

## PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

### Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

### How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

## How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
<b>Growth Strategy</b>		
<b>A</b>	<p><b>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</b></p>	<p>The Local Plan positively plans for growth. It directs most of the growth to eight Growth Areas, three of which are new (Staples Corner, Northwick Park and Neasden) providing new homes and jobs and supporting community infrastructure over the plan period. Elsewhere much of Brent is of consistent suburban character with limited potential for new, high-density development primality due to its low levels of public transport accessibility. Existing industrial areas are protected and jobs increased through intensification of wholly business floorspace, or as part of mixed-use developments. Town centres are promoted as the priority location for main town centre uses. (100 words)</p>
<b>B</b>	<p><b>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</b></p>	<p>5 existing Local Plan Growth Areas have delivered significant growth over the last decade and through expansion provide the opportunity for more. The new Northwick Park Growth Area consolidates existing One Public Estate land to create new public facilities and a sustainable community. Staples Corner and Neasden Growth Areas take under-used industrial land in areas with good public transport (and new potential through the West London Orbital), to provide new homes and jobs. Elsewhere, smaller site delivery, is encouraged through 'Intensification Corridors', turning low density into sustainable car-lite development, in addition to mitigating impacts upon existing receptors and environments. (99 words)</p>
<b>C</b>	<p><b>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</b></p>	<p><b>Growth areas:</b></p> <p>Northwick Park (BNWGA1).</p> <ul style="list-style-type: none"> <li>- One large allocation delivered through One Public Estate in phases. A new residential community with supporting infrastructure, assisting public bodies such as Northwick Park Hospital and University of Westminster to deliver much needed improvements.</li> </ul> <p>Infrastructure: new road, community centre, potential improvements to Northwick Park Station, including step-free access and interchange.</p> <p>Burnt Oak/ Colindale (BNGA1).</p> <ul style="list-style-type: none"> <li>- Currently identified infrastructure includes: improvements to greenspace, further play areas, and improved cycle infrastructure along the A5.</li> </ul>

	KEY QUESTIONS	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Sites: Capitol Way Valley (BNSA1), Colindale Retail Park (BNSA2), Queensbury LSIS and Morrisons (BNSA3). Each subject to masterplanning to identify further infrastructure needs.</p> <p>Wembley (BCGA1)</p> <ul style="list-style-type: none"> <li>- Infrastructure: Junction improvements, nursery and primary school and York House site, new open space, community centre, extension to existing CHP district power network, new health facilities.</li> </ul> <p>Sites: large sites in this Place are numerous, with the majority being carried over from the existing Wembley Area Action Plan.</p> <p>Staples Corner (BEGA2)</p> <ul style="list-style-type: none"> <li>- Infrastructure: significant infrastructure requirements are to be drawn up through forthcoming masterplanning. Currently being assessed with the GLA, for potential co-location of residential and industrial uses. Thames Water have indicated need for extensive water related works.</li> <li>- Sites: One large site allocation with capacities to be drawn out within masterplanning process.</li> </ul> <p>Neasden (BEGA1)</p> <ul style="list-style-type: none"> <li>- Infrastructure: the significant infrastructure requirements within this Growth Area are to be drawn up in the forthcoming masterplanning process. Will require associated infrastructure for the new WLO line.</li> <li>- Sites: One large site allocation with a number of land parcels with capacities to be drawn out within masterplanning process.</li> </ul> <p>Church End (BSGA1)</p> <ul style="list-style-type: none"> <li>- Infrastructure: employment community and health hub, new secondary school at Chancel House, new play facilities and open space.</li> <li>- Sites: Asiatic Carpets (BSSA1), B&amp;M and Cobbold Industrial Estate (BSSA2), Church End local Centre (BSSA3), Chapmans and Sapcoe Industrial Estate (BSSA4), Willesden Bus Depot (BSSA5), Argenta House and Wembley Point (BSSA6), and Unysis and Bridge Park (BSSA7).</li> </ul> <p>South Kilburn (BSEGA1)</p> <ul style="list-style-type: none"> <li>- Infrastructure: expansion of existing schooling infrastructure, new health facilities, improvