Common Future”.* This report identified the risks to the planet and the human race if existing environmental, economic and social practices and trends were perpetuated. Resolution 42/187 of the United Nations General Assembly

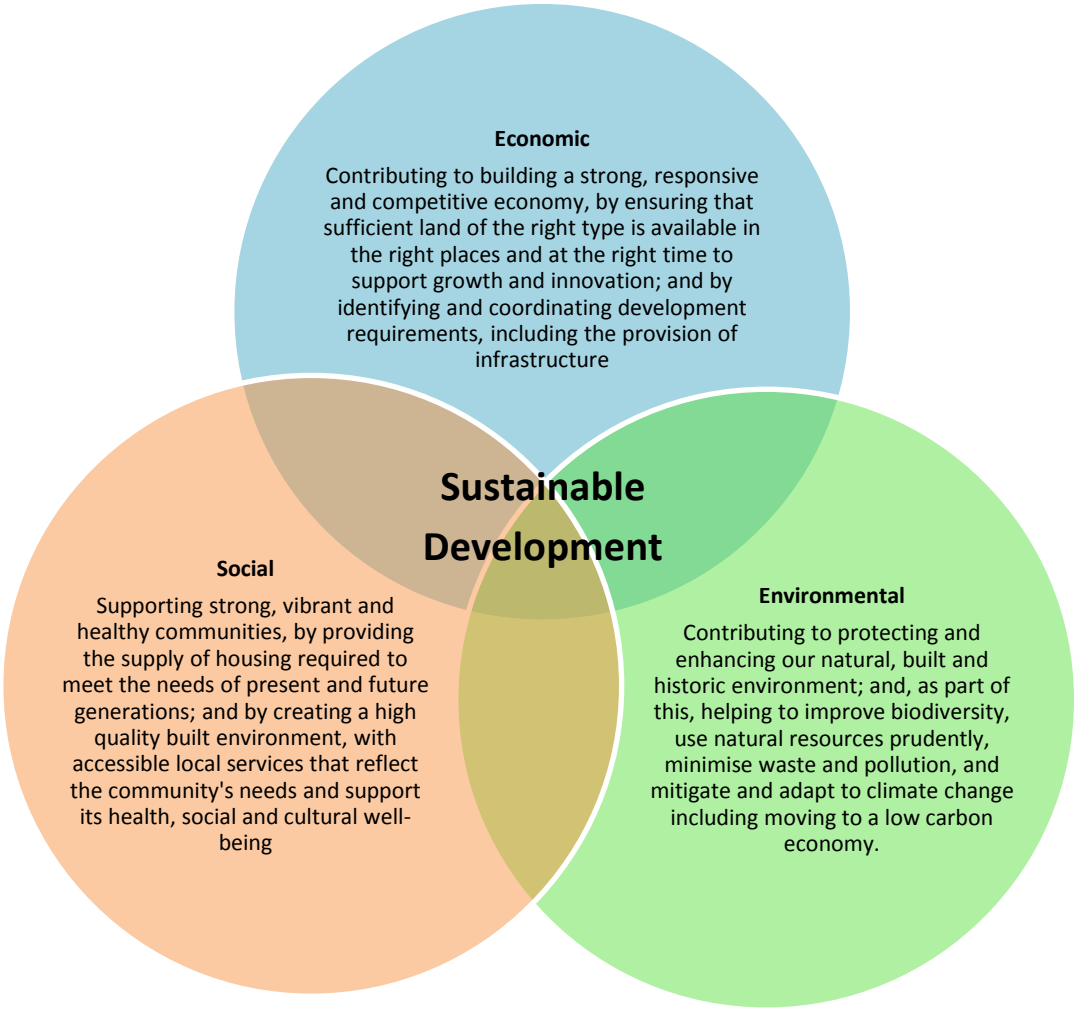
defined sustainable development as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’.

1.7 The UK Sustainable Development Strategy - *Securing the Future* (2005) set out the following five ‘guiding principles’ of sustainable development:

- living within the planet’s environmental limits;
- ensuring a strong, healthy and just society;
- achieving a sustainable economy;
- promoting good governance; and
- using sound science responsibly.

1.8 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Local Plans are the key to delivering sustainable development that reflect the vision and aspirations of local communities. It identifies the three dimensions to sustainable development; economic, social and environmental. The integration of these are key to the delivery of sustainable development as they are mutually dependent on each other.

Figure 1: The spheres of sustainable development



What is an Integrated Impact Assessment?

1.9 An Integrated Impact Assessment (IIA) brings together the Sustainability Appraisal (SA), Strategic Environmental Appraisal (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) into a single framework. Each of these assessments/

appraisals are explained in more detail below. A Habitats Regulation Assessment (HRA) will also be undertaken as a parallel process, with the findings of which will be integrated into the IIA as appropriate (Appendix 4).

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

1.10 A SA is an iterative process that must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development. It seeks to ensure better integration of sustainability considerations into Local Plans. SAs consider the implications of the Local Plan from a social, economic and environmental perspective. They require the assessment of options against available baseline data and sustainability objectives. SAs also assess how the plan will contribute to the achievement of sustainable development.

1.11 Section 19 of the Planning and Compulsory Purchase Act 2004 places a requirement to carry out a SA.

1.12 As advised in the National Planning Practice Guidance (NPPG), SAs should incorporate a Strategic Environmental Assessment (SEA). This is a European Directive 2001/42/EC requirement was transposed directly into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). A SEA assesses the effects of certain plans and programmes on the environment.

Health Impact Assessment (HIA)

1.13 The link between health and planning has long been established. The role the built and natural environment together with social and economic circumstances plays in shaping health is increasingly recognised. Chapter 8 – Promoting healthy communities, of the NPPF is supplemented by the NPPG states that "*Local Planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making".* It identifies that a health impact assessment (HIA) may be a useful tool in identifying impacts the of policies/local plans/proposals on the health and wellbeing of a local population or its particular groups.

1.14 A HIA identifies ways to maximise impacts for health gain, and minimise risks. Although undertaking a HIA is not compulsory, the Council will integrate this process throughout the IIA Framework. The IIA will expand the 'human health' topic of the SEA to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation measures are identified.

Equalities Impact Assessment (EqIA)

1.15 Section 149(1) of 'The Equality Act 2010' places a requirement on public organisations, and those who deliver public functions, to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.

- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a relevant protected characteristic and those who do not.

1.16 The Equality Act 2010 identified nine protected characteristics, which are as follows: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Socio-economic status (people on low incomes, young and adult carers, people living in deprived areas, groups suffering multiple disadvantages etc.) is not a characteristic protected by the Equality Act 2010. Nevertheless, the Council is committed to also considering the impact that new policies/policy changes will have on socio-economic groups.

1.17 To assist in complying with the above equality duties, the IIA will incorporate an Equality Impact Assessment (EqIA). An EqIA is an assessment of whether a proposed organisational policy, or a change to an existing one, will cause a disparate impact on people who have a protected characteristic.

Habitats Regulation Assessment

1.18 A Habitat Regulations Assessment (HRA) is a requirement under the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (the 'Habitats Directive'). This provides for the legal protection of habitats and species of European importance. The Directive identifies an ecological network of sites known as 'Natura 2000', comprising Special Areas of Conservation (SAC) and Special Protection Areas (SPA). These will be collectively referred to as 'European Sites' in the remainder of this report.

1.19 Article 6(3) of the Habitats Directive establishes the requirement for a HRA of any plan or project which:

- Is not directly connected with the management of the site for nature conservation; and
- Either alone or in combination with other plans or projects would be likely to have significant effect on a European Site.

1.20 Within Brent there are no internationally designated SACs, SPAs or Ramsar sites (Wetlands of International Importance). Five European Sites (listed in Table 1) are identified within 15km of Brent's boundaries. HRA screening will be undertaken to determine if the Local Plan in combination with other plans or projects would generate any adverse impact on these sites. It will consider conservation objectives and qualifying interests. It will be submitted to Natural England for approval.

European Site	**Conservation Status**	**Distance from Brent**
Richmond Park	Special Area of Conservation	8km
Wimbledon Common	Special Area of Conservation	9km

European Site	Conservation Status	Distance from Brent
Lee Valley	Special Protection Area	11km
South West London Water Bodies	Special Protection Area	15km
Epping Forest	Special Area of Conservation	15km

Table 1: European Sites within 15km of Brent's boundaries

Geographic Scope of the IIA

1.21 The IIA will assess the potential impacts of the Brent Local Plan against the IIA framework included within Table 6 of this scoping report. This assessment will cover the areas which fall within the administrative boundaries of the London Borough of Brent where Brent is Local Planning Authority (Figure 2). The shaded area falls within the administrative boundaries of the OPDC.

Figure 2:Administrative Boundaries of the London Borough of Brent

1.22 Figure 3 shows Brent in relation to neighbouring local authority areas. Where appropriate, the IIA will also consider the potential impacts beyond Brent's Local Planning Authority boundary.

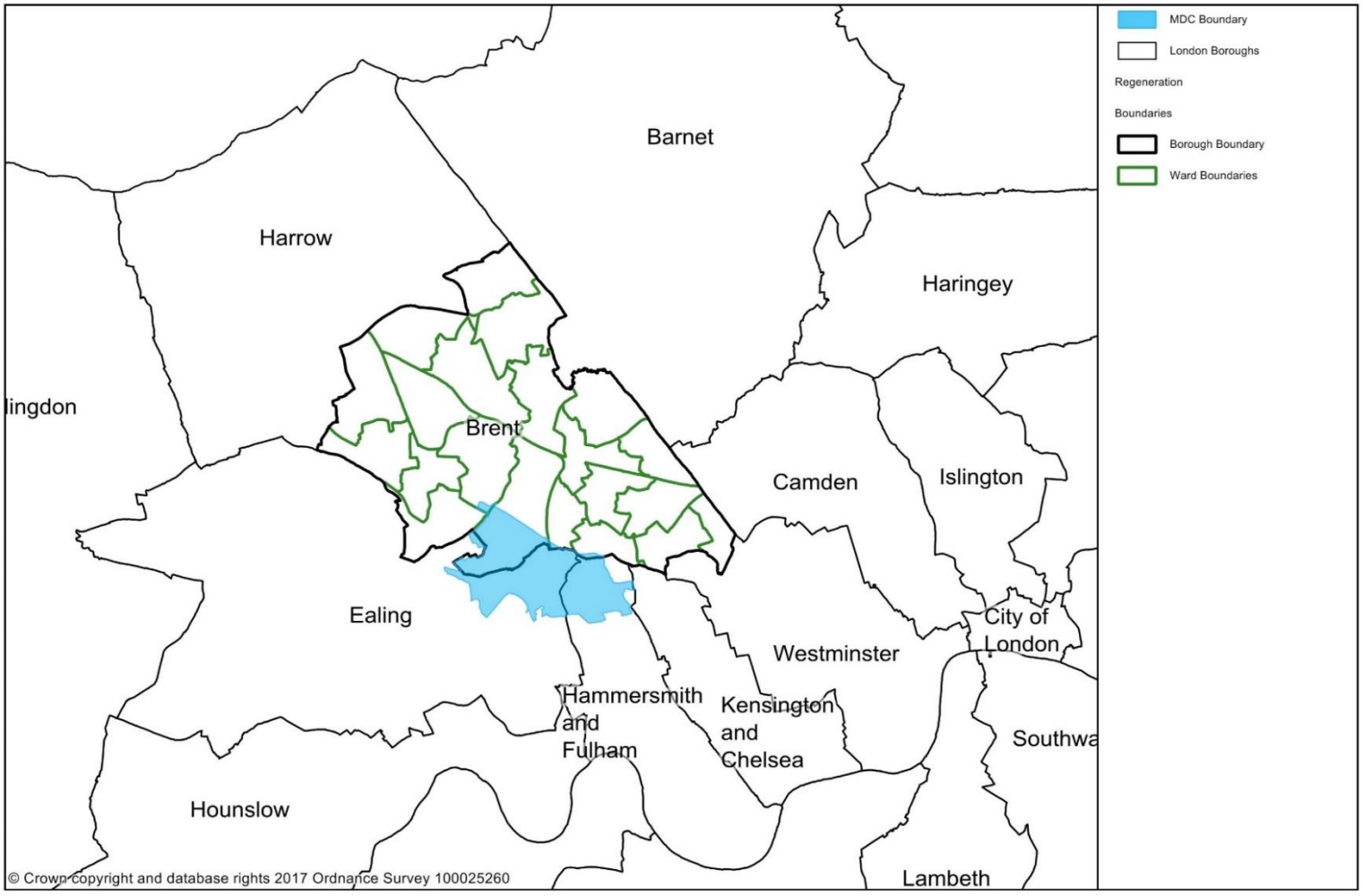


Figure 3: Brent and its neighbouring authorities

Technical Scope of the IIA

1.23 Table 2 below brings together the technical scope of SEA, HIA and EqIA. The factors have been broken down to social, environmental and economic in the table below; however, it is acknowledged some factors such as health and equality are relevant to all categories.

Table 2: Technical Scope of the IIA

	Sustainability Appraisal and Strategic Environmental Assessment	**Health Impact Assessment**	**Equality Impact Assessment**
Source	SEA Directive and the SEA Regulations	The NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework	Brent Council Equality Analysis Guidance
Social	• Population • Cultural assets and facilities • Landscape • Human health	• Housing quality and design • Access to healthcare services and other social infrastructure • Crime reduction and community safety • Access to healthy food • Social cohesion and lifetime neighbourhoods • Access to cultural facilities	• Impact on protected groups (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity) and socio-economic groups, including any potential negative impacts • Contribution to: a. Eliminate discrimination (including indirect discrimination), harassment and victimisation; b. Advance equality of opportunity; c. Encourage good relations between people from different groups
Environmental	• Biodiversity • Soil • Water • Air • Climatic factors • Fauna and flora • Human health	• Access to open space and nature • Air quality, noise and neighbourhood amenity • Minimising the use of resources • Climate change.	
Economic	• Material assets • Human health	• Accessibility and active travel • Access to work and training	

2. Brent's Local Plan

2.1 Brent Council is currently in the process of taking forward a new Local Plan. Once adopted, it is currently anticipated that it will replace the Core Strategy (2010) and Site Specific Allocations (2011) plans in their entirety and potentially parts of the Wembley Area Action Plan and Development Management policies plan. It will provide the Council's vision, objectives, policies and proposals for meeting social, economic and environmental development aims.

Brent's Current Local Plan

2.2 The current Brent Local Plan comprises of a suite of Development Plan Documents (DPDs). These documents are:

- Core Strategy (adopted 2010)
- Site Specific Allocations (adopted 2011)
- Wembley Area Action Plan (adopted 2015)
- Joint West London Waste Plan (adopted 2015)
- Development Management Policies (adopted 2016)

Development Management Policies (2016)

2.3 The Development Management Policies Development Plan Document (DPD) sets out detailed policies that will be used, in conjunction with the NPPF, the London Plan and the Brent Core Strategy, to determine planning applications for development in the borough (excluding the areas falling within the Old Oak and Park Royal Mayoral Development Area). This document completed the Brent Local Plan, and replaced the saved UDP policies. A Sustainability Appraisal was carried out on it. This concluded that "*Overall the policies are predicted to have positive effects. The policies score almost exclusively positive against the social and economic objectives, however, there are some mixed effects predicted in relation to some environmental objectives".* It is not anticipated that many, if any, of these policies will be amended as part of the emerging Local Plan process; therefore, the majority will sit alongside the Local Plan once it has been formally adopted.

Wembley Area Action Plan (2015)

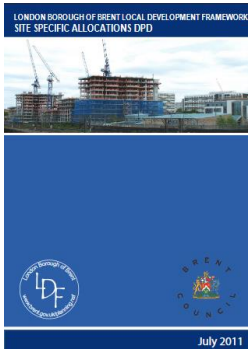
2.4 The Wembley Area Action Plan (WAAP) sets out the strategy for the growth and regeneration of the Wembley Area for the next 15 years. It builds upon the Council's vision that was set out in the Core Strategy (2010). This was to develop Wembley as a destination, It would l help drive the economic regeneration of Brent, and further promote its cultural and leisure offer attracting visitors throughout the day and evening. The WAAP includes key planning objectives and policies including the development of over 30 sites in the Wembley Area.

Joint West London Waste Plan (2015)

2.5 Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and the Old Oak and Park Royal Development Corporation) agreed to co-operate to produce a single waste plan for their combined areas that now forms part of each of their respective Local Plans. The waste plan provides a planning framework for the management of all waste produced in the six boroughs over the period to 2031. The Plan seeks to safeguard existing waste management facilities, identifies sites to be allocated for waste management development to ensure shortfall is addressed and also provides policies with which planning applications for waste development must conform.

Site Specific Allocations (2011)

2.6 The Site Specific Allocations (SSAs) document identified 70 key opportunity sites for use and development in line with the Core Strategy. The document provides policies for the future development of these site. It sets out the broad principles of development and appropriate conditions that may be applied in respect of social, economic and environmental factors. The bulk of the document sets out allocations within the five growth areas identified within the Core Strategy. The "allocation" text details uses and particular issues that need to be addressed by development, such as setting or height. For residential sites the document provides an indicative capacity and phasing. In total, it is anticipated that the sites within the SSA will deliver 11,000 homes.



Core Strategy (2010)

2.7 The Brent Core Strategy was the first document of the previously-titled Local Development Framework. It sets out the Council's spatial vision, objectives and key policies for the development of Brent up to 2026. It is a 15 year spatial strategy that has been guided by sustainable development principles. It focused growth within five key growth areas: Wembley, South Kilburn, Church End, Colindale/Burnt Oak and Alperton. These areas were identified as key to regenerating the borough and providing the opportunity for redevelopment. The delivery of the spatial strategy contained within the document would help to deliver "*a great place, a borough of opportunity and an inclusive borough".* The Core Strategy contains a vision plus 12 strategic objectives, which are supported by 23 policies.

3. The Integrated Impact Assessment Approach

3.1 NPPG sets out key stages and tasks for the SA process and their relationship with the Local Plan process. The key are also applicable to the IIA process, as identified in Table 3. It is important to note that the IIA is an iterative process, therefore it is possible that stages/tasks will be revisited to take into account updated/new information, evidence and/or consultation responses.

Table 3: Stages of the IIA process

Local Plan Pre-Production
Stage A: Setting the context & objectives, establishing the baseline & deciding on the scope
Tasks
1. Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the Local Plan. Identify health related plans/programmes linked into Joint Strategic Needs Assessments.
2. Collect relevant social, environmental and economic baseline information and likely future trends, with a focus on health and equalities.
3. Identify key sustainability, health and equalities issues and opportunities for the IIA to address
4. Develop the IIA framework, including defining the sustainability, health and equalities objectives, indicators and targets
5. Produce IIA Scoping Report (incorporating HRA, HIA and EA), and consult Consultation Bodies and other key stakeholders on the scope of the appraisal and the key issues and possible solutions

6. Review of Scoping Report consultation responses and preparation of final IIA Scoping Report to inform nest stage.
Local Plan Production
Stage B: Developing and refining options
Tasks
7. Test the Local Plan objectives against the IIA objectives
8. Develop, refine and appraise the Local Plan strategic options
9. Predicting the effects of the Local Plan including options
10. Evaluating the effects of the Local Plan and select preferred options
11. Mitigating adverse effects and maximising beneficial effects
12. Proposing measures to monitor the significant effects of the Local Plan implementation
Stage C: Preparing the IIA Report
Tasks
13. Prepare draft Local Plan (Regulation 18) and initial IIA Report (incorporating HRA, HIA and EqIA)
14. Consult on Local Plan issues and options (Regulation 18) and initial IIA Report
Stage D: Consultation on the draft Local Plan (Regulation 19) and IIA Report
Tasks
15. Public consultation on the draft Local Plan (Regulation 19) and IIA Report
16. Production of final Local Plan and assess any significant changes in revised IIA Report, if necessary
Local Plan Examination
Tasks
17. Submission of Local Plan, Pre-Submission Consultation Statement and IIA Report and Non-technical summary to Secretary of State
18. Assessing significant changes made as a result of representations, if necessary
Local Plan Adoption and monitoring
Tasks
19. Make the Local Plan and IIA Report available for public viewing
20. Produce an adoption statement and IIA Statement
Stage E: Monitoring implementation of the Local Plan

Tasks
21. Publishing results of monitoring the sustainability effects of the Local Plan in the annual monitoring reports as new information becomes
22. Responding to adverse effects

4. Identifying relevant plans, programmes and policies

4.1 Due to the influence that a plan can have, it is important to identify and review other strategies, plans and programmes to ensure that a clear and concise scope for the IIA has been established. Furthermore, Schedule 2 of the SEA regulations requires SEA's to:

- outline the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes, and;
- identify the environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

4.2 As part of Stage A1 of IIA process for the emerging Local Plan, the Council undertook a comprehensive review of policies, plans, programmes, strategies and initiatives. All considered to be relevant and influential on the emerging Local Plan have been identified in Table 4. An overview of each identified is included within Appendix 1.

Table 4: Plans, policies and programmes

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Overarching	• European Directive 2001/42/EC • National Planning Policy Framework, Department for Communities and Local Government, March 2012 • The London Plan, GLA, 2016 • The draft London Plan. GLA, 2017 • Brent Borough Plan 2015-2019, Brent Council • The UK Government Sustainable Development Strategy, 2005,	Sets out the overarching planning framework for sustainable growth. The overarching themes present in this document is applicable to all objectives/
Economic		
Employment	• Industrial Strategy White Paper, HM Government, November 2017 • The Culture White Paper, DCMS, March 2016 • The Mayor's Economic Development Strategy for London, GLA, May 2010	Promote sustainable economic development and a range of employment opportunities.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• The Mayor's draft Economic Development Strategy for London, GLA, December 2017 • A City for All Londoners, GLA, October 2016 • Culture and night-time economy SPG, GLA, November 2017 • Cultural Metropolis: The Mayor's Culture Strategy, GLA November 2010 • Cultural Metropolis: Achievements and Next Steps, GLA, 2014 • Town Centres SPG, GLA, July 2014 • Land for Industry and Transport SPG, GLA, September 2012 • London Office Policy Review, GLA, 2017 • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Employment, skills and enterprise strategy 2015-20, Brent Council	
Education & Skills	• The Children Act 2004 • Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26th July 2010) • Education Act 2011 • DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016 • The Mayor's draft Economic Development Strategy for London, GLA, December 2017 • Cultural Metropolis: The Mayor's Culture Strategy, GLA, November 2010 • International Education Strategy: Global Growth and Prosperity, Department for Business, Innovation and Skills, Department for Education, July 2013 • Employment, Skills and Enterprise Strategy 2015-20, Brent Council • Brent School Place Planning Strategy, 2014-2018 (refresh), November 2015, Brent Council	Seeks to improve educational attainment through the provision and access to good quality education. Seeks to improve training opportunities
Efficient Infrastructure	• Mayor's Transport Strategy, GLA, May 2010 • Draft Mayor's Transport Strategy, GLA, 2017 • The Mayor's draft Economic Development Strategy for London, GLA, December 2017	Promotes the prioritisation of space-efficient modes of transport which will help to tackle congestion and improve the efficient of the street for essential traffic

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Growth and Regeneration	• The Mayor's Economic Development Strategy for London, GLA, May 2010 • The Mayor's draft Economic Development Strategy for London, GLA, December 2017 • Estate Regeneration National Strategy, December 2016, DCLG • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council	Promotes sustainable growth and regeneration
Social		
Prosperity, Inequalities and Social Inclusion	• Equality Act 2010 • Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015 • Draft Guidance on Housing Needs for Caravans and Houseboats, March 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • A City for All Londoners, GLA, October 2016 • Social Infrastructure SPG, GLA, May 2015 • Accessible London; Achieving an Inclusive Environment, GLA, October 2014 • Cultural Metropolis: The Mayor's Culture Strategy, GLA, November 2010 • Cultural Metropolis: Achievements and Next Steps, GLA, 2014 • Culture and the night-time economy SPG, GLA, November 2017 • Play and Informal Recreation SPG, GLA, September 2012 • Town Centres SPG, GLA, July 2014 • Homes for Londoners – Affordable Housing and Viability SPG, GLA August 2017 • Housing SPG, GLA, updated August 2017 • Planning for Equality & Diversity in London, GLA, October 2007 • Financial Inclusion Strategy, Brent Council, September 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Stronger Communities Strategy 2015, Brent Council • Safer Brent Partnership Community Safety 2014-2017 Strategy, Brent Council	Seeks to create an equal society, which recognises people's different needs and provides fair opportunities for all. Seeks to remove barriers which limit what people can and cannot do.
Health and wellbeing	• Health for Growth 2014-2020, European Commission, 2011 • The Children Act, 2004	Seeks to improve health and well-being

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011 • Planning for Sport Aims and Objectives, July 2017, Sport England • Playing Fields Policy and Guidance, July 2017, Sport England • Play and Informal Recreation SPG, GLA, September 2012 • The London Health Inequalities Strategy, GLA , April 2010 • The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006 • Better Health for all Londoners: the Mayor's draft London Health Inequalities Strategy, GLA, August 2017 • Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA • NW London Sustainability and Transformation Plan – Our Plan for North West Londoner to be well and live well, NW London STP System, October 2016 • Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent • Planning for Sports and Active Recreation Facilities Strategy 2008-2021, Brent Council and Sport England, 2007 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and Associated Action Plans, Brent Council • Fit for Life – A Physical Activity Strategy for Brent, 2016-2021, Brent Council	Promotes greater levels of physical activity Support innovative solutions to improve healthcare provision. To reduce health inequalities
Housing	• Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015 • Estate Regeneration National Strategy, December 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • Planning and Affordable Housing for Build to Rent, February 2017, DCLG • The 2017 London Strategic Housing Market Assessment, GLA, November 2017 • The London Strategic Housing Land Availability Assessment 2017, GLA, November 2017 • Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on behalf of the GLA), November 2017	Seeks the creation of a mixed and balanced community by meeting the housing requirements of the whole community, including those in need of affordable and specialist housing

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Planning for the Right Homes in the Right Places: Consultation Proposals, September 2017, DCLG • A City for All Londoners, GLA, October 2016 Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017 • Housing SPG, GLA, updated August 2017 • Draft London Housing Strategy, October 2017, GLA • Town Centres SPG, GLA, July 2014 • Draft Housing Strategy, 2017 -2022, Brent Council • A regeneration strategy for Brent 2010-2030, Brent Council	
Quality of Surroundings	• European Landscape Convention 2000 • Sustainable Design & Construction SPG, GLA, April 2014 • Town Centres SPG, GLA, July 2014 • Play and Informal Recreation SPG, GLA, September 2012 • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, GLA	Maintain and enhance the quality of the environment
Community Identity	• Equality Act 2010 • Cultural Metropolis: The Mayor's Culture Strategy, GLA, November 2010 • Cultural Metropolis – Achievements and Next Steps, GLA, 2014 • Culture and the Night Time Economy SPG, GLA, November 2017 • Social Infrastructure SPG, GLA, May 2015 • Brent Equality Strategy 2015-19, Brent Council, 2015	Advance equality of opportunity, eliminate discrimination, and foster good relations. Maximise the contribution the art, culture and heritage facilities can make to the community Creating a positive community identity
Accessibility	• Accessible London; Achieving an Inclusive Environment, GLA, October 2014 • Town Centres SPG, GLA, July 2014 •	Enhancing accessibility for all
Crime Prevention and	• Secure by Design Homes 2016 • Safer Brent Partnership Community Safety Strategy 2014-2017	Identifying a sophisticated and modern approach that will through the

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Community Safety	• Stronger Communities Strategy 2015, Brent Council	improvement of data and technology will see a reduction in crime. Reducing the fear of crime
Environment		
Traffic	• Mayor's Transport Strategy, GLA, May 2010 • West London Sub Regional Transport Plan, Transport for London, 2014 update • Draft Mayor's Transport Strategy 2017 • Brent's Parking Strategy 2015, Brent Council • Bent's Walking Strategy 2017-2022, Brent Council • Brent's Cycling Strategy 2016 – 2021, Brent Council • Brent's Long-term Transport Strategy 2015-2035, Brent Council • Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, GLA	Promote the use of sustainable modes of transport over private vehicle use. Promote the efficient use of the transport system
Water Quality & Resources	• Water Framework Directive 2000/60/EC • Urban Waste Water Treatment Directive 91/271/EEC • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Written Ministerial Statement: Sustainable Drainage Systems, December 2014 • Flood Risk Sequential Test and Exception Test – Guide for LPAs, Environment Agency, February 2015 • National Flood Resilience Review, September 2016, HM Government • London Sustainable Drainage Action Plan, October 2015, GLA • Sustainable Design & Construction SPG, GLA, April 2014 • Securing London's Water Future, GLA, October 2011 • Thames Basin District River Basin Management Plan, DEFRA, 2015 • Part 2: River basin management planning overview and additional information, DEFRA, 2016 • The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009	Improve water quality, address flooding and water scarcity.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Brent River Corridor Improvement Plan, Brent River Catchment Partnership	
Environmental Health	• EU Directive on Ambient Air Quality and Management 96/62/EC • UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011 • UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017 • UK Detailed Air Quality Plan, July 2017, DEFRA, DfT • Sustainable Design & Construction SPG, GLA, April 2014 • The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014 • Clearing the air: The Mayor's Air Quality Strategy, GLA, December 2010 • New Proposals to Improve Air Quality, October 2016, GLA/TfL • Brent's Air Quality Action Plan 2017-2022, Brent Council • European Directive: Environmental Noise Directive 2002/49/EC • Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010 • Sounder City: The Mayor's Ambient Noise Strategy, GLA, March 2004	Improving air quality through reducing exposure to $PM_{2.5}$ and nitrogen dioxide. Prevent and reduce environmental noise and preserve quiet areas
Biodiversity	• European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats (*The Habitats Directive)* • Wildlife and Countryside Act 1981 • Natural Environment White Paper, DEFRA, June 2011 • 25 Year Environment Plan DEFRA January 2018 • UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012 • Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012 • Improving Londoners Access to Nature: London Plan Implementation Report, GLA, February 2008 • Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013	Enhance and protect biodiversity, and improve access to nature. Promote naturalisation.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Mayor's Biodiversity Strategy: Connecting with London's Nature, GLA, July 2002 • London Biodiversity Action Plan, London Biodiversity Partnership, 2001 • Draft London Environment Strategy, GLA, August 2017 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans , Brent Council • Brent Biodiversity Action Plan 2007, Brent Council	
Open Space	• All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • Play and Informal Recreation SPG, GLA, September 2012 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans , Brent Council • Brent Parks Strategy 2010-2015, Brent Council	Promotes the protection and enhancement of open spaces Recognises the importance of open spaces and their contribution to improving quality of life
Landscape & Townscape	• European Landscape Convention 2000 • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • London View Management Framework SPG, GLA, March 2012 • Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012 • Preparing Borough Tree and Woodland Strategies SPG, February 2013, GLA • Development in the Background of Protected Vistas, March 2017, Mayor of London • Brent Parks Strategy 2010-2015, Brent Council	Promote the conservation and protection of appropriate landscape, townscapes and their settings. Recognises the importance of open spaces, sport and recreation and the contribution that these areas can make in improving quality of life.
Historic Environment & Cultural Heritage	• European Convention on the Protection of the Archaeological Heritage (revised), 1992 • Planning (Listed Building and Conservation Areas) Act 1990 • Ancient Monuments and Archaeological Areas Act 1979 • Land Contamination and Archaeology, Good Practice Guide, February 2017, Historic England	Promotes the achievement, preservation and enhancement of historic assets and archaeological heritage.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• The Heritage Statement 2017, December 2017, DCM • The Setting of Heritage Assets Advice Note, July 2014, Historic England • Tall Buildings Advice Note, December 2015, Historic England • Brent Archaeological Priority Areas, Historic England • Translating Good Growth for London's Historic Environment, April 2017, Historic England • Historic England's Conservation Principles	
Flood Risk	• Flood Risk Management Strategy, Brent Council • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Flood and Water Management Act 2010 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	Seeks to reduce the impacts of flood risk Promotes mitigation measures against flood risk
Climate Change Adaption Climate Change Mitigation	• Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC • Flood and Water Management Act 2010 • Energy Act 2013 • Climate Change Act 2008 • UK Climate Change Programme 2006 • The UK Low Carbon Transition Plan, HM Government, July 2009 • The Carbon Plan, HM Government, December 2011 • UK Renewable Energy Strategy, HM Government, 2009 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, GLA, October 2011 • Sustainable Design & Construction SPG, GLA, April 2014 • Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, GLA, October 2011 • Flood Risk Management Strategy, Brent Council • Climate Change Strategy, Brent Council	Promotes the move to a low carbon future through sustainable design. Promotes mitigating and adapting to climate change. Promotes the use of renewable energy and renewable technologies in appropriate locations.
Waste Management	• Waste Framework Directive 2008/98/EC	Prevention or reduction of waste and its harmfulness and the recovery of value

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• National Planning Policy for Waste, October 2014 • London's Waste Resource: The Mayor's Municipal Waste Management Strategy, GLA, November 2011 • Joint West London Waste Plan, 2015	from waste by means of recycling, re-use and reclamation.
Land & Soil	• Safeguarding our soils- A Strategy for England, Department for Environment, Food and Rural Affairs • Environmental Protection Act 1990 • Hazardous Substances Technical Consultation, October 2014, DCLG	England's soil are managed sustainability and degradation threats tackled successfully. Improve the quality of England soils and safeguard their ability to provide essential services for future generations

5. Key Sustainable Issues and Opportunities

5.1 As stated in the NPPG, the term 'baseline information' refers to the existing environmental, economic and social characterises of the area that are likely to be affected by the Local Plan, and their likely evolution without implementation of new policies. This information will help to identify the key sustainability issues and problems. It will assist monitoring of local plan policies.

5.2 Annex I of the SEA directive requires that the 'likely significant' effects of the environment are assessed. The following factors and the interrelationship between them need to be considered: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, and landscape.

5.3 The baseline data that may be affected by the Local Plan has been summarised within Table 5, with further detail in Appendix 2.

Table 5: Summary of Baseline Information

Topic	**Key Issue**	**Implications/Opportunities for the Local Plan**	**Relevant Draft IIA Objective(s)**
Population and Equality	• Brent's population has grown significantly since 2001. High growth is predicted to continue with the population projected to grow by 23.7% by 2050 – from approximately 329,000 in 2016 to approximately 407,000.	• The significant increase in population will place additional pressure on Brent's housing and infrastructure. The Local Plan should ensure that there is sufficient provision of housing and	**S1, S3, S6, S7**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)

	• The increase in population is likely to change the age structure and ethnicity of the borough's residents
	  ○ The current population structure shows that Brent has a young population, with 33.3% of residents being aged between 20 and 39. Residents aged 65 years and over currently make up 11.5% of the population, however this is anticipated to increase in forthcoming years.
	  ○ The proportion of the population who are of working age is predicted to remain relatively stable to 2050.
	  ○ Brent is one of the most ethnically diverse boroughs in the UK, with BAME groups making up 64.9% of the population, with the Indian ethnic group making the highest proportion. It is likely that the increase in population will create changes in the ethnicity of the borough. It is forecasted that there will be an increase in 'Other British' and 'Other Asian' ethnic group, with a decrease in the population 'White British' and 'Black Caribbean'.
	  ○ There are 149 languages currently being spoken in Brent, with English being the main language for 62.8% of the population.
	• Between 2001 and 2011, there was a slight change in Brent's resident's religion or belief – there was a slight decline in those who stated that Christianity was their religion/belief, and a growth in the amount of residents who stated that their religion or belief was Islam.
		infrastructure that supports both existing and future population.
		• The Local Plan should be mindful of the borough's ageing population, whom may require bespoke housing solutions and a different type of environment.
		• The projected increase in population will create an extra demand for educational establishments and recreational facilities, such as parks and leisure centres, inclusive of all age groups.
		• The wider population trend of an ageing population could place additional pressure on the borough's infrastructure, particularly healthcare facilities.
		• There is also a need for the Local Plan to seek to create attractive areas for young people and those looking to raise a family.
		• Brent has a diverse community and the plan will be need to mindful of the different needs of groups i.e. ensuring there is a range of religious facilities and different types of housing to suit the needs of the community.
		• The Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough. The built environment should encourage community cohesion and reduce isolation.
		• Language could be a potential barrier that prevents some residents from engaging in the Local Plan process.	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
Education & Qualifications	• At the start of the 2015/16 academic year there were 85 schools in Brent. The Brent School Place Planning Strategy states that the secondary school roll projections, provided by the GLA, indicate the need for the equivalent of 2 new secondary schools by 2022. • Brent's school population has increased from 44,117 in 2011 to 51,262 in 2017. Of this growth, there has been an unprecedented increase in the demand for primary school places. • The proportion of Brent pupils attaining 5+ GCSE grades A*-C has remained around the 60% mark. • At the end of the 2015/16 academic year, 84% of Brent schools were judged as good or outstanding. • In 2016, Brent was above the national averages for all primary school headlines, however the average proportion of girls attaining the expected standard in reading, writing and mathematics at KS2 was higher than boys. • For secondary, the average attainment rate is 51.5, which indicates that students in Brent achieved on average a Grade B and above in eight GCSE subjects. However, there is great variation in the attainment of pupils at different secondary schools. • In 2016, the average A-Level point score was 30.7, which indicates that on average Brent students attained a Grade C in each of their A-Levels. • 92% of Brent's school population are from minority ethnic groups, which is significantly higher than the national average of 29%.	• The Local Plan should seek to ensure that there is adequate provision of primary and secondary schools to support the current and future population. • Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible. • The Local Plan could explore the opportunities to evenly spread out the location of primary and secondary schools within the borough	**S1, S7, EC4**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)

	• In 2017, there were 6,429 pupils with Special Educational Needs (SEN), which equates to 12.5% of the pupil population.
	  ○ Speech, Language and Communication Needs is the most common primary type of need in primary schools
	  ○ Moderate Learning Difficulty is the most common primary type of need in secondary schools		

Health	• The life expectancy (between 2011 and 2013) in Brent for females was 84.9 years, while for males it was 80 years. However, the life expectancy varies at ward levels between the most deprived and least deprived wards for both male (4.7 years) and female (4.4 years)
	• The current care provision in Brent is 67 practices, 66 dental practices, 75 pharmacies and 16 nursing homes.
	• Obesity is a significant health challenge to the borough, with it projected to increase between 2014 and 2030.
	  ○ In 2014/15 23.8% of Year 6 children were classed as obese
	  ○ In 2015 940 hospital admissions per 100,000 people were for obesity related problems
	• Over half of Brent's adult population do not participate in sport or physical activity, the highest level of inactivity in West London.
	• In 2012/13 there were 82 hospital admissions in Brent where alcoholic liver disease was the primary diagnosis, which equates to 31.4 per 100,000 population.
		• There is an opportunity for the Local Plan to promote physical activity by ensuring sufficient sport and recreational facilities, in addition active travel, promoting walking and cycling.
		• The Local Plan should seek to protect and enhance the borough's current open spaces.
		• The Local Plan should seek to ensure that new developments can access open spaces and help to address areas of open space deficiency. Accessibility to green spaces can have benefits for both physical and mental health.
		• There is the opportunity for the Local Plan to identify schemes that will help its high street achieved a high school in the Healthy Streets Measure (out of 10)
		• Due to scale of development needed to achieve the London Plan housing targets, new healthcare facilities will need to be delivered.
			S1, S2,S4, S7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	○ The rate of alcohol specific hospital admissions in Brent is significantly higher than the England average for males. • 31.4% of the population abstain from alcohol • Mental health remains the single largest cause of morbidity within Brent, affecting ¼ of all adults at some time in their lives. • The TB incidence rate in Brent (82.9 per 100,000) is significantly higher than the London average. • Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent. • The borough has high levels of long-term chromic conditions, many of which can often be related to poor lifestyles, relative deprivation and in some cases ethnic make-up. • There is a rising level of dementia amongst older adults, with it expected that the total population who are aged 65 and over with dementia projected to increase from 2,379 to 3,857 by 2030. • Only 47.1% of the population in Brent were meeting the recommended 5-a day fruit and vegetable intake in 2014, below the London average of 50%. • Brent has 30,616 households with people living on their own. Of these, 29% are 65 and over. With the projected growth of those aged 5 and over it is forecasted that there will be a significant increase in those affected by social isolation and loneliness. • The GFR in Brent in 2012 was 72, higher than the Outer London and national average.		

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)

Crime	• Crime in Brent costs £150 million per annum, with £55 million of this on violent crime.
	• There has been an increase in non-domestic violence with injury and theft for a motor vehicle incidents within the borough.
	• In 2016/17, the number of total notifiable offences increased from 26,117 to 27,919. However, Brent's crime rate (85 per 1000 population) remained below the London average.
	• Brent has been identified as having a national-level gang issue.
	  ○ Based on the gang matrix it is estimated that there are 21 gangs in Brent
	  ○ It is estimated that there is over 1,000 individuals involved in gang criminality in Brent
	• Anti-social behaviour is a key priority in Brent
	  ○ On average, the police receive 12,000 calls per year reporting anti-social behaviour.
	  ○ During 2016/17, Brent Council opened 275 anti-social behaviour cases. Some of the case fell into the categories of noisy neighbours, neighbour disputers, rough sleepers and street drinking.
	  ○ Hotspots for ASB are gathered around the town centres
	• In 2014, 51% of the population said that they felt safe walking outside in their local area alone after dark, with 19% feeling a bit unsafe and 9% feeling very unsafe.
	• Brent is one of the 50 Prevent Priority boroughs
		• The Local Plan should seek to ensure the design of development improves the safety and perceived safety of communities, in accordance with Secured by Design principles.
		• The Local Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough. The built environment should encourage community cohesion and reduce isolation.
		• The Local Plan should encourage the use of lighting and passive surveillance to help improve perceptions of safety.
			S4, S5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	○ The principle risk for Brent is Al-Qaeda inspired extremism, including the role of Daesh/Islamic State		
Water	• All waterbodies within Brent's Blue Ribbon Network are achieving a 'moderate status'. The Water Framework Directive requires all members' states to achieving a 'good status' for all water bodies. • Areas that are potentially at risk of fluvial flooding include Welsh Harp, the River Brent and Wealdstone Brook. • 35,500 residential properties and 4,400 non-residential properties in Brent could be at risk of surface water flooding of greater than 0.1m depth during a rainfall event with a 1 in 200 probability occurrence. • The borough has 27 critical drainage areas within Brent. • The two areas of the borough where surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding is Kenton and Northwick Park and Preston Road.	• The Local Plan should seek to improve water quality by promoting the naturalisation of water bodies and ensuring that there is sufficient infrastructural capacity for new development, ahead of occupation including Sustainable Urban Drainage Systems. • The Local Plan should seek to encourage increased efficiency in the use of water through design measures. • The Local Plan should support opportunities for recreation on Grand Union Canal and Welsh Harp. • The Local Plan should seek to reduce risk of flooding to people and property.	**EN3, EN4, EN12**
Air Quality	• Brent does not meet the national air quality targets for Nitrogen Dioxide (NO_2) and Particulate Matter (PM_{10}). • The largest contributor the poor air quality in Brent is local energy generation, construction and road transport. ○ Transport and traffic is the largest contributor, accounting for at least 52% of all emissions.	• The Local Plan should seek to improve air quality. This can be achieved through a variety of means, such as the promotion of renewable energy, modal shift to public transport and sustainable construction.	**EN1, EN4**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• It is likely that pollution for construction works will continue to be a big polluter due to the amount of homes required to be built. • The Council has created four air quality action areas at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton.		
Soils & Geology	• The geology of Brent consists predominantly of London Clay of the Barnet Plateau underlain by a chalk aquifer. • Barn Hill Open Space has been put forward for designation as a Locally Important Geological Site (LIGS), due to the presence of Dollis Hill Gravel. • Contaminated land covers approximately ¼ of the land in Brent.	• The Local Plan should seek to protect LIGS. • The Local Plan should seek to support the decontamination of soil within the local area • The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past	**EN4, EN10**
Climate Change	• There are a number of 'possible' future risks (i.e. heavy thunderstorms and intense winter downpours, increased storminess, higher temperatures) that could occur in Brent as a result of climate change • In 2007, the Mayor of London committed the city to an emissions reduction of 60% by 2025 compared to 1990 levels. Nearly half of Brent's emissions come from the resident's homes, with a third from industry and commercial and a fifth from road transport.	• Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. • The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the development of a site-wide decentralised energy generation in growth areas. • A high proportion of energy generated should be from low, zero or negative carbon energy sources.	**EN8, EN9, EN12**
Biodiversity, Flora & Fauna	• The condition of the 62 Sites of Importance for Nature Conservation (SINCs) varies from poor structure and species diversity to species=-rich and structurally diverse.	• The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area, having regard to the site specific recommendations of the SINC study.	**EN3, EN5**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• There are a number of invasive species recorded on various SINC sites. ○ Three of the commoner invasive species were recorded in Brent River Park, and large stands of Japanese Knotweed were recorded on several sites, particular on the railway tracksides. Parakeets were found in a number of parks within the borough. • There are no European or other internationally designated sites in the borough. The closest international sit is Richmond Park. • There are 260 TPO's within the borough • Located within Brent and Barnet is the Brent Reservoir SSSI. The SSSI is of interest primarily for breeding wetland birds (in particular for significant numbers of nesting great crested grebe). The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London.	• Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving, and invasive species are removed. • Opportunities should be sought to promote habitat connectivity both within the area and outside of it, taking into account strategic links identified in the All London Green Grid. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the Local Plan. • The Local Plan should explore opportunities to incorporate biodiversity into new developments. • The Local Plan should continue to protect trees with preservation orders, and where appropriate create encourage the creation of new TPOs.	
Architectural and archaeological heritage (Heritage Assets)	• Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudor Bethan', 'Old World', modern and brutalist. • Brent has 1 Grade I listed building, 9 Grade II* listed buildings and almost 300 Grade II listed buildings • It has 3 Registered Parks and Gardens and 40 parks and gardens on the London Parks and Gardens Trust national inventory • Brent has 4 properties on Historic England's Heritage at Risk register.	• The Local Plan should ensure that both designated and non-designated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. • Heritage assets throughout the borough could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings. • Heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well	**EN7**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• There are 22 conservation areas in Brent, which covers 7.47% of the borough. • The Council has identified 4 archaeological priority areas (APAs) where there are significant known archaeological interest or potential for new discoveries. It has also identified 40 local sites of Archaeological Importance (SAO) • There are over 200 non-designated heritage assets on the Council's Local List.	as economically through regeneration. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use. In particular opportunities to protect heritage identified as being at risk should be considered. • The Local Plan will need to be mindful of the planned review of Archaeological Priority Areas in 2019. • The Council should consider reviewing its Local List alongside the Local Plan.	
Landscape and Townscape	• A townscape Analysis undertaken in 2007 found that a number of areas within the borough were of a low townscape quality. ○ However, since this study was undertaken many areas, such as South Kilburn, Stonebridge and Wembley, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and the public realm. • The majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. • There are 162 open spaces, of various types and size, located within the borough.	• The Local Plan will be supported by an Urban Characterisation Study, to inform how townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping. • Opportunities could be sought to maintain the important heritage of Brent. • Integration with the All London Green Grid Area SPG Frameworks is an important consideration.	**S4, EN6, EN11**
Waste	• The total amount of municipal waste collected in 2016/17 was 109,260 an increase of 1.8% from 2015/16. • The proportion of waste recycle and composted in the borough was at its highest point in 2011/12 and has subsequently declined in later years.	• The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. For example through innovative solutions such as the 'integrated circular economy,' whereby products are created, used and recycled locally.	**EN2**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• In Brent, there are 12 existing safeguarded sites, with the Veolia Transfer Station and Twyford Transfer Station identified for increased capacity. • The London Plan (2011) allocated each borough an amount of London's waste that it has to positively plan for and manage.	• The Local Plan will need to ensure Brent continues to contribute to meeting West London's Waste apportionment in line with the West London Waste Plan. • This will need to be balanced with the need to improve air quality, and therefore the Plan may seek to promote innovative waste management and transport techniques which are less detrimental to air quality.	
Transportation	• The most popular mode of transport for Brent residents is the car, accounting for an average 225,843 trips per day. • Brent has a relatively limited high-order road network which plays an important role for freight and traffic which cannot be transferred to public transport. ○ In 2013, 846 million vehicle kms were travelled in Brent, which equates to 2.9% of all London traffic. • High levels of congestion reduce the quality of life for Brent residents. • Between 2004 and 2012, Brent saw a 45% reduction in KSIs (killed or seriously injured) from road traffic collisions. In 2015, 81 people were killed or seriously injured. • Cycling only accounts for a small proportion of trips made by Brent residents (2.22%) and from trips originating within the borough (2.12%) • Pedestrian share accounted for 26% of all trips made by Brent residents and those which originate from within the borough. The Council aims to increase this to 30% by 2021/22.	• Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking and cycling. • The Local Plan should seek to maximise opportunities to improve rail capacity within the borough • The Local Plan should encourage the use of rail as a means of getting around the borough, and to other locations within London. • The Local Plan should identify opportunities that will allow development around transport hubs. • Opportunities should be sought to direct development to accessible locations and secure transport upgrades to enable development. • The Local Plan can help increase the modal share of journeys by bike by protecting existing and securing new cycle routes, in line with the route network identified in the Brent Cycling Strategy. • Ensure streets designed to healthy streets and living streets standards to promote walking. • The Local Plan could promote opportunities to use sustainable modes of transport to move freight, such as rail and canal	**EN1, EC5**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)

	• Brent is well served by a variety of public transport networks (4 London Underground Lines, London Overground services, Chiltern Railway services, southern railway services and London bus services).
	• Public transport accounted for 33% of resident trips per day. The most popular mode of public transport for Brent residents was the bus.
	  ○ Due to traffic congestion and a lack of dedicated infrastructure, buses are often stuck in traffic, leading to slow travel speeds and a lack of travel time reliability
	• Brent has a number of industrial estates that both rely on and generate freight movement.
	• There were approximately 88,000 on-street parking places across the whole of Brent.
	  ○ The Council has introduced 40 controlled parking zones across the borough, serving 56,000 households and with over 33,000 on-street parking spaces.
	  ○ The Council operates 12 public car parks which has a total of 796 spaces. There are also over 700 spaces in privately owned car parks.		

Noise	• There are a number of sources of noise pollution in the borough. These sources include ambient noise, which can originate from transport and industry. These are supplemented by more periodic local noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units.	• The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group. • The Local Plan should seek to protect the tranquillity of Quiet Areas.	**EN4**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• Areas adjacent to the North Circular Road in Brent has been identified as amongst the most affected by traffic noise in the UK. • The Council has identified a number of quiet areas within the borough.		

Local Economy	• Brent's residents workforce totals 184,300
	  ○ SOC (Standard Occupation Classification) Major Groups 1-3 forms the largest portion of Brent's workforce. However, the proportion of the resident workforce in these groups is significantly lower than the London average.
	• There are a number of SOC groups that are over-represented in Brent. These include skilled trade occupations and elementary occupations.
	• Brent's key employment sectors are 'Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles' (19%), 'Human Health and Social Work Activities' (15%) and 'Administrative and Support Service Activities' (8%).
	• Micro businesses (0-9 employees) form a significant proportion of the borough's business stock.
	  ○ There has been a steady growth in the amount of micros businesses within Brent since 2015, with it having a greater share of micro businesses in comparison to the London average
	• Large businesses represent the smallest share of business stock within the borough.
	• There is currently a total of approximately 395ha of land currently in active industrial use in Brent. Strategic Industrial Land accounts for around
		• The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy.
		• The Local Plan should consider how it can continue to support local enterprise, including micro-enterprises.
		• The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development.
		• There is a need to address the shortfall in office floorspace, and ensure sufficient employment land is provided to meet the assessed need.
		• The Local Plan could support the creation of mixed-use development
		• The Local Plan should encourage the provision of affordable employment space.
		• Targeted approach to employment, ensuring all within the borough have equal access to employment
			EC1, EC2, EC3, EC4, EC5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	75% of the borough's total industrial land portfolio, Locally Significant Industrial Sites around 14% and the remainder is contained within Local Employment Sites. • There is approximately 27700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm predominantly in industrial clusters. There is additional demand for between 32,600sqm and 52,350 sqm of office floorspace in the borough has been identified to 2029. However, office floorspace is under threat from prior approvals. • In 2016, the gross annual pay in Brent was £29,812, lower than the London average of £33,766 • In 2015, the employment rate in Brent was 69.5%. However, there is significant variation between the employment rate for males and females.		
Deprivation and living environment	• Brent's is the 39th most deprived borough in the UK. ○ Brent is divided into 173 Lower Super Output Areas (LSOAs), of which 14 are within the 10% most deprived LSOAs in the country. 6 of these LSOAs are located within the Stonebridge ward. • In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. • In 2015, it was estimated that 14,702 dwellings were fuel poor, which equates to 13.1% of all	• Deprivation is a complex issue with multiple aspects. In delivering employment opportunities, high quality new housing, improved social infrastructure, including access to education, and a higher quality environment the Local Plan can contribute toward reducing deprivation. • As there are areas within the borough that are within the 10% most deprived LSOAs in the country, the Local Plan could consider a targeted approach to reducing deprivation.	**S1**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	households. This is higher than both the London average and England average. • In 2011-2014, levels of child poverty in Brent was higher than the London and England average. ○ The highest rates of child poverty in the borough are in Stonebridge, Harlesden and Willesden Green		
Housing	• It is estimated that there is 121,048 households in Brent. It is projected that the number of households will increase by 1.45% each year to 2050. • Brent's 2016 SHMA identified an OAN of 47,500 dwellings between 2011-2037, which equates to 1826 dwellings per annum. This includes an OAN for 21,700 affordable homes over the same time period, which equates to an average of 835 dwellings per annum. The draft London Plan (2017) places the requirement on the borough to 2,915 dwellings per annum. • The 2016 SHMA identified that there was a high need for 3 bedroom properties in both the market and affordable sectors. • There has been a significant increase in the amount of flats/maisonettes or apartments within the borough. This dwelling type now accounts for ⅓ of the borough's housing stock. • Between 2001 and 2011, the mean household size in Brent went from 2.6 to 2.8. It is anticipated that the average household size will fall to 2.3 by 2050. • Between January 2013 and November 2017, house prices in Brent were above the London	• A key challenge for the Local Plan will be to identify sufficient sites to meet the borough's housing need, with a particular focus on affordable housing. • The Local Plan will need to secure an appropriate mix to meet need, in terms of size, tenure and specific specialist needs. • The Local Plan will need to be informed by an assessment of the need for further gypsy and traveller plots.	**S3, S4**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	average and significantly above the national average. • The amount of the population who own their own house has decreased since 2001, with there being a significant tenure shift to the private rented sector • Over 3,800 households are in Bands A-C on the Housing Register (those considered to be in housing need). 73% are in need following homelessness and 8% due to overcrowding, while 52% need three bed or larger accommodation. • There is one Gypsy and Traveller site in the borough at Lynton Close, Wembley, which contains 31 plots.		

6. Developing the IIA framework

6.1 The IIA Framework will be the methodology that is used to assess the environmental, social and economic sustainability impacts and health and inequality effects of the policies contained within the emerging Local Plan. The methodology comprises of a series of aspiration economic, social and environmental objectives that seek to contribute to the delivery of sustainable development and reflect the locally-specific conditions that are affecting the borough. The IIA objectives will be separate from the objectives contained within the Local Plan. However as the two processes influence each other there is likely to be some overlap.

6.2 The starting point in setting out the IIA objectives was the SA for the Development Management Policies (2016). The Development Management Sustainability Appraisal identified 24 objectives; 5 economic, 12 environmental and 7 social. These objectives have been analysed and refined through the following process:

- Review of relevant plans, programmes and policies.
- Identification of sustainability, health and equalities issues facing the borough through the collection of baseline data
- Findings from the IIA workshop (discussed in more detail below)

6.3 Table 6 shows the Integrated Impact Assessment Framework which will be used for the assessment of the proposed policies contained within the emerging Plan. A set of questions has also been developed for each objective to assist in the assessment of emerging policies, which will help in analysing the issues to be considered in the objectives. To help demonstrate how these assessments the questions have been integrated as part of the IIA, they have been colour-coded to indicate which assessment element they relate to. The colour coding of the assessment is as follows:

- SEA/EA
- EA
- HIA

Table 6: IIA objectives

Integrated Impact Assessment Objectives	**Criteria**	**Potential Indicators**	Targets
Social			
Prosperity, Inequalities and Social Inclusion S1. To promote social inclusion, narrow inequalities and address poverty for all communities within the borough.	• Will the policy/project reduce poverty and social exclusion in those areas most affected? • Will it improve affordability of essential services? • Will it promote social cohesion and integration? • Will it have a positive impact on reducing fuel poverty/ associated deaths? • Does it remove or reduce disadvantages suffered by people due to their protected characterises?	• The borough's ranking on the Indices of multiple deprivations (IMD) • Number of households in fuel poverty • % of children in income deprived households	Reduce the area of the Borough within the lowest 20% IMD category from 2015 levels
Health and Well-being S2: To improve the health of the population and reduce health inequalities through access to	• Does it protect and enhance access to the provision of health care/community/open space/leisure facilities? • Will it reduce death rates?	• Levels of obesity within the borough • Open Space deficient areas • Life expectancy – borough wide and at ward level	Improve life expectancy overall and reduce the difference between the average life expectancy of the best and worst performing areas of the borough

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
necessary healthcare facilities and an environment that promotes physical and mental well-being	• Will it promote physical activity or increase participation in sport and leisure activities for all low participation groups? • Will it promote opportunities for better food choices? • Will it enhance mental well-being through a safer, more stimulating and pleasant natural and built environment? • Will it reduce health inequalities? • Does it affect specific sub-groups disproportionately compared with the whole population?	• % of population participating in 30 minutes of moderate intensity sport • Healthy Street Scores • Mortality Rate • Number of patients registered at GP surgery • Proportion of the borough deficient in relation to local sport facilities	
Housing S3: To provide everybody with the opportunity to live in a home which is suitable to their identified needs	• Will it increase access to good quality and affordable housing? • Will it encourage mixed use and range of housing tenure types to meet the varied and in some cases specialist needs of the population? • Will it reduce the number of unfit homes? • Will it reduce homelessness/ people living in temporary accommodation?	• Net additional dwellings during financial year • Number and % of housing completions that were affordable during financial year • Number of specialist accommodation homes built during financial year • Proportion of family sized (3+ beds) homes • Proportion of homes split by different tenures within the Census	• The 2015 SHMA identifies that the full objectively assessed for housing in Brent is 47,500 dwellings over the Plan period 2011-37, which is equivalent to 1,826 dwellings per annum. This includes the objectively assessed need for affordable housing of 21,707 dwellings over the same period, equivalent to an average of 835 dwellings per annum. • The London Plan indicates that over a 10 year period,

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it provide an opportunity to maintain or increase owner-occupier levels?	• Number of people homeless/in temporary accommodation	Brent needs to provide 29,150 houses, which equates to 2,915 dwellings per annum over the ten year period (2019-2029). • 50% of new homes within affordable tenures • 25% of new homes 3+ beds • Maintain or increase owner-occupation proportions at or above 2011 levels • Older people's accommodation increased at London Plan target rates • Reduce homeless and temporary accommodation numbers from 2017 levels
Quality of surroundings S4: To provide a safe, high quality and healthy environment for the borough residents to live, work and enjoy.	• Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it improve residents' amenity and sense of place? • Will it reduce actual noise levels? • Will it reduce noise concerns?	• Noise levels within the borough • Healthy Street Scores • Accessibility to open space?	
Crime and Preventing and Community Safety S5: To enhance community safety by reducing and preventing crime, anti-social	• Will it reduce actual levels of crime? • Will it reduce the fear of crime? • Will it reduce actual and perceived threats to personal	• Number of notifiable offences during financial year • Anti-social behaviour cases open during financial year • Brent Crime rate	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
activity and the perception of potential harm to personal safety	safety for example from fire or terrorism?	• Number of gangs within the borough • % of population who feel safe walking outside after dark	
Community Identity S6: To recognise and provide for Brent's population diversity while encouraging a shared sense of community and cultural identity/belonging, as well as engagement in local, high quality community services and facilities	• Will it meet or, if subject to change, have the potential to meet a specific diversity need that is not currently catered for in the borough? • Will it foster a sense of pride in area? • Will it increase the ability of people to influence decisions? • Will it improve ethnic relations? • Will it encourage communication between different communities in order to improve understanding of different needs and concerns? • Will it encourage people to respect and value their contribution to society?	• Number of community facilities within the borough	
Accessibility S7: To maintain and enhance the role and vitality and viability of Brent's town centres and where possible improve accessibility to a range of services and facilities, such as healthcare and	• Will the development maintain or enhance the role and vitality and viability of Brent's town centre? • Will it improve accessibility to key local services?	• Proportion of new homes or floorspace within 800 metres of a town centre • Footfall in Brent town centres • Level of ground floor vacancies in Brent town centres	• Reduce levels of vacancy • Increase footfall in major town centres

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
education, especially for the most vulnerable	• Will it improve the level of investment in key community services? • Will it make access more affordable? • Will it make access easier for those without access to a car?	• Average rent for retail and other uses within Brent's town centres • Number of patients registered at a GP practice • Number of schools within the borough • Open space deficient areas	
Environmental			
Traffic EN1: To reduce the effect of traffic on the environment through actively reducing the need to travel and promoting sustainable modes of movement	• Will it reduce the need to travel? • Will it reduce traffic volumes? • Will it increase the proportion of journeys using modes other than the car? • Will it encourage walking and cycling?	• Modal share • Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more • Vehicle km travelled by mode each year • PTAL levels • Km of cycle and walking routes within the borough • Car Parking Spaces created during financial year • Proportion of underground/over ground stations with step free access.	• Increase modal share of walking to 30% by 2021/22 • Increase modal share of cycling to 3% by 2021
Waste Management EN2: To reduce the production of waste and use of non-renewable materials and maximising re-use and recycling.	• Will it minimise the production of waste and use of non-renewable materials? • Will it promote recycling? • Where reuse or recycling is not possible will it encourage potential for energy from	• Recycling and composting rates • Amount of waste collected during financial year	• The London Plan (2011) contains the following targets for Brent: ○ 2021 – Municipal Solid Waste – 149, 000 tonnes, Commercial and

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	waste to minimise volumes of land-fill?		Industrial Waste – 199,000 ○ 2026 – Municipal Solid Waste – 156,000 tonnes, Commercial and Industrial – 196,000 tonnes ○ 2031 – Municipal Solid Waste – 191 tonnes, Commercial and Industrial – 194,000 tonnes.
Water Quality and Resources EN3: To improve quality of the water bodies within the borough to 'good', protect ground water quality, conserve water resources and provide for sustainable sources of water supply.	• Will it improve the quality of inland water? • Will it reduce water consumption? • Will it reduce combined sewer overflow events?	• Water Consumption Levels • Water Quality Levels	• All water bodies to achieve a 'good' status by 2027
Environmental Health EN4: Minimise air, noise and light pollution and improve existing areas of poor air quality and contaminated land.	• Will it improve air quality? • Will it reduce noise pollution? • Will it reduce light pollution? • Will it help to achieve the objectives of the Air Quality Management Plan? • Will it reduce emissions of key pollutants?	• Amount of contaminated land remediated • Status of water bodies within the borough • % of borough within AQMA • Noise levels within the borough	
Biodiversity	• Will it conserve and enhance habitats of borough or local importance and create	• Number of SINCs within the borough	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
EN5: To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, water bodies and increase opportunities for people to access nature in all areas of the borough	habitats in areas of deficiency? • Will it conserve and enhance species diversity; and in particular avoid harm to protected species? • Will it maintain and enhance woodland cover and management? • Will it encourage protection of and increase the number of trees? • Will it improve access to the borough's biodiversity?	• Changes in the areas and populations of biodiversity importance • Status of water bodies within the borough • Number of TPOs created during financial year • Number of TPOs within the borough • Proportion of developments that incorporate green roofs or other features that have potential to enhance biodiversity	
Landscape and Townscape EN6: Create, enhance and maintain attractive and clean environments including protecting and enhancing the borough's landscape and townscape.	• Will it enhance the quality of priority areas for townscape and public realm enhancements? • Will it minimise visual intrusion and protect views? • Will it decrease litter in urban areas and open spaces?	• Number of Anti-Social Behaviour cases opened for littering • Developments occurring in priority areas for townscape and public realm enhancements • Quality status of the borough's open spaces (Green Flag)	
Historic Environment and Cultural Assets EN7: To protect and where appropriate enhance the historic environment and cultural assets.	• Will it protect and enhance Conservation Areas and other sites? • Will it protect and enhance features and areas of historical and cultural value, such as assets of community value?	• Number of buildings on heritage at risk register • Number of listed buildings • Number of conservation areas • Number of buildings on the borough's Local List	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it protect listed buildings? • Will it help preserve and record archaeological features?	• Changes in the number of public houses • Changes in number of music venues, nightclubs, cinemas, theatres and art galleries	
Climate Change Mitigation EN8: To mitigate against the impacts of climate change, predominately through reducing greenhouse gas emissions	• Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will it lead to an increased proportion of energy needs being met from local district heating and energy networks or renewables sources? • Will it reduce emission of ozone depleting substances?	• Renewable energy installed by type • Proportion of dwellings/other floorspace connect to combined heat and power of district heating networks • Greenhouse gas emissions, by source, within the borough • Progress made against the actions contained within the Council's Climate Change Strategy	• National target or reducing greenhouse gas emissions by 80% by 2050 • In 2007, the Mayor of London committed the city to an emissions reduction of 60% by 2025 compared to 1990 levels. This target is applicable to Brent.
Climate Change Adaption EN9: Promote measures which adapt against the impact of climate change	• Will it reduce the risk of damage to property from storm events? • Will it maintain or ideally reduce the potential for over-heating/urban heat island effect?	• Renewable energy installed by type • SuDS installed during financial year • Number of developments built within a flood zone area	• National target or reducing greenhouse gas emissions by 80% by 2050 • In 2007, the Mayor of London committed the city to an emissions reduction of 60% by 2025 compared to 1990 levels. This target is applicable to Brent
Land and Soil EN10: To safeguard and conserve soil quality and quantity within the borough	• Will it minimise development on Greenfield sites? • Will it ensure that where possible; new development occurs on derelict, vacant and	• Soil quality within the borough • Number of LGIS within the borough	• Protect Barnhill as a Locally Important Geological Site (LGIS)

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	underused previously developed land and buildings? • Will it ensure land is remediated as appropriate? • Will it minimise the loss of soils to development? • Will it maintain and enhance soil quality? • Will it reduce the risk of subsidence?		
Open Space EN11: Protect, enhance, and where possible increase the amount of open spaces that are high quality, easily accessible and multi-functional.	• Contribute to addressing areas of open space deficiency? • Improve the quality of open space? • Increase the accessibility of an open space?	• Number of open spaces within the borough • Open space deficient areas within the borough • Loss of open space during financial year • Number of open spaces obtaining Green Flag standard • Public opinion on open spaces within the borough	• No open space deficient areas within the borough
Flood Risk EN12: To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	• Will it avoid areas of flood risk? • Where it cannot avoid risk areas will it minimise the risk of flooding from rivers, watercourses, surface water and sewage to people and property	• Number of applications granted permission within Flood Zone 3 • % of borough located within undefended Flood Zone • Flooding Events	
Economic			

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Growth and Regeneration EC1: To actively promote sustainable, resilient and inclusive economic growth and regeneration which tangibly benefits Brent residents and the environment	• Will it encourage the maintenance and provision of land and premises for identified employment needs? • Will it encourage new business start-ups and opportunities for local people? • Will it promote regeneration? • Will it reduce disparities within the surrounding areas? • Will it improve business development and enhance productivity? • Will it improve the resilience of business and the local economy? • Will it promote growth in key sectors? • Will it promote growth in key clusters? • Will it enhance the impact of the area as a business location?	• Number of employee jobs within the borough • Number of businesses within the borough • Amount of floor space development for employment by type created during the financial year • Amount of employment floorspace lost during the financial year	
Employment EC2: To offer everybody the opportunity for rewarding and satisfying employment /self-employment	• Will it reduce short and long-term local unemployment? • Will it provide job opportunities for those most in need of employment? • Will it help to reduce long hours worked	• Unemployment rate within the borough • Employee jobs, by sector, within the borough	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Investment EC3: To facilitate both indigenous and inward investment within the borough	• Will it reduce commuting? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce journey times between key employment areas and key transport interchanges? • Will it facilitate efficiency in freight distribution?	• Journey times to key employment areas • Mode of travel to work • Number of businesses opened within the borough during financial year • Size of businesses opened within the borough during the financial year	
Education and Skills EC4: Maximise the potential for everybody to contribute economically through increasing and improving the provision of and access to childcare, education and training facilities, volunteering opportunities and informal employment	• Will it improve qualifications and skills of the population? • Will it improve access to high quality educational facilities? • Will it help fill key skill gaps?	• Average grades achieved during financial year for KS2, KS3, KS4 and KS5 • Pupil population of Brent • OFSTED status of schools within Brent • Education space created during financial year • Education space lost during financial year	
Efficient Infrastructure EC5: To encourage efficient infrastructure to support economic growth	• Will it reduce commuting? • Will it improved accessibility to employment places by public transport? • Will it facilitate efficiency in freight distribution?	• Number of km travelled during the financial year by freight vehicles • Amount of freight carried by rail during the financial year • Amount of freight carried by water during the financial year • Number of residents employed within the borough • Mode of transport to work	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
		• Proportion of the borough within access to high speed broadband/IT infrastructure to meet modern day requirements	

6.4 The SEA Directive requires the objectives within a sustainability appraisal to cover 12 topics. Table 7 indicates the relationship between the 12 SEA topics and the identified IIA objectives.

Table 7: Relationship between SEA issues and the IIA objectives

SEA Directive Issues	IIA Objective(s)
Climatic Factors	EN1, EN3, EN8, EN9, EN12
Material Assets	S3, EC3, EC4, EN2
Biodiversity	EN3, EN4
Population	S1, S2, S3, S6, EC1, EC2
Human Health	S1, S2, S4, S5, S7
Fauna	EN4
Flora	EN4
Air	EN3
Water	EN3, EN5, EN12

Cultural Heritage	EN7, S6
Landscape	S4, EN6, EN7, EN11
Soil	EN4, EN10

6.5 The nature and potential impacts of the policies will be assessed using the approach summarised in the Table 8. A similar approach was adopted for the SA of the development management policies.

Table 8: Assessment Approach of IIA objectives

Symbol	Likely effect against the IIA objectives	Description of effect
++	Significant Positive	Very likely to lead to a significant opportunity/improvement, or a series of long-term improvements, leading to large-scale permanent benefits to the sustainability objective being appraised. The impact is likely to benefit a large area of the borough, or a large proportion of the boroughs residents. The policy/project is like to create a major positive effect that could have cumulative and indirect beneficial impacts and/or improve conditions outside the specific policy or project area – will have positive transboundary effects.
+	Minor Positive	Likely to lead to moderate improvement in both short and long-term, leading to large scale temporary or medium-scale permanent benefits to the objectives being appraised. The impact is likely to be limited to a small area within the borough, or a small proportion of the boroughs residents. The magnitude of the predicted effects of the policy/option will be minor.
0	Neutral	Unlikely to have any beneficial or negative impact/effect on the objective being appraised, either in the present or future.
-	Minor Negative	Likely to lead to moderate damage/loss in both short and long-term, leading to large-scale temporary, or medium scale permanent negative impact on the objective. The impact is likely to be limited to a small area within the borough, or limited to small groups of people. The effects can either be direct or indirect, with the magnitude likely to be minor. It is also likely that it will be possible to mitigate or reverse a minor negative effect through policy or project intervention.

--	Significant Negative	Very likely to lead to significant damage in the long-term, or a series of long-term negative effects, which leads to a large-scale and permanent negative impact on the sustainability objective being appraised. The impact is likely to affect the whole, or large areas of the borough or the majority of the population. The detrimental impacts of the policy/option will be hard to reverse and are unlikely to be easily mitigated through policy or project intervention.
?	Unknown	The effect of a policy/option cannot be, or is not, known or is too unpredictable to assign a conclusive score.
-/+	Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria.
N/A	Not Applicable	This is applied to objectives that will not be affected by the policy/option that is being assessed.

6.6 When determining the likely significance of the impacts of the policies, consideration should be given to the characteristics of the receptors involved. To assist in determining the impact, the following should be considered:

- Probability, frequency, duration and reversibility of effects
- Magnitude and spatial impact of effects
- Cumulative nature of effects
- Value and vulnerability of area likely to be effected

6.7 Commentary will be included which provides an overall summary which supports the score provided and comments on the predicted effects.

7. Consultation

7.1 Regulation 12(5) of the SEA Directive requires the authority preparing the plan to consult with the following statutory bodies on the scope and level of detail of the information that is included within this draft Scoping Report:

- Environment Agency;
- Historic England; and
- Natural England

IIA Workshop

7.2 At the IIA workshop, attendees identified a number of key issues. These have been summarised in Appendix 3.

Formal Consultation

7.3 As the IIA has a broader scope than environmental issues, as well as consulting with the three statutory bodies identified above, the Council will publish the draft Scoping Report to invite wider feedback from the general public and other interested stakeholders.

7.4 Following on from the public consultation, the Scoping Report will be finalised and used as a framework to assess the policies in the emerging Local Plan.

Appendix 1: Review of Relevant Plans and Programmes

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
International/European		
SEA Directive 2001 European Directive 2001/42/EC	For public plans and programmes requires an environmental report to be prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programmes are identified.	The IIA will accord with the requirements of the Directive to assess significant effects of Plan and reasonable alternatives.
The Habitats Directive European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	The aim of the Habitats Directive is to ensure the conservation of a wide range of rare, threatened or endemic animal and plant species across Europe. As part of this directive, a network of sites known as Natura 2000 sites or European sites (Special Areas of Conservation (SACS), Special Protection Areas (SPAs) and Ramsar Sites) was established.	IIA to incorporate HRA assessing impact of proposed development/policies on National and European Sites protected under the Directive. The IIA to incorporate an objective on protecting and maintaining the natural environment and important landscape features The development proposals contained within the Local Plan should not have any adverse impact on Natura 2000 sites or European Sites.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
European Directive: Environmental Noise Directive 2002/49/EC	The aim of the Environmental Noise Directive (END) is to "*define a common approach intended to avoid, prevent or reduce on a prioritised basis he harmful effects, including annoyance, due to exposure to environmental noise".* The directive also aims to provide a basis for developing community measures to reduce noise emitted by the major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery. The Environmental Noise Directive focuses on three action areas: • the determination of exposure to environmental noise • ensuring that information on environmental noise and its effects is made available to the public • preventing and reducing environmental noise where necessary and preserving environmental noise quality where it is good The Directive requires Member States to prepare and publish, every 5 years, **noise maps** and **noise management action plans** for: • agglomerations with more than 100,000 inhabitants • major roads (more than 3 million vehicles a year) • major railways (more than 30,000 trains a year) • major airports (more than 50,0000 movements a year, including small aircrafts and helicopters)	The IIA to incorporate an objective which considers the potential effects of the Local Plan in terms of environmental noise. The Local Plan should seek to minimise the adverse impacts of environmental noise for people living and working in, and visiting the area. The emerging Local Plan should seek to prevent and reduce environmental noise and preserve quiet areas.
EU Directive on Ambient Air Quality and Management 96/62/EC	Merges four directives into a single directive on air quality. It sets standards and target dates for reducing concentrations of fine particles, which together with coarser particles known as PM_{10} already subject to legislation, are among the most dangerous pollutants for human health. Under the directive Member States are	IIA objectives should consider the potential effects that the emerging Local Plan will have in terms of air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	required to reduce exposure to $PM_{2.5}$ in urban areas by an average of 20% by 2020 based on 2010 levels.	
Water Framework Directive 2000/60/EC	The Water Framework Directive is primarily concerned with the quality of waters, and commits all member states to achieving 'good status' for all water bodies by defining and implementing the necessary measures within integrated programmes of measures, taking into account existing Community requirements. The Directive promotes the development and application of sustainable urban drainage systems (SuDS) policy.	IIA objectives to reflect the need to improve water quality. The emerging Local Plan should consider issues around the protection of water quality and SuDS.
Waste Framework Directive 2008/98/EC	The Waste Framework Directive provides the legislative framework for the collection, transport, recovery and disposal of waste. It requires all member states to ensure waste is recovered or disposed of without endangering human health of causing harm to the environment. The directive also requires member states to take appropriate measures to encourage firstly, the prevention or reduction of waste and its harmfulness and secondly, the recovery of value from waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials	The IIA should consider the issues around waste and recycling and the possibility of utilising waste as a means of power generation. The emerging Local Plan should consider issues around waste and the possibility of utilising waste as a means of power generation. The emerging Local Plan should contain policies that contribute to achieving the waste targets set out in the London Plan.
Urban Waste Water Treatment Directive 91/271/EEC	The objective of the Urban Waste Water Treatment directive is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of:	The emerging Local Plan and IIA Objectives should take into account the issues around the management of urban waste water.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Domestic waste water • Mixture of waste water • Waste water from certain industrial sectors The Directive requires the following actions to be undertaken from all Member states: • The Collection and treatment of waste water in all agglomerations of >2000 population equivalents • Secondary treatment of all discharges from agglomerations of >2000 p.e., and more advanced treatment for agglomerations >10,000 population equivalents in designated sensitive areas and their catchments • A requirement for pre-authoritisation of all discharges of urban wastewater, or discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; • Monitoring the performance of treatment plants and receiving wasters; and • Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.	
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	The Promotion of the Use of Energy from Renewable Sources directive establishes an overall policy for the production and promotion of energy from renewable sources in the EU. It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020. All EU counties must also ensure that there is at least 10% of their transport fuels come from renewable sources by 2020. The Directive specifies national renewable energy targets for each country, taking into consideration the country's starting point and	IIA objectives to reflect the need to promote renewables. The emerging Local Plan will need to consider a policy response to aid in the promotion of renewable energy that will ensure national and international obligations specified within this directive are met.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	overall potential for renewables. The United Kingdom has a target of at least 15% share of energy from renewable sources.	
Health for Growth 2014-2020, European Commission, 2011	Health for Growth is the third EU health programme. It seeks to enable health to better contribute to economic growth and achieving the objectives of Europe 2020. The programme has the following 4 overarching objectives: 1. Promote health, prevent diseases and foster supportive environments for healthy lifestyles taking into account the 'health in all policies' principle 2. Protect Union citizens from serious cross-border health threats 3. Contribute to innovative, efficient and sustainable health systems 4. Facilitate access to better and safer healthcare for Union citizens	IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The emerging Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision. The emerging Local Plan should consider public health.
European Convention on the Protection of the Archaeological Heritage (revised), 1992	The aim of this Convention (also referred to as the Valletta treaty) is to protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study. The need to protect the archaeological heritage should be reflect in town and country planning and cultural development policies.	IIA objectives to reflect the requirement to protect archaeological heritage. The emerging Local Plan should continue to contribute to the protection of the borough's archaeological heritage.
European Landscape Convention 2000	The European Landscape Convention (also known as the Florence Convention) promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	IIA objectives to reflect the need to promote landscape protection. The emerging Local Plan should consider a policy response to protecting European Landscapes.
National		
Equality Act 2010	Under regulation 149 of the Equality Act 2010, a public authority and those who exercise public functions, in the exercise of its function, to have due regard to the need to	The IIA will fulfil the requirements of the Equality Act through the carrying out of an Equality Impact Assessment (EqIA).

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act • Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.	The emerging Local Plan will play an important role in advancing equality of opportunity and fostering good relations.
Wildlife and Countryside Act 1981	The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats and Council Directive 79/049/EEC on the conservation of wild birds in Great Britain. The Act makes it an offence to kill, injure or otherwise harm any wild bird, specified animals (listed in Schedule 5) and wild plants. The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.	The IIA should consider the potential effects the emerging Local Plan will have on the borough's wildlife. The IIA objectives to reflect the need to protect native wildlife. The emerging Local Plan to consider how it can promote naturalisation. The emerging Local Plan to consider the issues around the protection of wildlife.
Flood and Water Management Act 2010	The Flood and Water Management Act provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer. The Act contains the following key actions: • Requirement for the Environment Agency to develop, maintain, apply and monitor a strategy for flood and coastal erosion risk management in England which a number of organisations will have to follow	IIA objectives to reflect the need to address flooding and water management. The emerging Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS) The emerging Local Plan to be informed by a Strategic Flood Risk Assessment, and support the

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan

	• Requirement for lead local flood authority for an area in England to develop, maintain, apply and monitor a strategy for local flood risk management in its area
	• Enables the Environment Agency and local authorities t to exercise their flood or coastal erosion risk management functions with greater ease than previously
	• Requirement for a lead local flood authority to
	  ○ establish and maintain a register of structures or features which, in the opinion of the authority, are likely to have a significant effect on a flood risk in its area; and,
	  ○ a record of information about each of those structures or features, including information about ownership and state of repair
	• Introduces a more risk-based approach to reservoir management
	• Requirement for a sustainable drainage system (to be approved prior to construction) at certain type of development sites
	• Introduces a mandatory building standard for sewers
		implementation of the flood risk management strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
The Children Act 2004	The Children Act places a statutory duty on local authorities to act as the champion for all children and young people in the borough Each local authority in England must make arrangements to co-operate with relevant partners, with the view to improving the well-being of children in the authority's area so far as relating to: 1. Physical and mental health and emotional well-being 2. Protection for harm and neglect 3. Education, training and recreation 4. The contribution made by them to society 5. Social and economic well-being The Act also places a requirement on a local authority to establish a Children's Trust Board and a Local Safeguarding Children Board for their area. Regulation 17 of the Act states that "*The Secretary of State may be regulations require a Children's Trust Board …. From time to time to prepare and publish a children and young people's plan"*, which sets out the strategy of the persons or bodies represented on the Board for co-operating with each other with a view of improving the well-being of children and relevant young persons in the area.	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The emerging Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough. The emerging Local Plan should seek opportunities to improve the environment in which children and young people live, learn, work and play
Education Act 2011	The Education Act places a statutory duty on local authorities to "*promote high standards and fulfilment of potential in school so that all children and young people benefits from at least a good education".*	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The emerging Local Plan to ensure that there is sufficient social infrastructure i.e. schools, social care

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
		and community halls, to support the growing population.
Energy Act 2013	The Energy Act establishes a legislative framework for delivering secure, affordable and low carbon energy. The Act includes provisions on decarbonisation, nuclear regulation, government pipe-line and storage system, electricity market reform and consumer protection.	The emerging Local Plan and the IIA will take account of the Energy Act where it is relevant IIA objectives to reflect the need to promote low carbon energy.
Climate Change Act 2008	The Climate Change Act sets legally binding targets to ensure that the net UK carbon account for 2050 is at least 80% lower than the 1990 baseline The Act also places a duty on the Secretary of State to • Set for each succeeding period of five years beginning with the period 2008-2012 an amount for the net UK carbon account, and • To ensure that the net UK carbon account for a budgetary period does not exceed the carbon budget	IIA objectives to reflect the need to reduce carbon dioxide emissions. The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change. The emerging Local Plan should consider issues around climate change.
Planning (Listed Building and Conservation Areas) Act 1990	The Planning (Listed Building and Conservation Areas) Act consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest. Regulation 66 states that "*In considering whether to grant planning for permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".*	IIA objectives to reflect the desirability of preserving heritage. The IIA should consider the impacts proposed development/policies would have on the borough's heritage assets. The emerging Local Plan should consider issues around the management of the borough's heritage assets.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Ancient Monuments and Archaeological Areas Act 1979	The Ancient Monument and Archaeological Area Act consolidates and amends the law relating to ancient monuments. It makes provision for the investigation, preservation and recording of matters of archaeological or historical interest and for the regulation of operations of activities affecting such matters. Section 61(12) defines sites that warrant protection due to their being of national importance as 'ancient monuments'. The Act also introduced the concept of Areas of Archaeological Importance and city centres of historic significance which receive limited further protection by forcing developers to permit archaeological access prior to building work starting.	The IIA and Local Plan Review will take into account and accord within the provisions set out in the Ancient Monuments and Archaeological Areas Act.
UK Climate Change Programme 2006	The UK Climate Change Programme sets out the Government's commitments both at international and domestic levels to meet the challenge of climate change. On a domestic level the strategy stated that the following actions would be carried out: • Report annually to Parliament on emissions, future plans and progress on domestic climate change • Set out an adaptation plan for the UK which has been informed by additional research on the impacts of climate change. The strategy identified a number of primary elements which involved working with a number of sectors (energy, business, public sector and local government, transport, agriculture) to improve fuel and energy efficiency.	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency. The emerging Local Plan should consider issues around climate change. The emerging Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.
National Planning Policy Framework, Department for Communities and Local Government, March 2012	The National Planning Policy Framework (NPPF) sets out the Government's requirement for the planning policies for England and how these are expected to be applied. As stated in Paragraph 12, "*At the heart of the National Planning Policy Framework is a* ***presumption in favour of sustainable development,*** *which should be seen as the golden threat running*	The IIA objectives to encompass economic, social and environmental sustainability principles outlined in the NPPF

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	through both plan-making and decision-taking". The Government believes that sustainable development can be achieved through the following three roles: • An economic role – contributing to building a strong, responsive and competitive economy • A social role – supporting strong, vibrant and health communities; and • An environmental role – contributing to protecting and enhancing our natural, built and historic environment Identified in Paragraph 17 of the NPPF is 12 core land-use planning principles which should underpin both plan-making and decision-taking. Prior to discussing plan-making and decision-taking, the NPPF set outs the policies for planning in England, which are broken down into the following 13 sections. 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy 4. Promoting sustainable transport 5. Supporting high quality communications infrastructure 6. Delivering a wide choice of high quality homes 7. Requiring good design 8. Promoting health communities 9. Protecting Green Belt land 10. Meeting the challenge of climate change, flooding and coastal change 11. Conserving and enhancing the natural environment 12. Conserving and enhancing the historic environment 13. Facilitating the sustainable use of materials	The emerging Local Plan must be in conformity with the NPPF and promote sustainable development.
National Planning Policy for Waste, October 2014	The National Planning Policy for Waste sets out detailed waste planning policies. The document provides guidance on how local planning authorities should identify the need for waste management	IIA objectives and the emerging Local Plan should seek to promote a

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	facilities, identify suitable sites and determine waste planning applications	sustainable and efficient approach to resource use and management. The emerging Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns.
Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	Planning Policy for Traveller Sites sets out the Government's planning policy for traveller sites. It states that "*The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community".* To help achieve the above overarching aim, the Government's aims in respect of traveller sites are: A. That local planning authorities should make their own assessment of need for the purposes of planning B. To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites C. To encourage local planning authorities to plan for sites over a reasonable timescale D. That plan-making and decision-taking should protect Green Belt from inappropriate development E. To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites F. That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective. G. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies	IIA objectives should seek to ensure fair and equal treatment of travellers, ensuring their needs are addressed. The emerging Local Plan should identify need and seek to address under provision for the travellers community.

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	H. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply I. To reduce tensions between settled and traveller communities in plan-making and planning decisions J. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure K. For local planning authorities to have due regard to the protection of local amenity and local environment	
DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016	Identifies the Government's vision, system goals, delivery priorities and principles for the UK's education system. The vision is as follows: "*Provide world-class education and care that allows every child and young person to reach his or her potential, regardless of background".* To achieve the above vision, the strategy sets out the following twelve strategic priorities: *1.* Recruit, develop, support and retain teachers *2.* Strengthen school and system leadership *3.* Drive sustainable school improvement *4.* Embed clear and intelligent accountability *5.* Embed rigorous standards, curriculum and assessment *6.* Ensure access to quality places where they are needed *7.* Deliver fair and sustainable funding *8.* Reform 16-19 skills *9.* Develop early years strategy *10.* Strengthen children's social care *11.* Support and protect vulnerable children *12.* Build character and resilience	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The emerging Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.
Conservation Principles Policies and Guidance for	Sets out the logical approach to making decision and offering guidance about all aspects of England's historic environment.	IIA objectives to reflect the desirability of preserving heritage.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
the Sustainable Management of the Historic Environment, English Heritage (now known as Historic England), April 2008	The document sets out the following six conservation principles which are to provide a comprehensive framework for sustainable management of the historic environment. : 1. The historic environment is a shared resource 2. Everyone should be able to participate in sustaining the historic environment 3. Understanding the significance of place is vital 4. Significant [places should be managed to sustain their values 5. Decisions about charges must be reasonable, transparent and consistent 6. Documenting and learning from decisions is essential	The IIA should consider the impacts proposed development/policies would have on the borough's heritage assets. The emerging Local Plan should seek to protect and enhance the borough's heritage assets The emerging Local Plan should consider issues around the management of the borough's heritage assets.
International education strategy: global growth and prosperity, Department for Business, Innovation and Skills, Department for Education, July 2013	Sets out how the education sector must make the most of the benefits that international students bring, but also ensuring that they have access to good quality education. It identifies the strengths of the UK's education sector, but also highlights the following challenges: • Lack of co-ordination between agencies and actors • Not structure for growth • Visas • Competition from new types of provider • Stronger county-to-country competition • Changing customer relationships The document introduced a number of policy approaches, such as providing a competitive visa system, leading the world in education technology and supporting new and long-established British schools and college to operate overseas, to overcome the challenges.	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The emerging Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough The emerging Local Plan should seek to establish a strong commitment to high quality education which will generate economic, personal and cultural growth.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
The UK Government Sustainable Development Strategy, HM Government, 2005	The strategy set out the following guiding principles which will be used to achieve the sustainable development purpose and will form the basis for policy in the UK: • Living within environmental limits • Ensuring a strong, healthy and just society • Achieving a sustainable economy • Promoting good governance • Using sound science responsibly The shared priority areas for immediate action identified within the strategy are: • Sustainable consumption and production • Climate change and energy • Natural resource protection and environmental enhancement • Sustainable communities	The emerging Local Plan and the IIA objectives should reflect the vision and objectives of the strategy and promote sustainable development.
The UK Low Carbon Transition Plan, HM Government, July 2009	Sets out the Government's plan to deliver emission cuts of 18% on 2008 levels by 2020. Key steps include: • getting 40% of electricity from low carbon sources by 2020 • making homes greener • helping the most vulnerable, through a community based approach to delivering green homes • promoting green industry; • tackling emissions from farming; and • cutting carbon dioxide emissions from transport	IIA objectives to reflect the need to reduce carbon dioxide emissions. IIA objectives to reflect the need to promote low carbon energy. The emerging Local Plan should seek to reduce carbon emissions, promote the greening of houses and the use of renewable energy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
The Carbon Plan, HM Government, December 2011	The Plan sets out how the UK will make the transition to a low carbon economy to help cut emissions by 80% by 2050, while maintaining energy security. The Plan focuses around the topics of: • Low Carbon Buildings – by 2050, all buildings will need to have an emissions footprint close to zero. Buildings will need to become better insulation, use more energy-efficient products and obtain their heating from low carbon sources. • Low Carbon Transport – by 2050, domestic transport will need to be substantially reduce its emissions • Low Carbon Industry - By 2050, the Government expects industry to have delivered its fair share of emissions cuts, achieving reductions of up to 70% from 2009 levels. • Low Carbon Electricity – by 2050, emissions from the power sector need to be close to zero • Agriculture, land use, forestry and waste - Government is encouraging practical actions which lead to efficiencies such as improved crop nutrient management and better breeding and feeding practices, which save both money and emissions.	IIA objectives should be reflective of the move to the low carbon future. The emerging Local Plan take account of and be in line with The Carbon Plan.
UK Renewable Energy Strategy, HM Government, 2009	The strategy sets out the path for the UK to meet legally-binding target to ensure 15% of our energy comes from renewable sources by 2020. The Strategy also states that it will help to "*tackle climate change, reducing UK's emissions of carbon dioxide by over 750 million tonnes between new and 2030. It will also promote the security of our energy supply, reducing our overall fossil fuel demand by around 10% and gas imports by 20-30% against what they would have been in 2020".*	Issues around renewable energy will be considered in the IIA. The emerging Local Plan and the IIA will take account of, and be in line with the UK Renewable Energy Strategy. The emerging Local Plan to promote the use of renewable energy to help contribute to meeting legally-binding targets.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	Future Water sets out how the government wants the water sector to look by 2030, and identified some of the steps that need to be undertaken to get there The Government's vision for water policy and management is one where, by 2030 at the latest, we have: • Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water from our taps; • Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; • Ensured a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; • Embedded continuous adaptation to climate change and other pressures across the water industry and water users. As part of the above vision, the Government would like to achieve the following objectives: • Reduced per capita consumption of water through cost effective measures, to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day • Amending the Building Regulations to include a requirement for a minimum standard of water efficiency in new homes • Development of a National Policy Statement for water supply and wastewater treatment infrastructure • Large majority of water bodies in England having good ecological and chemical status	The IIA should consider the potential effects of the emerging Local Plan around water management. The IIA objectives should reflect the need for sustainable water use and the need to manage flood risk. The emerging Local Plan should consider the issues around water management and flood risk within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS) The emerging Local Plan should seek to improve the chemical and ecological status of water bodies within Brent.
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	The purpose of the UK Biodiversity Framework is to set a broad enabling structure for action across the UK between 2011 and 2020. The Framework sets out the following vision:	IIA objective to reflect the need to value, conserve and restore ecosystem services within the borough.

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	"*By 2050, biodiversity is valued, conserved, restored and wisely used, maintain ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'.* The Framework is based on the following five strategic goals: • Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society • Reduce the direct pressures on biodiversity and promote sustainable sue • To improve the status of biodiversity by safeguarding ecosystem, species and genetic diversity • Enhance the benefits to all from biodiversity and ecosystems • Enhance implementation through participatory planning, knowledge management and capacity building. The document identifies 23 areas of work which will contribute to the four UK counties achieving the 'Aichi Biodiversity Targets' and the aims of the EU biodiversity strategy.	The IIA should assess the potential impacts policies and proposals contained within the emerging Plan could have on the borough's biodiversity. The emerging Local Plan should promote biological diversity and seek to avoid any detrimental impact on species and habitats.
Safeguarding our soils: A Strategy for England, Department for Environment Food and Rural Affairs	The Strategy sets out the following vision: *By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.* The Strategy introduced a number of key new actions, which includes: • A commitment to developing a new framework for action for peat protection, including on horticultural peat use post 2010 • Reviewing thresholds for pollutants entering soil through recycling materials to land • Publishing a new code for practice for soil use on construction sites and a new toolkit for planners in 2010 on	IIA objectives to reflect the need to protect the quality of oils and safeguard their ability to provide essential services for future generations. The emerging Local Plan to reflect the objectives of this strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	how to take account of soil functions through the planning system	
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	This White Paper outlines the Government's commitment to protecting the population from serious health threats; helping people live longer healthier and more fulfilling lives; and improving the health of the poorest, fastest. The Paper responds to Professor Sir Michael Marmot's *Fair Society, Healthy Lives* report and adopts its life course framework for tackling the wider social determinants of health. The approach will aim to build people's self-esteem, confidence and resilience right from infancy – with stronger support for early years. The Paper identifies that the current approach is not up to the task of seizing the number of opportunities identified and sets out a new approach that will **reach across and reach out –** addressing the root causes of poor health and wellbeing, reaching out o he individuals and families who need the must support. The new approach will be: • ***Responsive*** – owned by communities and shaped by their needs • ***Resourced*** - with ring-fenced funding and incentives to improve • ***Rigorous –*** professionally-led, focused on evidence, efficient and effective; and • ***Resilient –*** strengthening protection against current and future threats to health The White Paper highlights local innovation and outlines the cross-government framework that will enable local communities to reduce inequalities and improve health at key stages in people's lives. This includes:	IIA objective to reflect the need to address the cause of poor health and wellbeing. The IIA will assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The emerging Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision. The emerging Local Plan should consider public health.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• The requirement for upper-tier councils and unitary authorities to lead local hire Directors of Public Health to lead local public health efforts; • Clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare; • Identifying the mandatory services that local authorities are required to provide; and • Establishing Public Heath England as an Executive Agency to provide greater operational independence within a structure that is accountable to the Secretary of State for Health.	
UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017	Recognises the leadership role that the Government has to take to help Local Authorities tackle the causes if air pollution, particularly nitrogen dioxide. The document sets out the following actions that the Government will take: • Setting up a £255m Implementation Fund • Establishing a Clean Air Fund • £100 million for retrofitting and new low emission buses Sets pit the requirement for relevant local authorities to produce initial plans by the end of March 2018, to be followed by final plans by the end of December 2018. The document also stated that the "*Government will assess local plans to ensure they are effective, fair, good value, and deliver the necessary air quality compliance".*	IIA objective to reflect the need to improve air quality The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough. The emerging Local Plan will seek to ensure there is improvement in the air quality within the borough The emerging Local Plan and IIA will take into account the Government's ambition to reduce nitrogen dioxide concentrations.
UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011	The updated strategy provides a long-term vision for improving air quality in the UK and offers options for further consideration to reduce the risk to health and the environment from air pollution. It sets out for each pollutant the European Directive limit	IIA objective to reflect the need to improve air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The aim of the updated Strategy is: "*This Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health these options are intended to provide important benefits to quality of life and help to protect our environment"* The strategy does not remove any of the objectives set out in the previous strategy, apart from replacing the provision PM_{10} objective in England, Wales and Northern Ireland with an exposure reduction approach.	The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough. The emerging Local Plan and IIA will take account of the UK Air Quality Strategy. The emerging Local Plan will seek to ensure there is improvement in the air quality within the borough
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	The aim of the Policy Statement is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion. The Policy Statement sets out the following long-term vision of Government noise policy: "*Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development".* This long-term vision is supported by the following aims: "*Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:* • *Avoid significant adverse impacts on health and quality of life;* • *Mitigate and minimise adverse impacts on health and quality of life; and* • *Where possible, contribute to the improvement of health and quality of life.*	IIA objectives to reflect the need to mitigate and minimise adverse impacts on health from noise. The emerging Local Plan to contribute to the aims of the policy statement, by taking forward relevant priorities identified in the borough Noise Action Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Secure by Design 2016	Secure by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major and minor property refurbishment, to adopt crime prevention measures. The 2016 edition addresses the community safety and security requirements for all types of dwellings including individual houses, housing estates, low and high rise apartment blocks (including assisted living and student accommodation). The document provides guidance on proven crime reduction methodologies for the external environment and provides additional support documentation to inform planning officers following the withdrawal of 'Safer Places'.	IIA and the emerging Local Plan to reflect the need to reduce and/or prevent crime. The emerging Local Plan should promote the Secure by Design principles
Environmental Protection Act 1990	This Act makes provision for the improved control of pollution arising from certain industrial and other processes. It brings in a system of integrated pollution control for the disposal of waste to land, water and air. The Act gives Local Authorities new powers to control air pollution from a range of prescribed processes.	IIA and the emerging Local Plan to be in accordance with the Environmental Protection Act
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26th July 2010)	The Policy Statements sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. The Statement sets out the there is a presumption in favor of the development of state-funded schools, as expressed in the National Planning Policy Framework, and therefore the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of these schools.	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The emerging Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	The Statement makes clear the Government's expectations that sustainable drainage systems are to be provided within new developments wherever it is appropriate.	IIA objective to reflect the need for sustainable drainage.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The Statement introduced a requirement from the 6th April 2015 for local planning policies and decision on planning applications relating to major development to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.	The emerging Local Plan to promote the use of SuDS on development sites (where appropriate) Emerging Local Plan policy to be reflective of the requirement introduced through the ministerial statement.
Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017	The housing white paper sets out the Government's strategy to build he homes the country needs. It identifies he support the Government will provide to enhance the capacity of local authorities and industry to build new homes, and he role that professions and institutions should play to make the identified proposals a reality. The proposals and actions identified within this White paper focus on the following areas: • Planning for the right homes in the right places • Building homes faster • Diversifying the marker • Helping people now	IIA objective to reflect the need to secure housing to meet identified need, particularly affordable housing. The emerging Local Plan will directly contribute to the aspirations of the White Paper, by setting out an up to date plan which seeks to boost housing supply. Through site allocations, the emerging Local Plan will seek to ensure that there is an adequate supply of affordable housing being provided within the borough.
Regional		
The draft London Plan, GLA, 2017	The draft London Plan provides the framework to address key planning issues facing London. The Plan covers the following policy areas: 1. Design 2. Housing 3. Social Infrastructure 4. Economy 5. Heritage and Culture	IIA objectives to reflect and building upon the key policy areas identified within the new London Plan. The emerging Local Plan must be in conformity with the London Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	6. Green Infrastructure and Natural Environment 7. Sustainable Infrastructure 8. Transport Each of the above policy areas in the Plan is informed by the following six Good Growth policies: • Policy GG1: Building strong and inclusive communities • Policy GG2: Making the best use of land • Policy GG3: Creating a healthy city • Policy GG4: Delivering the homes Londoners needs • Policy GG5: Growing a good economy • Policy GG6: Increasing efficiency and resilience Chapter two sets outs the overall spatial development pattern for London, and focuses on the growth strategies for specific places in London and how they connect to the wider South East. There are a number of objectives identified within the draft Plan, which includes: • Delivering 50% of green cover across London to help it become a National Park City; • 80% of all trips in London to be made by foot, cycle, or public transport by 2041; • 20% of all new homes to be genuinely affordable; and • Major development should be net zero-carbon • Deliver an additional 66,000 homes per year between 2019/20-2028/29	
The London Plan, GLA, 2016	The London Plan sets out an integrated social, economic and environmental framework for the future development of London and deals with planning issues of strategic importance. The London Plan sets out the following vision	IIA objectives should reflect and build upon the London Plan's strategic themes and objectives. The emerging Local Plan must be in conformity with the London Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	"*Over the years to 2036 – and beyond, London should:* *Excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change."* To achieve the over-arching vision for London, the Plan is supported by the following six objectives: 1. A city that meets the challenges of economic and population in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes; and 2. An internationally competitive and successful city with a strong and diverse with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city that is at the leading edge of innovation and research, and which is comfortable with – and makes the most of – its rich heritage and cultural resources. 3. A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive. 4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London ' s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways,	

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	realising their potential for improving Londoners' health, welfare and development. 5. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively. 6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan The Policies of the London Plan are split into the following chapters:	
A City for All Londoners, GLA, October 2016	The document sets the tone for the strategies and the direction of travel for the current Mayor's Mayoralty. The Mayor's key policy areas are as follows: 1. Accommodating growth – intensify housing development whilst protecting employment land, intensifying development around town centres. 2. Housing – promote delivery on public sector land, and secure a variety of affordable housing types. 3. Economy – continue to promote London as the top business city. 4. Environment, transport and public spaces – improve air quality and for London to be zero carbon by 2050. 5. A city for all Londoner's – addressing inequalities, tackling disadvantage and discrimination.	The IIA and Local Plan should take account of this proposed direction of travel and build on these strategic priorities.
Mayor's Transport Strategy, GLA, May 2010	The Mayor's Transport Strategy sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs will deliver that vision. The MTS is a statutory document that has been developed alongside	IIA objectives should reflect priorities of the Transport Strategy and translate them, as appropriate, to the local level.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	the London Plan and the Economic Development Strategy as part of the strategy policy framework to support and shape the economic and social development of London over the next 20 years. . The Mayor's transport vision is: "*London's transport system should excel among those of world cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling urban transport challenges of the 21st century".* To achieve this vision, the Strategy sets out the following six goals for the transport strategy: • Support economic development and population growth • Enhance the quality of life for all Londoners • Improve the safety and security of all Londoners • Improve transport opportunities for all Londoners • Reduce transport's contribution to climate change and improve its resilience • Support delivery of the London 2012 Olympic and Paralympic Games and its legacy	The emerging Local Plan should reflect the objectives and policies set out in the Mayor's Transport Strategy
Culture and the night-time economy SPG, GLA, November 2017	The SPG provides guidance on how to promote the evening and cultural economy through: • Protecting public houses • Sustaining existing venues and providing new facilities • Promoting a wider range of evening and night time activities • Transport • Safety and Security • Environmental Services • Designing developments that provide access to all • Agents of change i.e. development should not unduly add to the cost and burdens of existing businesses#	IIA objectives should seek to protect and promote the borough's cultural offer and evening economy. The emerging Local Plan should consider if new cultural quarters could be identified. The emerging Local Plan should seek to protect and enhance the borough's evening and cultural economy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Central Activities Zones • Promote strategic cultural areas and cultural quarters	
Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017	The SPG's main aim is to increase the number of affordable homes delivered through the planning system and will provide a consistent approach across London. The SPG sets out the Mayor's preferred approach to implement London Plan Policies 3.11, 3.12 and 3.13. The SPG also sets out the 'threshold approach' to viability, which is where the approach to viability information differs depending on the level of affordable housing being provided. The threshold hold approach consists of the following: • **Fast Track Route -** applications that meet or exceed 35% affordable housing provision without public subsidy and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. • **Viability Tested Route –** schemes which do not meet the 35% affordable housing threshold, or require public subsidy to do so will be required to submit detailed viability information which will be scrutinised by the Local Planning Authority, and where relevant the Mayor, and treated transparently. The SPG also provides specific guidance on Build to Rent developments.	IIA objectives should seek to increase affordability output. The emerging Local Plan should use this SPG as a key reference in defining Local Plan affordable housing policy/principles and mix. Through site allocations, the emerging Local Plan will seek to ensure that is an adequate supply of affordable housing being provided within the borough.
	The report aims to identify the agenda on which London's stakeholders should focus in order to maximise job creation and economic growth to 2036. The report states that the agenda is designed to deliver a London economy with : • Job growth that translates into opportunity	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy The emerging Local Plan should seek to maximise job creation and economic growth

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	• Diversity and resilience • Documents identifies priorities for actions. It lists a number of priority actions which would help to achieve the agenda identified above. These actions identified within the document fall under the following themes: • Cementing existing leadership: The Global Hub • Fuelling more diverse growth: The Creative Engine • Addressing weaknesses: The City that Works	
The Mayor's draft Economic Development Strategy for London, GLA, December 2017	The strategy sets outs the Mayor's vision to create a fairer, more inclusive economy. It also sets out the following aims for London's economy in 2041 1. Londoners are living healthier and happier lives 2. Living standards are improving with real incomes growing year-on-year 3. London has a fairer and more inclusive economy 4. London is a more affordable city to live and work 5. Londoners who want to work and are able to, have access to quality employment 6. London has the most talented workforce in the world 7. London is a global leader in innovation and creativity 8. London is the world capital for business, trade and investment 9. London is the best city in which to start and grow a business 10. More people are walking, cycling and using public transport to travel, helping London to grow sustainably 11. London is one of the greenest, cleanest and most resource efficient economies in the world 12. London has the highest productivity among global cities The Strategy outlines a number of actions which the mayor will undertake to achieve his vision.	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy The IIA objectives should reflect the objectives of the Mayor's draft Economic Strategy. The emerging Local Plan should ensure that the economic growth is catered for in Brent.

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Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on behalf of GLA), November 2017	This document provides an overview of the current housing situation for older person housing, care homes and dementia housing. It also identified the potential demand for this type of housing in the within the city. Figure 3.3 of the report identified an annual benchmark for Brent for specialist order persons housing between 2017 to 2029 is 230 dwellings per annum.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population. The emerging Local Plan to ensure that sufficient housing is supplied to meet the identified needs.
The 2017 London Strategic Housing Market Assessment (Part of the London Plan Evidence Base), GLA, November 2017	This document sets out estimates of London's current and future housing requirements. This information will inform the development of the Mayor's London Plan and London Housing Strategy. The document estimates the need for hones within London by tenure and type, as well as analysing the housing requirements of important sub-groups of the population.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population. The emerging Local Plan to ensure that sufficient housing is supplied to meet the identified needs
The 2017 London Strategic Housing Land Availability Assessment (SHLAA) (Part of the London Plan Evidence Base), GLA, November 2017	The document shows that London has a capacity for 649,350 homes during the ten year period covered by the London Plan housing targets (from 201/20-2028/29). This equates to an average annualised capacity of 64,935 homes a year. Table 1.1 of the SHLAA sets out the total 10 year capacity for each London borough. In regards to Brent, the SHLAA states that the Brent ha a total 10 year capacity of 29,150, which equates to an annual target of 2,915. Table 1.2 of the SHLAA sets out the housing capacity on small sites during the ten year period 2019/20-2028-29. In regards to Brent, the 10 year small sites target is 10,230, which equates to an annual small sites capacity of 1023.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population. The emerging Local Plan to ensure that sufficient housing is supplied to meet the identified needs. The emerging Local Plan to take into consideration the housing targets set out in the SHLAA.
Student Population Projections and Accommodation Need for new London Plan 2017, GLA	This paper presents the projections and estimations for the amount for the student population within London. It explains the rational for estimating how many of these students need to be accommodated in purpose-built student accommodation.	IIA objectives to reflect the need to provide sufficient housing which meets the identified nee of the population

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	The paper found that the is a net need for approximately 88,500 additional purpose-build student accommodation bed spaces between 2016 and 2041, or 3,500 when annualised over a 25-year period.	The emerging Local Plan to take into consideration the findings of this paper.
Housing SPG, GLA, updated August 2017	The SPG provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan MALP). The SPG is divided into 7 parts, which cover the following subjects: • **Part 1 – Housing Supply –** provides guidance on achieving and exceeding minimum housing targets and advises on potential sources of additional housing capacity • **Part 2 – Housing Quality –** updates the London housing standards to reflect the implementation of the Government's new national technical standards • **Part 3 – Housing Choice –** provides guidance on undertaking sub-regional and local housing need assessments. The information on Build to Rent developments within this part has been superseded by the 2017 Affordable Housing SPG • **Part 4 – Viability Appraisals -** the information within this part has been superseded by the 2017 Affordable Housing SPG • **Part 5 – Investment and existing Housing Stock –** provides advice on bringing empty homes back into use and the net loss of housing through redevelopment. • **Part 6 – Social Infrastructure –** focuses on the enabling role of housing in facilitating new infrastructure provision through mixed use development. • **Part 7 – Mixed Use and Large Developments - provides** guidance on residential and mixed use development in town centres, opportunity areas, large sites and housing zones.	IIA objectives should seek to increase affordability and family housing output, and reflect emphasis on quality of design and housing mix. The emerging Local Plan should use this SPG as a key reference in creating policy for housing i.e. housing quality, housing conversions, housing stock The emerging Local Plan should seek to provide enough dwellings to meet the borough's objectively assessed need. The emerging Local Plan should seek to ensure that there is sufficient social infrastructure to support the increase in the number of dwellings.

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Social Infrastructure SPG, GLA, May 2015	The SPG contains guidance on the implementation of London Plan Policies 3.16, 3.17, 3.18 and 3.19. The SPG has a particular focus on those elements of social infrastructure that face the biggest strategic challenges – specifically health, education, sport faith and burials. The SPG also includes a methodology to identify future needs and requirements and delivery mechanism.	IIA objectives should seek to ensure the Local Plan meets the need for social infrastructure. The emerging Local Plan should set out how the social infrastructure needs of the current and future population of the borough will be met.
London Infrastructure Plan 2050 update, March 2015	The London Infrastructure Plan 2050 provides an overview of London's infrastructure requirements and sets out a programme of infrastructure delivery that is believed to be necessary for London's future. The Plan identifies the city's infrastructure need around the following themes: transport, green infrastructure, digital connectivity, energy, a circular economy, water, housing and social infrastructure.	IIA objectives should reflect the need to secure infrastructure to support growth. This will be integral to many objectives contained within the IIA. The emerging Local Plan to take into account the London Infrastructure Plan 2050 when identifying the borough's infrastructure needs for the next 20 years.
Accessible London; Achieving an Inclusive Environment, GLA, October 2014	The SPG provides guidance on implementing inclusive design principles effectively and on creating an accessible environment I London, with particular emphasis on the access requirements of disabled and older people. Provides detailed guidance on implementing inclusive design principles and creating an accessible environment.	IIA objectives should reflect the need to promote inclusivity and access for all. The emerging Local Plan should contain policies which encourages inclusive design.
Town Centres SPG, GLA, July 2014	The SPG contains guidance on the Implementation of London Plan Policy 2.15 and Policy 2.16. The SPG acknowledges that town centres will face many challenges, but states that "*Planning has a key role to play in promoting vibrant and viable centres and helping them to be flexible, resilient and adaptable to change."* To assist in promoting successful and vibrant town centres, the SPG advances the following principles:	IIA objectives should reflect the Mayors guidance on Town centres. The emerging Local Plan should consider guidance on Town centres in connection with London Plan policy 2.15.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Supporting the evolution and diversification of town centres • Delivering mixed use housing intensification • Quality matters • Promoting accessibility and connectivity • Town centre and regeneration initiatives • Proactive town centre strategies	The emerging Local Plan should seek to protect and enhance the viability of the borough's town centres.
Sustainable Design & Construction SPG, GLA, April 2014	The SPG is intended to: • Provide detail on how to implement the sustainable design and construction and wider environmental sustainability policies in the London Plan • Provide guidance on how to develop more detailed local policies on sustainable design and construction • Provide best practice guidance on how to meet sustainability targets set out in the London Plan; and • Provide examples of how to implement sustainability measures within developments The SPG includes guidance on the following subjects: energy efficient design; meeting the carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met; retro-fitting measures; support for monitoring energy use during occupation; an introduction to resilience and demand side response; air quality neutral; resilience to flooding; urban greening; pollution control; basement developments and local food growing.	IIA objectives should seek to promote sustainable design and construction. The emerging Local Plan should incorporate the principles set out the Sustainable Design and Construction SPG.
Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city. GLA	The Healthy Streets Approach is a system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. The aim of the Healthy Streets Approach is to help create a vibrant, successful city where people can live active, healthy lives. The deliver the Healthy Streets Approach changes are required at the following levels of policy making and delivery: 1. Street Level	The IIA will consider the impact that policies/proposals will have with regard to sustainable transport IIA objectives to reflect the need to promote sustainable modes of transport.

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	2. Network level: planning and managing London's transport networks 3. Strategic level: policy and planning The Healthy Streets Approach uses 10 evidence-based indicators, which when achieved will help to create a healthier city in which all people are included and can live well, and where inequalities are reduced.	The emerging Local Plan will include policies which promote sustainable modes of transport.
Cultural Metropolis: The Mayor's Culture Strategy, GLA, November 2010 Cultural Metropolis: Achievements and Next Steps, GLA, 2014	Cultural Metropolis: The Mayor's Culture Strategy (2010) recognised the significance of the cultural and creative sector in making London a world city, and advocated continued support and investment. The priorities of the Cultural Strategy are: • Maintaining London's position as a world city for culture • Widening the reach to excellence • Education, skills and careers • Infrastructure, environment and the public realm • Culture and London in 2012 The 2014 update to the Cultural Metropolis summaries recent achievements, assesses progress against objectives, updates with new evidence and also outlines further actions.	IIA objectives to reflect the need to promote access to culture, and protect cultural facilities. The emerging Local Plan should contain policies which promotes the arts, culture and creative industries. The emerging Local Plan should seek to protect and enhance the borough's cultural facilities.
The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014	This SPG: • Provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor's Air Quality Strategy to neighborhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process; • Sets out the methodology for assessing the air quality impacts of construction and demolition in London; and • Identifies good practice for mitigating and managing air quality impacts that is relevant and achievable, with the	IIA objectives to reflect the need to improve air quality, with a focus on what is emitted during the construction phase of a development. The emerging Local Plan should include policies which promote sustainable construction methods, which limit dust and emissions.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	overarching aim of protecting public health and the environment. The SPG contains guidance on the following areas: • Preparation of an Air Quality Statement for construction and demolition activities, including air quality (dust) risk assessments • The stages of development the Air Quality Statement is to cover: demolition, earthwork, construction and 'trackout' (vehicles leaving the site) • Identifying the potential scale (large, medium, small) of dust emissions for each stage of work • Identifying the level of risk due to the scale of dust emissions on health, 'soiling' (dirt) and the natural environment • Best practice methods for controlling dust on-site and to prevent 'trackout' • Recommendations for monitoring • Early notification of new 2015 and 2020 standards for non-road mobile machinery	
Land for Industry and Transport SPG, GLA, September 2012	This SPG provides guidance on the implementation of London Plan (2011) Policies 2.1, 4.4 and 6.2. The guidance provided within this SPG is to: • Ensure an adequate stock of industrial capacity to meet the future needs and functional requirements of different types of industrial and related uses in different parts of London, including that for good quality and affordable space; • Plan, monitor and manage the release of surplus industrial land so that it can better contribute to strategic and local planning objectives, especially those to provide more	IIA objectives should consider the need for employment an industrial uses in Brent. The emerging Local Plan should use this SPG as a key referencing point when addressing issues around industrial capacity. The emerging Local Plan should seek to protect and enhance employment

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	housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal; • Ensure the provision of sufficient land, suitably located, for the development of an expanded transport system to serve London's need.	and industrial land within the borough to ensure employment needs are met. The emerging Local Plan will need to address issues (i.e. contamination) raised around bringing industrial land into use for other purposes.
London Office Policy Review, GLA, 2012	This review builds on the evidence base of the London Office Policy Review 2009, and considers a wide range of new factors, ranging from the severely austerity tinged budgetary environment to the European currency crisis. Key points of note from this review include: • There will be demand for new office space and for new types of formats of office space and related employment space • The rate of growth in office jobs 2011-36 is forecast to be half that prevailed over the last two decades. Spatial policy should play the long game and provide a flexible framework within which Opportunity Areas and mega schemes can evolve and respond to changing market conditions. • London's new villages and access to rapid and reliable public transport infrastructure. • A key strategic challenge for spatial policy will be to create the flexibility to respond to changes in the office market, while creating the certainty to attract investors	IIA objectives should consider these findings of the London Office Policy Review. The emerging Local Plan should consider these findings and the implications it may have in identifying priority uses for sites within the borough. .
Play and Informal Recreation SPG, GLA, September 2012	This SPG provides guidance on the implementation of London Plan policy 3.6 but also a range of policies on shaping neighbourhoods. The guidance is directed at local authority planners, developers, community groups and a range of consultation who all have roles in ensuring the implementation of the objectives set out in the Guidance.	IIA objectives should seek to protect and increase play and informal recreation opportunities within the borough. The emerging Local Plan should seek to ensure there is sufficient supply of play and informal recreation spaces to

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	The SPG provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference to guide boroughs in the development of their own local standards. The guidance sets out the responsibility for local authorities which is: • To ensure robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance; and • Having a detailed role in determining requirements for specific sites. The SPG also provides guidance for neighbourhood forums and local communities in shaping their neighbourhood plans.	support the current, and future, population of the borough. The emerging Local Plan should seek to create a framework in which robust play strategies can be established.
All London Green Grid, GLA, March 2012 All London Green Grid SPG, March 2012 ALGG Area Frameworks	The All London Green Grid (ALGG) is a policy framework to promote the design and delivery of 'green infrastructure' across London. The policy framework comprises London Plan policies on green infrastructure and urban greening – and those relating to open spaces, biodiversity, trees and woodland, and river corridors, plus the All London Green Grid Supplementary Planning Guidance and 11 ALGG Area Frameworks The vision for the ALGG is: *To create a well-designed green infrastructure network of interlinked, multi-purpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network, especially the Thames. This will provide a richly varied landscape that will benefit both people and wildlife providing diverse uses to appeal to, and be accessible by, all.* The aims of the ALGG are as follows:	IIA objectives should reflect the need to promote green infrastructure within the borough. The emerging Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure. The emerging Local Plan should contain policies encouraging urban greening. The emerging Local Plan policies should seek to protect the established strategically important view corridors. Where appropriate, the emerging Local Plan should include references

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	• To protect and enhance London's strategic network of green and open natural and cultural spaces, to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas • To encourage greater use of, and engagement with, London's green infrastructure; popularising key destinations within the network and fostering a greater appreciation of London's natural and cultural landscapes; enhancing visitor facilities and extending and upgrading the walking and cycling networks in between to promote a sense of place and ownership for all who work in, visit and live in London • To secure a network of high quality, well designed and multi-functional green open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change The ALGG SPG is a key document for delivering improvements to the green infrastructure network and to facilitate the identification and delivery of programmes and projects promoted by the borough and their partners. The SPG : • Provides guidance on the implementation of all relevant policies in the London Plan to local neighbourhoods, boroughs, developers and other delivery partners; • Sets out a vision and spatial framework for London-wide green infrastructure; • Promotes partnership working across the 11 Green Grid Areas within London and beyond via Green Arc Partnerships • Identifies strategic green infrastructure opportunities	to the objectives and/or schemes identified within the Brent Valley and Barnet Plateau draft SPG.

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	The 11 Area Framework documents expand on the strategic opportunities set out in the ALGG Supplementary Planning Guidance. The Area Frameworks identify projects that would deliver London's network of green infrastructure by: • Establishing a comprehensive baseline understanding of each area • Defining a vision, area objectives and strategic opportunities for each area • Identifying the specific projects that can improve and enhance green infrastructure in the area • Encouraging partnership working and a more joined up approach to allocating resources	
London View Management Framework, GLA, March 2012	Policies 7.11 and 7.12 of the London Plan establish the London View Management Framework, which seeks to designate, protect and manage 27 views of London and some of its major landmarks. The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London. The SPG also contains management plans for each of the 27 views designation in the London Plan. The Management Plans contain Visual Management Guidance to draw attention to the general principles for management development in the foreground, middle ground and background of the view and for managing the view location.	IIA objectives should reflect the importance of protecting the setting of important buildings. The emerging Local Plan policies should seek to protect the established strategically important view corridors.
Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013	This SPG was prepared jointly with the Forestry Commission, and provides guidance on the implementation of the London plan Policy 7.21 to protect, maintain and enhance trees and woodland in London. The SPG has been produced to provide to assist local authorities in the task of producing their own comprehensive tree and woodland strategy, so that any strategy maximises the benefits trees and	IIA objectives should reflect the need to promote green infrastructure within the borough. The emerging Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure.

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	woodlands can bring to the residents and businesses of an area. A consistent approach to producing strategies will also enable the co-ordination of work managing the resource cross borough boundaries to bring cumulative benefits such as tackling climate change impacts.	The emerging Local Plan should contain policies that seek to protect trees, groups of trees or woodlands within the borough that provide amenity.
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, GLA, October 2011	The Mayor's climate change adaptation strategy is one of eight environmental strategies setting out the action the Mayor is taking, and encouraging others to take, to green London, retrofit London, and provide cleaner air for London. This strategy focused on how London will adapt to the climate change and its association issues. The aim of the London Climate Change Adaptation Strategy is to assess the consequences of climate change on London and to prepare for the impacts of climate change and extreme weather to protect and enhance the quality of life of Londoners. The aim will be met through achieving the following objectives: 1. Identifying and prioritise the climate risks and opportunities facing London and understand how these will change through the century 2. Identify and prioritise the key actions required to prepare London, and to define where responsibility for delivering and facilitating these actions lies 3. Promote and facilitate new development and infrastructure that is located, designed and constructed for the climate it will experience over its design life 4. Improve the resilience of London's existing development and infrastructure to the impacts of climate change 5. Ensure that tried and tested emergency management plans exist for the key risks and that they are regularly reviewed and tested	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency. The emerging Local Plan should take into account the Mayor's Climate Change Adaption Strategy. The emerging Local Plan should consider issues around climate change. The emerging Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.

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	6. Encourage and help business, public sector organisations and other institutions prepare for the challenges and opportunities presented by climate change 7. Promote and facilitate the adaptation of the natural environment 8. Raise general awareness and understanding of climate change with Londoners and improve their capacity to respond to changing climate risks 9. Position London as an international leader in tackling climate change The strategy is the first step in determining the 'adaptation gap' for each climate impact in London and exploring the adaptation options to close the gap. The Mayor will work with partners to identify the risk management options, assess the 'true' value of these options and then develop flexible adaptations pathways for each climate risk.	
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, GLA, October 2011	The Mayor's Climate Change Mitigation and Energy Strategy is one of eight environmental strategies setting out the action the Mayor is taking, and encouraging others to take, to green London, retrofit London, and provide cleaner air for London. This strategy focuses on reducing CO_2 emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon capital. The Mayor set the following four objectives for this strategy: • To reduce London's CO_2 emissions to mitigate climate change • To maximise economic opportunities from the transition to a low carbon capital • To ensure a secure and reliable energy supply for London • To meet, and where possible exceed, national climate change and energy objectives	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency. The IIA objectives should reflect the objectives of the Mayor's Climate Change, Mitigation and Energy Strategy IIA objectives to reflect the need to reduce carbon emissions. The emerging Local Plan should take into account the Mayor's Climate Change Mitigation Strategy.

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		The emerging Local Plan should consider issues around climate change. The emerging Local Plan should explore measures/methods on how the borough will mitigate against the impacts of climate change
London's Waste Resource: The Mayor's Municipal Waste Management Strategy, GLA, November 2011	The strategy sets out what action London's households and businesses can take to reduce waste and also calls on the government and industry to play a role. The strategy identifies the following objectives: 1. Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible 2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste 3. Unlock the massive economic value of London's municipal waste within London's boundary, through investment in new waste infrastructure 4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure The Mayor's key targets for the management of London's municipal waste are as follows: 1. To achieve zero municipal waste direct to landfill by 2025 2. To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20% reduction per household	The IIA should consider the issues around waste and recycling and the possibility of utilising waste as a means of power generation. The IIA objectives should reflect the objective contained within the Mayor's Waste Strategy The emerging Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns. The emerging Local Plan should consider issues around waste and the possibility of utilising waste as a means of power generation. The emerging Local Plan should contain policies that contribute to achieving the waste targets set out in the London Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031. 4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% per 2031 5. To cut Londoner's greenhouse gas emissions through the management of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately: o 545,000 tonnes of CO_2 eq in 2015 o 770,000 tonnes of CO_2 eq in 2020 o One million tonnes of CO_2eq in 2031 6. To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40% of London's municipal waste after recycling or composting targets are achieved by 2031. To achieve the above objectives and targets, the strategy focuses on six policy areas, each of which contains a number of proposals. The 6 policy areas are: 1. Informing producers and consumers of the value of reducing, reusing and recycling municipal waste 2. Reducing climate change impact of London's municipal waste management 3. Capturing the economic benefits of municipal waste management 4. Achieving high recycling and composting rates resulting in the greatest environmental and financial benefits 5. Stimulating the development of new municipal waste management infrastructure, particularly low carbon technologies 6. Achieving a high level of street cleanliness	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Securing London's Water Future, GLA, October 2011	The Mayor's Water Strategy is the first water strategy for London and provides a complete picture of London's water needs. The strategy calls for organisations involved in the city's water management to: • Invest in a water management and sewerage infrastructure system that's fit for a world class city and will create jobs • Support and encourage Londoners to take practical actions to save water, save energy and save money off their utility bills • Realise the potential of London's sewerage as an energy resource to help reduce greenhouse gas emissions • Work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces The Mayor's water strategy sets out the following objectives: 1. To use the water London already has more efficiently and effectively 2. To minimise the release of untreated wastewater and diffuse pollution into the water environment 3. To manage, and where possible reduce, the threat of flooding to people and their property 4. To reduce the greenhouse gas emissions produced from supplying water and treating wastewater.	IIA objectives to reflect the need to improve water quality. The IIA objectives should reflect the objectives identified within the Mayor's Water Strategy. IIA objectives to reflect the need to address flooding and water management. The emerging Local Plan should consider issues around the protection of water quality and SuDS. The emerging Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS)
Clearing the air: The Mayor's Air Quality Strategy, GLA, December 2010	The Air Quality Strategy sets out how the Mayor will achieve his vision for air quality in London. It details the actions that the Mayor will take to reduce air pollution in the capital using the powers available to him and sets a framework for boroughs to take action. The overarching aim of the Strategy is to reduce air pollution in London so that the health of London is improved. The Mayor's vision for air quality is as follows:	The IIA will consider the impact that the proposed policy/developments within the emerging Local Plan will have on air quality in the borough. IIA objectives to reflect the need to improve air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan

	To protect the health of Londoners and enhance their quality of life by significantly improving the quality of the air we breathe in London. This will:
	• *Make London a more pleasant place to live and work in*
	• *Reduce the burden on health services in the capital*
	• *Enhance London's reputation as a green city – making it more attractive to tourists and businesses*
	• *Make Londoner cleaner whilst safeguarding its biodiversity*
	
	The first priority of the strategy is to achieve Greater London EU limit values for local air pollutants, PM_{10} and NO_2. This will be achieved through undertaking the following measures:
	• Reducing emissions from transport by
	  ○ Encouraging smarter choices and sustainable travel behaviour
	  ○ Promoting technological change and cleaner vehicles
	  ○ Reducing emissions from the public transport and public transport fleets
	  ○ Using emissions control schemes to reduce emissions from private vehicles
	• Targeting air quality priority locations by:
	  ○ Adopting local measures, including trialling new processes (such as the use of dust suppressants)
	  ○ Using action days to encourage behaviour change and reduce pollution in priority areas
	• Reducing emissions from homes, business and industry by:
	  ○ Promoting and delivering energy efficiency schemes
	  ○ Using the planning system to reduce emissions from new developments
	  ○ Updating and implementing best practice on construction and demolition
	• Increasing awareness of air quality issues by:
		The IIA objectives should reflect the objectives identified the Mayor's Air Quality Strategy.
		
		The emerging Local Plan and IIA will take account of the Mayor's Air Strategy.
		
		Where appropriate, the emerging Local Plan should include policies which promote measures that improve air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Improving access to information about the health impacts of poor air quality ○ Directing information about poor air quality to those most at risk	
The London Health Inequalities Strategy, GLA, April 2010	The London Health Inequalities Strategy sets out a framework for partnership action to: • Improve the physical health and mental well-being of all Londoners; • Reduce the gap between Londoners with the best and worst health outcomes; • Create the economic, social and environmental conditions that improve quality of life for all; and • Empower individuals and communities to take control of their lives with a particular focus on the most disadvantage. The Mayor's plan for tackling health inequalities in London identified the following five core objectives: 1. Empower individuals and communities to improve health and well-being 2. Improve access to high quality health and social care services particularly for Londoners who have poor health outcomes 3. Reduce income inequality and the negative consequences of relative poverty 4. Increase the opportunities for people to access the potential benefits of good work and other meaningful activity 5. Develop and promote London as a healthy place for all Each of the above objectives has a set of commitments which will be met through short-term and long-term actions identified within the strategy.	IIA objectives to reflect the need to improve health for all residents of the borough. The IIA objectives should reflect the objectives of the Mayor's Health Inequalities Strategy The emerging Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough. The emerging Local Plan should contain policies which ensure health provision is available for all residents of the borough.
The Mayor's Economic Development	The strategy provides a long-term vision for London's economy, which is to be the best big city in the world. To 2031, and beyond, London should excel among global cities, expanding opportunities	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Strategy for London, GLA, May 2010	for all its people and enterprises, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change. The strategy sets out set five economic objectives: • Objective 1: to promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity. • Objective 2: to ensure that London has the most competitive business environment in the world. Objective 3: to make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance. • Objective 4: to give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers. • Objective 5: to attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment and in particular from the opportunity created by the 2012 Olympic and Paralympic Games and their legacy. The strategy includes a number of actions which detail what the Mayor will do to achieve the above vision. Such actions include: • Ensuring that all young people in London have appropriate opportunities to gain the knowledge, skills and confidence to succeed in London's labour market • Working with boroughs, developers and other partners to direct investment into existing major employment areas including the Central Activity Zone (CAZ), town centres and the Strategic Outer London Development Centres • Working with others to maximise London's global market share in low carbon finance, carbon trading, business and consulting and legal services	The IIA objectives should reflect the objectives of the Mayor's Economic Strategy. The emerging Local Plan should ensure that the economic growth is catered for in Brent.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Green infrastructure and Open Environments: Protecting the Geodiversity of the Capital SPG, GLA and London Geodiversity Partnership, March 2012	This SPG provides guidance on London Plan (2011) policy 7.20, which seeks to protect and promote geodiversity in London. The SPG: • Reviews existing guidance and criteria for geodiversity assessment • Undertake a geodiversity audit of London, including: a regional geodiversity overview; a description of methods and criteria use for the audit; a map and description of each recommended RIGS; good practice guidance on geoconservation for the London Boroughs • Outlines further actions needed to facilitate the implementation and future development of the Geodiversity Action Plan(GAP) for London	IIA objective to reflect the need to protect and promote geodiversity The IIA an emerging Local Plan to take into account this SPG.
Improving Londoners' Access to Nature: London Plan Implementation Report, GLA, February 2008	Improving Londoners Access to Nature is an implementation report which provides non-statutory advice that demonstrates how the aim of improving access to nature can be achieved by identifying opportunities. The report provides details the Mayor's Role, priority sites for alleviating deficiency, priority borough wildlife sites for enhancing access to nature, priority sites for reducing areas of deficiency, the opportunities within the planning and development process, working in partnership and the cost of enhancements.	IIA Objectives should reflect the importance of improving access to green and natural spaces The emerging Local Plan should identify opportunities to improve access to the borough's wildlife sites and open spaces.
Draft London Environment Strategy, GLA, August 2017	The draft Environment Strategy sets out a vision for London in 2050 that will realise the potential of London's environment to support good health and quality of life and to make the city a better place to live, work and do business. The strategy sets out the Mayor's ambition to make London the world's greenest global city. This will mean making it: 1. Greener 2. Cleaner 3. Ready for the future	IIA objectives to identify the need to protect and enhance the borough's green environments. The IIA objectives should reflect the vision and aims of the draft London Environment strategy The emerging Local Plan should consider, and where appropriate,

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	The strategy sets out the Mayor's vision for London's environment in six areas. The aims for 2050 for each of the six areas is as follows; • **Climate Change and energy:** London will be a zero carbon city – with a zero emission transport network and zero carbon buildings • Waste: **London will be a zero waste city. 65% of London's municipal waste will be recycled** • Adapting to climate change: **London and Londoners will be resilient to severe weather and longer-term climate change impacts, such as flooding, heat risk and drought** • Green Infrastructure: **More than half of London's area will be green, and tree canopy will increase by 10% by 2050** • Air Quality: **London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities** • **Nosie:** The number of people adversely affected by noise will be reduced, and quiet and tranquil spaces will be promoted.	promote the visions and aims of the draft London Environment strategy.
Planning for Equality & Diversity in London, GLA, October 2007	The SPG provides guidance on how to implement key London Plan policies which relate to addressing the needs of London's different communities, to ensure that the implementation of the London Plan achieves the Mayor's vision. The document is formed of four different parts , which are as follows: • Part 1 – a brief introduction to the SPG and its purpose • Part 2 – Promoting equality and diversity in planning processes – deals with the legislative context to planning for equality, explores equality implications in the new planning system and explains some of the tools that are already	IIA objectives should reflect the equality and diversity issues contained within the SPG. The emerging Local Plan should include policies which relate to equality and diversity.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	available to address equality issues in planning – such as Equality Impact Assessments and Sustainability Appraisals – and set out processes to ensure effective consultation and engagement with equality groups • Part 3 – The key spatial and social issues for London – introduces the complex relationship between spatial planning and wider social issues in the London context of diversity and multiculturalism, It explores how spatial planning can be used to help address inequality and disadvantage and promote community cohesion and identifies key spatial issues for achieving this. • Part 4 – Addressing the spatial needs of target equality groups – considers the ley spatial issues faced by each of the equality groups as a result of wider social issues. This parts set out where planning can make a positive impact, with implementation points where appropriate and signposts to further information.	
Better Health for all Londoners: the Mayor's draft London Health Inequalities Strategy, GLA, August 2017	The draft Health Inequalities strategy seeks to reduce the unfair variation of health across London while also improving the overall health of Londoners. The draft strategy sets out the following vision: "*The mayor's vision is for a healthier, fairer city, where nobody's health suffers because of who they are or where they live".* The draft strategy sets out the following aims for the strategy: • For every London child to have a healthy start in life ○ The Mayor's key ambition is to launch a new health programme that will support London's early years setting • For all Londoners to share in a city with the best mental health in the world	IIA objectives to reflect the need to improve health for all residents of the borough. IIA objectives should reflect the objectives of the Mayor's draft London Health Inequalities strategy. The emerging Local Plan should ensure that there is sufficient social infrastructure to support the proposed developments and the current and future population of the borough. The emerging Local Plan should contain policies which ensure health

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	○ The Mayor's key ambition is to inspire more Londoners to have mental health first aid training, and more London employers to support it • For all Londoners to benefit from a society, environment and economy that promotes good mental and physical health. ○ The Mayor's key ambition is to work towards London having the best air quality of any major global city • For London's diverse communities to be healthy and thriving. ○ The Mayo's key ambition is to support the most disadvantaged Londoners to benefit from social prescribing to improve their health and wellbeing. • To ensure that the healthy choice is the easy choice for all Londoners ○ The Mayor's key ambition for this strategic aim is to work with partners toward a reduction in childhood obesity rates and a reduction in the gap between the boroughs with the highest and lowest rates of child obesity	provision is available for all residents of the borough.
The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006	The Mayor's Food Strategy for London explores the significance of food in and for the capital sets out a vision for the future of London's food system; and outlines the key actions and support required to achieve this vision. The Strategy, using the London's Sustainable Development Framework as a starting point, includes the following vision for a sustainable and world-class food system: "*In 2016, London's people, residents, employees and visitors and organisations public, private and voluntary sector – are:* • *Taking responsibility for the health, environmental, economic, social, cultural and security impacts resulting from the food*	The IIA objectives should reflect the objectives of the Mayor's food strategy. The emerging Local Plan should include policies which encourage a vibrant food economy and strengthen the borough's food security.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	choices that they make, and their role in ensuring that food and farming are an integrated part of modern life • *Demonstrating respect for all the many elements involved in the provision of their food, and are treating fairly the environment, the people, the animals, the businesses and others involved in providing their food* • *Conscious of the resources being used in growing, processing, distributing, selling, preparing and disposing of their food, and continuously engaged in minimising any negative impacts arising from this resource use* • *Benefiting from the results of this effort, such that all Londoners have ready access to an adequate, safe, nutritious and affordable diet that meets their health, cultural and other needs* The London Food Strategy focuses on the following five themes health, environmental, economic, social/cultural and security. Corresponding to these five themes, the London Food Strategy has five broad objectives, which are as follows : • to improve Londoners' health and reduce health inequalities via the food they eat • to reduce the negative environmental impacts of London's food system • to support a vibrant food economy • to celebrate and promote London's food culture • to develop London's food security	
Sounder City: The Mayor's Ambient Noise Strategy, GLA, March 2004	The Strategy focuses on reducing noise through better management of transport systems, better town planning and better design of buildings. It identifies practical actions and way forward, especially in transport and through the planning system. The overall vision for the Mayor's Ambient Noise Strategy is to minimise the adverse impacts of noise on people living and working	IIA objectives to consider the impact that the policies/proposals contained within the emerging Local Plan will have on the ambient noise levels of the borough.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	in, and visiting London using the best available practices and technology within a sustainable development framework. To achieve this vision, the Strategy sets the following objectives: • to minimise the adverse impacts of road traffic noise; • to encourage preferential use of vehicles which are quieter in their operating conditions; • to minimise the adverse impacts of noise from freight and servicing • to promote effective noise management on rail networks in London • to minimise the adverse impacts of aircraft noise in London, especially at night • to minimise the adverse impacts of noise on or around London's rivers and canals, while retaining working wharves and boatyards, and enhancing water space tranquillity and soundscape quality; • to minimise the adverse impacts of industrial noise, recognising the use of best practicable means/best available techniques, and the need to retain a diverse and sustainable economy; • to improve the noise environments in • London's neighbourhoods especially for housing, schools, hospitals and other noise-sensitive uses; • to protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm	The IIA objectives should reflect the objectives of the Mayor's Ambient Noise Strategy.
Mayor's Biodiversity Strategy: Connecting with London's Nature, GLA, July 2002	The Mayor's Biodiversity Strategy aims to protect and enhance the natural habitats of London together with their variety of species. It contains proposals, commitments and targets for the promotion by the Mayor of biodiversity in London. The strategy provides the	IIA objectives to reflect the need to protect and promote biodiversity. The IIA should assess the impact that the policies/proposals contained within

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	strategic framework within which the actions plan (identified within London's Biodiversity Action Plans and the Strategy itself) sit. The Strategy sets outs the following objectives: • Biodiversity for people: to ensure all Londoners have ready access to wildlife and natural green spaces. Access to nature provides psychological, educational and health benefits – an antidote to the stresses of urban life – and the Strategy aims to maintain and increase access to natural green space. • Nature for its own sake: to conserve London's plants and animals and their habitats. • Economic benefits: to ensure the economic benefits of natural greenspace and greening are fully realised. • Functional benefits: to ensure London enjoys functional benefits that biodiversity can bring. • Sustainable development: to recognise biodiversity conservation as an essential element of sustainable development. Proposals contained within strategy include: • The Mayor will work with London borough councils, schools and other groups, to enable and encourage children to take an active interest in the biodiversity of their local green space • The Mayor will facilitate best practice for developing safe, convenient and enjoyable access to nature, and addressing issues of safety, anti-social behaviour and fear or crime in green spaces. • The Mayor will encourage and support all London borough councils in the establishment of local biodiversity partnerships and the production, implementation and monitoring of borough Biodiversity Action Plans as an	the emerging Local Plan will have on the borough's biodiversity. The emerging Local Plan should include policies which seek to protect and enhance the borough's biodiversity. The emerging Local Plan should include policies which promote the incorporation of biodiversity in new developments.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan

	integrated element of the delivery and implementation of Community Strategies
	• The Mayor will measure the success of this Strategy primarily against two targets, to ensure:
	  ○ That there is not net loss of Sites of Importance of Nature Conservation, and
	  ○ That the areas of deficiency in accessible wildlife sites are reduced	

London Biodiversity Action Plan, London Biodiversity Partnership, 2001	The London Biodiversity Action Plan (BAP) identifies priority habitats that are of particular importance for biodiversity in London. Many of these habitats are covered by Habitat Action Plans (HAPs). The London BAP has 11 HAPs – 9 of these are for named habitat types, while the other two are for land uses. 214 priority species were under particular threat in London.	IIA objectives to reflect the need to protect and promote biodiversity. The IIA will assess the impact that the policies/proposals contained within the emerging Local Plan will have on the borough's biodiversity. The emerging Local Plan should include policies which seek to protect and enhance the borough's biodiversity. The emerging Local Plan should include policies which promotes biodiversity as part of new developments. Where appropriate, the emerging Local Plan should take into account the actions contained within the London BAP.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Thames Basin District River Basin Management Plan, DEFRA, 2015	The Plan provides a framework for protecting and enhancing the benefits provided by the water environment within the Thames river basin district. It also identifies significant water management issues and provides a progress update on the 2009 plan. The Plan contains 4 sets of information, which are: • Baseline classification of water bodies –establishes the current status for all the quality elements in each water body. • Statutory objectives for protected areas - highlights the areas of land and bodies of waters that have specific uses that need special protection. The plan ensures that these areas have the legally binding objectives in place that protect water uses (i.e. drinking water, bathing, commercial shellfish harvesting) from potentially harmful activities and new developments • Statutory objectives for water bodies – sets out legally binding objectives for each quality element in every water boy, including an objective for the water body as a whole. The default objective is good status. • Summary programme of measures to achieve statutory objectives – provides a framework for action and future regulation. This section summaries the existing mechanisms, both statutory and voluntary, that are used to manage the quality of the water environment. It also summaries the types of actions and who needs to do this, to achieve the statutory objectives.	The IIA objectives should reflect the environmental objectives of the management plan to protect and improve water quality. The emerging Local Plan should take into account the local measures in the management plan in terms of improving water quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Part 2: River basin management planning overview and additional information, DEFRA, 2016	Part 2 of the Thames Basin Direct River Basin Management Plan contains a summary of technical, economy and engagement processes used to develop the Plan. This document contains information that the WFD requires to be part of each plan and provides more detail about the process the Environment Agency and others have followed in reviewing and updating the plans. It also puts river basin management planning and the plans into the wider context of managing the water environment in England.	As above.
The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009	The Action Plan has been developer to provide a delivery mechanism to take forward London's river restoration strategies. The Plan will build upon the river restoration strategies success and look for river restoration opportunities. The Plan : • Supports the delivery of the Thames River Basin Management Plan under the Water Framework Directive • Contributes to sustainable regeneration through the implementation of the Blue Ribbon policies • Contributes to the implementation of the Mayor's access to nature aspirations • Supports one of the London Plan's biodiversity targets to restore 15km of river by 2015 • Supports the delivery of the Environment Agency's Thames Catchment Flood Management Plan. The five key aspirations identified within the Plan are: 1. Improve flood management using more natural processes; 2. Reduce the likely negative impacts of climate change;	The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality. The emerging Local Plan should take into account the aspirations of the action plan and projects in the River Brent Catchment.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	3. Reconnect people to the natural environment through urban regeneration; 4. Gain better access for recreation and improved well-being; 5. Enhance habitats for wildlife.	
Brent River Corridor Improvement Plan, Brent River Catchment Partnership	The Brent River Corridor Improvement Plan identifies a number of actions that can be undertaken to improve the water quality of this catchment and achieve the outcomes listed below. The Improvement Plan contains the following vision: *To improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife.* The following outcomes were identified within the Plan: • By 2021, water quality in the Brent catchment has improved and has a 'moderate' ability to support wildlife; and by 2027 it will have a 'good' ability to support wildlife • Transforming up to 10km of heavily modified river to a more natural condition by 2021 • Decreasing density and distribution of invasive non-native species in chosen locations by at least 20% by 2021. • Having Giant Hogweed under a management programme in all parks, reserves and pathways by 2015 • Completing a 24-mile riverside trail from Barnet to Brentford on the Thames. • Creating or improving 12 miles of riverside access for walking, cycling and the disabled through the catchment • Creating at least to new green spaces along waterways in the Brent catchment by 2021.	The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality. The emerging Local Plan should take into account the local measures in the improvement plan in terms of improving water quality.
Joint West London Waste Plan, 2015	Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) and the Old Oak Common and Park Royal Development Corporation (OPDC) have joined	The IIA should consider the issues around waste and recycling and the

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	together to plan for the future management of waste produced in their areas. The West London Waste Plan: • Details the estimated amounts for the different types of waste that will be produced in West London up to 2031 • Identifies and protects the current sites to help deal with that waste; • Identifies the shortfall of capacity needed over the life of the Plan (to 2031); and • Allocates a set of sites to meet the shortfall which are preferred for waste related development. In addition to the above, the Waste Plan provides policies with which planning applications for waste developments most conform.	possibility of utilising waste as a means of power generation. The emerging Local Plan should consider issues around waste management and the possibility of utilising waste as a means of power generation. The emerging Local Plan should contain policies which contribute to achieving the waster targets set out in the London Plan (which have been incorporated into the Joint West London Waste Plan)
West London Sub Regional Transport Plan, Transport for London, 2014 update	The update provide information on • Developments over the last 12 months • Commitments made in the TfL Business Plan and through Local Implementation Plan (LIP funding) • Future opportunities to improve transport and address the remaining challenges The Plan aims to help boroughs with the development of Local Implementation Plan (LIP) and TfL in developing the priorities for business planning in order to address the medium to longer-term challenges for London and the sub-regions. The document identifies the following challenges to be relevant to every sub-region	The IIA will consider the impact that policies/proposals will have with regard to sustainable transport IIA objectives to reflect the need to promote sustainable modes of transport. The emerging Local Plan will include policies which promote sustainable modes of transport. Where appropriate, the emerging Local Plan will help to identify and promote solutions to the west London specific challenges identified within this document.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Improve air quality to meet and exceed legal requirements and ensure health benefits for Londoners • Transport the role of cycling and walking the sub-region • Meet CO_2 targets The document identified the following challenges as being west London specific: • Enhance east-west capacity and manage congestion • Improve access to, from and within key locations • Enhance the efficiency of freight movement • Improve north-south public transport connectivity • Improve land-based air quality	
NW London Sustainability and Transformation Plan – Our plan for North West Londoners to be well and live well , NW London STP System, October 2016	The STP describes the shared ambition across health and local government to create an integrated health and care ambition across health and local government to create an integrated health and care system that enables people to live well and be well. The STP sets out how the NHS will meet the needs of the population more effectively. TP states that "*The focus of the STP for the first two years is to develop the new proactive model of care across NW London and to address the immediate demand and financial challenges".*	The IIA and emerging Local Plan objectives to support the NW London Sustainability and Transformation Plan.
Local		
Brent Borough Plan 2015-2019	The Brent Borough Plan sets out how the Council, working with partners, will build a better Brent. The Borough Plan sets out the following vision for Brent: "*Our vision is to make Brent a great place to live and work, where people feel that they have opportunities to change their lives for the better. We want to help ensure that residents feel that they and their children are safe and cared for and can achieve well, and that they*	IIA objectives should reflect and build upon the Borough Plan's vision and priorities. The emerging Local Plan must be in conformity with the Brent Borough Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan

	receive excellent services when they need them. We are working for a Brent where business and enterprise can prosper and where local people can find employment. We are building a Brent with plentiful access to arts, leisure and cultural activities, and where people from different backgrounds feel at ease with one another; a place where the principles of fairness, equality, good citizenship and respect for people and place are valued."
	
	To achieve the above vision, the borough plan is centred around the following three priorities
	• Better locally
	  ○ Building resilience and promoting citizenship, fairness and responsibility among local people and strengthening the sense of community among the people who live and work here
	  ○ Promoting cohesion and integration in our communities
	  ○ Making sure that everyone has a fair say in how services are delivered, that they are listened to and taken seriously
	  ○ Making sure that inequalities in the quality of life in different parts of the borough are tackled by a stronger focus on local needs
	  ○ Building partnership – between local service providers and between local services and residents – to find new ways of providing services that are more finely tailored to individuals, community and local needs
	• Better place
	  ○ Making sure that Brent is an attractive place to live, with a pleasant environment, clean streets, well-cared for parks and green spaces
	  ○ Continuing to reduce crime, especially violent crime, and making people feel safer	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Increasing the supply of affordable, good quality housing ○ Supporting good quality, accessible arts and leisure facilities • Better Lives. This means ○ Making sure that local people have the best possible life chances, regardless of their starting position ○ Supporting local enterprise, generating jobs for local people, helping people into work and promoting fair pay ○ Making sure that our schools are among the best and that our children and young people achieve their potential ○ Enabling people to live healthier lives and reducing health inequalities ○ Supporting vulnerable people and families when they need it	
Brent's Air Quality Action Plan 2017-2022, Brent Council	Brent's air quality action plan demonstrates how the Council will tackle air pollution at the source or reduce exposure where this is not possible. The Air Quality Action Plan identifies that Nitrogen Dioxide (NO_2) and Particulate Matter (PM_{10}) are the pollutants of most concern in the borough. The majority of Brent is within an Air Quality Management Area (AQMA). The air quality outside of the air quality management area has not worsened since 2006 and so new management areas for air quality action are proposed. The Air Quality Matrix outlines the 24 actions Brent will implement to deliver air quality improvement. These actions are split into six themes which focus on measures to reduce pollutant emissions from key sources.	The IIA of the Local Plan will consider the impact that the proposed policies/developments within the emerging Local Plan will have on the air quality in the borough. IIA objectives to reflect the need to improve air quality. The emerging Local Plan and IIA will take account of Brent's Air Quality Action Plan, and where appropriate, contribute to its delivery.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Brent Biodiversity Action Plan, 2007, Brent Council	The Brent BAP Plan sets out actions to improve the natural environment in Brent to achieve the targets of the Local Biodiversity Action Plan. The Brent BAP includes Habitat Action Plans for the following: • Garden and Allotments • Street scene • Trees, Woodland and Hedgerows • Grasslands • Wetland Habitats • Rail-side Habitats • Churchyards and Cemeteries • Parks and Green Spaces • School Grounds • Buildings and the built environment In regards to Species Action Plan, the Brent BAP proposes to: • Adopt and implement all the London-wide and UK Species Action Plans that are applicable, or potentially applicable, to the Brent area. • Seek 'champions' for the above and other Species Action Plans to encourage the conservation of selected individual species	IIA objectives to reflect the need to protect and promote biodiversity. The IIA will consider the impacts that policies/proposals contained within the emerging Local Plan will have on the boroughs biodiversity. The emerging Local Plan should include policies which promote the incorporation of biodiversity in new developments Where appropriate, the emerging Local Plan should take into account the actions contained within the Brent BAP.
Brent's Long Term Transport Strategy, 2015-2035, Brent Council	The Long Term Transport Strategy outlines the Council's commitment to improving transport options for every member of the community and to reducing the negative impacts of transport on the borough. The Strategy provides a strategic direction for investment in transport through the borough of the period 2015-2035. Five priority areas are identified which will be focussed on during the period of the strategy. These areas are: • Road safety • Air Quality	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Health • Congestion • Growth and Regeneration The Strategy also contains five objectives which have been formulated to reflect the priorities in a measurable context. These objectives are as follows: • Increase the uptake of sustainable modes, in particular active modes of travel • Reduce conventional vehicular tips on the network, particularly at peak time • Support growth areas and town centres to enable acceptable development • Reduced Killed and Seriously Injured (KSI) incidents and slight accidents on Brent's roads • Reduce the exposure of Brent residents to Particulate Matter (PM) and Nitrogen Dioxide (NO_2) generated by the transport network These objectives have informed the targets that are set out within the document.	The emerging Local Plan will contain policies with promote sustainable transport. The emerging Local Plan will support the aims and objectives contained within the Long Term Transport Strategy.
Brent's Cycling Strategy, 2016-2021, Brent Council	The Cycling Strategy is a daughter document to the Long Term Transport Strategy (LTTS) and will help to implement the objectives it contains. The cycle strategy provides a framework that will enable the Council to implement works in a transparent way and prioritise funds to increase cycling through the borough. The Council's vision for cycling in Brent is: • To make Brent a borough where everyone can cycle safely, in comfort and with confidence • To enable people of all ages and abilities from every section of Brent's diverse society to see cycling as a good option for everyday travel	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes, The emerging Local Plan will contain policies which promote sustainable transport.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The achieve the above vision the Strategy sets the following objectives: • Develop a coherent network of direct, comfortable and attractive cycle routes • Promote cycling as a convenient, safe, health, enjoyable and inclusive activity • Reduce the number of accidents on Brent's roads involving cyclists • Improve access to cycling for all Brent residents and businesses • Address the specific concerns that may reduce the ability of some groups to take up cycling The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Cycle Strategy and the LTTS.	The emerging Local Plan will support the aims and objectives contained within the cycling strategy.
Brent's Walking Strategy, 2017-2022, Brent Council	The Walking Strategy is a daughter document to the Long Term Transport Strategy (LTTS) and will help to implement the objectives it contains. The Council's vision for walking is: "*Make Brent a healthy, active and safe borough where walking is a practical and pleasant option for all".* To achieve the above vision the Strategy sets the following objectives: • Provide a better environment and improve the experience of walking within the borough, ensuring it is accessible and inclusive for all • Promote walking as a healthy and sustainable way to travel as well as to increase personal activity • Improve the perceived and actual safety and security of pedestrians	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes. The emerging Local Plan will contain policies which promote sustainable transport. The emerging Local Plan will support the aims and objectives contained within the walking strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Walking Strategy and the LTTS.	
Planning for Sports and Active Recreation Facilities Strategy 2008-2021Brent Council and Sport England, 2007	The Strategy sets out a plan for the development of sport facilities in the borough between 2008-2021 and proposes local planning standards. The overall vision for the strategy is: *To ensure the co-ordinated, strategic development of formal and informal facilities for sport and active recreation within Brent that meets the needs of a changing multi-cultural population and provides attractive, sustainable, accessible, quality facilities that enhance the Boroughs natural and built environment. Such provision will increase opportunities for participation in sport and active recreation by all sections of the community resulting in improved health, well-being and enhanced quality of life of Brent's resident.* In order to achieve the above vision, a number of key objectives have been identified • Strategic Provision – to ensure there is a planned approach to the provision of a local and strategic mix of facilities • Meets need of future populations – to provide an innovative approach to the provision of facilities that can meet the future needs of a growing population • Delivers on sustainability principles – to ensure that sustainability is at the forefront of all sport and recreation provision particularly in relation to design, construction, use of natural resources and sustainable transport to assure respect for the environment. • Provides access for all – to ensure that sport and recreation facility providers commit to extensive, well managed, affordable community access for all	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure to support the growing population. The emerging Local Plan will take into account this strategy, and where appropriate assist in the delivery of sports facilities.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Maximises a facilities lifespan – to ensure that mechanisms and funding are in place to secure regularly facility maintenance to enhance the lifespan of the facility and maintain quality standards of provision • Create a safe and secure environment – to embrace a design-led approach to new sports facilities that helps to reduce crime and the fear of crime • Seeks contributions for sports provision from developers - to secure appropriate funding for sports provision from new residential development in the borough to help meet the sporting needs of a growing population	
Food Growing and Allotments strategy and associated Action Plans, Brent Council	The Strategy unites allotment and food growing provision in Brent under a single vision and set of objectives and action plan. It highlights what is currently done well, what needs to be reviewed, objectives and opportunities for future development and how performance will be measured. The vision of the Food Growing and Allotment Strategy is to provide a range of food growing opportunities accessible to all parts of the community and to promote the benefits of a healthy lifestyle within a green borough. This vision will be achieved through the delivery of the following objectives. 1. To provide efficiently managed allotment sites that offer good value for money and are accessible to all 2. To develop and broaden the range of food growing opportunities available through increased partnership working 3. To promote the benefits of food growing as part of a healthy lifestyle within a greener borough.	The IIA objectives should reflect the objectives of the strategy. The emerging Local Plan should take into account the Council's Food Growing and Allotments Strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	For each objective, the Action Plan identifies a number of actions which can assist in them being met. The Action Plan contained within the strategy has been reviewed twice; once for 2012/14 and the other for 2014/16. In the latest review contained 15 actions – 7 under objective, 4 under objective 2 and 4 under objective 3. Actions included: • 1.1 – Using the site audit list of recommended actions for allotment sites, implement prioritised improvements works and repairs as and when funding is available. • 1.5 – Review cycle stand provision • 2.4 – Investigate options for integrating food growing space provision into planning guidance on a permanent basis and explore future food growing opportunities in regeneration areas and existing housing with a view of creating new food growing spaces: ○ Inclusion in the Wembley Area Action Plan (WAAP) ○ Inclusion in the Local Development Framework ○ Timetable for designation of allotment sites as SINCs ○ Complete projects at St Raphael's and Bramshill • 3.3 – Produce a conservation plan for features of wildlife importance and protected species	
Brent School Place Planning Strategy 2014-2018 (Refresh), November 2015, Brent Council	The update to the Brent School Place Planning Strategy identifies the Council's commitment to improving the educational outcomes of all children and young people in Brent. The Council has a statutory duty to ensure that there are sufficient school places available for all Brent children and young people who need one. The Strategy articulated the following aspirations for Brent schools: • All Brent schools should be goo or outstanding • All Brent schools should be part of a 'family of schools' which promotes resilience, mutual support and improvement	IIA objectives to highlight the need to The emerging Local Plan will

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• The Council and schools should work together to meet the challenge of providing sufficient school places • Schools should operate in good quality, safe premises • Children should be educated close to home • Schools should work with their local communities • Meeting the needs of children with special educational needs and disabilities should be central to our vision for education in Brent • We should make efficient use of resources The strategy outlines a set of sixteen operating principles that underpin the above aspirations, with the update proposed amendments to five of these principles (principles 1,3,4, 10 and 16) The projections used to inform the strategy indicate the following: • The demand for reception places will slow down from 2016 but the demand for places in other primary years will continue to grow. • There will continue to be a shortage of reception places in some parts of the borough, such as Planning Area 1 (Queensbury, Fryent and Welsh Harp wards) and in some primary year groups. • At least 2 new secondary schools will be needed by 2022	
Brent Equality Strategy 215-19, Brent Council, 2015	Sets out how effective diversity and equality practice will be fully integrated into everything that the Council does. The equality strategy reflects the stated core values of the council: • Fairness • Respect for People • Valuing Diversity • Excellence in all our services The strategy seeks to ensure that the Council fulfils the duties placed on them by the Equality Act 2010.	IIA objectives should reflect the equality objectives outlined in the strategy. The emerging Local Plan should include policies which relate to equality and diversity.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The strategy sets out the following objectives: 1. To know and understand all our communities 2. To involve our communities effectively 3. To demonstrate leadership in equalities and human rights, both within the council and amongst partners, and organisational commitment to excellence 4. To ensure that local public service are responsive to different needs and treat users with dignity and respect 5. To develop and sustain a skilled and committed workforce able to meet the needs of all local people. The Equality Strategy is accompanied by an Action Plan which sets out the key activities that are intended to achieve the above objectives.	
Financial Inclusion Strategy, September 2015, Brent Council	The Council's Financial Inclusion Strategy focuses on how the Council will create an inclusive environment where individuals are confident and capable of making the right decisions for themselves and their families. The strategy has four strategic objectives, which are: • Help residents to move from unemployment or low skill/pay employment to sustainable and fulfilling employment; • Helping residents overcome high levels of debt and promote responsible borrowing • Improve access to mainstream financial products and services whilst encouraging residents to build their awareness of financial services and make appropriate choices with their finances; and • Maximising opportunities for delivering financial inclusion through working in partnership The strategy details the Council's 'what works' approach to particular challenges of financial exclusion. It also proposes to	IIA objectives to reflect the need to ensure high quality employment opportunities and encourage enterprise and innovations The IIA will include consideration of the potential effects of the emerging Local Plan on the economy and employment. The IIA and emerging Local Plan will take into consideration the Financial Inclusion strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	create a high level Financial Inclusion Partnership that and that the council facilitates working groups as far as reasonably practical.	
Brent Health & Wellbeing strategy, 2014-2017, Brent Council and NHS Brent	The Health and Wellbeing Strategy seeks create an environment in Brent that enables individuals and families to lead healthy lives, and where health and wellbeing is at the heart of service delivery. The aim of the Health and Wellbeing Strategy is to • Improve health and wellbeing • Reduce health inequalities The strategy identifies a number of priority areas, which includes: • Giving every child the best start in life • Helping vulnerable families • Empowering communities to take better care of themselves • Improving mental wellbeing • Working together to support the most vulnerable adults in the community For each priority area, the key issues have been highlighted and a number of objectives identified.	IIA objectives to reflect the need to address the cause of poor health and wellbeing. IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The emerging Local Plan should consider public health. The emerging Local Plan should contain policies which ensure health provision is available for all residents of the borough.
Safer Brent Partnership Community Safety 2014-2017 strategy	The Safer Brent Partnership Strategy 2014-2017 describes a new model of community safety for the Safer Brent Partnership. This strategy focusses less on tackling individual crimes, and places greater focus on: reducing demand; identifying and addressing the needs of the most vulnerable; integrating better with other processes to be more efficient; and, making communities more resilient. The strategy identifies six priorities: 1. Violence against Women and Girls 2. Gang-related Offending 3. Anti-Social Behaviour 4. Reducing Reoffending 5. Preventing Radicalisation 6. Child Sexual Exploitation	IIA objectives to reflect the need to improve community safety and reduce crime**.** The emerging Local Plan to take into account the Council's Safer Brent Partnership Community Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Stronger Communities Strategy, 2015, Brent Council	The Stronger Communities Strategy sets out the Council's partnership vision for tackling complex challenges (hate crime, extremism and radicalism, domestic abuse and harmful practices, child sexual exploitation, and gang-related crime) by working with communities and residents, alongside professionals within the statutory services, to develop a community based approach. The Council's over-arching aim for this strategy is to work with partners, communities and residents to make Brent stronger, more resilient and cohesive. The strategic objectives set o within the strategy are as follows: 1. Promote common ground 2. Encourage participation in civic life 3. Tackle intolerance and challenge extremism and other harmful practices 4. Promote our vision and understanding of cohesion	IIA objectives to reflect the need to improve quality. IIA objectives to reflect the need to improve community safety and reduce crime. The emerging Local Plan to take into account the Council's Stronger Communities Strategy.
Employment, skills and enterprise strategy 2015-20, Brent Council	The Employment, Skills and Enterprise Strategy sets out how Brent aims to capitalise on the growth opportunities available in Brent (such as at Old Oak Common, Wembley and Alperton) by ensuring that the new investment brings new jobs as well as new homes and by making sure that the Borough's established businesses and residents are able to benefit first hand from the new opportunities created. The vision of the strategy is "*to reduce inequality and raise living standards in Brent through economic growth and employment",* with a long-term ambition that in 20 years the levels of employment in Brent will be comfortably above the London average. The Strategy has the following strategic objectives: • To promote economic growth through regeneration, increasing the number of local jobs providing new opportunities for local businesses	The IIA will include consideration of the potential effects of the emerging Local Plan on the economy an employment IIA objectives to reflect the need to improve education and skills IIA objectives to reflect the need to encourage high quality employment opportunities and encourage enterprise and innovation. The emerging Local Plan should seek to protect and enhance the borough's employment and industrial land to ensure employment needs are met.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• To ensure that local education and skills provision is reflective of the demands of the labour market, providing a labour pool made up of well qualified and highly motivated individuals • To have a strong focus on addressing inequality by reducing economic and social polarisation within our most deprived neighbourhoods and amongst those residents who are furthest away from work. • To reduce poverty through employment and progression in work • To secure increased local influence over national and regional employment programmes so as to deliver better outcomes for Brent residents A number of outcomes is associated with each strategic objective which will help to deliver the vision of the strategy.	
A Regeneration Strategy for Brent 2010-2030, Brent Council	The Regeneration Strategy aims to proactively respond to the opportunities and challenges brought by the new political and economic environment. The Strategy includes the following strategic priorities: • To deliver transformation change across the borough, focusing primarily on the identified priority areas for investment. These areas are Alperton, Burnt Ok, Chalkhill, Church End, Harlesden, North Circular (Including Brentfield and St Raphael's), Stonebridge, South Kilburn and Wembley. • To increase employment and income levels of Brent resident's concentration on those most in need. • To maximise investment in Brent from the private, public and community sectors in line with our regeneration priorities and ambitions	The emerging Local Plan and IIA will take into account the Regeneration Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	Associated with each strategic priority is a number of actions. The Strategy also identifies a number of performance indicators for each strategic priority to enable the success of this strategy to be measured.	
Capital Investment Strategy, 2016-2020, Brent Council	The Capital Investment Strategy sets the framework through which the capital programme helps to deliver the Council's key priorities. The investment strategy shifts the focus of the Council's capital expenditure plans from on "fundamental" of "game-changing" investment in infrastructure with the potential to transform the long term economic prosperity of the borough and its residents. The initial focus of the strategy is on meeting short-term housing need, through the temporary accommodation reform strategy. Over the medium to longer term the focus of the investment strategy will shift to ensure the opportunities in the borough can be seized. This will include: • Investment in major development sites – OPDC, Wembley & Alperton Housing Zones; Harlesden, Stonebridge and Willesden opportunity sites; regeneration in church end and bridge park • Revitalising high streets as a major retail destinations • Examining the case for investment in heat networks and power generation • Considering how to attract more jobs, and more high quality jobs in the borough • Strategic property acquisitions to enable regeneration	The emerging Local Plan an IIA will take into account the Capital Investment Strategy
Flood Risk Management Strategy, Brent Council	The Flood Risk Management details the actions that the Council and other key stakeholders are taking to manage flood risk in Brent. It sets out the flood risk in Brent, by discussing the flood history, the geography of Brent, likely sources of flood and the overall risk of flooding for Brent.	IIA objectives to reflect the need to address flooding

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The strategy has the following five Objectives: • Improving the understanding of flooding risks In Brent. • Reducing the risk of flooding for people and businesses in Brent. • Providing clear information on the roles and responsibilities of everyone involved in flood risk management in Brent. • Ensuring that emergency plans and responses to flood incidents in Brent are effective. • To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social The Strategy includes a summary of actions, each of which is relevant to one of the above objective that Brent Council and other relevant stakeholders are undertaking to deliver the objectives of the Strategy.	The emerging Local Plan will support the implementation of the flood risk management strategy.
Climate Change Strategy, Brent Council	The Council's Climate Change Strategy identifies the possible impacts of climate change on the borough and identifies the opportunities and challenges the Council needs to take into account when planning to tackle climate change. The Strategy has the following three aims: • To cut emissions produced by the borough • To enable Brent to cope with extreme weather • To adapt to climate change To achieve the above aims, the strategy set out the following 5 objectives: 1. To secure commitment from all relevant partners to act 2. To achieve wide-ranging and inclusive solutions to the challenges of climate change 3. To provide user-friendly information to those who need it 4. To collect evidence and continually assess progress	The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change. The IIA objectives should be in line with the objectives identified within this strategy The emerging Local Plan should consider issues around climate change. Where applicable, the emerging Local Plan should support the aims and objectives of the Council's Climate Change Strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	5. To mainstream climate change into our everyday activities	
Draft Housing Strategy, 2017 – 2022, Brent Council	The 2017-2022 draft Housing Strategy updated the 2014 housing strategy to take into account the political and economic changes. The draft housing strategy has the following ambition: "*A housing market that provides a range of housing options to meet the diverse needs and aspirations of Brent's residents, enables social and economic mobility and supports access to decent, affordable accommodation for all".* The Strategy also identifies a number of priorities and objectives, which are as follows: • Housing Supply. ○ **Priority –** to significantly increase the supply of affordable housing ○ **Objective (Affordable Housing Supply) –** to increase the capacity to meet housing needs and support social mobility through the provision of 5,000 Affordable Rent and Low-cost Home Ownership properties by 2019. ○ **Objective (Larger house and reducing overcrowding) –** to ensure that at least 35% of new general needs affordable rented housing is 3 bedroom or larger, to align with the demand profile. To halve severe overcrowding in the social housing sector by 2019. ○ **Objective (Private renting and low cost home ownership) –** the development of 1,000 build-to-rent homes by 2019, of which at least 30% are affordable to those on lower incomes ○ **Objective (Supported housing supply) –** to deliver a programme of extra-care and specialist supported	IIA objectives should reflect the need to secure housing and meet identified need, particularly affordable housing. The emerging Local Plan should seek to provide enough dwellings to meet the boroughs objectively assessed nee. The emerging Local Plan will take into account the draft Housing Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	housing units by 2019 to widen housing options and reduce reliance on residential care • **Housing and wellbeing** ○ Priority – to promote wellbeing and reduce economic and social exclusion through an integrated approach to housing and wider service provision ○ **Objective (Integrated Housing and Employment Support) –** to integrate housing advice and management services with employment guidance and support ○ **Objective (economic and Social Deprivation) -** to reduce economic and social polarisation by achieving significant convergence between priority neighbourhoods and the borough as a whole by 2019 ○ **Objective (Energy Efficiency and Fuel Poverty) -** to improve the energy efficiency of the housing stock through programmes of retrofit works ○ **Objective (Tenancy Strategy and Allocations)** – to foster support wellbeing through access to suitable and affordable housing • **Private renter sector improvement** ○ **Objective -** To maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation ○ **Objective (Standards) -** for all private rented properties in the borough to achieve minimum standards of management and condition by 2019 ○ **Objective (Access) –** to establish a lettings agency and other arrangement to increase access to meet housing need • **Homelessness and allocations**	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ **Objective -** to significantly reduce levels of homelessness and the use of temporary accommodation ○ **Objective (Prevention)** – to reduce the number of homeless acceptance s to below the London average by 2019# ○ **Objective (Temporary Accommodation)** – (a) to minimise the use of Bed and Breakfast Accommodation and eliminate the use of non-self-contained B&B for more than six weeks. (b) To reduce the number of households in temporary accommodation to the London average by 2019 • **Social Housing Improvement** ○ **Objective -** to improve the quality of the existing social housing stock and ensure its efficient use ○ **Objective (Council Housing Investment) –** to maintain the decent homes standard and complete a programme of maintenance and improvement across the council's housing stock by 2021 ○ **Objective (Maximising Use of Social Rented Homes) –** to maximise the efficient use of the social housing, achieving top quartile performance	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Fit for Life, A Physical Activity Strategy for Brent, 2016-2021, Brent Council	This strategy follows on from the success of the 2010-2015 Health and Wellbeing Strategy and seeks that by "2021 more people in Brent will be more active and there will be improved health and wellbeing through the borough. This will be achieved by establishing physical activity as a fundamental and enjoyable part of people's lives The Strategy has the following 0bjectives, which will, be achieved through carrying out the actions identified within the Action Plan included with Chapter 9 of the strategy: 1. To increase participation in physical activity through the development of a core offer accessible to everyone 2. To develop sustainable and long term local community approaches to encouraging more people to adopt healthy lifestyles 3. To achieve permanent behaviour change by helping people to build physical acidity into the fabric of their everyday lives	IIA objectives to promote health and wellbeing IIA objectives to reflect the need to address the cause of poor health and wellbeing. IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The emerging Local Plan shod promote health and well-being

Appendix 2: Baseline Information

1. Population and Equality

Evidence:

- 2001 and 2011 Census
- GLA Short Term Projections
- The Brent Joint Strategic Needs Assessment (JNSA) 2015
- London Borough of Brent Strategic Housing Market Assessment (January 2016)

Evidence Gaps:

- None Identified

Brent's Population

1.1 The 2011 Census recorded Brent's population as 311,215, a 19.1% increase from the previous Census in 2001. Since the 2011 Census, the borough's population has continued to grow, with it now estimated to be 329,000[1], which equates to a 5.7% increase and a population density of 76.09 people per hectare. The population is expected to continue to increase to 2050, with it estimated that that by 2050 the population will be approximately 407,000, an increase of 23.7% from 2016.

1.2 As shown in Figure 4, Stonebridge, Kilburn and Queensbury have the largest populations of the borough's wards, with Brondesbury Park, Southwick Park and Kenton being the least

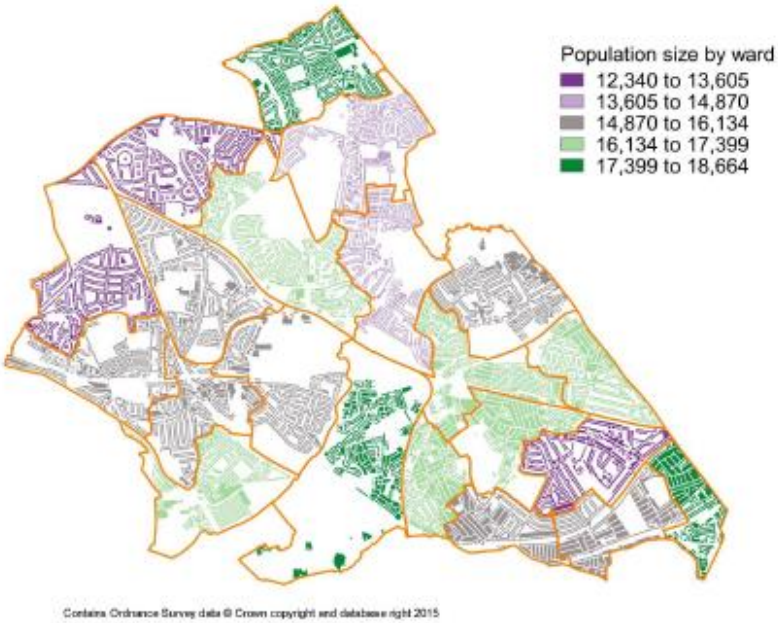


Figure 4: Population size by ward

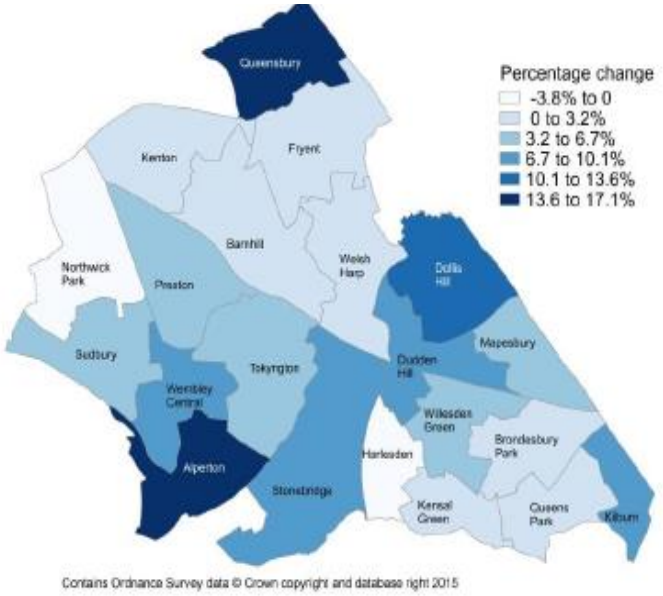


Figure 5: Percentage change in ward population

[1] GLA Short-term Population Projections 2016

populated of the borough's wards. At ward level, the population change in Brent between 2011 and 2016 has varied significantly, as depicted in Figure 5. The largest population growth between 20 11-2016 was in Alperton (17.1%), where the population increased by 2,411 people from 14,102 in 2011 to 16, 513 in 2016. During the same time period, there was a 4% decrease in the population of Harlesden, which fell from 17,277 in 2011 to 16,622 in 2016.

Gender

1.3 In 2016, 50.9% of Brent's population was male and 49.1% was female. As shown in Figure 6, it is predicted that there will no real change within the population's gender balance.

Age

1.4 Brent has a young population, with 33.3% of its population being aged between 20 and 39. This corresponds with London as a whole, which has a much higher proportion of its population within the age range 25-34 than the rest of England. The 16-64 (working age population) makes up 67.3% of the population. Figure 8 shows that the working age population will continue to form a significant portion of Brent's population to 2050.

1.5 Currently, the 65 and over population makes up 11.5% of Brent's population. However, the 2016 SHMA stated that "*the population in older age groups is projected to increase during the Plan period, with a third of the overall population growth projected to be aged 65 or over".* This point is further highlighted in Figure 5.

Sexual Identity and Gender Orientation

1.6 Lesbian, Gay and Bisexual people make up between 5% and 7% of the UK population. Taking this into consideration, it is estimated there is

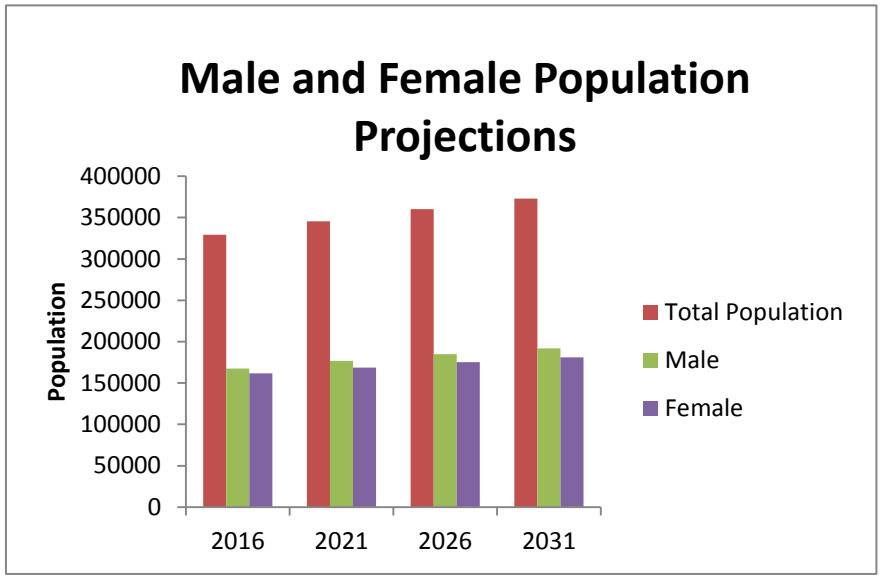


Figure 6: Male and female population projections

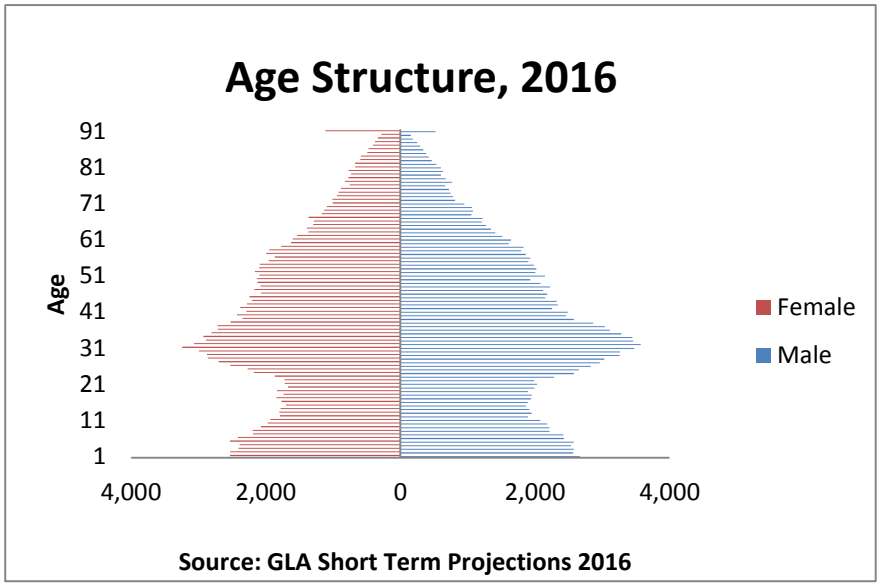


Figure 7: Age structure of Brent

15,600-21,800 people in Brent who identify as being lesbian, gay and bisexual.

1.7 1% of the UK population experience gender variance. Taking this into consideration, it is estimated that 3,100 people in Brent will experience gender variance. 0.02% of the UK population will undergo gender transition. Taking this into consideration, it is estimated that 60 people in Brent will undergo gender transition.

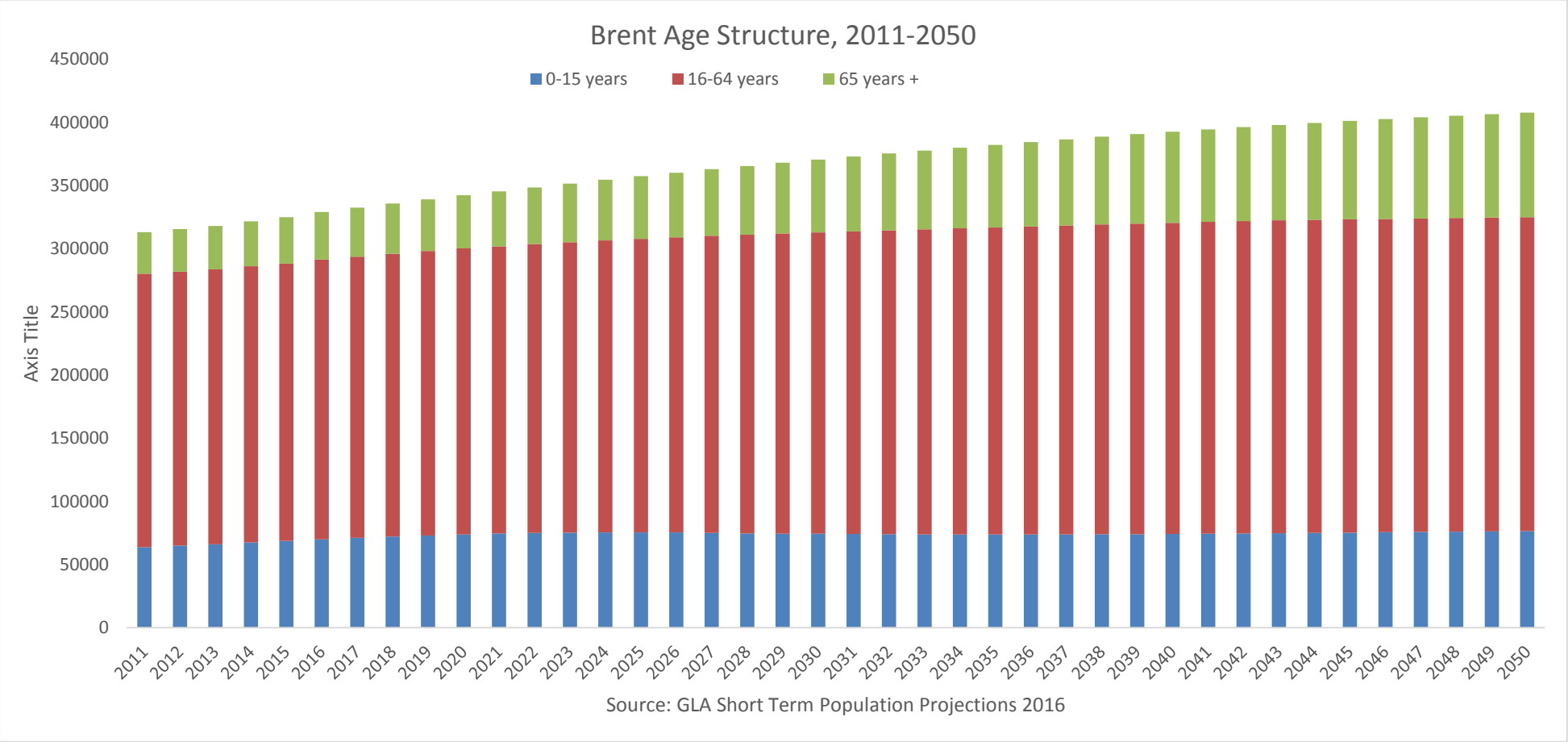


Figure 8: Age Structure Projections for Brent, 2011-2050

Ethnicity

1.8 Brent is one of the most diverse local authority area in the UK. Approximately 64.9% of Brent's population is Black, Asian or other minority ethnicity (BAME). This has increased since 2011, when BAME groups made up 63.7% of the population. The Indian ethnic group currently makes up the highest proportion of BAME (18%), followed by Other Asian (10%). The White Group makes up 35% of the population.

1.9 Of all local authorities, Brent has the largest proportion of residents born abroad (55%). This ranges from South Asia (16%), Sub-Saharan Africa (11%) and the European Union (12%). Both EU born and non-EU born resident groups increased between 2004 and 2015. There has been a significant increase in the amount residents who place of birth is in South Asia between 2004 and 2015 (from approximately 28,000 residents in 2004 to approximately 50,000 in 2015).

1.10 There are 149 languages spoken in Brent. English is the main language for 62.8% of the population. Gujarati is the main langue for 7.9% of the population and Polish is the main language for 3.4% of the population. In one in five households, nobody speak English as their main language.

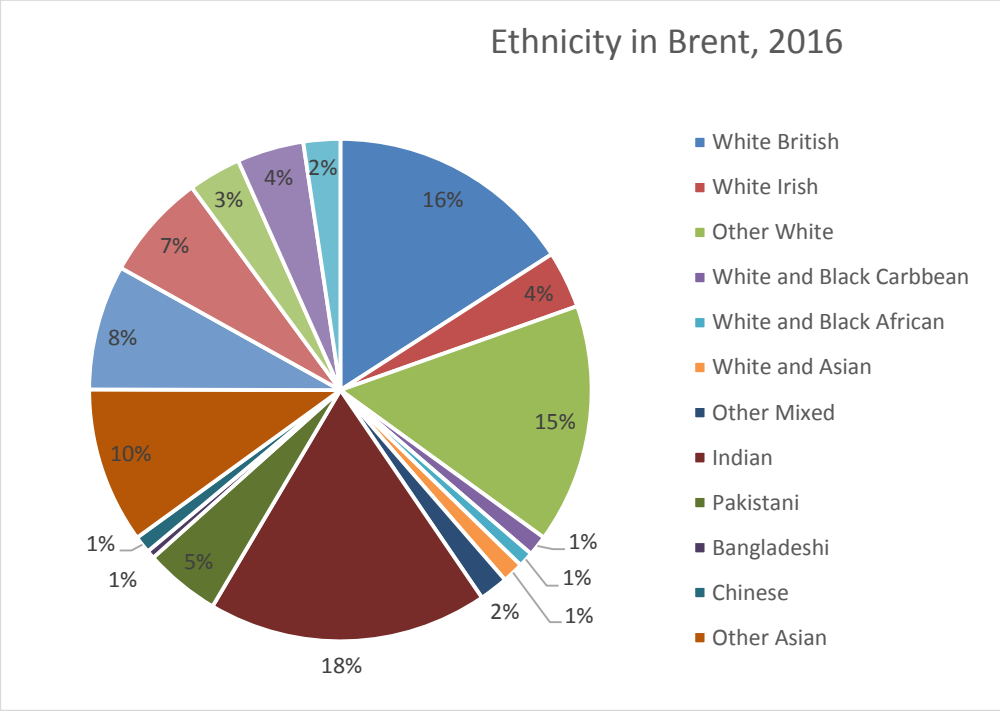


Figure 9: Ethnicity in Brent

1.11 The increasing population is likely to create changes in the ethnicity of residents. As shown in Figure 10, it is predicted that the largest population increase within the borough will be within the 'Other White' and 'Other Asian' category which by 2050 is predicted to be 66,989 and 47,078 respectively. It is forecasted that there will be a slight decline in the borough's Black Caribbean and White Irish population. The borough's Black Caribbean population is projected to decrease from 23,834 in 2011 to 18,144 in 2050 and the White Irish population of the borough is predicted to decrease from 12,384 in 2011 to 10,506 in 2050.

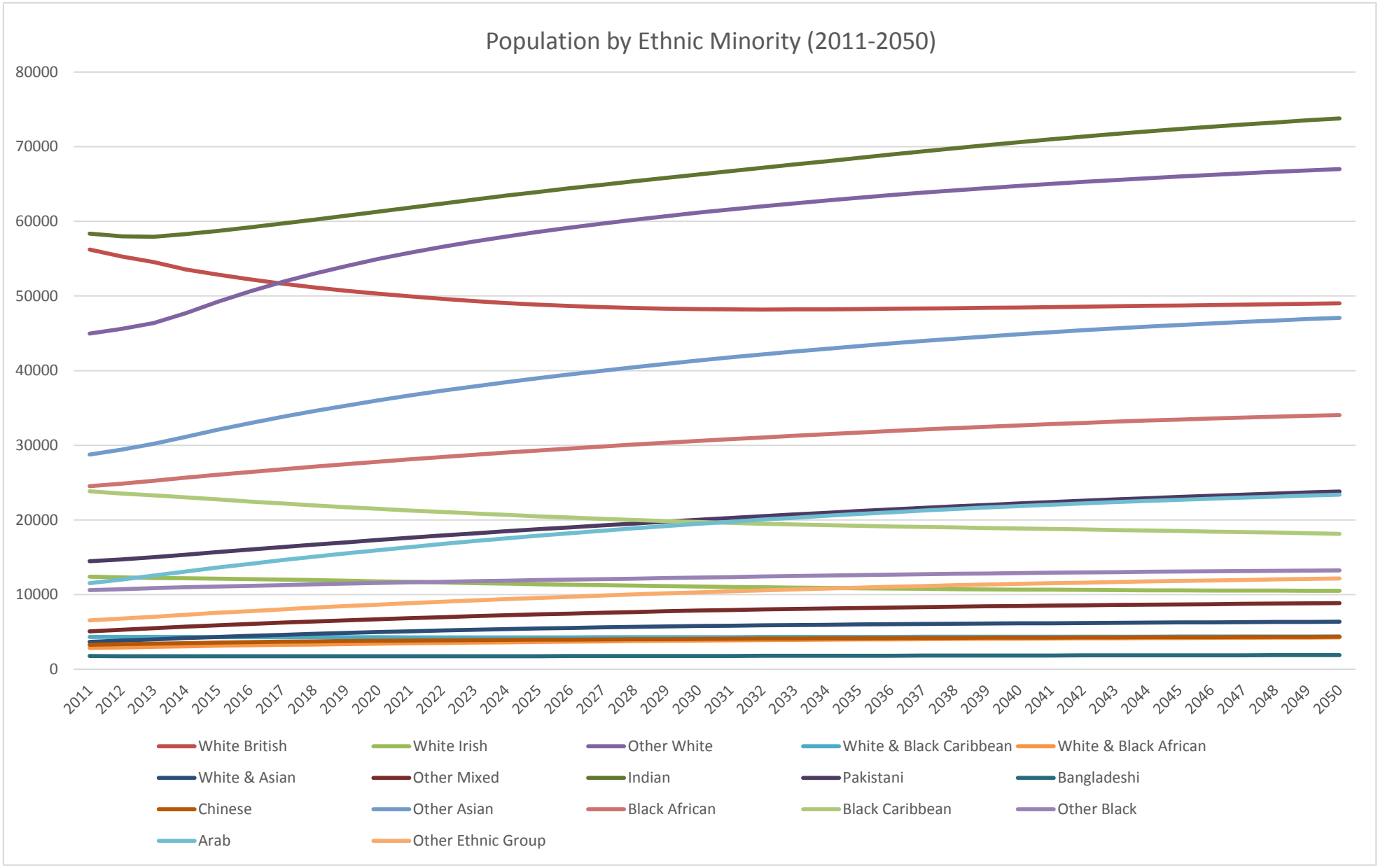


Figure 10: Population by Ethnic Minority, 2011-2050

Religion or Belief

1.12 At the time of the 2001 Census, 48% of Brent's population stated that their religion or belief was Christianity. Although Christianity remained the most popular religion/belief in the borough in 2011, the percentage of the population that stated it was their religion had decreased by 7% to 41%.

1.13 Between 2001 and 2011, there was an increase in the amount of residents who stated that their religion or belief was Islam. As a result of this 7% increase from 12% to 19%, it replaces Hinduism as the second most popular religion/belief in the borough. During the same time period, there was a 2% decrease to 1% in the amount of residents who stated that their religion/belief was Judaism.

2. Education

Evidence Base

- Projecting Adult Needs and Service Information (PANSI) system
- Joint Strategic Needs Assessment
- Annual School Standards and Achievement Report 2015-2016
- Brent School Place Planning Strategy 2014-18 (Refresh November 2015)
- Statistics at Department for Education – Statistics: special education needs (SEN) (January 2017)

Evidence Gaps:

- None identified

Infrastructure

2.1 At the start of the 2015/16 academic year there was 85 schools in Brent; 4 nurseries, 60 primary schools, 15 secondary schools, 4 special schools and 2 pupil referral units. Of these schools, 1 secondary school and 1 primary school are 'Free' schools and 5 primary (3 sponsored, 11 secondary (4 sponsored) and 1 special school were academies. As of November 2017, there is outstanding planning permission for a two form of entry primary school and nursery school at the former oriental city is and a new primary school at the former Manor school. There are also various planning applications for extensions to increase the capacity at a number of secondary and primary schools.

2.2 The Brent School Place Planning Strategy states that the secondary school roll projections, which are provided by the GLA, indicates the need for the equivalent of 2 new secondary schools in Brent by 2022. This reflects the fact that the significant growth in the primary population will be moving into the secondary phase.

School Population

2.3 Brent's school population has increased from 44,117 in 2011 to 51,262 in 2017[2]. This represents an increase of 16.1%. In recent years Brent has seen an unprecedented increase in the demand for primary school places, but it is anticipated that the demand for **reception places** will slow from 2016. The primary population (Reception to Year 6) increase by 17.78% from 21,427 in May 2008 to 26,028 in

[2] Department of Education (2017). Table SFR37

May 2015. As identified in the Brent School Place Planning Strategy there will continue to be a shortage in primary school places within Queensbury, Fryent and Welsh Harp. In the last five years the nursery-age population of the borough has grown by 34%. There is currently a surplus of places in Secondary School, but this is anticipated to change from 2018 as the primary growth moves through the education system.

Educational Attainment

2.4 At the end of the last academic year, 94% of Brent schools were judged as being good or outstanding, an increase of 8 percentage points on the previous year's figure of 86%. Brent was eight percentage points above the national average of 86% of above the London average of 90%. All nursery and special schools, and pupil referral units have been judged as at least good.

2.5 Brent performed well against the national averages in 2016 for the primary and secondary headline attainment measures but was below London at the end of Key Stage 2 and just below London at the end of Key Stage 4.

Primary

2.6 In 2016, Brent was above the national averages for all primary school headline indicators.

- 55% of primary school pupils were attaining the expected standard in reading, writing and mathematics at the end of Key Stage 2. This was higher than the national average (53%) and the London average (59%).
- In 2016, the average progress scores for Brent pupils were above the national averages for reading, writing and mathematics. Brent is below the London average for reading and writing, but well above London for mathematics
- The attainment of children at the end of the Early Years Foundation Stage improved, closing the gap with the national average.
- A key issue for Brent continues to be the wide variation in the attainment of pupils at different primary schools; the difference between the schools with the highest proportion of pupils attaining the headline measure at the school with lowest proportion was 65 percentage points.
- The Brent average for girls attaining the expected standard in reading, writing and mathematics at Key Stage 2 in 2016 was 5 percentage points above boys' attainment. However, the boys' attainment was 2 percentage points above the average for all boys nationally and just below the national average for all pupils.

Secondary

2.7 The new headline measures for secondary schools are the Attainment 8 score and the Progress 8 score. Attainment 8 measures the performance of students across eight qualifications, which includes mathematics (double weighted) and English (English Baccalaureate).

- In 2016, Brent's figures for the proportion of students attaining grades A*-C in English and maths increased to 64%, an increase of three percentage points compared to 2015.
- The average progress that Brent students made in eight subjects at secondary school was well above the national average, statistical neighbours and London.

- The average attainment in Brent was 51.5, above the national average and average for statistical neighbours and marginally below London (Figure 11). This indicates that students in Brent attained an average of Grade B and above in eight GCSE subjects.
- There is great variation in the attainment of pupils at different secondary schools. The difference between the school with the highest proportion of students attaining the headline measure and the school with the lowest proportion is 25 percentage points.
- The Brent average Attainment 8 score for girls was four points above boys. Boys' attainment was one point above the average for all boys nationally and one point below the national average for all students. For the Progress 8 measures Brent boys made significantly more progress at secondary school than girls

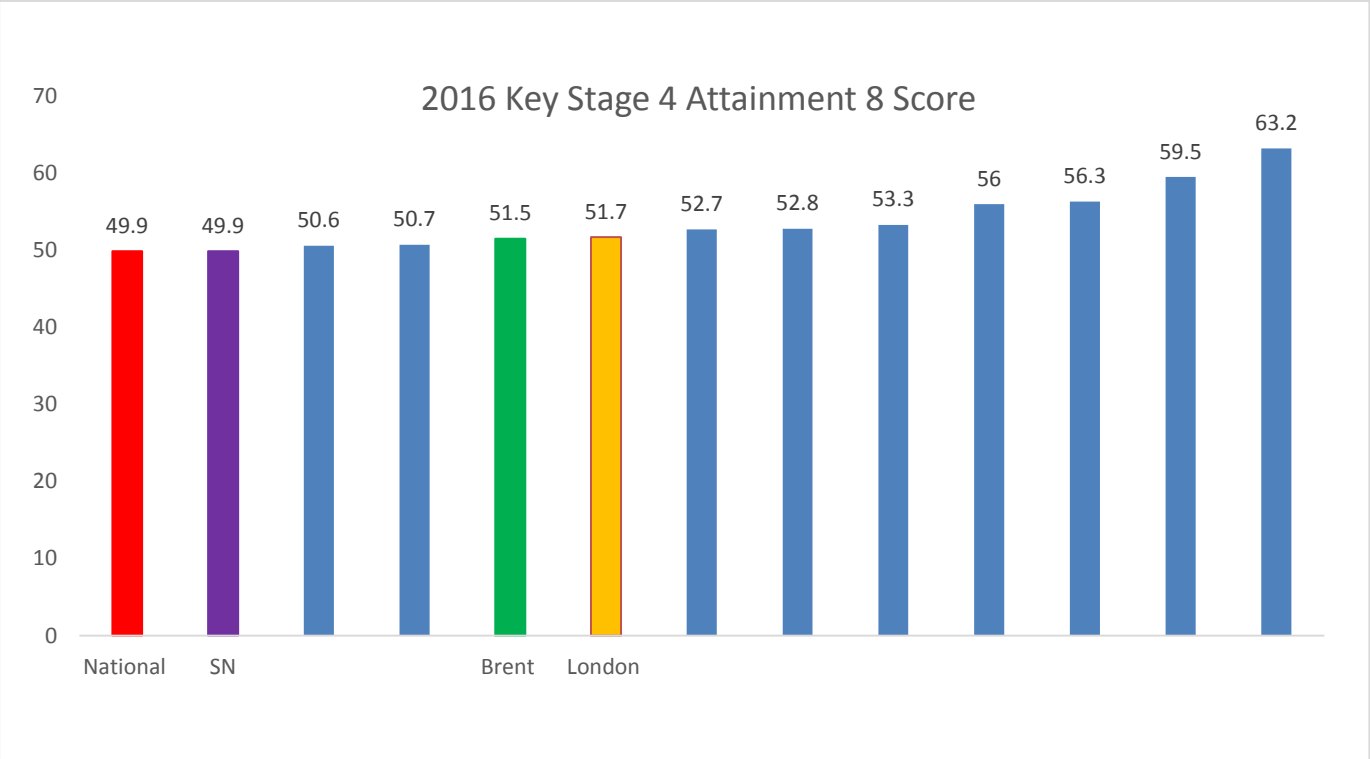


Figure 11: KS4 attainment scores

Post-16 Key Stage 5

2.8 The statistics for Key Stage 5 cover all state-funded mainstream schools, Academies, free schools, Maintained special schools and further education colleges. Students are able to study a variety of different qualifications at Key Stage 5, which includes: A Levels, Applied General and Tech Level.

2.9 In 2016, the average A level average point score per qualification was 30.7, which is marginally above the London average (30.5) and the national average (30.4). As 10 points equals one A level grade, it indicates that on average Brent students attained a grade C in each of their A levels.

2.10 For Tech Level courses, Brent's average pint score was 34.25, which is above both the London and national average. Brent students also attained an average grade of C in Applied General qualification, which is equal to the London average but below the national average.

Ethnic Groups

2.11 92% of Brent's school population are from minority ethnic groups. This compares with the national average of 29%. The largest ethnic groups in Brent are Asian Indian (15%), Black Somali (9%), Black Caribbean (9%) and White British (8%). Schools in Brent now draw pupils from an increasingly diverse range of cultural and linguistic backgrounds.

Primary

2.12 Of Brent's ethnic groups, in 2016, Black Caribbean was 14 percentage points below the national average for all pupils attaining the expected standing in reading, writing and mathematics at the end of Key Stage 2 and the Black Somali group was three percentage points below. The attainment of the whole Black African group, Asian Pakistani and White British groups was above the national average and the group nationally. Although the Asian Indian group was above the national average, the Brent average was below the average for this group nationally.

Secondary

2.13 Of Brent's significant ethnic groups, in 2016, Black Caribbean was six points below the national average for all students and the Black Somali group was three points below. The Asian Pakistani and White British groups were above the national average and above the group nationally, and the Asian Indian was above the national average. All of Brent's significant groups made progress at secondary school than the national average for all students nationally.

Special Educational Needs (SEN)

2.14 Of the 51,262 pupils in Brent in 2017, there are 6,429 pupils with Special Educational Needs (SEN), which equates to 12.5%. This is lower than the national average, where the percentage of pupils with special educational needs is 14.4%. It is expected that the number of pupils with SEN will rise in proportion to the overall increase in pupil numbers.

2.15 In 2016, Brent pupils with SEN attaining the expected standard in reading, writing and mathematics (KS2) was 18%, which is above the national average for pupils with SEN. For secondary education. The Brent average Attainment 8 score for students with SEN was two points below the national average for students with SEN and well below the average for all students. For Progress 8 measures Brent students made more progress at secondary school than students with SEN nationally, but less progress than the average for all students.

2.16 Speech, Language and Communication Needs is the most common primary type of need in primary schools. 1,447 pupils, which equates to 39% of pupils with special education needs have this primary type of need in January 2017. Moderate Learning Difficulty is the most common primary type of need in secondary schools; 460 pupils with special education needs, which equates to 27%, have this type of primary need in 2017.

3. Health

Evidence

- Brent Health and Wellbeing Strategy, 2014-2017
- Annual Public Health Report
- A Physical Activity Strategy for Brent, 2016-2021
- Health Profile 2017 – Public Health England
- Joint Strategic Needs Assessment, 2015
- Brent – Summary of Progress under Shaping a Healthier Future, Brent CCG

Evidence Gaps:

- None identified

3.1 In Brent, life expectancy for females between 2011 and 2013 is 84.9 years. This was higher than male life expectancy of 80 years. However, life expectancy for males and females varies across Brent. Life expectancy is 4.7 years lower for men in the most deprived areas of Brent than in the least deprived areas. For women, the life expectancy gap is 4.4 years between the most deprived parts of Brent and least deprived parts.

3.2 At the time of the 2011 Census, the vast majority of people in Brent (83%) described their health as “very good” or “good”, a similar picture to England and Wales as a whole (81%). 5% described their health as “very bad” or “bad”, with the remaining 12% saying that their health it “fair”. At ward level, Kilburn had the highest number of residents who assessed their health as “very good” (8,448 residents) while Kenton

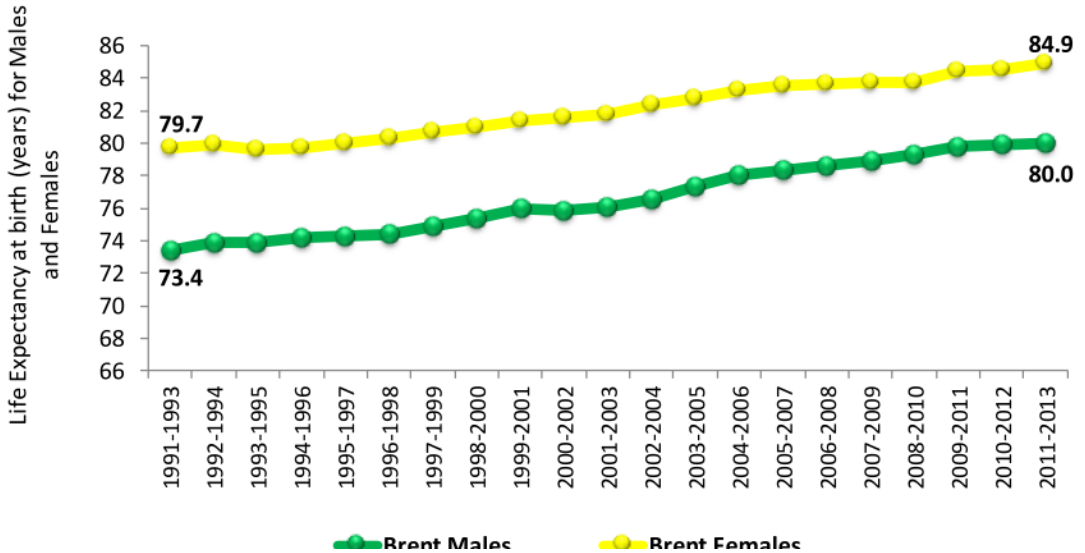


Figure 12: Life expectancy in Brent

had the lowest number of residents (5,502 residents) that assessed their health as “very good”. Harlesden had the highest number of residents with both “good” health (5,815 residents) and those reporting “very bad” health (313 residents)

3.3 The Joint Strategic Needs Assessment, which was jointly commissioned by Brent Council and NHS Brent, identified a number of health and wellbeing challenges in the borough, which are:

- ***Low rates of readiness for school amongst under-fives –*** *I*n Brent, only 57% of 5-year olds reach a good level of development at age 5, compared to 59% across London.
- ***Poor oral health amongst children –***46% of five year olds had one or more decayed, missing or filled teeth. This is worse than the England average of 28%.
- ***Rising levels of obesity*** – In 2014/15, 23.8% of year 6 children were classed as obese, which is worse than the England average of 19.1%, and that 10.2% of reception year pupils were obese compared to the England average of 9.1%. Figures from the Health and Social Care Information Centre show that in 2015 there were 940 hospital admissions per 100,000 people for obesity related problems, which is above the national average of 811 per 100,000 people. Furthermore, the projected levels of obesity is projected to increase by 50% – between 2014 and 2030 the number of people in Brent aged 65 and over and who are obese is predicted to rise from 9,194 to 13,692.
- ***Low levels of participation in physical exercise*** – Sport England’s Active People Survey (APS) shows that over half of Brent’s adult population (55.7%) do not participate/undertake sport or physical activity, which is the highest level of inactivity in the 6 west London boroughs and the fourth highest across the 33 London boroughs. The same survey also shows that only 18.5% of Brent’s population are achieving the recommended level of moderate intensity sports or active recreation per week. As identified in the Physical Activity Strategy for Brent, there has been some increase in women taking part in sport and exercise between October 2005 and April 2014, however there is still a gap between men’s and women’s participation in sports.
- ***Increasing rates of alcohol-related hospital admissions*** – In 2012/13, there were 82 hospital admissions in Brent (66 males and 16 female) where alcoholic liver disease was the primary diagnosis. This equates to a rate of 31.4 per 100,000 of the population, which is similar to the England average of 31.8 per 100,000. The rate of alcohol specific hospital admissions in Brent is significantly higher than the England average for males, but significantly lower than the England average for females. However, Brent has significant lower numbers of under 18 alcohol-specific hospital admissions (16.8 per 100,000 population) compared to the London (26.6 per 100,000 population) and England (40.1 per 100,000 population) average.

- ***Mental health remains the single largest cause of morbidity within Brent affecting one quarter of all adults at some time in their lives*** – In Brent, 33,959 people aged 18-64 were estimated to have a common mental health disorder (CMD) in 2014. As shown in Figure 13, by 2030 this is predicted to increase by 7% to 36,625 people. The Figure shows that there is also greater prevalence of CMD within the female population of the borough compare to the male; in 2014 it was estimated that 20,409 female residents of the borough had a CMD compared to 13,550 male residents. The prevalence of severe and enduring mental health (such as schizophrenia, personality disorders and bi-polar) in Brent affects 1.1% of the population, which is above both the London (1%) and England (0.8%) average.

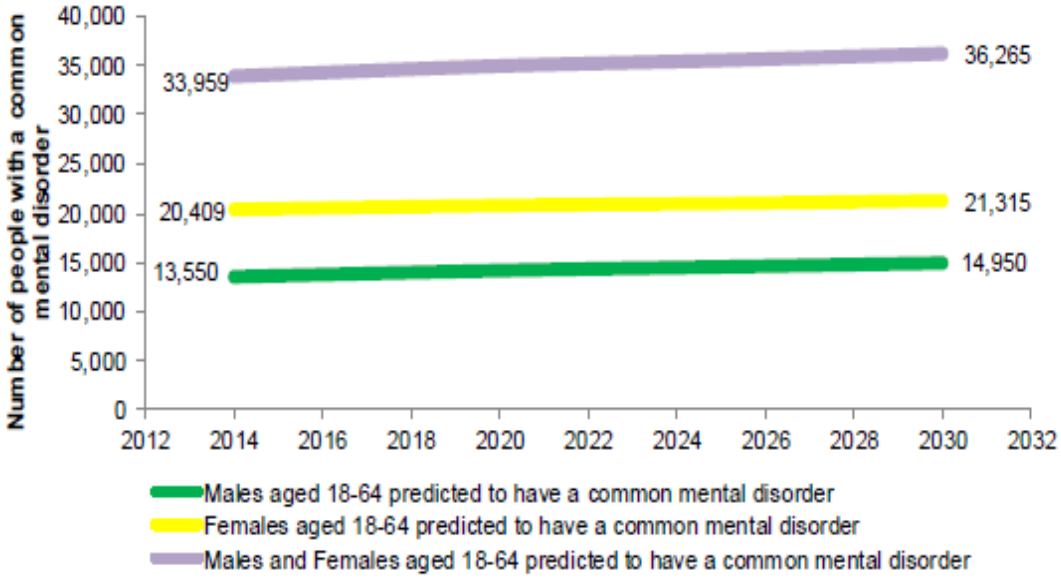


Figure 13: Number of people with a common mental disorder in Brent

- **Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent and account for much of the inequalities in life expectancy within the borough**
- **The borough has high levels of long-term chronic conditions, many of which are often related to poor lifestyles, relative deprivation and in some cases ethnic make-up. Diabetes is a good example of such a conditions and the borough –** There is currently 18,000 registered diabetic patients in the borough. The prevalence of diabetes is projected to rise in Brent with it estimated in 2030 14% of people aged 16 and over will have diabetes. This is fuelled by the ageing population, increasing numbers of people who are overweight or obese and the high proportion of black and south Asian ethnic groups in the borough who are more at risk of diabetes.
- **The need to increase access to, and to expand, key prevention and screening programmes**
- **Rising levels of dementia amongst older adults –** In March 2015, 1,381 patients (55.1%) in NHS Brent CCG ha mild dementia, 818 patients (32.7%) had dementia of a moderate severity, 306 patients (12.2%) had severe dementia and 730 people remained undiagnosed. The prevalence of dementia varied at GP practice levels, ranging from 1.12% to 0.03%. Between 2014 and 2030, the

total population age 65 and over in Brent estimated to have dementia is projected to rise from 2,369 to 3,857. This equates to an increase of 63%.

3.4 The JNSA also identified the following facts about the health and wellbeing of Brent's residents:

Figure 14: Population meeting the recommended 5-a-day fruit and vegetable intake in 2014

- 47.1% of the population in Brent were meeting the recommended 5-a-day fruit and vegetable intake in 2014. As shown in Figure 14, this was below the London (50.3%) and England (53.5%) average.
- 31.4% of Brent's population who are aged 16 and over abstain from alcohol use, almost twice the national average of 16.5%.
- In 2012-14, the TB incidence rate in Brent was 82.9 per 100,000 of the population. This was significantly above the England average rate (13.5 per 100,000) and London average (35.4 per 100,000).
- Brent has 30,616 households with people living on their own (according to 2011 Census). Of these, 29% (8,808) are age 65 and over. Social isolation, loneliness and higher levels of deprivation are all linked with pensioners who live alone. As identified in the JNSA, the number of older people in Brent aged 65 and above is anticipated to increase to 52,900 in 2030, which is equivalent to an increase of 47%. Given this projected rise, the number of people in Brent aged 65 and over who are likely to be affected by social isolation and loneliness is forecast to increase significantly
- The General Fertility Rate (GFR) is the number of live births per 1,000 population for women aged between 15 to 44. The GFR in Brent in 2012 was 72, higher than the Outer London (71.8) and national (64.8) average. The conception rate for all women in Brent was 1 in 10 (pp per 1000), which is higher than the England and Wales, and London rates

3.5 The current care provision within Brent is 67 GP practices, 66 dental practices, 75 pharmacies and 16 nursing homes. London North West Healthcare and NHS Trust and Imperial College Healthcare NHS Trust are the main providers of acute and specialist care. London North West Healthcare NHS Trust also provides community nursing and therapies. Central North West London (CNWL) Foundation Trust is the main provider of mental health services. 4 networks have been set up (which comprises of Brent GP's) to deliver extended primary care and Out of Hospital Services for the Brent population.

4. Crime

Evidence:

- Community Safety Strategy 2014—17
- Community Safety Strategy 2014-17 Annual Reports
- Residents Attitudes Survey 2014 Results

Evidence Gaps:

- None identified

4.1 The Community Safety Strategy states that crime in Brent costs £150m per annum. Of this £150m, £55m is violent crime. The Strategy identified a number of key priorities, which are: addressing violence against women and girls; gang-related offending; anti-social behaviour; reducing reoffending; preventing radicalisation and child sexual exploitation.

4.2 In 2016/17 the number of Total Notifiable Offences (all crimes) in Brent has increased from 26,117 to 27,919. This accounted to an increase of 6.9%. However, despite this increase in crime, Brent's crime rate per 1000 of the population is still below the London average; 85 crimes per 1000 of the population compared to the London borough average of 86 crimes per 1000 of the population. Figure 15 depicts the highest crime types as a percentage of total crime in Brent during 2016/17. Although the majority of crime have remained stable during this time period, there was an increase in non-domestic violence with injury and theft from a motor vehicle. There was a decrease in residential burglary.

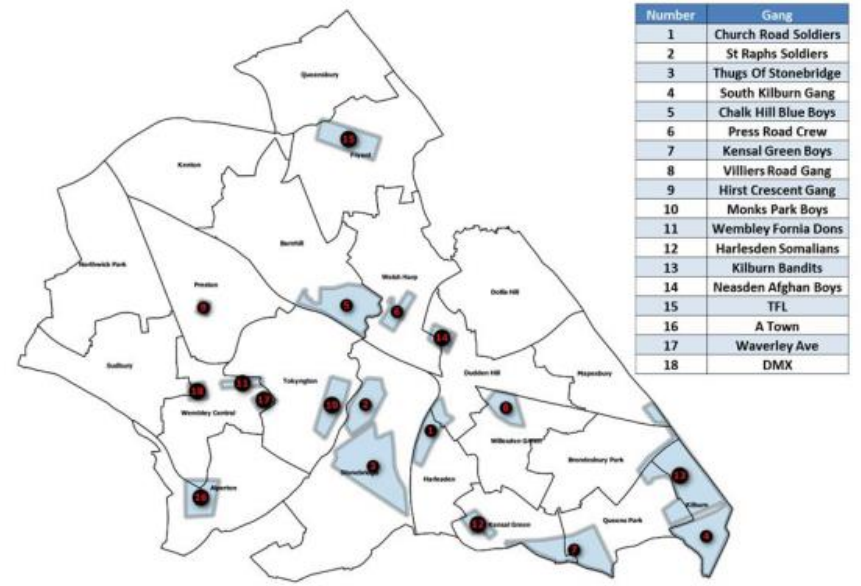
Crime Rank		Crime Type	% of all borough TNO	London Rank
1	⇨	Common Assault	10.6%	3
2	⇨	Harassment	9.7%	15
3	⇨	Criminal Damage	8.3%	10
4	⇧	Non Domestic VWI	7.8%	6
5	⇧	Theft from MV	6.7%	11
6	⇩	Burglary in Dwelling	6.7%	6
7	⇨	Theft from Shops	5.4%	17
8	⇨	Robbery - Personal Property	3.2%	9
9	⇨	Theft Person	2.6%	11

Figure 15: Highest crime types in Brent during 2016/17

4.3 The Home Office identified Brent as one of the 30 boroughs in England and Wales that has a national-level gang issue. Based on the Metropolitan Polices gang matrix there are currently 21 gangs in Brent. There are estimated to over 1,000 individuals involved with gang criminality in Brent, of which 282 have been identified by the current Metropolitan Police Gangs Matrix. The 2016/17 Annual Report of the Safer Brent Partnership states that "[t]*he Brent gangs' cohort is over 90% male, 80% black and has an average age of 24 years old. The long standing gang issues in Brent have created a cohort which is older than most London boroughs. Currently only 7% of the cohort are 17 years old or under, compared to the London average of 20%".* As shown in Figure 16, a number of 'hotspots' for gang activities have been identified, with there being a concentration in areas in the south of borough i.e. Church End, St Raphael's and South Kilburn.

4.4 Anti-social behaviour is a key priority for Brent, with on average 12,000 calls per year to police to report anti-social behaviour. During 2016/17, Brent Council opened 275 anti-social behaviour cases and carried out 1943 case actions. The top ten categories for anti-social behaviour in Brent during 2016/17 were: drug dealing (42 requests), noisy neighbours (18 requests), rough sleepers (17 requests), street drinking (15 requests), neighbour dispute (14 requests), intimidation/harassment (13 requests), kerb crawling (12 requests), moped nuisance (11 requests), taking drugs (10 request), begging (9 requests). As shown in Figure 17, hotspots for ASB are gathered around town centres.

4.5 Brent is one of the 50 Prevent Priority Boroughs that have been identified by the Office for Security and Counter-Terrorism, Home Office. A Counter Terrorism Local Profile which was produced by the Counter-Terrorism Command of the Metropolitan Police, informs the principle risk for Brent is Al-Qaeda inspired extremism, including the role of Daesh/Islamic State.



Number	Gang
1	Church Road Soldiers
2	St Raphs Soldiers
3	Thugs Of Stonebridge
4	South Kilburn Gang
5	Chalk Hill Blue Boys
6	Press Road Crew
7	Kensal Green Boys
8	Villiers Road Gang
9	Hirst Crescent Gang
10	Monks Park Boys
11	Wembley Fornia Dons
12	Harlesden Somalians
13	Kilburn Bandits
14	Neasden Afghan Boys
15	TFL
16	A Town
17	Waverley Ave
18	DMX

Figure 16: Hot spot locations for gang activities

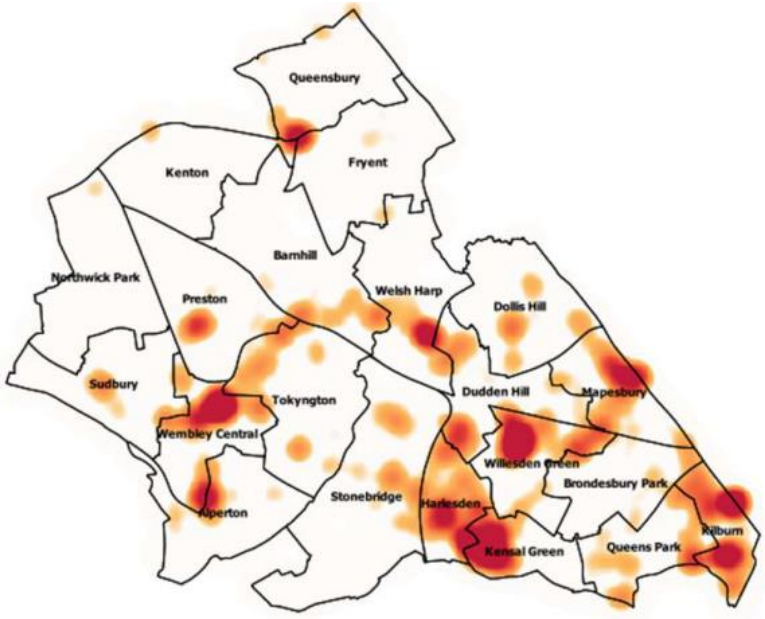


Figure 17: Hot spot locations for anti-social behaviour

4.6 The Resident's Attitude Survey, carried out by Brent Council in 2014, found that 51% of the surveyed population felt fairly safe walking outside in their area alone after dark, with 19% feeling a bit unsafe and 9% feeling very unsafe. Since 2002, there has been a significant reduction in percentage of people who feel very unsafe walking outside alone after dark, decreasing from 24% in 2002 to 9% in 2014. A number of reasons were cited for why people feel unsafe in their local area after the dark. These reasons have been identified in Figure 18.

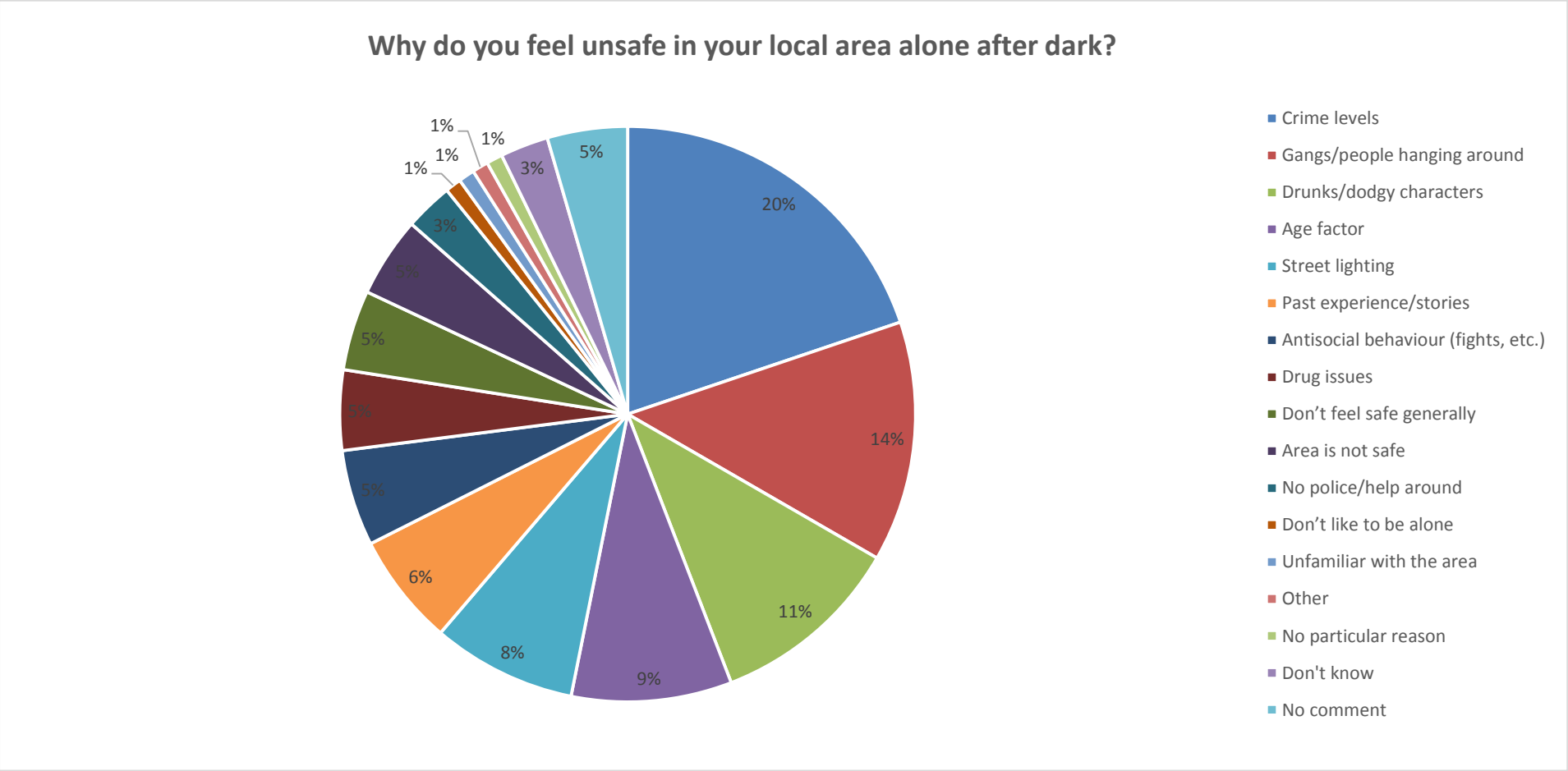


Figure 18: Reasons cited for why people feel unsafe in their local area after dark

5. Water

Evidence

- Brent Strategic Flood Risk Assessment – Level 1 (2007),
- Surface Water Management Plan, 2011
- Flood Risk Management Strategy
- Brent River Corridor Improvement Plan, Brent Catchment Partnership, 2014
- Thames River Basin Management Plan, Environment Agency

Evidence Gaps

- Greater West London Strategic Flood Risk Assessment
- Water consumption per household
- Sewer Capacity within Brent

5.1 Brent's Blue Ribbon Network (Figure 19) includes the following water bodies:

- The River Brent - one of the main rivers that flows through the borough.
- Grand Union Canal - runs along the south-western boundary of the borough with a connecting feeder channel running from the Welsh Harp reservoir to the north east of the borough
- Welsh Harp Reservoir - also referred to as the Brent Reservoir, this water body forms part of an SSSI and supports a large selection of wetlands birds and plants

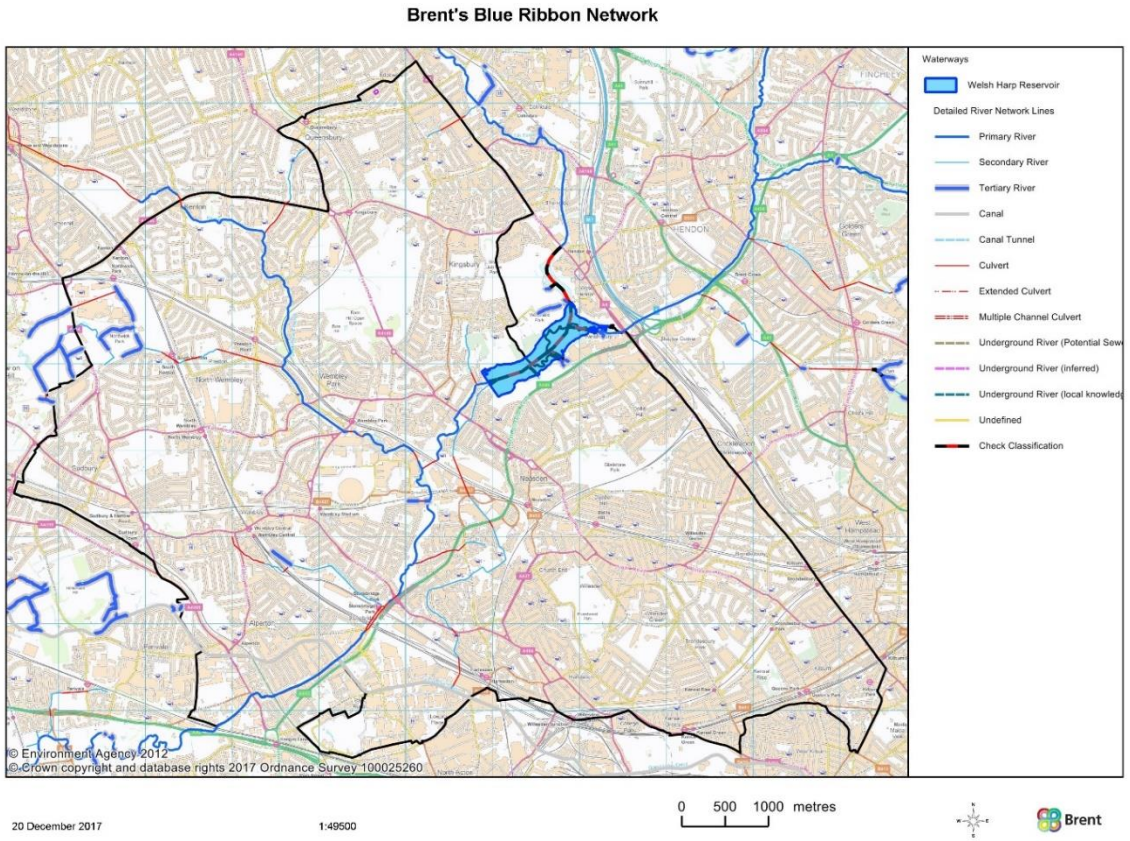


Figure 19: Brent's Blue Ribbon Network

5.2 Other tributaries which play an important role in Brent's network of waterways includes:

- Wealdstone Brook - runs through the London Borough of Harrow to the north of Brent on to its confluence with the River Brent near the centre of the Borough. The Wealdstone Brook responds very quickly to rainfall and has had several flooding incidents over the last 30 years, particularly due to the foul sewerage system backing up as a consequence of being overloaded with surface water.
- Brent Feeder Canal – an artificial watercourse
- Dollis Brook - the starting point, and a tributary, of the River Brent.

5.3 The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good status' for all water bodies. As identified in Table 1, the rivers, lakes and canals within the Brent catchment are achieving a 'moderate' status. This status is primarily due to pollution and physical modification from urban development, transport and the water industry.

Water Body	Length	Type of Water Body	Overall Water Body Classification (2016 Cycle 2)
Welsh Harp	n/a (catchment area is 38.5ha)	Reservoir	Moderate
Wealdstone Brook	7.907km	River	Moderate
Silk Stream and Edgware Brook	16.258km	River	Moderate
Lower Brent	20.475km	River	Moderate
Dollis Brook and Upper Brent	16.986km	River	Moderate
Bentley Priory	n/a (catchment area is 63.75ha)	Lake	Moderate
Brent Feeder Canal	4.857km	Artificial Canal	Moderate
Grand Union Canal	45.496km	Artificial Canal	Moderate

Table 1: Overall water quality of Brent's Blue Ribbon Network

5.4 The Brent Catchment Partnership, an informal group of organisations who are committed to improving the rivers in the Brent catchment, have prepared the 'Brent Catchment River Improvement Plan' which seeks to "*improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife".* To achieve this, the document identified a number of objectives, which included:

- By 2021, water quality in the Brent catchment has improved and has a 'moderate' ability to support wildlife
- To transform up to 10 kilometres of heavily modified river to a more natural condition by 2021

5.5 The 2007 SFRA for the Borough states that a proportion of the borough is borough is affected from the River Brent and its tributaries. The spatial variation in flood risk within the borough, which is presented in Figure 20, can be broken down in the following manner:

- Flood Zone 3b (Functional Flood Plain) – areas located within this zone are subject to relatively frequent flooding, and may be subject to flat flowing and/or deep water.
- Flood Zone 3a (High Probability) – areas subject to flooding up to (and including) once in every 100 years on average
- Flood Zone 2 – areas subject to flooding in events exceeding the 100 year event, and up to (and including) once in every 1000 years on average.
- Flood Zone 1 (Low Probability)

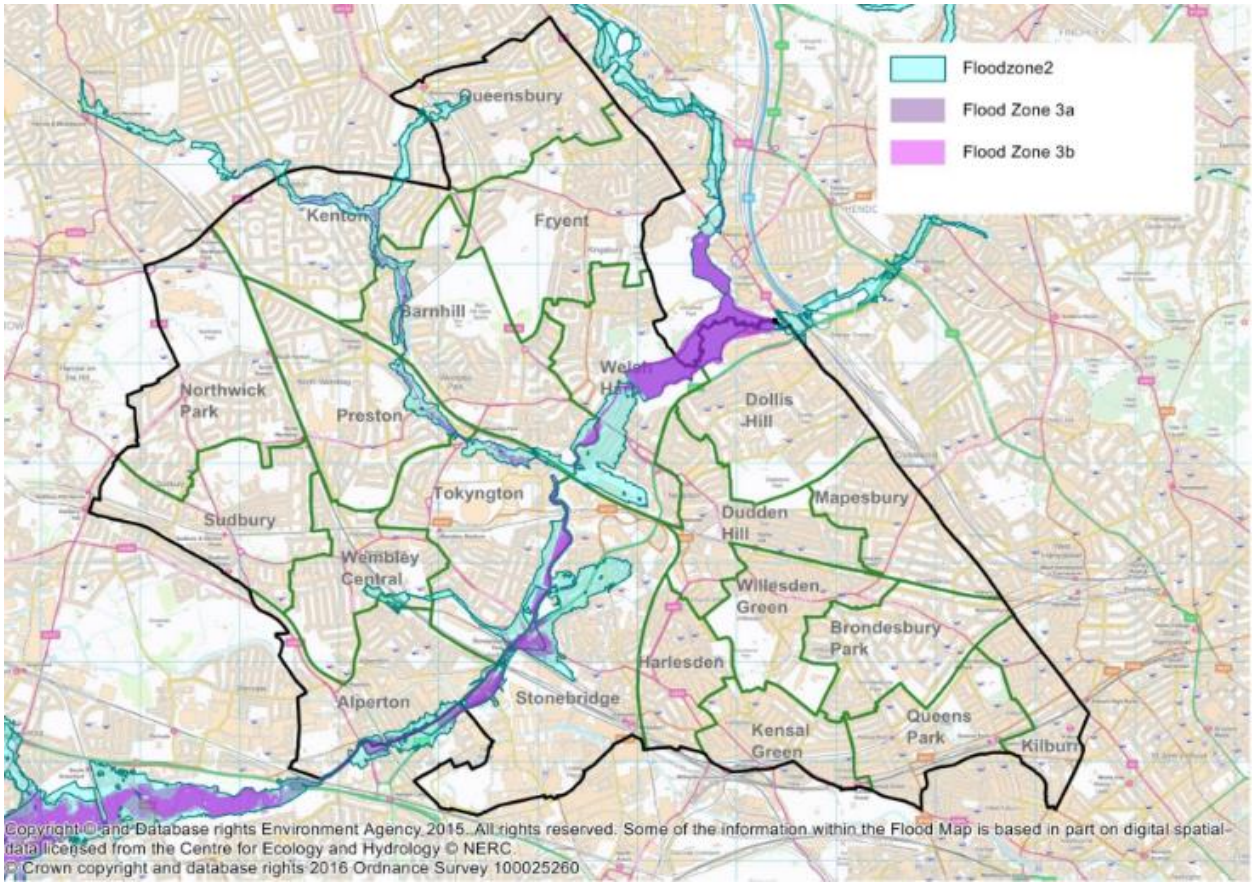


Figure 20: Flood risk within the borough

5.6 Areas that are potentially at risk of fluvial flooding include Welsh Harp, the River Brent and Wealdstone Brook.

5.7 In addition to fluvial flooding, a key flood risk for the borough is surface water flooding. According to the Environment Agency's property county for their national Flood Map for Surface Water (FMfSW) dataset, approximately 35,500 residential properties and 4,400 non-residential properties in Brent could be at risk of surface water flooding of greater than 0.1m (10cm) depth during a rainfall event with a

1 in 200 probability of occurrence in any given year. Furthermore, of those, 12,600 residential properties and 4,400 non-residential properties are estimated to be at risk of flooding to a depth of greater than 0.3m (30cm) during the same modelled rainfall event. The borough's Surface Water Management Plan (SWMP) identified 27 Critical Drainage Areas (CDAs) within Brent, as indicated in Figure 21, a number of which are cross-boundary. A CDA is "*a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure".* The borough also has small risk of groundwater flooding. The SWMP identified two areas within the borough where surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding:

- Kenton
- Northwick Park and Preston Road

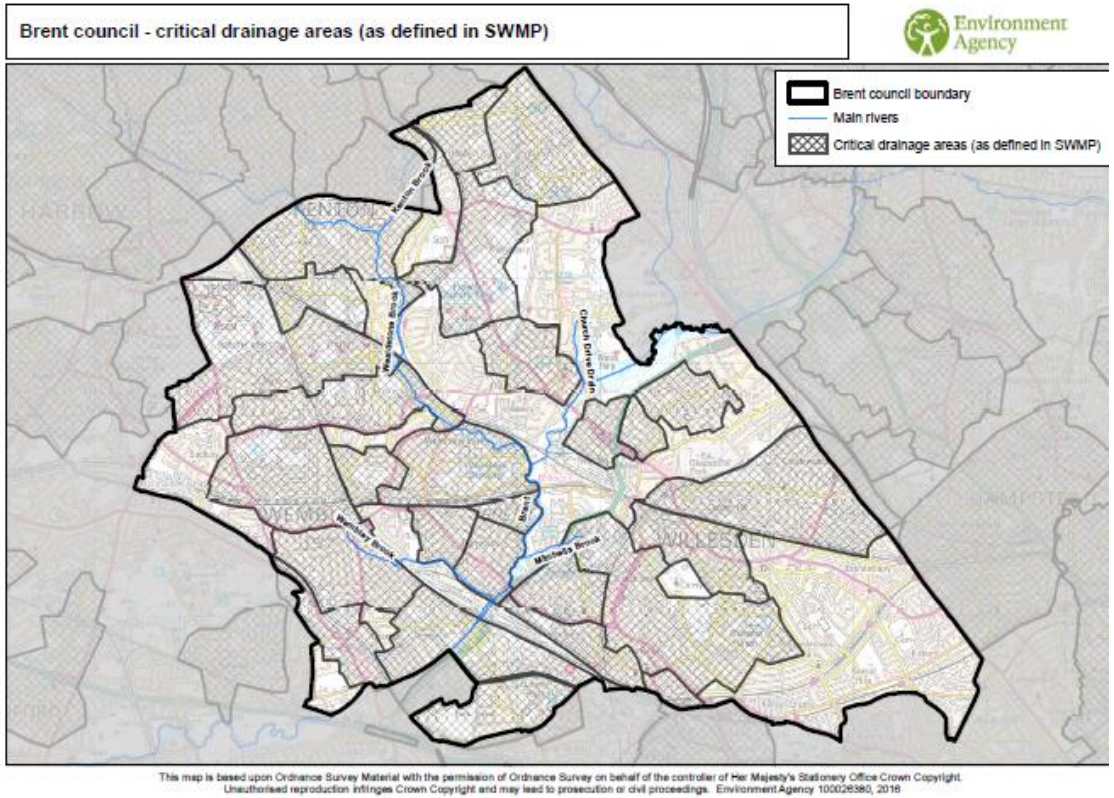


Figure 21: Critical drainage areas within Brent

6. Air Quality

Evidence:

- Air Quality Action Plan 2017-2022
- Air Quality Annual Status Reports

Evidence Gaps:

- None identified

6.1 Brent meets all the national air quality targets except for two pollutants – Nitrogen Dioxide (NO_2) and Particulate Matter (PM_{10}). In the areas where these targets have not been achieved, the Council has declared an Air Quality Management Area (AQMA). The borough's AQMA is depicted in Figure 22. Air quality outside of the AQMA has not worsened since 2006.

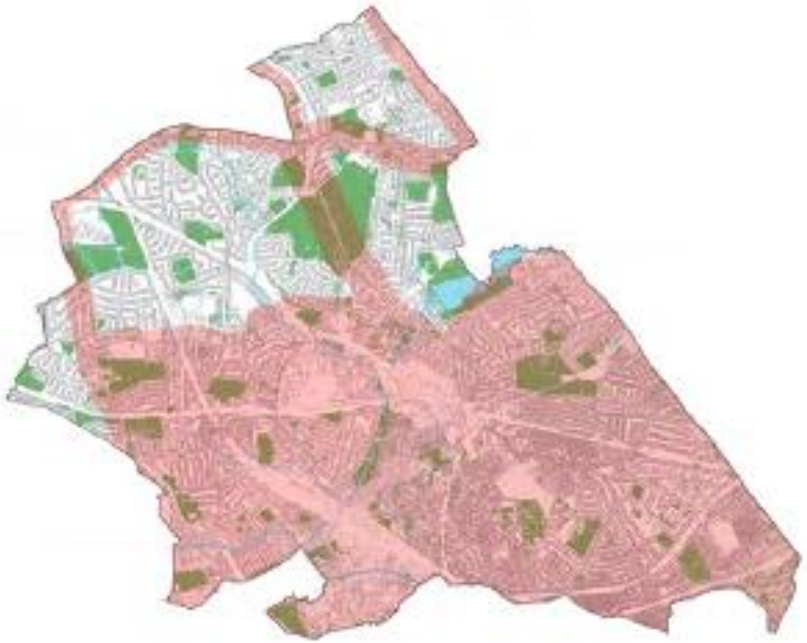


Figure 22: Air Quality Management Area within Brent

6.2 The largest contributors to poor air quality in Brent are local energy generation, construction and road transport. Traffic and transport is the largest contributor to air pollution in Brent, accounting for at least 52% of emissions in the borough. Emissions from local energy generation account for 15% of the NOx emissions across London. In addition, it is likely the building works will continue to be a key source of pollution in the short, long and medium term as the Council plans to build over 22,000 new homes by 2026, unless it is properly controlled.

6.3 In the Air Quality Action Plan 2017-2022, the Council created four Air Quality Action Areas (AQAA) at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton. A specific action plan will be created for each area which includes

actions on how to address the main sources of pollution. In addition, for these areas the Council will develop strategic policies and localised focussed air quality measures.

7. Soils and Geology

Evidence:

- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA and Design for London Borough of Brent
- Contaminated Land Database, Brent Council

Evidence Gaps:

- None identified

7.1 The geology of Brent consists predominantly of London Clay of the Barnet Plateau underlain by a chalk aquifer. The London Clay acts as a protective barrier both to infiltration as well as rising groundwater from within the chalk aquifer. The River Brent corridor runs on a bed of low level gravel.

7.2 Barn Hill Open Space has been put forward for designation as a Locally Important Geologically Site (LIGS), due to the presence of Dollis Hill Gravel. There are no sites of Regionally Important Geodiversity within the borough.

7.3 Contaminated land covers approximately a quarter of the land in Brent according to the Contaminated Land Database. The database includes 10,300 sqm of land with historical industrial uses, including in-filled land of which the origin is unknown.

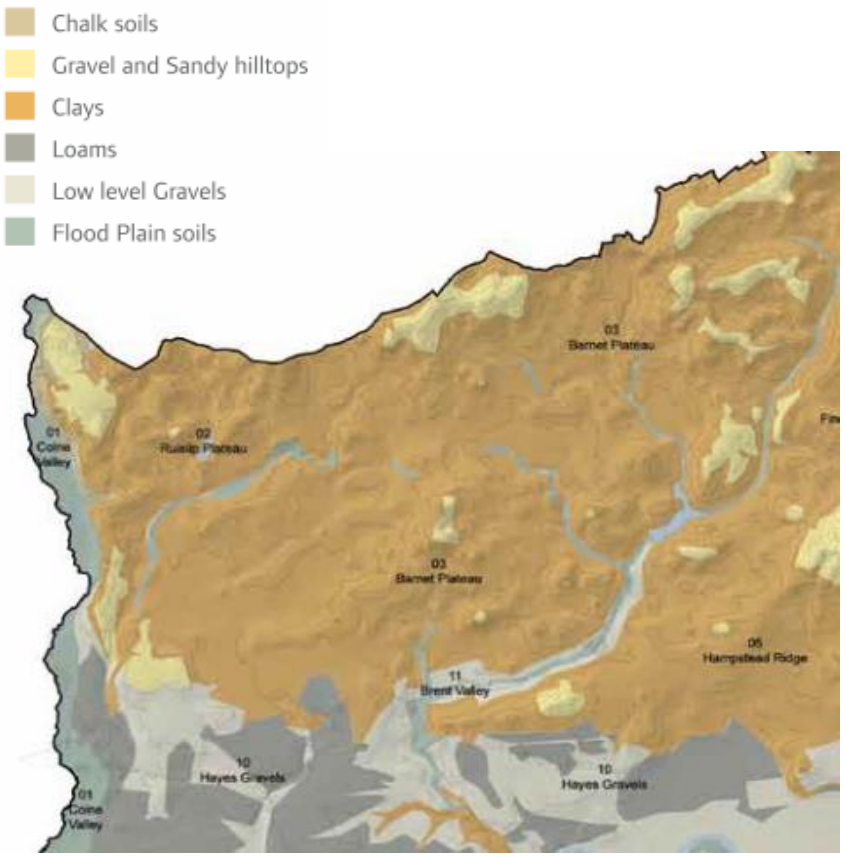


Figure 23: Brent's Geology

8. Climate Change

Evidence:

- Brent Climate Change Strategy and supporting evidence document
- Strategic Flood Risk Assessment

Evidence Gaps:

- Greater West London Strategic Flood Risk Assessment

8.1 Climate Change is a process by which our 'usual' weather patterns begin to change at an unnatural rate because of a gradual warming of the Earth's surface. As well as gradual changes, it is predicted to increase the number of extreme weather events, such a flooding, heat waves, droughts and storms.

8.2 The potential impact of climate change on the global environment and our economic, social and environmental wellbeing is now well documented.

Heat

8.3 It is anticipated that as a result of climate change, temperatures will be higher all-year round, by an average of +3.6° in the summer and +2° in the winter by 2050. Due to Brent being a largely urban area with comparatively little parkland, higher temperatures will have a bigger impact due to the amount of concrete and buildings (Urban Heat Island effect). A hotter Brent will mean that more people will suffer from illnesses and could also lead to the damage of roads, railways and buildings. In addition, there will also be increased chances of drought, meaning that the water supplies may be limited and gardens and parks will dry out.

Rainfall and Flooding

8.4 Heavy thunderstorms and intense winter downpours will become more common as a result of climate change. Due to Brent's urban, built-up nature, almost all rainfall ends up in drains, which were not designed to cope with sudden, very heavy rainfall. This will result in flash flooding, which could block roads, cause damage and lead to prolonged disruption to the local economy.

Storms

8.5 In the winter of 2006, Brent suffered from a tornado which damaged over 100 houses. Increased storminess as a result of climate change would increase the chances of a similar event happening again in Brent.

8.6 As shown above, Brent will significantly be affected by climate change. In addition, many residents within the borough have family and friends overseas, for example in South Asia or Africa, so will be concerned about the impacts overseas. The Council has produced a strategy ('Brent Climate Change Strategy') which identified the following 'possible' future risks for Brent as a result of climate change:

- The London to Birmingham train line runs through Brent and might be damaged by heat stress, causing major delays and possibly the need for major reconstruction work.
- Densely population areas, such as South Kilburn, will heat up very quickly, causing discomfort and possibly severe heat and premature death to residents. People with existing illnesses, mental health problems and the elderly are especially vulnerable to heat stress.
- The areas close to the North Circular Road (A406), where air quality is currently the worst in the borough, will suffer during hot weather because air quality deteriorates rapidly as temperatures rise. This may cause medical difficulties and affect people's quality of life.
- Food processing is one of the key sectors in Brent's economy. Food safety is one of the top concerns for health managers during a heat wave. Without changes to training and facilities, the sector could be badly affected by the challenges of maintain high standards of food hygiene during heat waves in future.
- Small sections of the North Circular may be flooded, causing traffic chaos in the borough
- Brent's retail industry will suffer if climate change disrupts travel into, within and out of the borough
- Brent is home to the largest industrial estate in Europe, Park Royal, which could be hit by flash flooding after intense rainfall
- 8% of Brent's area is covered by green spaces. Not only will these spaces become more difficult to manage as drought becomes more frequent, but the borough will require more green spaces in order to cope with a warmer climate in the future
- Brent's emergency services and hospitals will have to cope with more demand if surrounding boroughs are hit by flooding or heat waves
- Global events are likely to cause increased migration flows into London and the south-east which will add to Brent's population and put a strain on existing services and facilities such as hospitals, schools, housing and the transport networks.

8.7 In 2007, the Mayor of London committed the city to an emissions reduction of 60% by 2025, compared to 1990 levels, with a 20% reduction to be achieved by 2016. Nearly half of Brent's emissions come from the resident's homes, with over a third from industry and commercial and a fifth from road transport.

9. Biodiversity, Flora and Fauna

Evidence:

- Review of Sites of Importance for Nature Conservation In Brent, October 2017, EPR
- Natural England, http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx
- Brent Biodiversity Action Plan, 2007
- Food Growing and Allotment Strategy

Evidence Gaps:

- None identified

9.1 The borough has 62 Sites of Importance for Nature Conservation. The location of these sites are identified in Figure 24.

9.2 The 2014 Review of Sites of Importance for Nature Conservation in Brent found that the quality of habitats in the borough varied form poor structure and species diversity to species-rich and structurally diverse. It found that some areas of woodland, such as those found at Coronation Gardens, although planted, had become naturalised through cessation of management and offer a good, diverse habitat. Other areas of woodland, appeared to have declined since the last survey are now structurally and species poor, for example, The Old Orchard is now a stand of mature trees over amenity grassland.

9.3 The Review stated that there were a number of invasive species recorded on various sites. Three of the commoner invasive species were recorded in the Brent River Park, and large stands of Japanese Knotweed were recorded on several, put in particular on the railway tracksides. Parakeets were found in a number of parks within the borough.

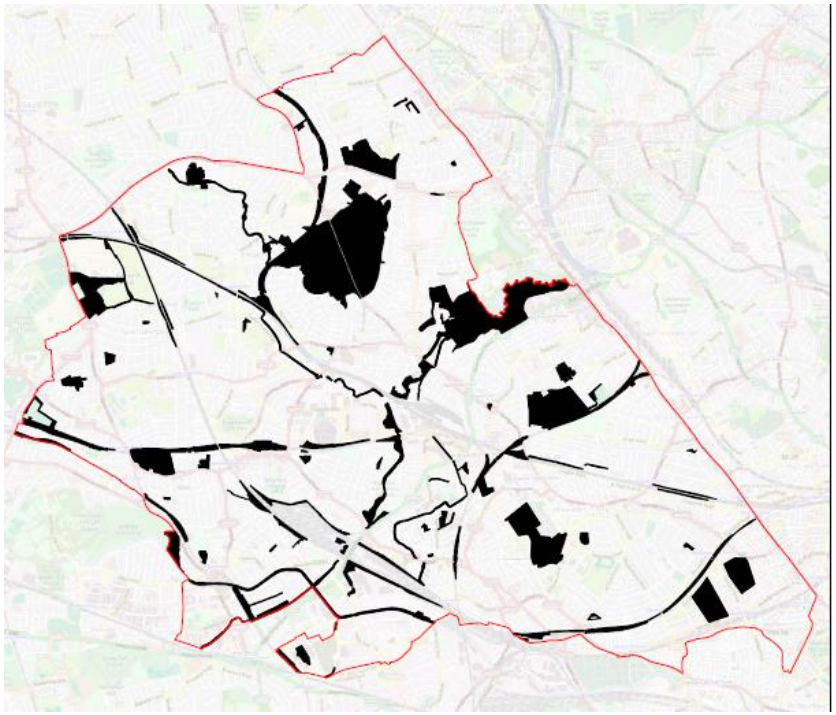


Figure 24: Location of Sites of Importance for Nature Conservation within Brent

9.4 The borough has a wide range of habitats where biodiversity can be found. This includes:

- **Trees, Woodlands and Hedgerows:** A wide range of habitats is associated with trees in Brent. These include broadleaved woodland, lowland mixed deciduous woodland, wet woodland, street trees, veteran trees, orchards, hedges and hedgerows, and scrub.
- **Grasslands:** A large proportion of the borough has grassland cover which provides benefits for recreation, urban flood reduction and soil conservation, only a proportion of this is actively managed for wildlife. Of the wildlife grasslands in the borough, the hay meadows at Fryent Country Park are amongst the best in London. In other areas of the borough, for examples around the Brent Reservoir, on Barn Hill and at Gladstone Park, there are remnants of more acid grasslands. Elsewhere there are rough grasslands and wildflower meadows in a few gardens.
- **Private Gardens and Allotments:** The 2007 Biodiversity Action Plan states that private gardens occupy a fifth of the borough by land area and had 1,108 allotment plots (this has since increased to 1138 plots and 103 shed plots as identified in the Food Growing and Allotment Strategy). Approximately 20% of biodiversity by land area in Brent is represented via its gardens and allotments.
- **Wetland Habitats:** Wetland habitats include habitats that provide for freshwater wildlife: rivers and streams, ditches, the Brent Reservoir, Canal Feeder, Grand Union Canal, freshwater marsh and reed-be habitats; and ponds. Each of these could be considered individually and as contributing to a richer wildlife in Brent. Most habitats could also be considered in terms of length or area, water quality, wildlife, access and specific projects.
- **Railside Habitats:** These areas are generally inaccessible to people, however they can provide areas of scrub, rough grassland and other habitats
- **Schools grounds:** A small proportion of school grounds include SINCs. The Welsh Harp Environmental Education Centre (which was previously managed by the borough until 2016) is a dedicated facility for environmental education, but is also a base for waterway improvement projects taking place across north-west London.
- **Parks and Green Spaces:** Parks and green spaces provide much of the area of publicly accessible land in the borough and encompass much of the semi-natural habitats including grasslands, trees, woodland, hedgerows and ponds.
- **Churchyards and Cemeteries:** As well as provide areas of contemplation and waling, churchyards and cemeteries provide a range of intricate habitats, often with various grasslands and open woodland habitats. All three cemeteries within the borough boundary and both burial grounds are recognised by the GLA as Sites of Importance for Nature Conservation (SINCs).

9.5 There are no European or other internationally designated sites within the borough. The closest internationally designated site to the borough is Richmond Park, which is a Special Area of Conservation, located 8km to the south of the borough.

9.6 Located within the Brent and Barnet is Brent Reservoir SSSI. The SSSI is 69.37 hectares. 100% of the site is in a favourable condition. The reservoir was formed in 1835 by damming the valley of the River Brent below the confluence of its two constituent tributaries. The Brent Reservoir is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London.

9.7 As of December 2017, there were 260 tree preservation orders within the borough. Some of the orders protect a single tree whereas others protected multiple trees. In a couple of instances, the orders protect small woodlands.

10. **Heritage Assets (Architectural and Archaeological)**

Evidence

- Brent Heritage Asset webpage
- The National Heritage List for England, Historic England
- Heritage at Risk Register, Historic England
- London Parks and Gardens National inventory

Evidence Gaps:

- Brent has not had a comprehensive review of its statutory listed buildings since 1978
- The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004
- The Archaeological Priority Areas for Brent are due for review in 2019.
- In 2006 character appraisal for all 22 conservation areas were published. These are not fully comprehensive and are out of date.

10.1 Heritage assets make a substantial contribution to Brent's local character and distinctiveness. They are a unique and irreplaceable resource which justifies protection, conservation and enhancement. The borough has historic formal public parks, garden and cemeteries as well as planned 'garden village' estates but its archaeological discoveries from early prehistory are scarce.

10.2 Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudorbethan', 'Old World', Modern and Brutalist. Furthermore, the British Rail lines and the Metropolitan Railway enabled suburban 'Metroland' development. This was boosted by the British Empire Exhibition in Wembley Park in 1924/25. Many historic buildings within Brent reflect the styles of these times, but it also has examples of mandir architecture as well as 'moorish' and 'Indo-Islamic'.

<u>Statutory Listed Buildings</u>

10.3 A statutory listed buildings is a building or structure that has been placed on the National Heritage List of buildings of special architectural or historical interest by the Secretary of State for Culture, Media and Sports (DCMS). Historic England manages and maintains the National Heritage List of all national designated heritage assets including Brent's listed buildings and registered parks and gardens.

10.4 Brent has one Grade I listed building, the Old Parish Church at St Andrew's. This building dates from the 12th or 13th century and is considered to be the oldest building in Brent. The borough has 9 Grade II* Listed buildings and almost 300 Grade II listed buildings.

Heritage at Risk

10.5 The Heritage at Risk Programme (HAR) helps Historic England understand the overall state of England's historic sites. Launched in 2008, the programme identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. Every year, Historic England updates the Heritage at Risk Register. There are currently 4 buildings in within Brent which are on the HAR register and these are set out below.

Name	Description	Heritage Category	Condition	Additional Information
Old Oxgate Farm, Coles Green	C16 and C17, timber-framed and plastered with a little brick rebuilding. Two parallel ranges, that to north probably C16, that to south C17, ending in a double gable end on road. Three storeys with one window (modern casement with lead light) per floor under gable. Left hand of around floor rebuilt in brick. Central door with wooden porch. Main front facing south on garden at right angles to road. Two storeys. 2 windows and door. Tile roof. Windows 3-light slashes with trellis porch. Interior – ground floor room with moulded and chamfered beams and floor of large flagstones.	Grade II*	Poor	C16 and C17 timber-framed building suffering from subsidence to the brick plinth and structural failure of bean ends to the ground floor due to damp penetration. The owner carried out urgent works in 2013 and is exploring possible long term solutions. A condition assessment was produced in 2016, funded by Historic England, and discussions are now underway to secure safeguarding works.
Cambridge Hall, Cambridge Avenue	Former church, now hall. 1863. Prefabricated structure built of corrugated iron with boarded wooden roof covered in corrugated asbestos. Fairly elaborate example with 4 bay nave, aisles and tower, which originally had a chamfered spire which has been broken off near the base. Central tower of two stages has pointed arched window with two lancets, quatrefoil above and louvres. Large arched doorcase with steeply pitched gable above. Lancet on either side of tower and large arched window to aisles. Square windows to sides of aisles. Interior has	II	Poor	Since 1930 it has been the homes of the Willesden and St Marylebone Cadet Corps which converted the interior to resemble a boat, in itself of historic interest. It is putting together a business plan to acquire funds to run the building as a community venue. A planning application is to be submitted for a new residential building alongside to include conservation works to the hall.

Name	Description	Heritage Category	Condition	Additional Information
	unusual arcading with cast iron columns with moulded capitals and tall slender wooden arches. One aisle has been partitioned off. Unusual roof has 6 tiers of purlins and the principal rafters have giant wooden arches with pierced quatrefoils, daggers and mouchettes.			
The Chapels at Paddington Cemetery, Willesden Lane	1855, by Thomas Little as part of a new cemetery. Typical group of Anglican and nonconformist chapels connected by a pair of carriage-porches and a central bellcote behind which is a lodge. C13 style, the Anglican chapel having richer, more developed windows. Squared rag-stone with ashlar dressings slated roofs. Iron finials.	II	Poor	The vacant buildings are isolated within the cemetery and too danger to use, Funding for repairs and a long term solution is being sought.
Wembley Hill Lodge, Wembley Hill Road	Early 19th century cottage orné style. One storey and attic colour washed brick with gable to front. One 2 light leaded casement in gable; one 3 light leaded casement oriel window on ground floor with thatched roof. Part set back to right of one storey with continuous lean to roof in front, serving as a canopy to porch. Thatched roof. Left hand part has colour washed brick lower part; 20th century tile hanging to upper floor and tile roof. Formerly a lodge to Wembley Park.	II	Very Bad	The detached property was severely damaged by a fire in 2013

Table 2: Listed Buildings on the Heritage at Risk Register

Local List

10.6 The Local List of Buildings or Architectural or Historic Importance is an essential tool in the protection and enhancement of local heritage (non-designated heritage assets). Whilst not Statutory Listed, these buildings and structures are of good quality design or area historically significant. There are important local landmark features in their own right and make a significant contribution to the character and appearance of their locality. These assets re known as 'locally listed' and includes monuments, sites, places, areas of landscapes identified as having a degree of significant meriting consideration in planning decisions

10.7 There are over 200 non-designated heritage assets on the Council's Local List on Brent's Local List. The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004. There are no Article 4 Directions placed on any buildings within the list (outside of conservation areas) and these remain unprotected from demolition and damaging alterations.

Conservation Areas

10.8 Conservation areas are designated to safeguarded areas of special architectural and historic interest, the character and appearance of which is desirable to preserve or enhance. There are currently 22 conservation areas in Brent within which there are special planning controls which needed to be considered when undertaking development. These are a follows.

- Barn Hill
- Brondesbury
- Buck Lane
- Harlesden
- Homestead Park
- Kensal Green
- Kilburn
- Lawns Court
- Wembley High Street
- Mapesbury
- Mount Stewart
- North Kilburn
- Northwick Circle
- Roe Green Village
- Paddington Cemetery
- Queens Park
- South Kilburn
- Willesden Green
- St Andrews
- Sudbury Cottages
- Sudbury Court
- Neasden Village

10.9 The borough's conservation areas cover approximately 323 hectares of the borough, which equates to 7.47% of the borough's area. The location of the borough's conservation areas are identified in Figure 25.

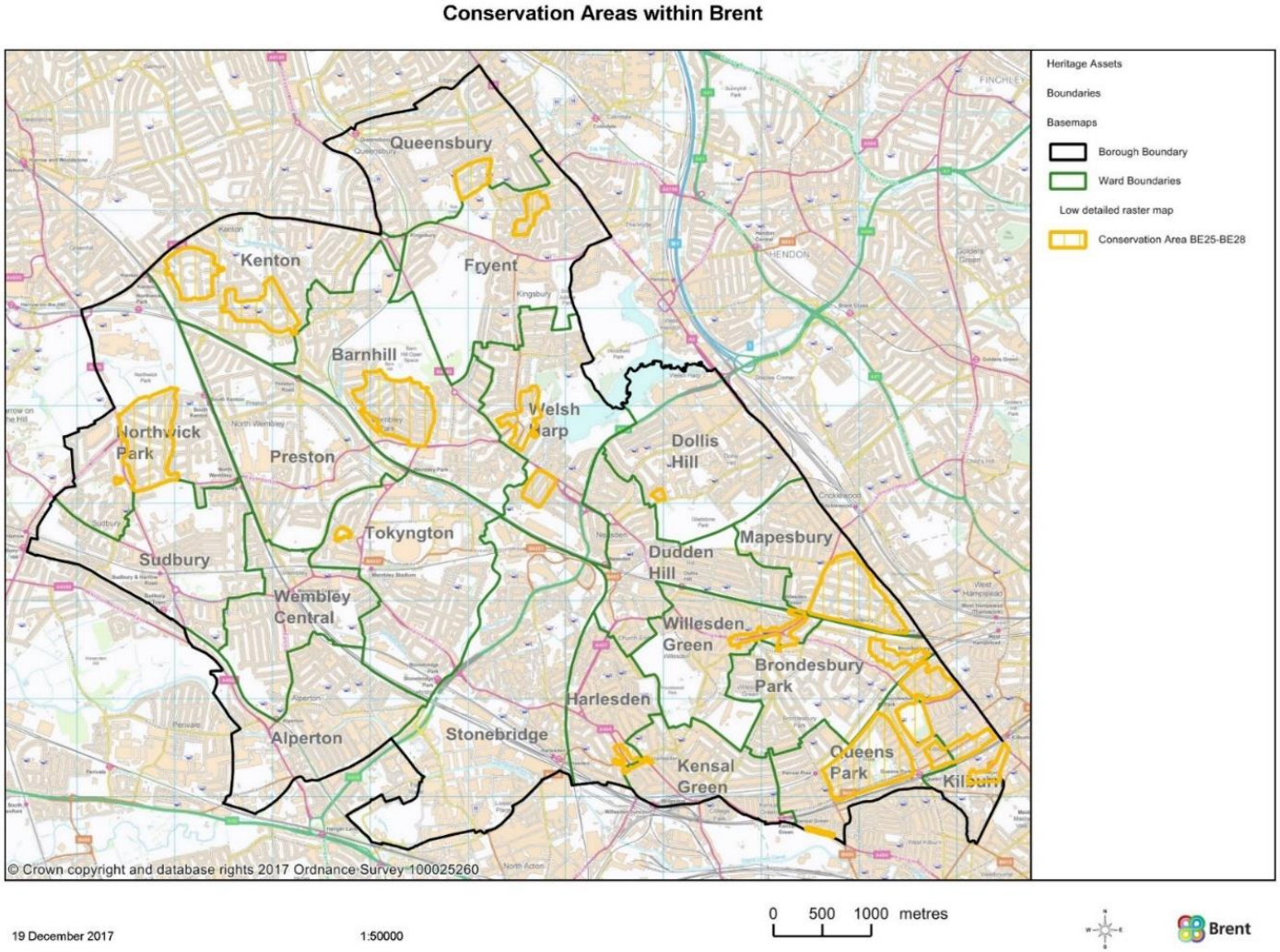


Figure 25: Conservation areas within Brent

10.10 The survey of Brent's existing conservation areas was last undertaken in 2004. The conservation area boundaries of the existing areas were not reviewed nor was there a full survey of the borough to consider if other merit designation.

Conservation Character Appraisals

10.11 Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places on local planning authorities the duty to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts. Regularly reviewed character appraisals identifying threats and opportunities can be developed into a management plan, which can in turn channel development pressure to conserve the special quality of the conservation area. Both areas in relative economic decline and those under pressure for development can benefit from management opportunities that promote beneficial change

10.12 In 2006 the Planning Service produced Character Appraisals for the Borough's 22 conservation areas in response to the Council's Comprehensive Performance Assessment. Although these were based on guidance from Historic England, the appraisals were generic, describing history but do not properly describe the significance of the area nor outline proposals for management. There is new guidance (2016) from Historic England on which provides advice on the appraisal of conservation areas, assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Article 4 Directions

10.13 Article 4 Directions are in place for Brent's residential conservation areas. Article 4 directions restrict the scope of permitted development rights either in relation to a particular area or site, or of a particular type of development anywhere in the authority's area. The last formal consultation on Article 4s was undertaken in 2005 with Directions being made for the following Conservation Areas: Northwick Circle, Buck Lane, Kensal Green, Kilburn, Homestead Park, Sudbury Cottages, Wembley High Street, Brondesbury and St Andrews. There are residential properties within the commercial based conservation areas that do not have an Article 4 Direction and there are locally listed buildings outside of conservation areas which do not have Article 4 Directions. None accord with the General Permitted Development Order 2015.

The Archaeological Priority Areas (APAs) and sites of Local Archaeological Importance (SAI)

10.14 Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. There are four APAs within Brent, with their location depicted in Figure 26.

10.15 In addition to the 4 APAs, Brent has 40 sites of Local Archaeological Importance (SI). These sites were identified in 1988.

10.16 The Greater London APAs were created in the 1970s and 1980s either by the boroughs or local museums. They are now being comprehensively reviewed and updated using up to date evidence and consistent standards to comply with National Planning Policy. The new system assigns all land to be one of four tiers denoting different levels of sensitivity to development indicated by an archaeological risk model.

10.17 Brent's Review is scheduled to be undertaken in 2019 and will include the 40 SAIs.

Figure 26: Archaeological Priority Areas within Brent

11. Landscape and Townscape

Evidence:

- Analysis of townscape analysis undertaken in 2007 for the Development Management Policies DPD Preferred Options
- All London Green Grid SPG, 2012, GLA
- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA Design for London Borough of Brent

Evidence Gaps:

- An Urban Characterisation Study is to be undertaken to provide an up to date evidence base

11.1 The built environment is the setting for all the borough's activities in the urban area. The design and quality of Brent's built environment is not only about its appearance and attractiveness, but the overall 'form' of the development/environment and its use. The townscape quality varies across Brent. A townscape analysis undertaken in 2007 identified a number of areas within the borough that were judged to be of low townscape quality. These areas are highlighted in Figure 27.

11.2 Since this study was undertaken many areas, including South Kilburn, Stonebridge and Wembley Growth Area, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and public realm. Alongside the Local Plan, the Council is undertaking an 'Urban Characterisation Study', which will provide up to date evidence on townscape quality and identify areas for intervention.

11.3 The All London Green Grid SPG identifies that the majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. To supplement the All London Green Grid SPG, six area frameworks have been produced to expand on the implementation points and strategic opportunities identified in the SPG. One of the six area frameworks produced covers the 'Brent Valley and Barnet Plateau'.

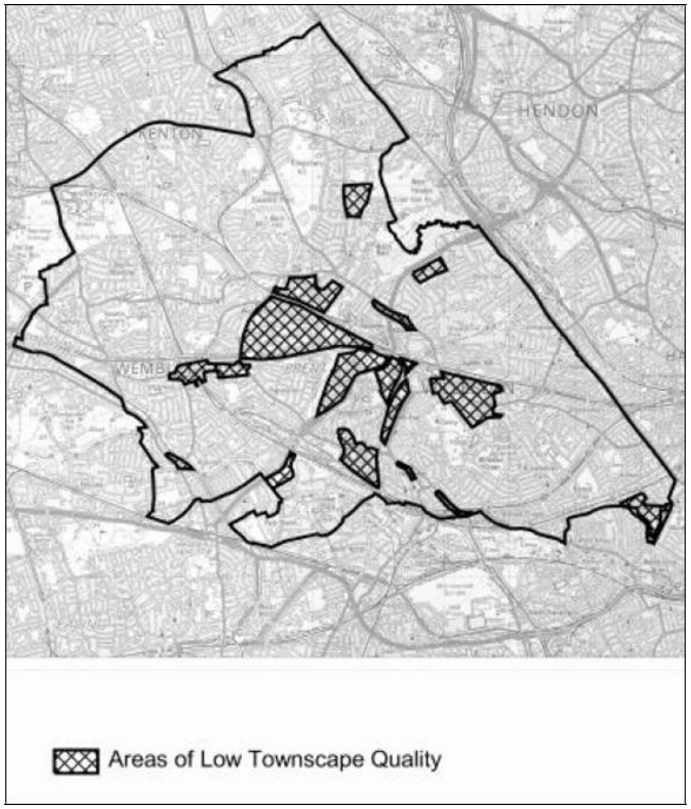


Figure 27: Areas of low townscape quality

11.4 The key landscape zones in Brent is the Brent River Valley which is described as having a natural signature of meandering, shallow river bordered by diverse floodplain meadows and winding strips of damp woodland. It is noted that there are significant green infrastructure assets in the Brent Valley and Barnet Plateau, but many are hidden and isolated within a largely car bound urban fabric. Way-marked long distance walks – the London Loop and Capital Ring, and local riverside routes – The Dollis Trail from Brent Cross to the greenbelt, or the Brent River Walk between the A40 and the Thames provide connections between large open spaces of real distinctiveness and biodiversity. The Brent Reservoir by the Junction of the North Circular, A5 and M1 is a particular note – it is an SSSI, has a naturalised shoreline, accessible paths and facilities for bird watching and sailing.

11.5 Open Spaces form a key part of the borough's landscape. There are 162 open spaces within the borough, which equates to 597.2139ha. A breakdown of the borough's open spaces is contained within Table 3, and their location is shown in Figure 28

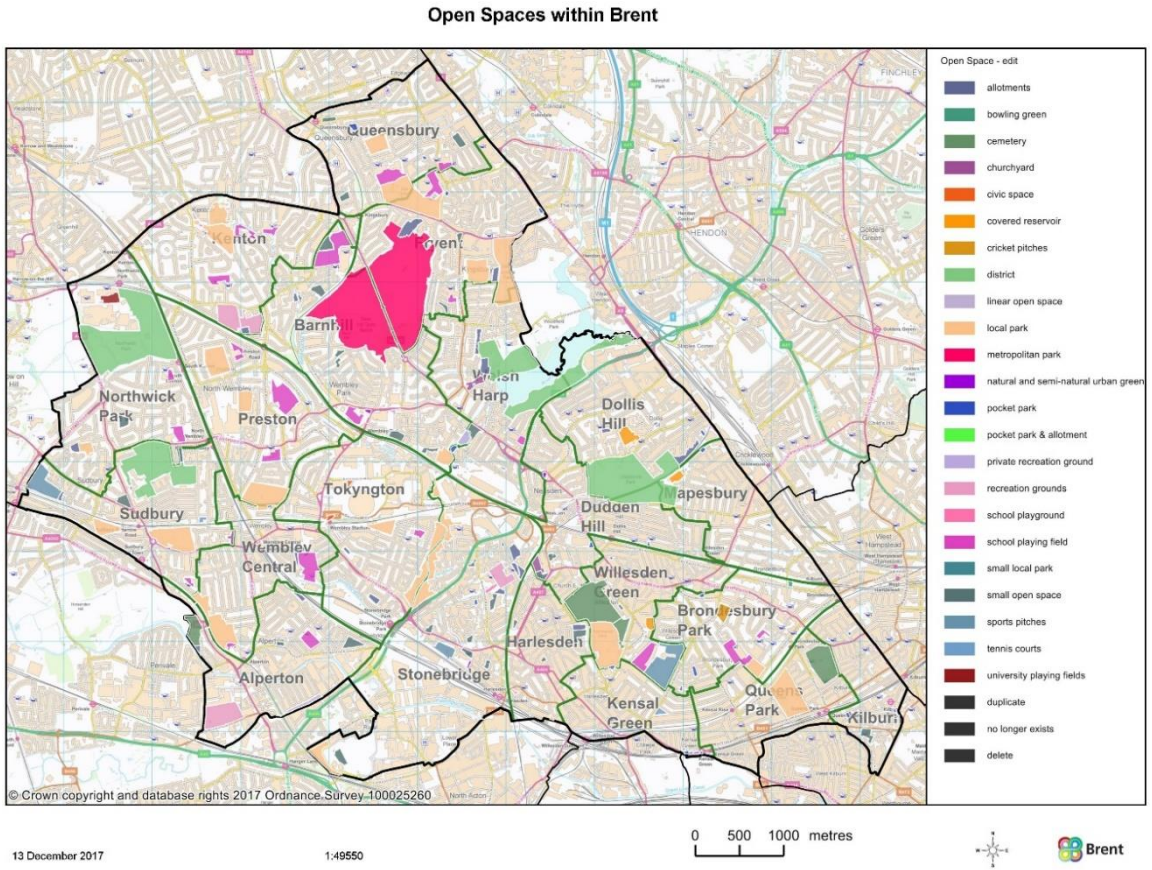


Figure 28: Open spaces within Brent

Open Space Type	No. of Sites	Area (ha)	% of Open Space Area
Regional Park	0	0	0
Metropolitan Park	1	112.467	18.8319461
District Park	5	166.17	27.8242017
Local Park	22	158.0423	26.4632655
Small Open Spaces	27	26.6108	4.45582395
Pocket Parks	32	5.5352	0.9268371
Linear Open Space/Green Corridors	10	5.0663	0.84832252
Public Park Total	**97**	**473.8916**	79.3503969
Allotments	22		0
Cemetery	3	36.2898	6.0765163
Churchyard	3	3.5597	0.5960511
Civic Space	3	0.9224	0.15445052
Natural and Semi-Natural Urban Green Space (not including SINC sites)	3	0.8007	0.13407257
Private Recreation Ground	1	1.3288	0.22249984
Recreation Grounds	4	23.8591	3.99506776
School Playground/School Playing Fields	26	56.5618	9.470945
Total	162	597.2139	100

Table 3: Breakdown, by area, of open space within Brent

12. Waste

Evidence

- Annual Monitoring Reports
- West London Waste Plan

Evidence Gaps

- None identified

12.1 The total amount of municipal waste collected in 2016/17 was 109,260 tonnes, an increase of 1.8% from the previous year (107,236 tonnes in 2015/16) (Figure 29). As shown in Figure 30, the proportion of waste recycled and composted in the borough was at its

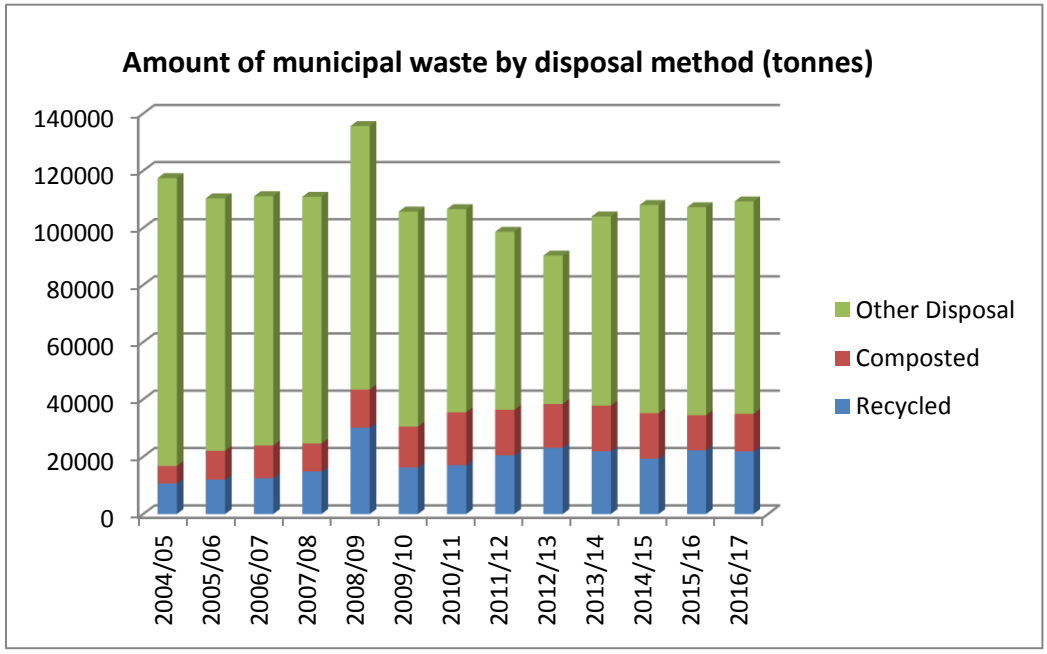


Figure 30: Amount of municipal waste by disposal method, 2004-2017

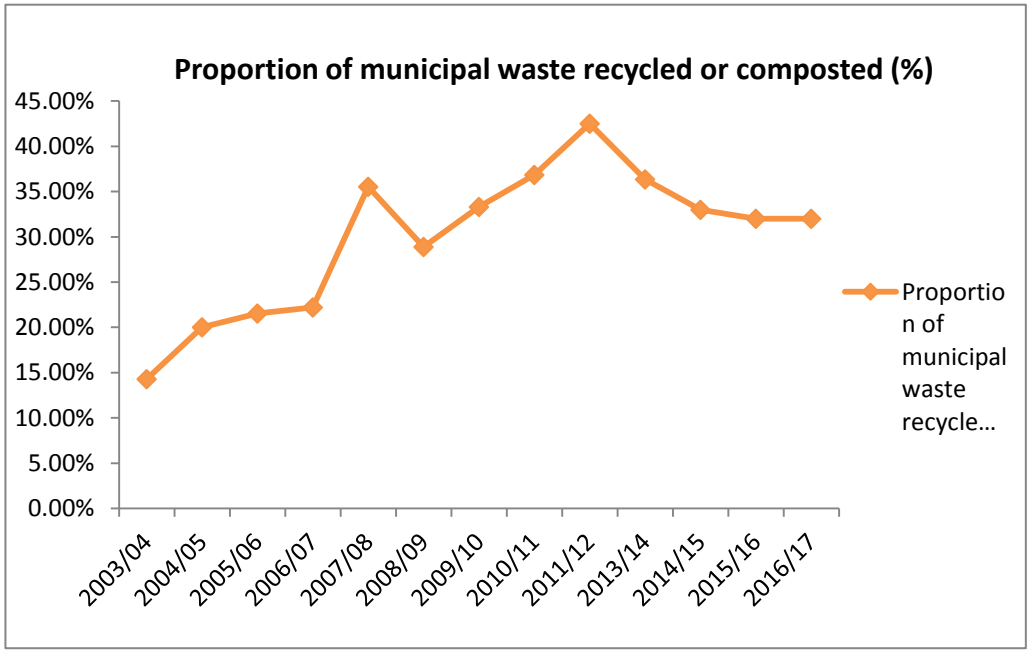


Figure 29: Proportion of municipal waste recycle or composted, 2003-2017

highest point in 2011/12 and has subsequently declined in later years. In 2016/17, 32% of the boroughs waste was recycled and composted, which is below the London Plan target of 45%.

12.2 In the London Plan (2011), the Mayor set out projections of how much municipal waste and commercial and industrial waste is likely to be generated in the capital over the next 20 years. The Plan allocated each borough an amount of London's waste that it has to positively plan for and manage. This included ensuring that sufficient capacity was identified to meet the apportioned targets set in the Plan. By each borough meeting its apportionment, London will dramatically reduce its reliance on landfill and move towards being net self-sufficient overall. The targets set for Brent in the London Plan have been identified in Table 4. Please note that all figures are in a 1000 tonnes.

	2011		2016		2021		2026		2031	
	Municipal Solid Waste	Commercial and Industrial Waste	Municipal Solid Waste	Commercial and Industrial Waste	Municipal Solid Waste	Commercial and Industrial Waste	Municipal Solid Waste	Commercial and Industrial Waste	Municipal Solid Waste	Commercial and Industrial Waste
Waste Arising Figures	136	202	143	200	49	199	156	196	161	194
Waste Apportionment Figures	80	160	109	174	130	190	152	207	175	225

Table 4: Waste targets set for Brent in the London Plan (2011)

12.3 A Joint West London Waste London Plan, which was prepared by 6 West London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) to provide a planning framework for the management of waste, identifies sites that are allocated for waste management development in the plan area. In Brent, there are 12 existing safeguarded sites (identified in Table 5). Of these identified site, the Veolia Transfer Station in Alperton and Twyford Transfer Station in Park Royal are identified for increased capacity.

Operator Name	Facility Name	Site Activity
Ace Waste Haulage Ltd	Neasden Goods Yard	CDE Waste Processing/ Transfer
G. Pauncefort	Steele Road, London	CDE Waste Processing/ Transfer
X – Bert Haulage Ltd	Neasden Goods Yard	CDE Waste Processing/ Transfer
X – Bert Haulage Ltd (Glynn Skips)	Fifth Way, Wembley	CDE Waste Processing/ Transfer

Operator Name	Facility Name	Site Activity
Biffa Waste Services Ltd	Wembley Transfer Station & Recycling Facilities	MSW&C&I Waste Processing/ Transfer
Seneca Environmental Solutions Ltd	Hannah Close, Neasden	MSW&C&I Waste Processing/ Transfer plus biomass CHP
Veolia	Veolia Transfer Station, Marsh Road	MSW&C&I Waste Processing/ Transfer
West London Waste Authority	Twyford Transfer Station	MSW&C&I Waste Processing/ Transfer
Metal & Waste Recycling Ltd	Mitre Works, Neasden Goods Yard	Metal Recycling & Vehicle Depollution
Brent Oil Contractors Ltd	Fourth Way Waste Transfer Facility	Oil Reclamation Facility
Wembley Car Breakers	Edwards Yard	Vehicle Depollution
Bridgemarts Ltd (Gowing & Pursey)	100 Twyford Abbey Road	CDE Waste Processing

Table 5: Safeguarded Waste Sites within Brent

13. Transportation

Evidence:

- Brent Long Term Transport Strategy 2015-2035
- Brent Cycle Strategy 2016-2021
- Brent Walking Strategy 2017-2022
- WebCAT, Transport for London
- Parking Strategy, Brent (2015)
- Brent Council Annual Parking Reports

Evidence Gaps

- Delivery and Servicing Strategy
- Parking Strategy

13.1 As shown in Figure 31, the most popular mode of transport for Brent residents is the car, with it accounting for on average 225,843 trips per day. The least popular mode of transport for Brent residents was taxi/other. When the figures are combined, public transport (rail, underground/DLR and bus) account for a significant portion of trips made per day by Brent residents.

13.2 Cars account for a significant number of journeys originating in Brent. In comparison to the trips made by Brent

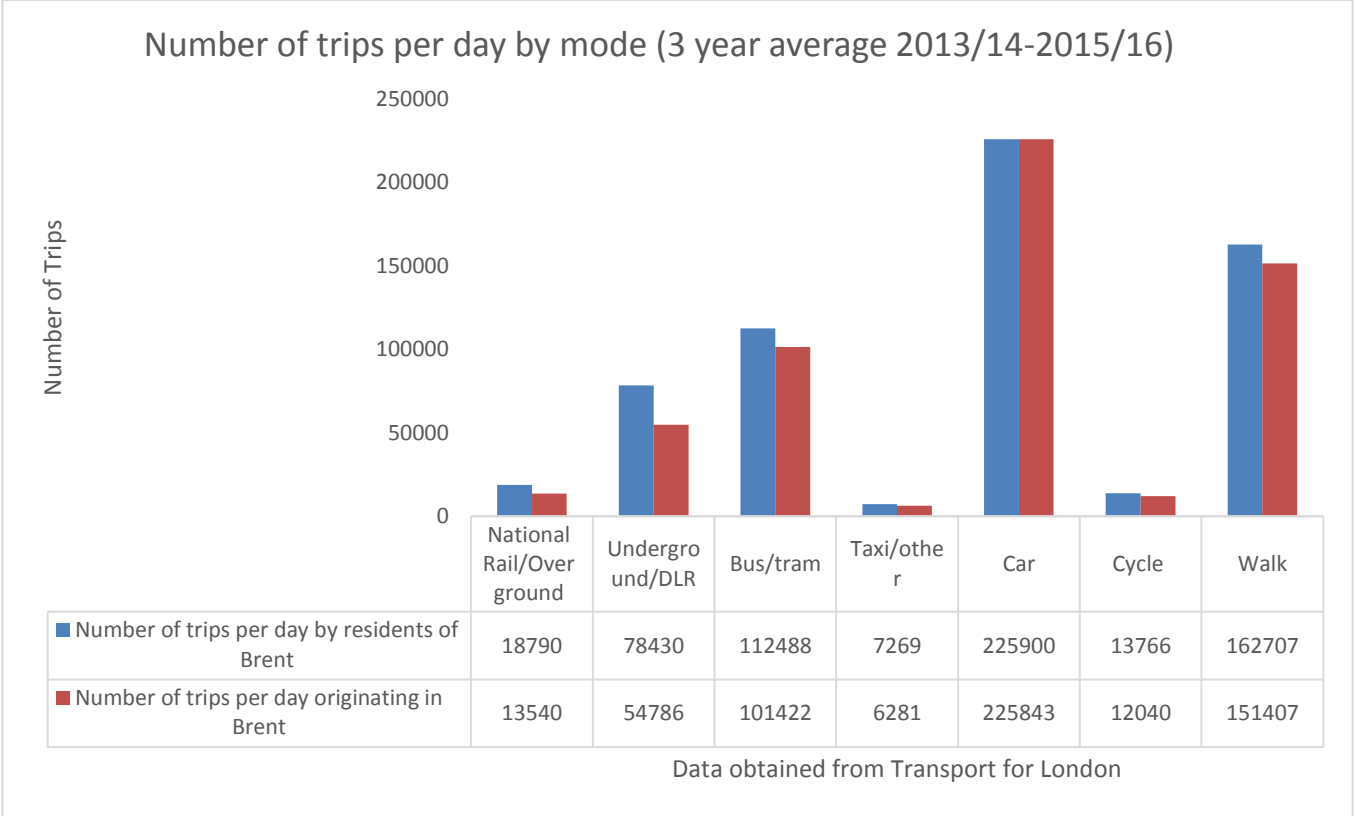


Figure 31: Number of trips per day by mode in Brent

residents, fewer trips originating within Brent are made on modes of public transport. Very few trips that originate within Brent are from the use of a taxi.

Road

13.3 Brent has a relatively limited high-order road network which plays an important role for freight and traffic. Its total road length is 15km TLRN, which consists of 53k of major roads an 434km of minor rods. This includes radial roads into Central London, such as the A5 (Edgware Road), A4088 (Dudding Hill Lane/Blackbird Hill) and A404 (Harrow Road), and Orbital Roads such as A406 (North Circular Road, Kingsbury Road) and A4127 (Sudbury Court Drive).

13.4 In 2013, 846 million vehicle kms were travelled in Brent, which equate to 2.9% of all London traffic. Brent is expecting high levels of growth over the next 20 years, which will put more pressure on the road network.

13.5 A key problem associated with car traffic within the borough is congestion. High levels of congestion reduce the quality of life of Brent residents and have a negative effect on economic growth. Congestion also suppresses the uptake of active travel modes by degrading the environment for cyclists and pedestrians. As shown in the following figures, there are a number of areas within Brent that are have significant delays (during peak hours) as a result of congestion.

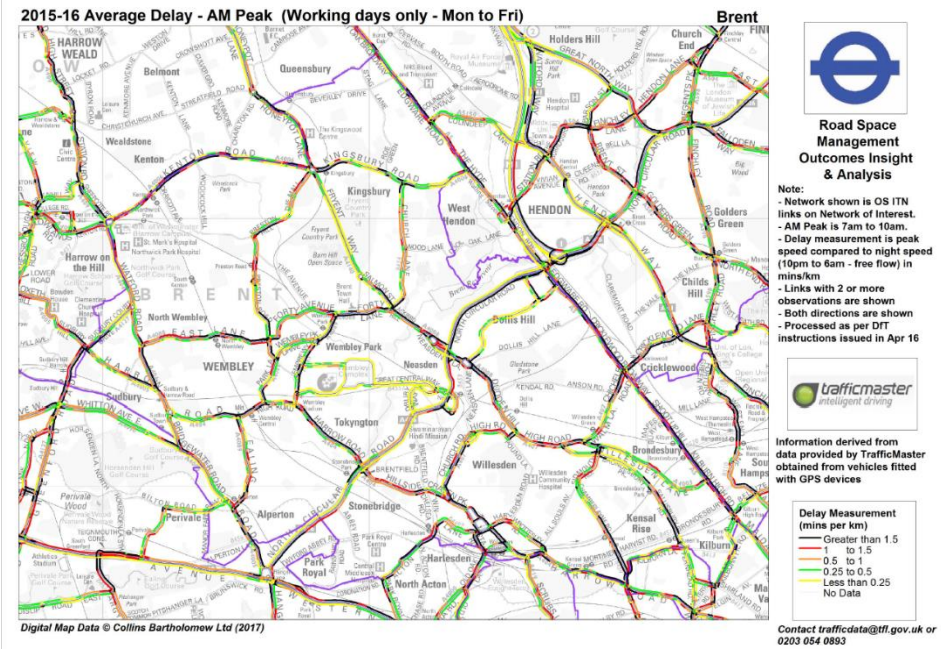


Figure 33: 2015-2016 Average Delay AM Peak (Mon-Fri)

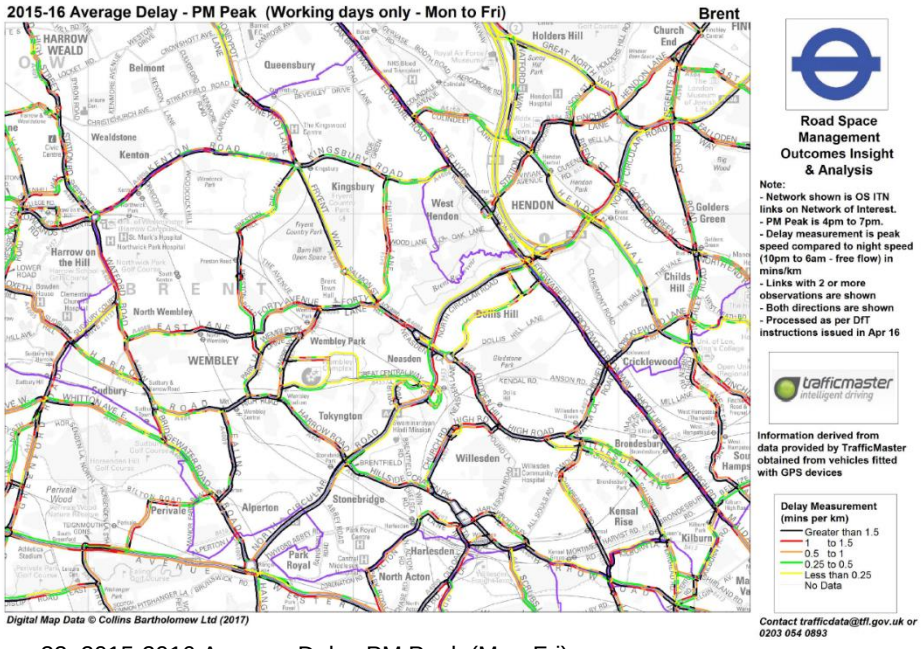


Figure 32: 2015-2016 Average Delay PM Peak (Mon-Fri)

Road Safety

13.6 As identified in the Council's Long Term Transport Strategy, there has been significant progress made in regards to road safety in Brent. Between 2004 and 2012, Brent saw 45% reduction in KSIs (killed or seriously injured) from road traffic collisions, which placed the borough 7th of the 33 London boroughs. During the same time period, London wide KSIs reduced by 28%. In 2015, 81 people were killed or seriously in 2015.

Cycling

13.7 As shown in Figure 31, cycling only accounts for a small proportion of trips made by borough residents (2.22%) and trips originating within the borough (2.12%). The Council seeks to increase this to 3% by 2020/21 and to 5% by 2025. The uptake of cycling varied within the borough; in the south of the borough cycling claimed 2-5% modal share journey, whereas in the north of the borough cycling only claimed 0-1% modal share journey. It is though that around 32% of Brent households own at least one bicycle. Brent has a large number of cycle parking spaces at stations, in high streets and other activity hubs. The Council aim to increase provision by 1000 spaces by 2021. The Brent Cycle Strategy found that concerns over road safety is the biggest issue which prevents people from cycling

13.8 Existing and proposed cycle route in Brent are shown in Figure 34. Brent has two radial cycle routes and one orbital route forming part of the

Figure 34: Existing and proposed cycle routes in Brent

900km London Cycle Network Plus (LCN+). Transport for London is also implementing a Quietway programme which will connect Regent's Park and Gladstone Park.

Walking

13.9 One of London's metropolitan walking routes passes through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects South Kenton to Welsh Harp. As shown in Figure 31, pedestrian mode share accounted for 26.27% of all trips made by residents within the borough, and 26.78% of trips originating within the borough per day. Through the implementation of the walking strategy, the Council aims to increase this to 30% by 2021/22. The Brent Walking Strategy identified that poor quality or excessive street furniture such as advertising boards outside businesses, high vehicle speeds on local streets and insufficient lighting and footpaths through parks were identifies as specific barriers to walking. Between 2005 and 2015 the number of pedestrian casualties in Brent has fluctuated. Although the number of pedestrians receiving fatal injuries in collisions with vehicles has decreased slightly, is still remains high. Brent aims to achieve zero pedestrian fatalities by 2021/22 and a reduction of 30% in the total number of casualties.

Public Transport

13.10 Brent is well served by a variety of public transport networks, including:

- Four London underground lines (Bakerloo, Jubilee, Metropolitan and Piccadilly lines)
- London Overground services on the North London line and Euston-Watford Junction line
- Chiltern Railway services from High Wycombe to London Marylebone
- Southern Railway services from East Croydon to Milton Keynes Central
- London Bus Services throughout the borough

13.11 Public transport account for 33% of trips made by Brent residents each day, and 31% of trips originating within Brent each day. It is expected that the use of public

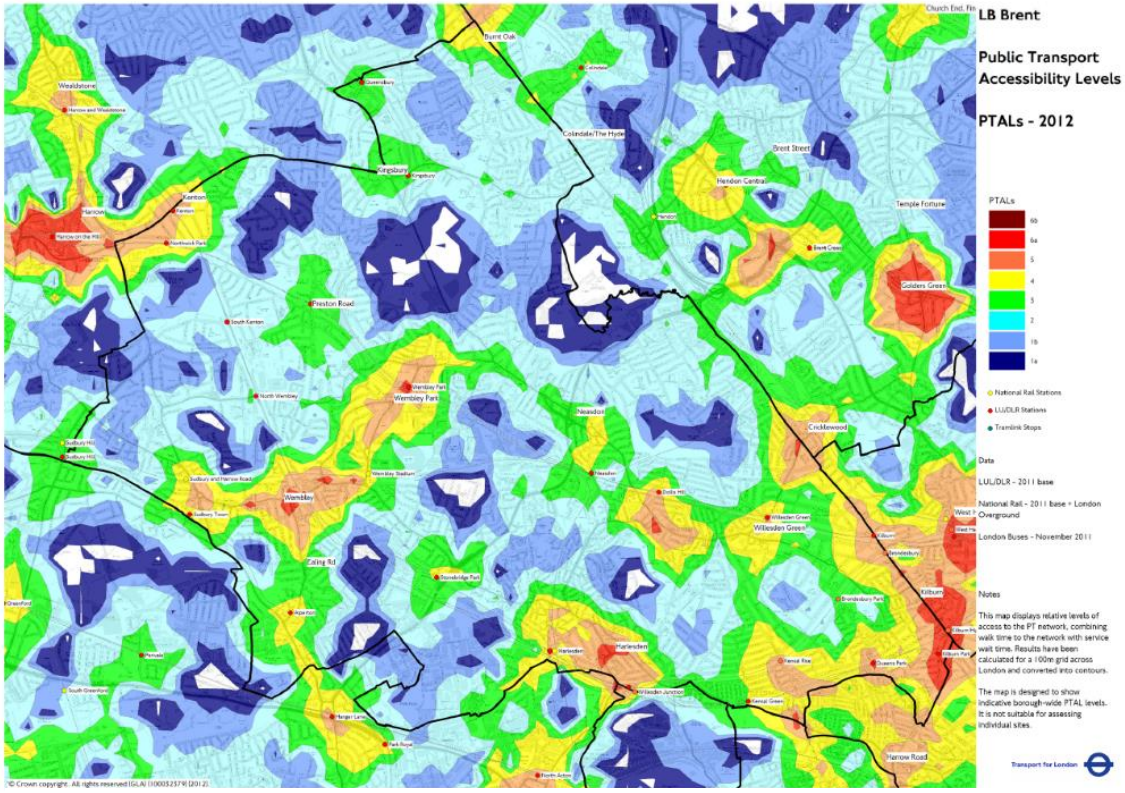


Figure 35: Public Transport Accessibility Levels (PTAL) in Brent

transport will remain stable up to 2030. However, if adequate interventions are made, private vehicle mode share is expected to decline from 41% in 2013 to 30% in 2030.

13.12 As shown in Figure 35, there are areas within Brent that have relatively high PTAL levels i.e. Wembley and Kilburn Park. There are also areas that have poor access to public transport i.e. Dollis Hill and Welsh Harp.

13.13 The mean excess waiting time for high-frequency bus routes has increased from 1 in 2010/11 to 1.2.

13.14 Major public improvement works have been undertaken. The most notable being the Wembley stadium and Wembley station. In addition, due to the increase in patronage on the London Overground, there has been considerable investment in new trains, platform extensions and station upgrades to meet demand. The implementation of the London Bus Priority Network (LBPN) has resulted in major benefits in Brent particularly on the Edgware Road and Harrow Road corridors. However, even with all these improvements, Figure 30 illustrates that there are still areas with poor public transport accessibility (those in dark blue), showing that significant areas remain deficient particularly to the north.

13.15 The Brent Long Term Transport Strategy identified the Metropolitan line as being a key strength of public transport within the borough; it provides a fast and efficient link into Central London and is currently under capacity. In addition, due to the growth in patronage on the London Overground, there has been considerable investment in new trains, platform extensions and station upgrades to meet demand. The Strategy also states that the greatest weakness of public transport in Brent is in bus services due to the following reason: "*Due to traffic congestion and a lack of dedicated infrastructure, buses are often stuck in traffic, leading to slow travel speeds and a lack of travel time reliability".* However, through the Bus Accessibility Programme 94% of bus stops in Brent are now accessible for people with mobility impairments.

Freight

13.16 Brent has a number of industrial estates that both rely on and generate freight movement. London wide, LGVs and HGVs formed 13% and 4% respectively of all vehicle kilometres travelled on London roads in 2012. This has a significant impact on the network in terms of congestion, road safety and air quality. In addition, vehicles which deliver to private residences and construction traffic also contribute to the number of vehicles movements on the road network. As identified in the Long-term Transport Strategy, "*Brent is currently working with WestTrans and the other boroughs that form the WestTrans group to formulate a Delivery and Servicing Strategy for the six north-west London boroughs. This strategy will seek to outline an approach and develop schemes to reduce the impact of freight on air quality, road safety and congestion."*

Parking

13.17 Parking is an important part of the transport infrastructure for many Brent residents and can have a significant impact on quality of life. Demand for parking in Brent is high, as in other London Boroughs. The Council seeks to manage this demand through the use of parking controls and traffic regulations.

13.18 A survey in 2014 indicated that there were approximately 88,000 on-street parking places, both controlled and uncontrolled, available across the whole of Brent. Over large areas of the borough, particularly in the north and west, on-street parking remains available to motorists free of charge or restriction. In these areas, there are only limited lengths of kerbside waiting and loading restrictions in place on-street including those necessary to ensure road safety. The main demand for both on-street and off street parking in the borough's town centres occurs from Monday to Saturday across the working day between 8am and 6:30pm, on Sundays during the retailing hours of 10am-5pm, and during special event

13.19 The Council operates 12 public car parks across the borough which has a total of 796 spaces. There are also over 700 spaces in privately owned car parks

13.20 The Council has introduced a number of measures to manage the high demand for kerb space. Parking in the south-eastern part of the borough, is managed through Controlled Parking Zones. Other parts of the borough also have residential controls; these typically cover areas near high street locations and/or tube and railway stations The Council manages 40 Controlled parking Zones (CPZs) across the borough, serving 56,000 households with over 33,000 on-street parking spaces. Specific times of operation vary but the majority are in operation through the day, from Monday to either Friday or Saturday.

14. Noise

Evidence

- London Noise Mapping Service (www.londonnoisemap.com)

Evidence Gaps:

- None Identified

14.1 There are numerous sources of noise pollution in the borough. These sources include ambient noise, which is long-term 'background' noise, which can originate from transport and industry. These ambient noises can be supplemented by more periodic local (or neighbour) noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units.

14.2 Areas adjacent to the North Circular Road in Brent have been identified as amongst the most affected by traffic noise in the UK. In addition, development around Wembley can be impacted by noise on event days at the National Stadium.

14.3 In light of the guidance contained in the Noise Action Plan: Agglomerations published by DEFRA in January 2015, the Council has identified quiet areas. These are areas of tranquillity, usually open spaces and green network areas, which have remained relatively undisturbed by noise and have recreational and amenity value for this reason. The boundaries of the borough's Quiet Areas are consistent with the open space designations for Fryent Country Park, the Welsh Harp, Roundwood Park/Willesden New Cemetery, Paddington Cemetery and Alperton Cemetery.

15. Local Economy

Evidence:

- Brent Employment Land Demand Study. 2015, URS
- Annual Monitoring Report
- ONS Annual Population Survey
- GLA Brent London Borough Employment

Evidence Gaps:

- None identified

15.1 Table 6 compares the occupation structure of Brent's residents with the London averages. Brent's total workforce is approximately 154,300. Standard Classification of Occupation (SOC) 2010 major groups 1-3 forms the largest proportion of Brent's resident workforce, totalling 58,300 people (equivalent to 37.8% of all persons in employment). However, the proportion of the resident workforce in SOC major groups 1-3 is significantly lower than the London average, which is 55.8% of all persons in employment. There are a number of SOC groups that are over-represented in Brent, in comparison to the London average. For example, the skilled trade occupations accounts for 10.6% of the borough's working population, compared to 7.3% across London, and elementary occupations are better represented in Brent (16%) than in London (8.7%).

SOC Major Group	Occupation	Brent (number)	Brent (%)	London (%)
1	Managers and senior officials	13,200	8.5	12.2
2	Professional occupations	26,300	17.1	25.4
3	Associate professional and technical	18,800	12.2	17.6
4	Administrative and secretarial	13,100	8.5	9.8

5	Skilled trades occupations	16,400	10.6	7.3
6	Personal Service Occupations	11,900	7.7	7.4
7	Sales and Customer Service	15,100	9.8	6.7
8	Process Plant and Machine Operatives	14,800	9.6	4.5
9	Elementary Occupations	24,700	16	8.7
	Total	154,300		

Table 6: Breakdown of Brent's workforce by SOC Major Groups

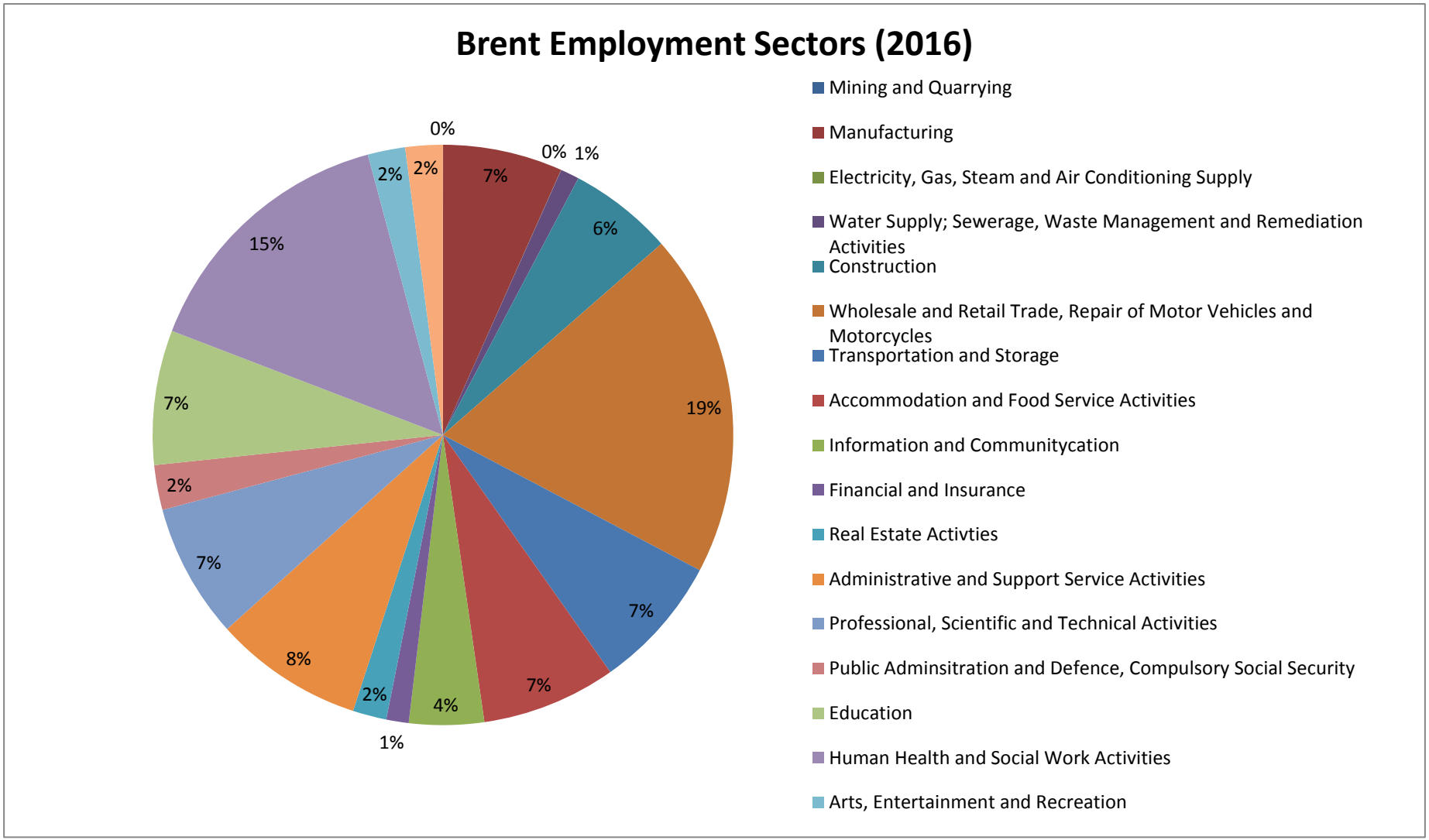


Figure 36: Employment sectors in Brent

15.2 As identified in Figure 36, Brent's key employment sectors are 'Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles' (19%), 'Human Health and Social Work Activities' (15%) and 'Administrative and Support Service Activities' (8%). Although it remains one of the largest employment sectors within Brent, administrative and support service activities has declined by 0.5% between 2015 and 2016, which reflects a contraction in this sector across London (from 10.7% to 10.5%). Brent has also seen growth in both the transport and storage (from 7.0% in 2015 to 7.5% in 2016) and construction (from 4.4% in 2015 to 5.8% to 2016).

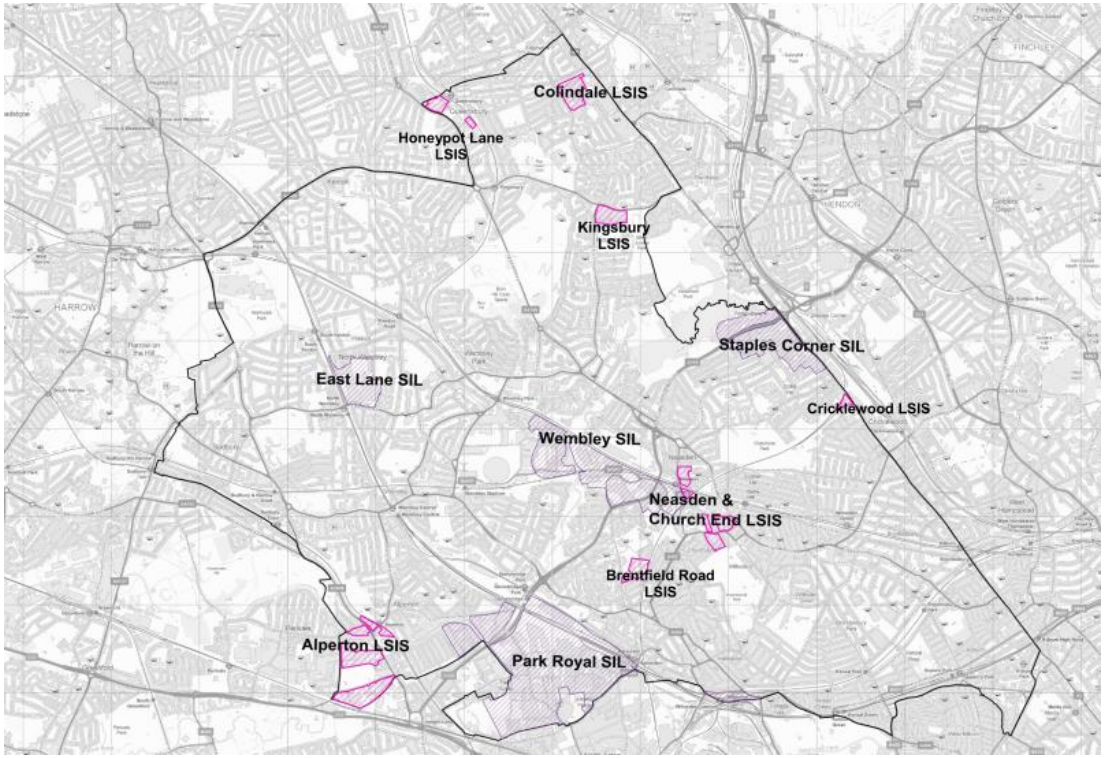


Figure 37: Strategic Industrial Locations and Locally Significant Industrial Locations in Brent

15.3 Brent's designated employment sites comprise Strategic Industrial Land (SIL), which are designated in the London Plan due to their importance to the London Economy, and Locally Significant Industrial Sites (LSIS), which are of strategic importance to employment in the borough. The location of the borough's strategic SIL and LSIS are depicted in Figure 37. In addition, there are smaller employment sites distributed throughout the borough, referred to as Local Employment Sites. There is currently a total of 395ha of land current in active industrial use in Brent. SIL accounts for around 75% of the borough's total industrial land portfolio, LSIS around 14% and the remainder is contained within Local Employment Sites.

15.4 There is approximately 27700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm in predominantly in industrial clusters. The Employment Land Demand Study (2015) identified additional demand for between 32,600 sqm and 52,350 sqm of office floorspace in the borough to 2029. However, prior approvals have resulted in a net loss of office floorspace. For example, during the 2015/16 monitoring period there was a net loss of 11,373 sqm of office floor space due to prior approvals resulting in the

conversion to residential, redevelopment to residential and to a lesser extent conversion to employment uses or mixed use development.

15.5 As identified in Brent Employment Land Demand Study (2015) VAT registration and de-registration rates for Brent provide an indication of the entrepreneurial characteristics of the borough. Published date indicates that, in 2013, there were 2,515 registrations and 1,150 de-registrations, resulting in a bet gain of 954 businesses. This corresponds to 6.9% of the total stock (13,915 businesses), a rate of churn similar to levels across London (7.3%).

15.6 The size of the firms operating within Brent are identified in Table 7. Micro businesses (those which employ up to 9 people) form a significant proportion of the borough's business stock – this type of business made up 89.6% of all businesses within the borough in 2017. There has been steady growth in the amount of micro businesses within the borough since 2015. Brent has a greater share of micro businesses in comparison to the London average. Small and medium sized businesses represent a small share of the total stock of businesses within Brent, with there being a decline in the amount of these sized businesses within the borough since 2015. This is also reflected in the trends across London. Large businesses represents the smallest share of business stock within the borough, which is similar trend to that across London.

	Brent (Numbers)			**Brent (%)**			**London (%)**		
Local Businesses	**2015**	**2016**	**2017**	**2015**	**2016**	**2017**	**2015**	**2016**	**2017**
Micro (0-9)	12835	13815	14620	88.5	89.3	89.6	86.2	86.8	87.3
Small (10-49)	1310	1285	1320	9	8.3	8.1	11	10.5	10.1
Medium (50-249)	305	315	310	2.1	2	1.9	2.4	2.3	2.2
Large (250+)	50	50	60	0.3	0.3	0.4	0.4	0.4	0.4

Table 6: Size of firms operating in Brent

15.7 The GLA Brent profile stated that the employment rate within Brent in 2015 was 69.5%. The employment rate varied between male and female varies significantly – the male employment rate was 76.0% compared to 62.6% for females. Both the male and female employment rates was lower than the outer London and London averages. In 2015, the unemployment rate in Brent was 7.5%, which was higher than the London average (6.1%). In December 2015, the youth unemployment claimant rate was 2.6, which is lower than the London average of 3.6.

15.8 In 2016, the gross annual pay in Brent was £29,812, which is nearly £4,000 lower than the London average of £33,766. Unlike employment rates, the difference between the gross annual pay for male and females is relatively small – the gross annual pay for males was £30,129 and the gross annual pay for females was £29,600. However, the gross annual pay for males is significant lower than the London average of £36,697. There is not a significant difference between the gross annual pay for females in the borough and the London average for females (£30,979).

16. Deprivation

Evidence:

- Index of Multiple Deprivation, 2015
- Joint Strategic Needs Assessments, 2015
- Sub Regional Fuel Poverty Data (2015), Department for Business, Energy and Industrial Strategy 2017
- End Child Poverty (endchildpoverty.org.uk)
- Children in Poverty for Boroughs and Wards in London dataset, HMRC, November 2016

Gaps:

- None identified

16.1 The Indices of Multiple Deprivation (IMD) 2015 is a measure of relative deprivation of small areas (referred to as Lower Super Output Areas (LSOA)) within England. It combines information from 7 domains, each of which measure a different type or dimensions of deprivation, to provide an overall relative measure of deprivation.

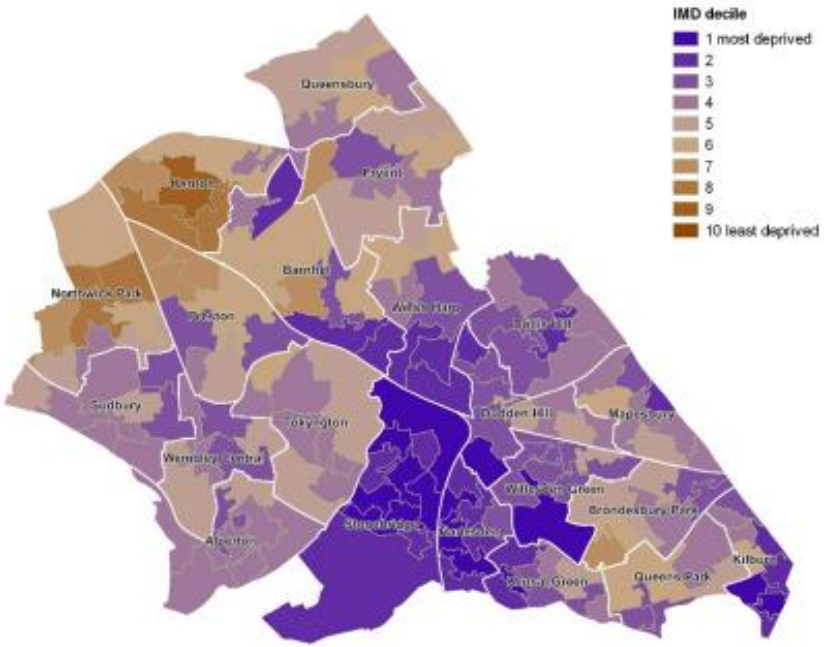


Figure 38: Levels of deprivation in Brent

16.2 Brent's national rank was the 39th most deprived borough in the UK. Brent has 173 LSOAs, of which 14 are within the 10% most deprived LSOAs in the country. As shown in Figure 38, 6 of these LSOAs are located within the Stonebridge Ward. Brent does not have any LSOAs that are within the 10% least deprived LSOAs in the country. In the domain 'Barriers to housing and Services', Brent was ranked the 3rd most deprived borough.

16.3 In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. The rate for out of work benefits was nearly 29% in Harlesden and Stonebridge, under 9% in Northwick Park and under 8% in Kenton.

16.4 Households are considered by the Government to be in fuel poverty if they would have to spend more than 10% of their household income on fuel to keep their home in a 'satisfactory' condition. In England, this is defined as 21°C in the living room and 18 C in other occupied rooms. In 2015, it was estimated that 14,702 dwellings were fuel poor in Brent, which equates to 13.1% of all households. This is significantly higher than both the London average (10.1%) and England average (11.0%) in 2015.

16.5 As indicated by Table 8, levels of child poverty in Brent 2011-2014 was higher than the London and England average. The 'Children in Low-Income Families', which is the Government's preferred measure of child poverty, shows the proportion of children living in families in receipt of tax credits where their reported income is less than 60% of the UK median income. This measures provides a broad proxy for relative low income child poverty as set out in the Child Poverty Act 2010.

	Children in Child Benefit Families						% of children in low-income families					
	Brent		London		England		Brent		London		England	
	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children
2011	63615	73405	1611800	1853670	9855830	11537505	28.1%	28.8%	26.5%	26.7%	20.6%	20.1%
2012	65345	75315	1636025	1880560	993640	11602370	24.8%	25.0%	23.7%	23.5%	19.2%	18.6%
2013	66265	76570	1641015	1892710	9957705	11649215	21.0%	21.3%	21.8%	21.8%	18.6%	18.0%
2014	66455	76890	1635720	1888430	9956030	11638995	23.4%	24.3%	23.4%	23.9%	20.1%	19.9%

Table 7: Level of Child Poverty in Brent, London and England

16.6 At a more local level, as shown in Table 9, the highest rates of child poverty in the borough are in Stonebridge, Harlesden and Willesden Green, which after housing costs scored 40.07%, 41.04% and 40.53% respectively. The wards which have the lowest rates of Child Poverty are Sudbury and Queens Park, which after housings costs scored 16.52% and 20.62% respectively. Table 9 also highlights the impact that housing prices have on child poverty i.e. prior to housing costs Wembley Central and Fryent had a relatively low percentage of children in poverty, however, when housing costs are factored in amount of children in poverty increases by 10%.

Local Authority and Ward Names	Before Housing Costs	After Housing Costs
Brent	**20.46%**	**32.04%**
Alperton	16.28%	25.64%
Barnhill	21.44%	33.46%
Brondesbury Park	16.76%	26.39%
Dollis Hill	24.60%	37.58%
Dudden Hill	20.25%	32.23%
Fryent	17.53%	27.32%
Harlesden	26.67%	41.04%
Kensal Green	22.87%	35.54%
Kenton	10.25%	16.52%
Kilburn	23.78%	37.30%
Mapesbury	22.90%	35.32%
Northwick Park	15.79%	24.75%
Preston	16.78%	26.82%
Queens Park	12.59%	20.62%
Queensbury	16.97%	26.73%
Stonebridge	25.55%	40.07%
Sudbury	16.58%	26.20%
Tokyngton	18.65%	29.11%
Welsh Harp	23.68%	36.20%
Wembley Central	17.51%	27.55%
Willesden Green	26.57%	40.53%

Table 8: Levels of child poverty at ward level within Brent

16.7 The Council has adopted a Child Poverty Strategy (2011-2021) which seeks to achieve the following vision:

"*For no children or young people to be disadvantaged by poverty in 20-21 by breaking the cycle of deprivation and mitigating poor children becoming poor adults. Over the next decade [the Council] will ensure that each child has the best possible start in life and not be disadvantaged by family circumstance or background".*

16.8 To achieve the above vision, the strategy identified the following six priorities: 1) Reduce poverty levels of children living in low income households, 2) Supporting troubled families, 3) Reduction in the NEET group, 4) Improve financial capacity of parents, 5) Support

looked after children and children at the edge of care, and 6) Improve the health and wellbeing of children with a focus on reducing obesity, tooth decay and poor mental health.

17. Housing

Evidence Base:

- 2001 and 2011 Census
- Housing Benefit caseload statistics
- London Borough of Brent Strategic Housing Market Assessment, SHMA, 2015
- GLA Brent Borough Profile, 2017

Gaps:

- Gypsy and Traveller Needs

Housing Stock

17.1 The 2011 Census counted 110,286 households in Brent, an increase of 10.3% from the previous census. The GLA borough profile estimated that in 2017 there was 121,048 households in the borough. The number of households in Brent is expected to increase to 172,681 ds by 2050 – an average yearly increase of 1.45% from the 2011 figure.

17.2 Between 2001 and 2011, there was a significant increase (35%) in the amount of flats, maisonette or apartments (purpose-built block of flats or tenement) in the borough, which resulted in this accommodation type making up a third of the borough's total housing stock. There was also a growth in the amount of detached housing in the borough, which increased from 3317 in 2001 to 7402 in 2011. This represents an increase by 11.86%. During the same time, there was 53.6% reduction in the amount of caravan or other mobile or temporary structure household spaces. There was also a reduction in the amount of semi-detached properties within the borough; in 2001 there was 28,303 semi-detached dwellings, which had decreased to 27,064 by 2011.

17.3 There is also variation in the housing stock across the borough. The dominant type of housing stock in Kenton and Northwick Park is semi-detached house3s (57% and 46%), compared to the high percentage of flats in wards such as Kilburn and Mapesbury (86% and 75%).

17.4 The 2016 SHMA also identified the tenure mix and size for market and affordable housing need in Brent between 2011-2037 (Table 10). It stated that there is "*a high need for 3 bedroom properties in both the market and affordable sectors. The main driver of this need in the affordable sector is the need to address overcrowded households in Brent who require larger affordable housing. Meanwhile, in the*

market sector the need for 3 bedroom properties is by past trends for the type of dwellings occupied in Brent and changing household types." The SHMA also indicated that there would be a growth in the amount of households that would fall in the 'Other Household Type' as they would not contain a single family unit i.e. HMOs.

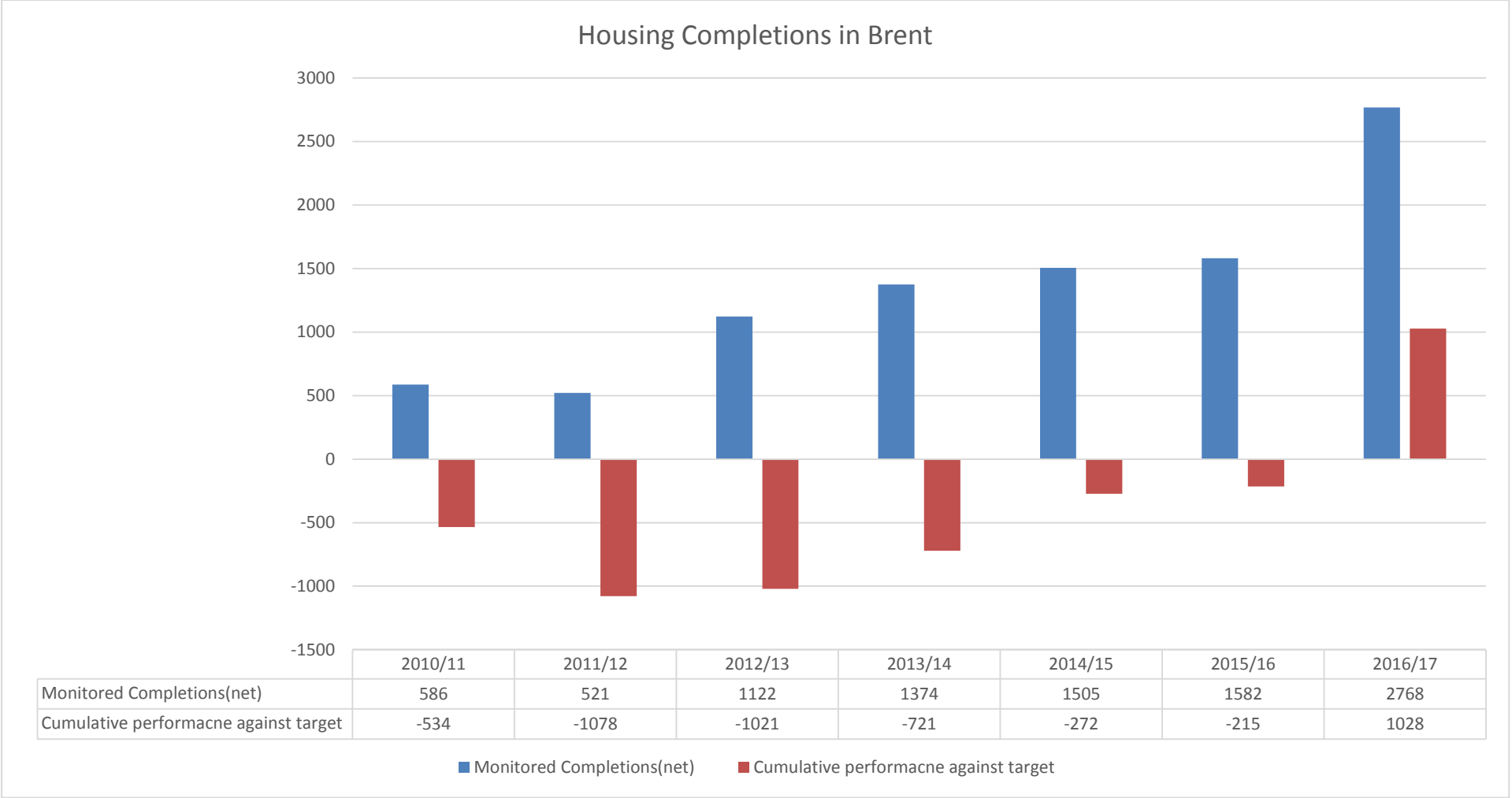
	Brent
Market Housing	
Flats	7,400
House	18,300
Total Market Housing	25,700
Affordable Housing	
Flats	11,000
House	10,700
Total	21,700

Table 9: Market and affordable housing need in Brent between 2011-2037

Housing Delivery

17.5 The 2016 SHMA identifies that the "*Full Objective Assessed Need for Housing in Brent to be 47,500 dwellings over the 26-year plan period 2011-37, equivalent to an average of 1,826 dwellings per year. This includes the Objectively Assessed Need for Affordable Housing of 21,707 dwellings over the same period, equivalent to an average of 835 dwellings per year".* It should be noted that the recently published draft London Plan (2017) indicates that the borough's housing target could increase to 2,915 dwellings per annum.

17.6 As shown in the Figure 39, there has only just been a positive performance against the borough's housing targets. Such a significant increase in completions is due to a large amount of student housing being completed within the Wembley area.



	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
Monitored Completions(net)	586	521	1122	1374	1505	1582	2768
Cumulative performacne against target	-534	-1078	-1021	-721	-272	-215	1028

Figure 39: Housing completions in Brent

Household Size

17.7 Between 2001 and 2011 the mean household size in Brent went from 2.6 to 2.8[3]. During this period all wards, other than Brondesbury Park, Northwick Park and Queens Park, had a positive change in household size. Alperton and Sudbury saw the greatest increases to 3.4 and 3.1 persons respectively, which equated to an increase of half a person per household in each.

17.8 As shown in Figure 40, it is predicted that by 2050 the average household size will fall to 2.3. The average household size in Brent is, and will continue to remain higher than the London average household size.

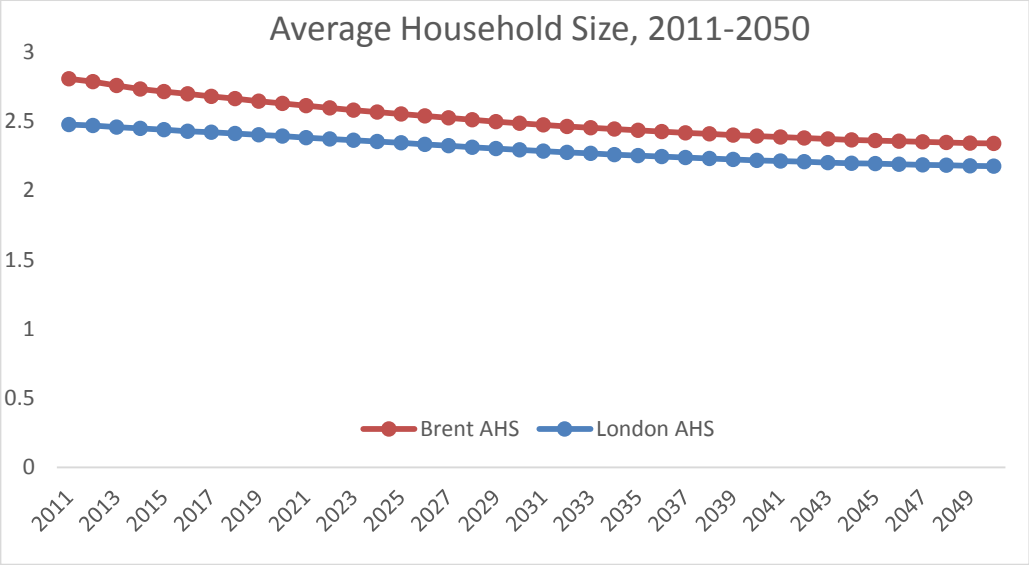


Figure 40: Average household size, 2011-2050

Household Tenure

17.9 At the time of the 2011 Census, 42.9% of Brent's population owned their house. This is a decrease of 11.6% from the 2001 Census, where 57.7% of Brent's households were considered to be part of the owner occupied dwellings category. Furthermore, the fall in owner occupation rates have been above the national average – 63.3% of England's population owned their house in 2011, compared to approximately 68% in 2001.Since the 2001Census, there has been a significant tenure shift, with the private rented sector seeing a 10.6% increase to 30.1% (33,181 dwellings). While this is significantly higher than the England average, it is in line with the London average.

17.10 However, there are significant differences in the tenure pattern across the borough. Highest levels of owner occupation are seen in Kenton (73%) and Northwick Park (62%), with much lower levels in Harlesden (22%) and Stonebridge (18%). Similar contrasts exist for social and private renting. Stonebridge has the highest proportion of social renting (62%), followed by Kilburn (45%), while Tokyngton

[3] Population and Household Changes 2001 to 2011, Brent

(12%) and Kenton (5%) have the lowest levels. Private renting is highest in Mapesbury (45%) and Willesden Green (43%) and lowest in Northwick Park (19%) and Stonebridge (15%).

Affordability

17.11 The predicted increases in London and Brent's population is likely to have implication on the affordability of housing. For the majority of the period between January 2013 and November 2017, the house prices in Brent have been above the London average and significantly above the England average house price. In 2015, the median house price in Brent was £407, 250, which is 14% more expensive than the Outer London average (£350,000) and 1.8% more expensive than the London average (£399,950).

17.12 As shown in Figure 41, the amount of people claiming housing benefit has steadily increased since 2008, but appears to have plateaued since 2015. Figure 42 shows that in May 2017 there was 35,368 housing benefit claimants, of which 52.6% were within the social rented sector and 47.4 were within the private rented sector.

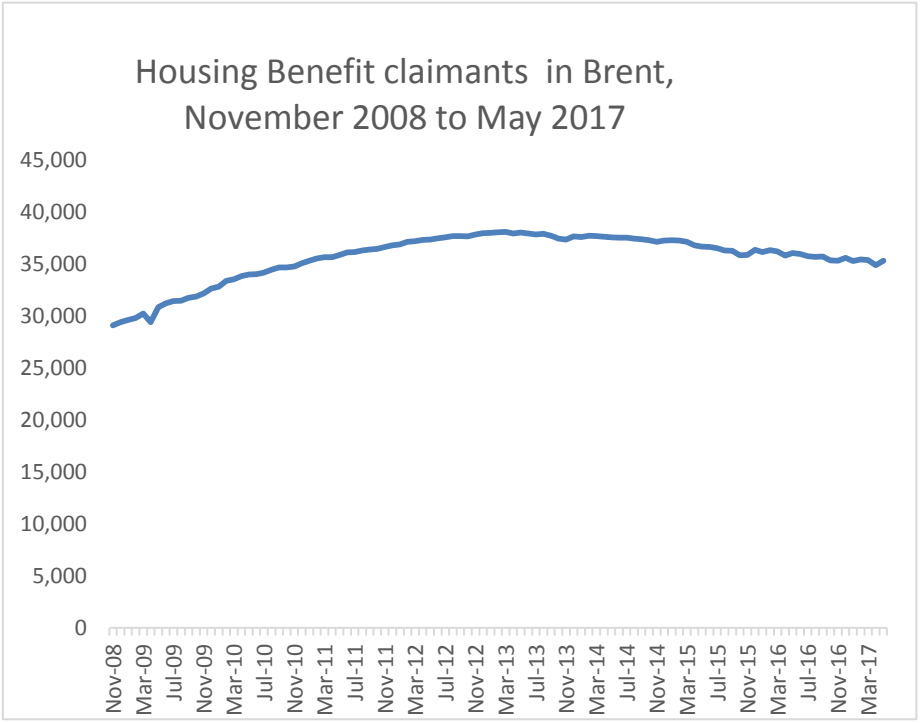


Figure 41: Housing Benefit claimants in Brent, November 2008to May 2017

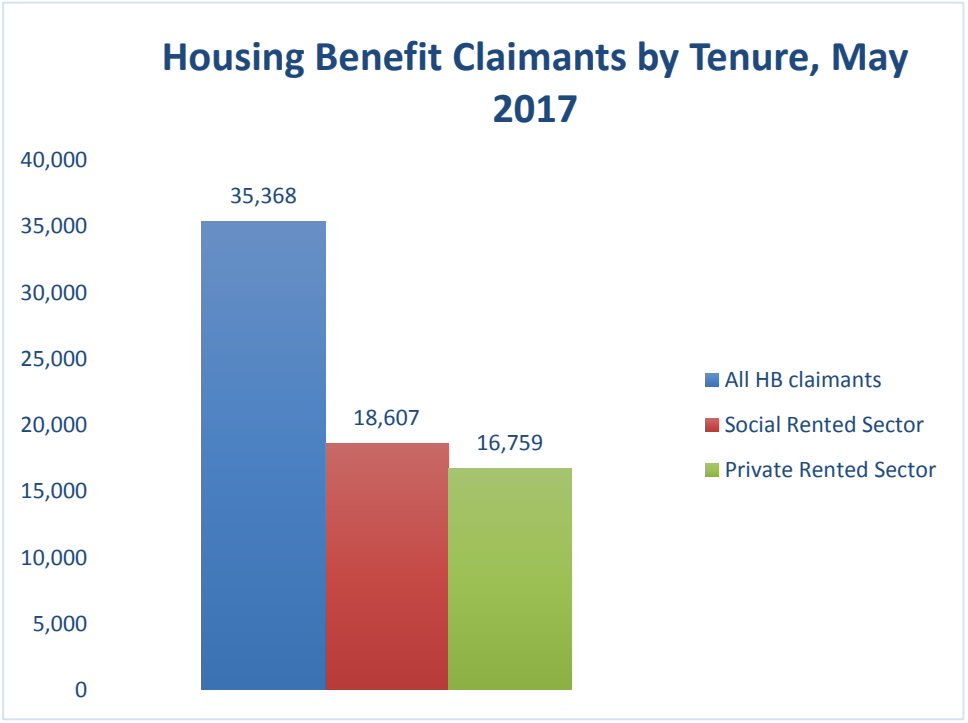


Figure 42: Housing benefits claimants by tenure, May 2017

17.13 The median monthly private rent in 2015 was £1,400 or 67.4% of the median gross salary. Most assessments of affordability suggest that rents at 35-40% salary are reasonable. Even in the affordable housing sector, affordability is strained. The average weekly Registered Provider (RP) rent in 2015 was £123.16, while the gross weekly salary for a household in the lowest 10% of earners – a category into which many social housing tenants fall – was £141.40, meaning that rent represented 87.1% of earnings, compared to 85.8% in 2011. Although the change is not as marked as in other sectors, there is still upward pressure on rents increasing reliance on housing benefit.

17.14 Over 3,800 households are in Bands A-C (those considered to be in housing need) on the Housing Register. 73% are in need following homelessness and 8% due to overcrowding. 52% of these households need three bed or larger accommodation, which as a result has meant very long waiting time.

"*High rents, rising prices and restricted access to social housing has driven a rise in overcrowding. Overcrowding increased from 23,943 to 32,688 households (an increase of 8,745) over the 10-year period 2001-11. The percentage of overcrowded households has also increased from 23.9% to 29.6%"*

17.15 There is one gypsy and traveller site in the borough at Lynton Close, which contains 31 plots.

Appendix 3: Integrated Impact Assessment Workshop Summary

1.1 The workshop was divided into two parts:

- Identifying social, economic and environmental issues within the borough and whether there are any plans, programmes or policies which are addressing these. Attendees were also asked to identify whether there was any evidence which highlights the issue that they identified.
- Commenting on ways the Sustainability Appraisal objectives used for the 2016 Development Management Polices could be improved.

Part 1 – Social, Economic and Environmental Issues and Opportunities

1.2 The social, economic and environmental issues identified within the workshop are detailed in the below table.

Social	Economic	Environmental
Issue: Closure of GP surgeries. There is approximately 200 GPs within the borough, however, there has been some close of GP surgeries. There were 67 practises within the borough, but this is now down to 62. This can be associated with GP's retiring. **Protected Groups Impacted:** Borough-wide issue. **Associated Health Issues:** **Opportunities to address issue:** Provision of parks and recreational spaces	**Issue:** Brent has a low wage economy. There is also significant variation in wage levels across the borough. **Protected Groups Impacted:** Ethnic diversity (particularly new communities), disability and young people. **Associated Health Issues:** Anxiety Depression There is a link between this issue and rough sleeping. The health impacts of rough sleeping includes no access to health services as they are not aware that they are entitled. **Opportunities to address issue:** There are a number of opportunities that could help to address this issue, which include:	**Issue:** The sewer network is near capacity within the northern and western regions of the borough. **Protected Groups Impacted:** **Associated Health Issues:** **Opportunities to address issue:**

Social	Economic	Environmental
	• Protecting existing employment and promote more • Improve cultural baseline – secure cultural space • Promote cultural uses – digital infrastructure/skills/hubs • Providing inclusive education • Local labour clauses – digital skills, link education	
Issue: High rates of depression within the borough **Protected Groups Impacted:** This issue is not specific to one particular group **Associated Health Issues:** **Opportunities to address issue:**	**Issue:** Lack of health workers. It should be noted that there is a difficult in attracting health workers nationally, so this issue is not specific to Brent. However, due to the lack of GPs patients within Brent may have to travel further i.e. Northwick Park **Protected Groups Impacted:** **Associated Health Issues:** **Opportunities address issue:**	**Issue:** Poor water quality within Brent's waterbodies. The lower Brent and Wealdstone Brook are or poor chemical water quality due to poor plumbing connections and CSOs. There is a target for all water bodies to achieve 'good quality' status by 2027. **Protected Groups Impacted:** Borough-wide issue so will have an impact on everyone. **Associated Health Issues:** **Opportunities to address issue:**
Issue: High levels of childhood obesity within the borough **Protected Groups Impacted:** Young population of the borough **Associated Health Issues:** **Opportunities to address issue:** Improved accessibility to exercise and activity.	**Issue:** Lack of funding for projects and working in partnership **Protected Groups Impacted:** dependent on project **Associated Health Issues:** dependent on project **Opportunities to address issue:** Identification of projects within infrastructure	**Issue:** A number of the borough's wildlife sites are linked with parks. **Protected Groups Impacted:** **Associated Health Issues:** It was noted that the provision of open space can have a positive impact on health and wellbeing. **Opportunities to address issue:** Seek to protect existing spaces in the Local Plan. Create and/or enhance green spaces.

Social	Economic	Environmental
	delivery plan (IDP), acknowledging the funding gap, Section 106 and CIL.	
Issue: Gangs and their activities (i.e. child sexual exploitation) **Protected Groups Impacted:** Namely the young population of the borough **Associated Health Issues:** **Opportunities to address issues:** An Urban Space Review (Change Manager) is to be undertaken. This could identified opportunities to help improve this issue.	**Issue:** GPs being encouraged to work at scale and move to built for purpose facilities. **Protected Groups Impacted:** **Associated Health Issues:** **Opportunities to address issues:**	**Issue:** Augmentation of rivers – banks and channels. Encourage the naturalisation or rivers. **Protected Groups Impacted:** **Associated Health Issues:** **Opportunities to address issues:**
Issue: Inequality within the borough – deprivation in the southern area of the borough and affluence in the north **Protected Groups Impacted:** socio-economic **Associated Health Issues:** **Opportunities to address issues:**		**Issue:** Invasive species along rivers in Brent. A number of the river banks with the Brent Catchment are covered entirely by invasive non-native vegetation like the Giant Hogweed and Japanese Knotweed. **Protected Groups Impacted:** **Associated Health Issues:** **Opportunities to address issues:** Brent River Catchment Plan 2014
Issue: The perception of crime, safety and security was identified as an issue within Brent, with parks being a particular area of concern. Hate Crime, which is apparent within Wembley, Neasden and Harlesden. **Protected Groups Impacted:** LGBT, disability and race.		**Issues:** Areas of fluvial flood risk along the main rivers within Brent **Protected Groups Impacted:** those impacted is likely to be location dependent **Associated Health Issues:** wide-range of health effects on physical and mental health

Social	Economic	Environmental
Associated Health Issues: Anxiety and Mental Health **Opportunities to address issue:** A number of opportunities for addressing this issue were identified, and includes: • Improved opportunities for interaction • Protecting community facilities • Secure by Design • Celebrate identity and local culture • Space for interaction/performance spaces • Eyes on the street • Quality of maintenance		i.e. hypothermia, depression and anxiety disorders. **Opportunities to address issues:** opportunities to be addressed within the London West Alliance SFRA
Issue: Diversity within the borough has resulted in the prevalence of long-term conditions i.e. **Protected Groups Impacted:** Race **Associated Health Issues:** **Opportunities to address issue:** Ensuring healthcare is easily accessible for all		**Issue:** Noise in the borough is created through a number of sources: railways, north circular, Wembley Park events and the night time economy. **Protected Groups Impacted:** Disability groups **Associated Health Issues: H**eart disease and anxiety. **Opportunities to address issue:** There are a number of opportunities which the Local Plan could explore to address this issue, which includes: • Quiet Zones • Noise Proofs near railways • Establishing a balance between the night time economy and noise impacts

Social	Economic	Environmental
Issue: Child Isolation, which can be caused by bullying, social media, video games. **Protected Groups Impacted:** Young population of the borough **Associated Health Issues:** Could lead to anxiety, depression **Opportunities to address issue:** provision of open space and children's play spaces		**Issue:** Recycling and Waste Storage can smell and have a negative impact on the quality of the environment. **Protected Groups Impacted:** Disability groups. **Associated Health Issues:** Stress **Opportunities to address issue:** This issue could be addressed through providing a dedicated waste storage that is closed off.
Issue: Family Structure • If a resident has moved to Brent from another country by themselves it may be difficult for them to build a network • Extended Family Network can have its benefits and drawbacks i.e. great support network but **Protected Groups Impacted:** **Associated Health Issues:** Depression **Opportunities to address issue:**		**Issue:** The borough has poor air quality. **Protected Groups Impacted:** This issue can impact on a range of people such as pregnant women, both the old and young population, those with a disability and long-term illness and people on low income. **Associated Health Issues:** A number of health issues can be associated with poor air quality, these include: respiratory and heart disease, WHO carcinogenic, and neuro development and pre-natal (the evidence for the latter two is less established). **Opportunities to address issue:** There are a number of opportunities which the Local Plan could explore to address this issue, which includes: • Tackle congestion. Get people to use other modes, electric vehicles, cycle, Quietway, railways

Social	Economic	Environmental
		• The use of the hydrogen freight vehicles • Establishing an ultra-low emission zone (potentially extended TfL) • Control construction through construction management plans
Issue: Increase in respiratory conditions **Protected Groups Impacted:** borough-wide issue **Associated Health Issues:** Respiratory Conditions **Opportunities to address issue:** NHS are developing services (at home/in the hospital) being developed to help address this issue at others		
Issue: The privatisation of public space was identified as an issue. Code of conduct. **Protected Groups Impacted:** Young people feel excluded from some areas of private/public space, such as the LDO. **Associated Health Problems:** **Opportunities to address issue:** space for interaction/performance, provision of youth spaces within the borough.		
Issue: Low levels of physical activity. The northern region of the borough is more car focused, whereas the south is more walkable.		

Social	Economic	Environmental
Protected Groups Impacted: **Health Issues:** Cardiac **Opportunities:** A number of opportunities for addressing this issue were identified, and includes: • Lift every other floor, orientation of staircase • Green spaces – connect with nature • Promote active travel. • Facilities in walkable distances • Signage, Smart travel planning • Navigable neighbourhoods • Consider community severance by transport network		
Issue: Social Isolation **Protected Groups Impacted:** disability groups, older people, socio-economic, pregnant women, new arrivals (language-barriers) and Asian older women (do not socialise outside community). **Associated Health Impacted:** shortened life, mental health, depression and cardiac. **Opportunities to address issue:** A number of opportunities for addressing this issue were identified, and includes: • Neighbourhood encourage interaction • Love where you live – engagement		

Social	Economic	Environmental
• Pedestrian friendly, walkable facilities that are accessible, de-cluttered and contain benches • Communal facilities in tall buildings i.e. communal shared living space/bookable space for family visits • Co-living – integrated, private and communal area • Community Land Trust – community led development • Villages for older people • Secure cultural space • Local business, mix of uses		

Workshop Part 2: IIA Objectives

General Observations:

- The objectives need to be rephrased so that can be understood by everyone.
- The objectives should be more outcome based, with targets and standards incorporated into the objective where possible. The creation of SMART objectives.

Social		Economic		Environmental	
Objectives	Comments received during workshop	Objectives	Comments received during workshop	Objectives	Comments received during workshop
To reduce poverty and social exclusion	• The objective should include a reference to narrowing inequalities • The objective should address social isolation as it is not necessarily linked to poverty	To encourage sustainable growth	• The word 'encourage' needs to be stronger. It could be replaced with 'To actively promote'. • The objective could be rephrased to read as follows: *To actively promote sustainable economic growth*	To reduce the effects of traffic on the environment	• The objective should include a reference to the safety of people travelling • The objective should address the severance of the community • The objective should include a reference to air quality.

	• The objective could be more positive i.e. *promote social inclusion* • The objective should include a reference to access to homes, jobs, education • The objective should acknowledge Brent's diverse population i.e. *Encouraging diversity and promoting social inclusion*		*that tangibly benefits Brent's residents and enhances the environment.* • The objective should include the word 'inclusive'		• The objective should be rephrased to read as follows: *To reduce the effect of traffic on the environment and promote sustainable modes of travel/active travel*
To improve the health and wellbeing of the population	• The objective should address narrowing the health gap/reducing health inequalities • The objective could be furthered extended to reference access to health green spaces and nice rivers • The objective could acknowledge the role that food and a safe environment have in good health and well-being • The objective could also address social isolation	To offer everybody the opportunity for rewarding and satisfying employmen t	• The objective could be rephrased to read as follows: *Maximise the potential for everybody to contribute economically/develop skills inc. volunteering/informal employment* • The objective should refer to self-employment as well	To improve water quality, conserve water resources and provide (missing part of the objective is as follows: *for sustainable sources of water supply)*	• The objective needs to be more positive • The reference to improving water quality should clearly define water source this relates to (i.e. rivers or groundwater) • The objective should reference the standard for water efficiency • The objective could reference the biodiversity and recreational aspects of water quality • The objective could be rephrased as the following: *To improve water quality to a "good status" by 2027 and conserve water resources*
To improve the education and skills of	• The objective should be moved to the economic group.	To reduce disparities in economic	• The objective should make reference to existing communities	To improve air quality	• The objective should reference the harmful substances that the borough

the population	• ‘skills of the population’ could be replaced with ‘*skills that improve community cohesion/life opportunities of the population* • The objective could be rephrased to read as follows: *To improve the education and skills of the population which will empower the population to increase their life chances/to assist in the local community* • The objective could be rephrased to read as follows: *To provide inclusive education and skills for all the population* • The objective could reference learning opportunities, such as community projects and volunteering schemes, which provides people with the experience to get into jobs	performance and promote sustainable regeneration	• The title of the objective should include the term ‘inclusive’ • The objective should address existing and new communities		would like to see a reduction in. • This objective should be grounded with noise and dust, and an environmental objective created. • The objective should reference the need to mitigate against poor air quality
To provide everybody with the opportunity to live in a decent home	• The objective could be rephrased to read as follows: *To provide everybody with the opportunity to live in a home which meets their identify needs* • The objective could be rephrased to read as follows: *To provide everybody with the opportunity to live in appropriate accommodation*	To encourage and accommodate both indigenous and inward investment	• No comments received	To conserve and enhance biodiversity	• The objective could reference urban greening and food production • The objective should reference improving access to biodiversity • The objective should make reference to a *well-connected green infrastructure network.* • To objective could be extended to include the following phrase ‘*through*

					improving green spaces, river restoration and/or increasing diversity of habitats'.
To reduce crime and anti- social activity	• The objective should also addressing the perception of crime. The objective should be rephrased to read as follows: *To reduce crime and anti-social activity and the perception of crime* • The objective should promote the opposite i.e. preventing crime and anti-social activity • The objective include a reference to '*a better/improving environment'* • To objective should include the phrase: *To ensure safe, secure spaces* • The objective could promote the creation of community spaces	To encourage efficient patterns of movement in support of economic growth.	• The term 'efficient patterns of movement' needs to be more understandable • The objective should be rephrased to read as follows: *TO encourage efficient infrastructure in support of economic growth* • The title of the objective should be rephrased to read Efficient Infrastructure	To maintain and enhance the character and quality of landscapes and townscapes	• The objective should seek to promote developments that provides a good quality environment
To encourage sense of community identity	• The objective should reflect the importance of culture • The objective should be rephrased to read as follows: *To encourage the sense of community cohesion, identity and welfare* • The objective should include community cohesion • The objective should reflect that Brent is a diverse			To conserve, and where appropriate, enhance the historic environment and cultural assets	• No comments received during the workshop.

	borough, and has a wide range of communities. • The objective should be rephrased to read as follows: *To encourage a shared sense of community, identity and welfare* • The objective should encourage community participation and a sense of social responsibility				
To improve accessibility to key services especially for those most in need	• Key services needs to be defined. This could be including a reference to health services • '*for those most in need'* should be rephrased as '*for the most vulnerable'.*			To reduce contributions to climate change and reduce vulnerability to climate change	• The climate change objective is too broad. • The phrase 'reduce vulnerability' is very loose. • Flood risk should be a separate objective
				To minimise the production of waste and use of non-renewable materials	• 'Minimise' could be made stronger by replacing it with 'reduce'. Reduce, reuse and recycle before recovery and landfill is part of the waste hierarchy, although I can see versions with 'waste prevention' at the top as well. • The objective could include more explicit waste targets • The objective should reference the circular economy
				To conserve and enhance	• Does land and soil need its own objective?

				land quality and soil resources	• The objective should include a reference remediated contaminated land

Appendix 4: Habitats Regulation Assessment (HRA) Screening Opinion

1. Introduction

1.1 This report provides information in support of the Habitats Regulations Assessment (HRA) of the emerging Brent Local Plan. The objective of the HRA Screening Opinion is to establish whether the policies and proposals – either alone or in combination with other plans and projects – will have a likely significant effect on any site designated under European Law for its nature conservation interest. If the HRA establishes that this is the case then an Appropriate Assessment (AA) will be required to ascertain whether or not the plan or project will have adverse impact on the integrity of the site(s).

1.2 It should be noted that the HRA and Integrated Impact Assessment (IIA) are parallel processes. Information forming the baseline data for the IIA process informs the HRA. However, the assessments are conducted separately as the assessment processes have different aims, emphasis and levels of detail.

2 Background Information

2.1 A Habitat Regulation Assessment (HRA) is a legal requirement and seeks to determine whether any plan or project will have a 'likely significant effect' (LSEs) on any European sites as a result of the plan's and/or project's implementation. The need for a HRA is set out within the EC Habitats Directive 92/43/EC, which was transposed into British Law in the *Conservation of Habitats and Species Regulations 2010 (as amended).* Article 6(3) of the EU Habitats Directive states that:

Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public

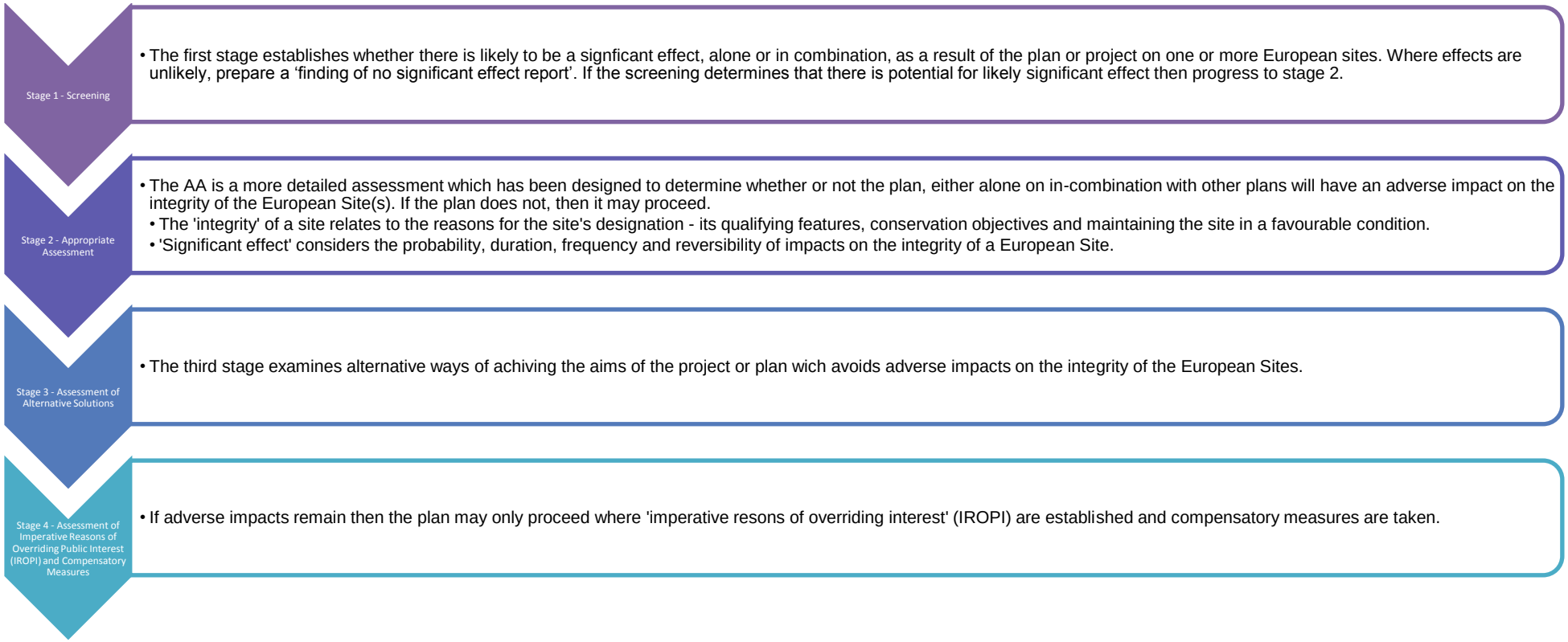
2.2 The Habitats Directive provides for the legal protection of habitats and species of European Importance. An ecological network of sites is identified by the Directive and is known as 'Natura 2000'. The Natura 2000 network comprises of the following sites:

- Special Protection Area (SPA) – a European designation which protects birds

- Special Area of Conservation (SAC) – a European designation which protects habitats
- Ramsar Site – a European designation which protects wetlands

2.3 Collectively, these sites are referred to as ‘European Sites’, with this term being used for the remainder of the document.

2.4 The HRA is a multi-stage process. The different stages of the HRA are detailed in the below Figure.



3 Methodology for the Screening Assessment

3.1 There is no statutory or formal guidance on how to undertake a Habitats Regulation Assessment. It should be noted that the following documents provide some guidance on the HRA:

- Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission
- Planning for the Protection of European Sites: Appropriate Assessment, Guidance for Regional Spatial Strategies and Local Development Documents, Department for Communities and Local Government, 2006

3.2 In addition, the methodology for this screening has drawn on that used within the Appropriate Assessment of the Core Strategy (2010) and Development Management Policies (2016).

Stage 1 – Screening for possible adverse effects

- Screening of European Sites to identify which sites the Local Plan could possibly affect

Stage 2 – Appropriate Assessment for likely adverse effects

- Identification of qualifying features, key environmental conditions to support the integrity of the screen European Sites and any weaknesses or threats to the sites
- Identification of key elements of the Local Plan and adverse environmental impacts arising from its implementation.
- Identification of trends and future developments which could lead to an ‘in-combination’ adverse effect on the screen European Sites
- Analysis on how implementation of the Local Plan alone and ‘in-combination’ is likely to affect screened European Sites including identification of cross-cutting adverse impacts.
- Analysis of cross-cutting impacts with an assessment of how significant the impact of development in Brent is likely to be.
- Screening of individual Local Plan policies for effects/impacts on European Sites

4 Relevant European Sites

4.1 Whilst there are no European Sites that lie wholly or partially within Brent there are several in and around London which are in close enough proximity to be considered as potentially affected by development in the borough. Five European Sites are identified within 15km of Brent's boundaries; these are listed in Table 1.

Table 10: Relevant European Sites

European Site	Conservation Status	Location	Site Size (ha)	Distance from Brent
Richmond Park	Special Area of Conservation	London Borough of Richmond upon Thames and immediately adjacent to the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames	846.43	8km
Wimbledon Common	Special Area of Conservation	London Borough and Wandsworth and the London Borough of Merton and immediately adjacent to the Royal Borough of Kingston upon Thames	351.3831	9km
Lee Valley	Special Protection Area	London Borough of Waltham Forest, the London Borough of Waltham Forest, Epping Forest District and the Borough of Broxbourne	451.2962	11km
South West London Water Bodies	Special Protection Area and Ramsar Site	London Borough of Hounslow, the Borough of Elmbridge, the Borough of Runnymede, the Borough of Spelthorne and the Royal Borough of Windsor and Maidenhead	828.14	15km
Epping Forest	Special Area of Conservation	London Borough of Waltham Forest, the London Borough of Redbridge and Epping Forest District	1,796.92	15km

Site Descriptions

4.2 Information for the above sites, including their qualifying features, current condition and threats was taken from the following sources:

- *Habitats Regulation Assessment Screening of the Core Strategy DPD and Development Management Policies DPD, Updated July 2015*
- *Draft Habitat Regulation Assessment for the emerging London Plan, GLA, 2017*
- *Natural England Site Improvement Plans*

Richmond Park SAC

4.2.1 Richmond Park SAC is a parkland site which covers 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. It is significant for its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and a significant population of veteran trees. These habitats support a number of invertebrates and regionally uncommon plants, which includes Upright Chickweed (*Moenchia erecta),* Blinks (*Montia fontana)* and Subterranean Clover (*Trifolium subterraneum)*. The site is at the heart for the distribution of Stag Beetles in South London.

4.2.2 Richmond Park is also designated as a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI)

Wimbledon Common

4.2.3 Wimbledon Common has a large number of old trees and much fallen decaying timber. The site is at the heart of the South London centre of distribution for Stag Beetle and is recognised as being important for this species. The Common also supports examples of Northern Atlantic wet heaths and European dry heaths and has one of the few sphagnum bogs in the London area. Periodic mowing maintains wet and dry acid grassland and there are a number of valuable pond habitats formed by old gravel pits. The Common provides habitat for a variety of plants and animals typical of heathland and wetland. Nationally rare plant species present include the Liverwort, Veilwort (*Pallavicina lyelli).* The dry grassland supports the nationally scarce Yellow Vetchling (*Lathyrus aphaca)* and Spring Vetch (*Vicia lathyroides).* The habitats at this site support a number of birds including the Skylark and Bullfinch, and invertebrates including butterflies and dragonflies/damselflies.

4.2.4 Wimbledon Common is also designated as an SSSI.

Lee Valley Regional Park

4.2.4 The Lee Valley Regional Park includes 450ha of protected open water and wetland vegetation carefully managed to support a diversity of plant and animal species. Wintering populations of Bittern (*Botaurus stellaris)*, Shoveler (*Anas clypeata*) and

Gadwall (*Anas strepera)* visit the area and breeding birds including the Kingfisher (*Alcedo atthis)*, Little Ringed Plover (*Charadrius dubius)*, Skylark (*Alauda arvensis)* and Yellow Wagtails. The reservoirs also support nationally and regionally important numbers of Tufted Duck (*Aythya Fuligula)*, Great Crested Grebe (*Podiceps cristatus)*, Goosander (*Mergus merganser)* and Goldeneye (*Bucephala clangula)*. There are a number of rare aquatic invertebrate present such a water-boatman, as well as many regional uncommon and rare wetland plant species including River Water-drop-wort (*Oenanthe fluviatilis),* Tubular water-dropwort (*Oenanthe fistulosa)*, Whorl-grass (*Catabrosa aquatic)*, Arrowhead (*Sagittaria sagittifolia)*, Flowering-rush (*Butomus umbellatus)* and Stream water-crowfoot (*Ranunculus penicillatus)*. The Lee Valley supports a number of specially protected species including the Water Vole and Great Crested Newt. The area is also very popular for recreational activities and is designated a Regional Park. The Lee Valley Park Authority is responsible for managing the important balance between nature conservation and recreational activity on the site.

South West London Water Bodies (SWLWB)

4.2.5 South West London Water Bodies (SWLWB) comprises several gravel pits and reservoirs scattered around Staines in Greater London. The site is an important habitat for hundreds of migratory wintering Gadwall and Shoveler spend their winter on and around these bodies. The waterbodies are also of national important to a number of wintering wildfowl, namely Vormorant (*Phalcrocorax carbo),* Great Crested Grebe*,* Tufted Duck, Pochard (*Aythya farina),* and Coot (*Fulica atra).* Seven of the reservoirs on the site are designated as SSSIs.

Epping Forest

4.2.6 Epping Forest is an extensive wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathlands and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands. The site has a significant amount of Oak and Hornbeam trees, an important habitat of Atlantic acidophilous Beech Forest and is home to a rare species of epiphytes (including mosses). The woodland supports many bird species, including breeding Sparrow Hawk, Marsh Tit and Hawfinch. The woodland habitat also supports Stag Beetles.

4.2.7 The below table provides a summary of the qualifying features, conservation objectives, site sensitivities and threats of the identified relevant European sites.

Table 11: Summary of Qualifying Features, Conservation Objectives, Site Sensitivities and Threats of the European sites

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
Richmond Park	The site is designated as an SAC due to the presence of Annex II species Stag Beetle *Lucanus cervus*	With regard to the SAC and the natural habitats and/or species or which the site has been designated (the 'Qualifying features'), and subject to natural change: **Ensure that the integrity of the site is maintained and restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintain or restoring:** • **The extent and distribution of the habitats of qualifying species** • **The structure and function of the habitats of qualifying species** • **The supporting processes on which the habitats of the qualifying species rely** • **The populations of qualifying species, and**	• 100% of this site is in an 'Unfavourable – Recovering' condition. This is equivalent to 846.63 hectares.	• Water Level • Water Quality • Scrub encroachment • Development pressure • Human Disturbance • Atmospheric Pollution	• Recreational Pressure • Urbanisation The above does not directly affect the European Interest ('Qualifying features') of the site.

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
		• **The distribution of qualifying species within the site**			
Wimbledon Common	The site is designated as an SAC for the following Annex I habitats: • Northern Atlantic wet heaths with *Erica tetralix* • European dry heaths The site is designated as an SAC for the following Annex II species: • Stag Beetle *Lucanus cervus*	With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change: **Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:** • **The extent and distribution of qualifying natural habitats and habitats of qualifying species** • **The structure and function (including typical species) of qualifying natural habitats**	• 94.99% of this site is in an 'Unfavourable-Recovering' condition. This is equivalent to 333.77 hectares. • 5.01% of this site is in an 'unfavourable – No change' condition. This is equivalent to 17.62 hectares.	• Water Quality • Heavy recreational pressure • Spread of non-native/invasive species • Scrub encroachment • Atmospheric pollution	• Public Access/Disturbance • Habitat Fragmentation • Invasive Species • Air Pollution: impact of atmospheric nitrogen deposition

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
		• **The structure and function of the habitats of qualifying species** • **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely** • **The populations of qualifying species, and,** • **The distribution of qualifying species within the site.**			
Lee Valley SPA and Ramsar Site	The site qualifies as a SPA site for the presence of the following Annex I species: *Wintering:* • Bittern *Botaurus stellaris* *Migratory* • Gadwall *Anas stepera*	With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change; **Ensure the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;** • **The extent and distribution of the**	<u>Walthamstow Reservoirs</u> • 100% of the site is achieving an 'Unfavourable-Recovering' condition. This is equivalent to 179.51 hectares. <u>Turnford and Cheshunt Pits Reservoir</u> • 100% of the site is in 'Favourable' condition. This is equivalent to 174.41 hectares.	• Water Quality – eutrophication is a threat, particular from point source pollution but also from surface run-off or groundwater pollution and atmospheric deposition • Water levels • Disturbance to bird feeding and roosting	• Water Pollution • Hydrological Changes • Public Access/Disturbance • Inappropriate scrub control • Fisheries; Fish stocking • Invasive species • Inappropriate cutting/mowing • Air Pollution: risk of atmospheric

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
	• Shoveler *Anas clypeata* The site qualifies as a Ramsar site under the following criterion: • Criterion 2: The site supports the nationally scarce plant species and whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invetebrate *Micronecta minutissima* (a water-boatman); and • Criterion 6: species/populations occurring at	**habitats of the qualifying features** • **The structure and function of the habitats of the qualifying features** • **The supporting processes on which the habitats of the qualifying features rely** • **The population of each of the qualifying features, and** • **The distribution of the qualifying features within the site**		habitats (noise/visual) • Siltation • Scrub or tree encroachment • Spread of introduced non-native species • Recreational pressure/disturbance • Development Pressure • Diffuse air pollution from traffic and agriculture	nitrogen deposition

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
	levels of international importance. Qualifying species/populations are: ○ Species with peak counts in spring/autumn: Northern shoveler *Anas clypeata* ○ Species with peak county in spring autumn: Gadwall *Anas strepera*				
South West London Water Bodies SPA and Ramsar	The site qualifies as a SPA site for the presence of the following Annex II winter migrant species: • Northern shoveler *Anas clypeata*	With regard to the SPA and individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change; **Ensure that the integrity of the site is maintained or restored**	<u>Staines Moore</u> • 96.16% of the site is in 'Favourable' condition. This is equivalent to 491.18 hectares. • 2.13% of the site is in 'Unfavourable-Recovering' condition. This is equivalent to 10.90 hectares.	• Water Quality – eutrophication is a threat, particularly from point source pollution but also from surface run-off or groundwater	• Public access/disturbance • Changes in species distributions • Invasive species

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
	• Gadwall *Anas strepara* The site qualifies as a Ramsar under the following criterion: • Criterion 6: species/populations occurring at levels of international importance. Qualifying species/populations are: ○ Species with peak counts in spring/autumn: Northern shoveler *Anas clypeata* ○ Species with peak county in	**as appropriate, and ensure that the site contribute to achieving the aims of the Wild Birds Directive, by maintaining or restoring:** • **The extent and distribution of the habitats of the qualifying features** • **The structure and function of the habitats of the qualifying features** • **The supporting processes on which the habitats of the qualifying features rely** • **The population of each of the qualifying features, and,** • **The distribution of the qualifying features within the site**	• 1.71% of the site is in 'Unfavourable – declining' condition. This is equivalent to 8.74 hectares. <u>Wraysbury Reservoir</u> • 100% of the site is in a 'Favourable' condition. This is equivalent to 205.56 hectares. <u>Wraysbury and Hythe End Gravel Pits</u> • 100% of the site is in a 'Favourable' condition. This is equivalent to 117.21 hectares. <u>Wraysbury No1 Gravel Pit</u> • 100% of the site is in a 'Favourable' condition. This is equivalent to 57.96 hectares. <u>Thorpe Park No 1</u> • 100% of the site is in a 'Favourable' condition. This is equivalent to 42.53 hectares.	pollution and atmospheric deposition • Disturbance to bird feeding and roosting habitat (noise/visual) • Water levels • Siltation • Scrub or tree encroachment • Spread of introduced non-native species • Recreational pressure/disturbance • Development pressure • Diffuse air pollution from traffic and agriculture	• Natural changes to site conditions • Fisheries: Fish Stocking • Inappropriate weed control

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
	spring autumn: Gadwall *Anas strepera*		<u>Knight and Bessborough Reservoirs</u> • 100% of the site is in a 'Favourable' condition. This is equivalent to 63.43 hectares. <u>Kempton Park Reservoirs SSSI</u> • 100% of this site is in an 'Unfavourable-Recovering' condition. This is equivalent to 25.29 hectares.		
Epping Forest	Epping Forest qualifies as a SAC for both habitats and species. The site contains the following Annex I habitats: • Beech forests on acid soils with *Lilx* and sometime *Taxus* in	With regard to the SAC and the natural habitats and/or species for which the site has been designated) the 'Qualifying Features'), and subject to natural change: **Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contribute to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:**	• 35.48% of the site is in a 'Favourable' condition. This is equivalent to 643.31 hectares of the site. • 48.17% of the site is in an 'Unfavourable-recovering' condition. This is equivalent to 861.19 hectares. • 14.53% of the site is in an 'Unfavourable- No change' condition. This is equivalent to 259.76 hectares of the site. • 1.83% of the site is in an 'Unfavourable-Declining'	• Water quality • Water level • Heavy recreational pressure • Scrub encroachment • Atmospheric pollution (nutrient deposition and acidification) • Development pressure	• Air Pollution: Impact of atmospheric nitrogen deposition • Under grazing • Public Access/Disturbance • Changes in species distributions • Inappropriate water levels • Water Pollution

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats
	the shrub layer • Wet heathland with cross-leaved heath • Dry Heath The site contains the following Annex II species: • Stag Beetle *Lucanus cervus*	• **The extent and distribution of qualifying natural habitats and habitats of qualifying species** • **The structure and function (including typical species) of qualifying natural habitats** • **The structure and function of the habitats of qualifying species** • **The populations of qualifying species, and,** • **The distribution of qualifying species within the site**	status. This is equivalent to 32.66 hectares.		• Invasive Species • Disease

5. The Brent Local Plan

5.1 The emerging Local Plan will set out the development strategy for the borough over a particular period. There are a number of issues that the Local Plan will need to address which include:

- The provision of at least an additional 47,500 dwellings between 2011-2037 (based on the 2015 SHMA), which equates to 1,826 dwellings per annum. However, it should be noted that the draft London Plan (2017) indicates that during the period 2019-2029 Brent will have to deliver 29,150 dwellings, which equates to 2,915 dwellings per annum.
- These dwellings will support the high population growth predicted for Brent – it has been projected that the population will grow by 23.7% by 2050, from approximately 329,000 in 2016 to 407,000 in 2050.
- The provision of an additional 26,000 jobs and the need to achieve a higher wage economy
- Protection and enhancements of the borough's open spaces and biodiversity
- Improving air quality and the quality of the borough's water bodies
- Addressing climate change
- Provision of adequate infrastructure is provided to support both existing and new residents, businesses and visitors
- Addressing the issue of road congestion and seeking improvements to public transport
- Maintaining the vitality of the borough's town centres and addressing the challenges in terms of changes to retailing

5.2 The emerging Local Plan will incorporate the Development Management Policies DPD. The Development Management Policies DPD has been subject to a HRA screening where it was concluded that "*no significant effects on designated European Sites have been found to arise from the implementation of ….the Development Management Policies DPD, alone or in-combination with any other plan or projects"*

5.3 In carrying out a HRA it is important to identify the various ways in which land use plans can have an impact on the internationally designated sites. This is done through following the impact pathways which can connect development with internationally designated sites. The following possible impact pathways have been identified for the Brent Local Plan:

- Urbanisation - *Increased urbanisation could entail greater noise, light, and air pollution. This could have an impact on migrating birds. Greater urbanisation could also lead to degradation in water quality.*

- Recreational Pressure – *Population growth within the borough could lead to increased visit to European sites with associated disturbance to flora and fauna impacts on supporting habitats due to recreational activities.*
- Water Quality – *Increased water use, depending on the source of the water and where it deposited could affect water levels and quality within European sites.*
- Atmospheric Pollution - *Increased traffic as a result of the commercial and housing development within the borough could lead to an increase in air pollution. This increase in air pollution could affect sensitive species.*

6. Assessment of Likely Significant Effects

6.1 Table 3 sets out the assessment of possible impacts and their level of significant, arising from the issues that are to be addressed in the Brent Local Plan. In-combination effects of the Plan are discussed in Section 8. The pathways of impact identified for the Local Plan are further analysed in Section 6.

Table 12: Assessment of Likely Significant Effects

Site	**Current Condition of site**	**Qualifying Features**	**Possible Impacts arising from the Local Plan**	**Is there likely to be a significant effect? (magnitude/duration/reversibility/impact)**	**Possible impacts from other trends, plans and projects**	**Is there a risk of significant 'in combination' effects?**
Richmond Park	100% unfavourable-recovering	Stag Beetle	Increased recreational visits as population of the borough grows. This could place additional pressure on supporting habitats	Very Limited	Population growth across London could lead to increased pressure on the Capital's open spaces and biodiversity	Limited
Wimbledon Common	94.99% unfavourable recovering, 5.01% unfavourable – no change	Stag Beetle	Increased recreational visits as population of the borough grows. This could place additional pressure on supporting habitats	Very Limited	Population growth across London could lead to increased pressure on the Capital's open spaces and biodiversity	Limited

Site	Current Condition of site	Qualifying Features	Possible Impacts arising from the Local Plan	Is there likely to be a significant effect? (magnitude/duration/reversibility/impact)	Possible impacts from other trends, plans and projects	Is there a risk of significant 'in combination' effects?
		Northern Atlantic Wet Heaths	Worsening Air Quality - Increased air pollution as a result of population increase and growth in Brent's employment sectors. Both these factors is likely to lead to increased levels of traffic within the borough.	Very Limited	Population growth across London could lead to an increase in air pollution as a result of development and increased traffic levels	Limited
		European Dry Heaths		Very Limited		Limited
Lee Valley Regional Park	<u>Walthamstow Reservoirs</u> 100% unfavourable recovering <u>Turnford and Cheshunt Pits Reservoir</u> 100% favourable	Wintering - Bittern Migratory – Gadwall, Shoveler	Decrease in water quality on the European Site as a result of additional demand for waste water treatment	Very Limited	Overall growth in London leading to greater demand for water (increased abstraction) and waste water treatment. Climate Change can also have an effect on water supply.	Limited
			Increase in water demand as a result of the borough's increase in population and commercial activities could lead to additional water extraction. This could affect the site if water is extracted from the same source.	Very Limited		Limited
			Increased housing and commercial development within the borough could lead to increased diffuse source pollution.	None		Limited

Site	Current Condition of site	Qualifying Features	Possible Impacts arising from the Local Plan	Is there likely to be a significant effect? (magnitude/duration/reversibility/impact)	Possible impacts from other trends, plans and projects	Is there a risk of significant 'in combination' effects?
South West London Water Bodies (SWLWB)	<u>Staines Moore</u> 96.16% favourable, 2.13% unfavourable recovering. 1.71% unfavourable declining <u>Wraysbury Reservoir</u> 100% favourable <u>Wraysbury and Hythe End Gravel Pits</u> 100% favourable <u>Wraysbury No1 Gravel Pit</u> 100% favourable	Wintering – Bittern Migratory – Shoveler	Increase in water demands as a result of the borough's increase in population and commercial activities which could lead to additional water extraction. This could affect the site(s) if the extraction is from the same water source.	Very Limited	Overall growth in London leading to greater demand for water (increased abstraction) and waste water treatment. Climate change can also have an effect on water supply.	Limited
			Decrease in water quality on the European site as a result of additional demand for waste water treatment.	Very Limited		
			Increased housing and commercial development within the borough could lead to increased diffused source pollution.	Very Limited		Limited

Site	Current Condition of site	Qualifying Features	Possible Impacts arising from the Local Plan	Is there likely to be a significant effect? (magnitude/duration/reversibility/impact)	Possible impacts from other trends, plans and projects	Is there a risk of significant 'in combination' effects?
	Thorpe Park No 1 100% favourable Knight and Bessborough Reservoirs 100% favourable Kempton Park Reservoirs SSSI 100% unfavourable recovering		Increased recreational visits as population of the borough grows. This could place additional pressure on supporting habitats.	Very Limited	Population growth across London could lead to increased pressure on the Capital's open spaces and biodiversity.	Limited
Epping Forest	35.48% favourable condition, 48.17% unfavourable recovering, 14.53% unfavourable – no change, 1.83% unfavourable-declining	Beech Forests Wet Heathland	Worsening Air Quality – Increased air pollution as a result of population increase and growth in Brent's employment sectors. Both these factors is likely to lead to increased levels of traffic within the borough.	None	Population growth across London could lead to an increase in air pollution as a result of development and increased traffic levels.	Limited
		Stag Beetle	Increased recreational visits as population of the borough grows. This could place additional pressure on supporting habitats.	Very Limited	Population growth across London could lead to increased pressure on the Capital's	Limited

Site	Current Condition of site	Qualifying Features	Possible Impacts arising from the Local Plan	Is there likely to be a significant effect? (magnitude/duration/reversibility/impact)	Possible impacts from other trends, plans and projects	Is there a risk of significant 'in combination' effects?
					open spaces and biodiversity.	

6.2 Following the completion of the issues and options stage, the Council will carry out a screening of the preferred options to assess whether there are likely to have a significant effect on the identified European sites.

7. Pathways of Impact

7.1 As identified above, it is considered that there are three ways in which the Brent Local Plan can impact on the European sites. These impacts have been discussed in more detail below.

Urbanisation and Recreational Pressure

7.2 The sites identified above have a range of habitats and have proven to be a popular recreational resource. As identified in Table 2, conservation value of 4 out of the 5 sites are at risk from recreational pressure. The recreational use of a European site can have the potential to cause the following:

- Disturbance to sensitive species
- Cause damage through mechanical/abrasive damage and nutrient enrichment i.e. trampling, dog fouling, off-road vehicle use
- Prohibit appropriate management or exacerbate existing management difficulties/issues

7.3 Different European sites are subject to different recreational pressures. For example, as highlighted in Natural England's Site Improvement Plan for Epping Forest, the site is subject to high recreational pressure, with it having a high level of footfall through the year, which results in a diverse range of impacts which include mountain biking and unmanaged fires. The JNCC has identified that recreational and urban disturbance at lowland heathland, such as that found at Wimbledon Common, can lead to excessive disturbance to wildlife, pollution through dog-fouling and littering, and damage through trampling and erosion.

7.4 In addition to the impacts identified above for recreational pressure, urbanisation can also have the following impacts on European sites:

- Fly tipping
- Increased predation due to domestic cats
- Light Pollution and Noise Pollution
- Disturbance as a result of construction activities

Effects of the Brent Local Plan on the identified European Sites

7.5 As mentioned above, the emerging Brent Local Plan will provide for a significant amount of new housing and jobs to accommodate population growth, therefore it is possible that there could be increased visits from Brent residents to the identified European sites.

7.6 4 of the 5 the 'qualifying features' of the sites have been identified as being vulnerable to the impacts of recreational pressure (public access/disturbance). Although the European Sites identified above provide a number of recreational activities, it is considered unlikely that Brent residents and workers will go to these sites on a frequent basis due to the following reasons:

- None of the sites are adjacent to the Brent or within north-west London (all are over half hour drive from the centre of the borough) and there are a number of alternative green spaces both within Brent and neighbouring boroughs which are more likely to experience increased demand from Brent residents and workers.
- There are a number of open spaces within the borough, such as Fryent Country Park and Welsh Harp which are both over 100ha in size. In addition there are also several major green spaces in neighbouring boroughs that are relatively accessible to Brent residents, including Hyde Park (142ha) and Regents Park (166ha) to the south, Hampstead Heath (302ha) to the east, and Horsenden Hill to the west.
- Some of the recreational activities offered at the European sites can be accessed within the borough and/or in neighbouring boroughs. For example, both Lee Valley Regional Park and SWLWB are popular sites for angling and water sports. However, Welsh Harp offers water-based activities within North West London which are comparable to those a Lee Valley and SWLWB.

7.7 Furthermore, the threats of recreational pressure and urbanisation at the European Sites are address and mitigated through local management plans. For example, the Richmond Park Management Strategy seeks to ensure the intensity of any particular recreation activities does not conflict with the landscape or ecological qualities of the Park i.e. a management plan for the Isabella Plantation is being updated to provide detailed guidance on the work that will be carried out to deal with water management and irrigation as well as the control of inappropriate activities such as ball games. The Lee Valley Regional Park Authority prepared a Water Management Strategy in the late 1990s which set out an approach to how the

competing demands of recreation and biodiversity will be met. The study has informed the policies and proposals that were embodies within the Lee Valley Regional Park Plan (2000) and continues to be the basis for integrating the competing demands on the Parks water bodies.

7.8 Although it is recognised that the borough has areas of open space deficiency (predominantly within the south), the Brent Borough Plan (2015-2019) and the new London Plan (both current (2016) and new (2017)) seeks to protect open and recreational spaces, encourage improved access to these spaces and ensure provision is made for new space within developments to support the identified need.

Water Quality and Water Levels

7.9 Poor water quality can have a number of impacts, some of which include:

- Eutrophication – the over enrichment of water by nutrients. This can lead to hypoxia (oxygen depletion) and harmful algal blooms which can destroy the aquatic life of the affected area.[4]
- Detrimental impact on the landscape in regards to smell and aesthetics.
- Microbial pollutants (i.e. those from sewerage) could lead to infectious diseases which could infect the aquatic life and terrestrial life through drinking water
- Reduced amount of sunlight penetrating the water as a result of suspended particles. This could disrupt the growth of photosynthetic plants and micro-organisms, which would impact on the aquatic community that they support.

7.10 The quality of water can be impacted by a range of factors, which includes:

- Increased impermeable surfaces leading to greater storm water run-off
- Diffuse source pollution
- Pollution associated within construction and industrial processes
- Poor sewerage connections

7.11 Diffuse source pollution is primarily managed locally through waste water treatment. The management of greater storm water run-off can be achieved through the creation of sustainable urban drainage systems. Water quality can also be

[4] World Resources Institute: http://www.wri.org/our-work/project/eutrophication-and-hypoxia/about-eutrophication

managed by enforcing stronger controls on agricultural use, fertilisers and pesticides. Water quality is also sensitive to water supply as decreasing water levels can lead to a greater concentration of nutrients and a reduction in quality.

7.12 Water scarcity and water quality levels is a London-wide issues, with all water companies that serve London located in areas classified as seriously water-stressed. Housing growth and the increasing number of 1 person households (which use proportionally more water than larger households) have led to increasing domestic demand for water. As identified in the draft London Plan (2017)[5] Londoners consume on average 156 litres of water per person per day, which is 17 litres above the national average. With the predicted population growth, it is likely that the abstraction rate is to increase to support the growing population, which as a consequence could have a detrimental impact on water levels.

7.13 2 of the 5 identified European Sites; Lee Valley and SWLWB, are sensitive to water quality and vulnerable to changes in water levels.

The effects of the Brent Local Plan

7.14 Like a number of authorities, Brent draws its water from the wider Thames River Basin – an area of 16,000km encompassing the River Thames, its tributaries and groundwater supply.

7.15 The impact of water quality poses a potential significant effect on two of the five identified European sites (South West London Water Bodies and Lee Valley Regional Park). However, it is considered that the proposed development in Brent will not have an impact on the water quality of the two European site for the following reasons:

- The Development Management Policies DPD requires development in the vicinity of the blue ribbon network to improve water quality by contributing to the delivery of the Thames River Basin management Plan, Brent River Corridor Improvement Plan and River Action Plan and Brent Biodiversity Action Plan.
- Although Code for Sustainable Homes was recently revoked by the Government water efficiency standards can still be applied and this is clarified in the Development Management Policies DPD.

7.16 It is considered that the development in Brent will not directly impact the water quality of these sites. However, as mentioned above, like many other authorities within London, Brent draws its water from the wider Thames River Basin. It is likely that as

[5] Draft London Plan 2017, Paragraph 9.5.1

a result of rising water demand the use of water is going to increase due to the increase in housing supply and population across the London area. However, it should be noted the draft London Plan HRA found that due to the significant investment that Thames Water has placed in its water supply infrastructure to make it as resilient as possible, and no intention to use the top level of any of the reservoirs in the South West London Water Bodies (as indicated in Thames Water draft Water Resource Management Plan 2015-2040), there is no likely to be a significant effect on the European sites as a result of this pathway.

Air Quality

7.16 As identified in the draft HRA for the emerging London Plan, the three main pollutants of concern to European sites are:

- Sulphur Dioxide (SO_2) – the output of these emissions is from power stations and industrial processes that require the combustion of coal and oil.
- Ammonia (NH_3) – the output of these emissions is dominated by agricultural processes, with some chemical processes.
- Oxides of Nitrogen – the output of this pollutant is dominated by vehicle exhausts.

7.17 Epping Forest is particularly vulnerable to air pollution. The decline in epiphytes in the area has been largely attributed to air pollution. However, the management of air pollution is generally a local issue as the major contributor to air pollution are vehicle emissions which decline exponentially with distance from the roadside.

7.18 Similar to water scarcity, air quality is a London-wide problem, with a number of national targets for nitrogen dioxide, ozone and particulate matters levels exceeded. Working to improve air quality across London requires a regional response, as identified in the Mayor's Air Quality Strategy (Clearing the Air, December 2010).

The effects of the Brent Local Plan

7.19 In order to address the poor air quality within the borough, the Council has prepared an Air Quality Action Plan (2017-2022) which details the actions that the Council will undertake over the next five years and how the Council will act to reduce the pollution from transport, construction and local industry. The emerging Local Plan will support the aims of the Brent Air Quality Action Plan.

7.20 Through the implementation of the air quality action plan Brent's contribution to the London-wide problem of air quality will be limited, thus reducing the risk of an adverse impact on Epping Forest SAC. The London-wide problem of air quality is being addressed through a number of strategies: Clearing the Air – the Mayor's Air Quality Strategy, the Mayor's draft Transport Strategy and the Mayor's draft Environment Strategy.

8. Possible in-combination effects

8.1 There is a requirement to consider the 'in-combination' effects of the plan. To assist in establishing whether there is likely to be 'in-combination effects', this section of the HRA details existing and/or future regional trends and developments within neighbouring boroughs. The emerging London Plan Integrated Impact Assessment, emerging London Plan and associated strategies identified a number of issues in the London region which are likely to have detrimental environmental impacts if not addressed. Trends relating to climate change are also likely to have significant impacts for biodiversity which could affect the integrity of European Sites:

- London has seen significant population growth, and current population projections suggest that this is likely to continue with it anticipated that there will be an additional 3 million people in the city by 2050. It is predicted that the population will reach 10.5 million by 2041.
- London's streets are some of the most congested in the world. Lifestyle changes, increased use of internet deliveries, Sunday shopping and the rapidly growing night-time economy has caused changes in travel and congestion patterns in recent years.
- At present, 800,000 people commute into work. This is anticipated to increase to more than 1 million by 2041. In addition, it is anticipated that trips made by Londoners will increase from 20 million to 25 million per day between 2011 and 2041.
- In 2016, London has a total of 5.7 million workforce jobs; this is projected to grow to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041.
- London had a total of 5.7 million workforce jobs, which is set to increase to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041. Provision for employment growth will also lead to additional recreational demand from workers. All of the identified European Sites are popular destinations for visitors from London and from further afield.
- Rising levels of freight and private hire traffic in London.
- Of London's 65 waterbodies, only 2 are rated as good, 50 are moderate, 10 are poor and 3 are bad.
- The number of Londoners exposed to poor air quality has been declining, however it is estimated that in 2020 500,000 people will still be exposed to high levels of NO_2 above the EU limit value. Furthermore, there are high levels of NO_x, $PM_{10}$and $PM_{2.5}$emissions from road transport – it is predicted there will be little or no reduction in PM_{10} and $PM_{2.5}$ emissions from road transport between 2013 and 2030.
- The probability of flooding in London is increasing with climate change.

- The intensification of development in London to accommodate a growing population is likely to increase the UHI and further increase the risk of overheating.
- The relatively dry nature of the South East combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use on the country but also having one of the highest rates of leakage from the water supply distribution network.
- There are six current and anticipated effects of climate change for London: hot summers, more intense rainfall, more frequent and intense heatwaves, changes in seasonality of rainfall, increased urban heat island effect and sea level rise.
- Garden coverage has declined in recent years. If a more proactive approach to the intensification of suburbs to increase housing delivery is adopted, there is likely to be further reduction in the garden coverage of London.

8.2 The major provision of the emerging London Plan, which once adopted will be implemented through the plans and programmes of the London Borough local planning authorities, is the target to provide for an additional 649,350 homes over a ten year period. This equates to an additional 64,935 dwellings per annum. The number of houses that are to be provided in Brent's neighbouring boroughs is identified in Table 4.

Table 13: Draft London Plan targets (2017) for Brent and its' neighbouring authorities

Borough	Draft London Plan Target (2017)	
	Total Ten Year Capacity	Annualised
Barnet	31,340	3,314
Brent	29,150	2915
Camden	10,860	1,086
Harrow	13,920	1,330
Ealing	28,070	2,807
Hammersmith and Fulham	16,480	1,648
Kensington and Chelsea	4,880	488
City of Westminster	10,100	1,010
OPDC	13,670	1,367

8.3 It is considered that the greatest scope for any in-combination effect on the identified European sites is through the delivery of housing and employment land as a result of significant population growth.

8.4 As shown in the below table, the HRA's of the borough neighbouring authorities concluded that no likely significant effect to the qualifying features of the European site would occur as a result of their growth.

Local Planning Authority	**Development Plan Document**	**Year of Production**	**Identified European Sites**	**Conclusion**
Barnet	Core Strategy	2010	Lee Valley, Epping Forest, Richmond Park, Wimbledon Common and Wormley – Hoddesdonpark Woods	There will be no likely significant effect on the integrity of the Natura 2000 sites as a result of Barnet's Core Strategy
Camden	Draft Local Plan	2015	Epping Forest, Lee Valley, Richmond Park, Wimbledon Common	None of the proposed draft policies were found to have likely significant effects on the sites of European Importance for habitats or species, or an adverse impact on the integrity of sites.
Harrow	Core Strategy	2012	Richmond Park, Wimbledon Common, Lee Valley, South West London Water Bodies	The Core Strategy would not have an adverse impact on the integrity of the European sites.
Ealing	Development Strategy	2011	South West London Water Bodies, Richmond Park, Wimbledon Common	The DPD is not likely to give rise to impacts on the European sites identified because one (or more) of the following applies: • Policies intend to protect the natural environment, including biodiversity • Policies intend to conserve or enhance the natural, built of historic environment, where enhancement measures will not be likely to have

Local Planning Authority	Development Plan Document	Year of Production	Identified European Sites	Conclusion
				any negative effect on a European Site. • Policies positively steer development away from European sites and associated sensitive areas
Hammersmith and Fulham	Local Plan	2016	Richmond Park	It is not considered that this site (Richmond Park) would be significantly adversely impacted upon by any of the policies in the Local Plan.
Kensington and Chelsea	Local Plan Partial Review	2015	Richmond Park, Wimbledon Common,	None of the policies that are being reviewed are likely to have a significant/any effect on the relevant Nature 2000 sites.
City of Westminster	Revision to Westminster's City Plan	2016	Richmond Park, Wimbledon Common, Epping Forest, Essex Estuaries, Thames Estuary and Marshes, Lee Valley	Westminster is not situated close enough to any of the designated European Sites for there to be any direct and obvious detrimental effects on these sites as a result of the Special Policy Areas and Policies Map Revision to Westminster's City Plan and therefore a comprehensive Habitats Regulations Assessment is not required for this policy.
OPDC	Local Plan	2016	Richmond Park, Wimbledon Common	None of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites. It is considered that the only effects likely to arise as a result of the implementation of the OPDC Local Plan could be reduced air quality and increased population. These

Local Planning Authority	Development Plan Document	Year of Production	Identified European Sites	Conclusion
				factors could impact the European designated sites through habitat degradation and increased recreational pressure. However the Local Plan policies seek to mitigate this kind of impact and that coupled with standard mitigation measures that are required of such developments it is therefore unlikely that the OPDC Local Plan will have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.

8.5 Furthermore, the draft HRA for the new London Plan concluded that "*there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on European sites, either alone or in combination with other plans and projects'.* It should be noted that it recommended amendments to policies or matters of directions to boroughs, however none of these impacted upon Brent.

9. Assessment Outcome

9.1 This HRA report identified 5 European Sites within 15km of Brent. None of the screened European Sites are within or adjacent to the borough – the closest site (Richmond Park) is 8km to the south. The impact of the Brent Local Plan was screened both alone and in-combination with other projects and plans. The impact pathways of urbanisation and recreational pressure, water levels and water quality, and, air quality, have been assessed. The distance between Brent and the European Sites means that none of these issues will have a direct significant effect on any of the sites.

9.3 The provisions of the Brent Local Plan has also been assessed in-combination with trends and development within London to identify whether any adverse impacts on the European sites would arise. Furthermore, it should be noted the HRA for the new London Plan concluded that there is sufficient protective mechanisms within the London Plan to ensure that the development proposed would not have a likely significant effect on European sites, either alone or in combination with other plans and projects.

9.4 The conclusion of this assessment is the emerging Brent Local Plan **is not likely to have significant effects** on the qualifying features and integrity of the identified European Sites. However, the Council will carry out a further screening assessment following the completion of the Issues and Options stage to identify whether the preferred approach is likely to have a significant effect on the identified European sites.

Brent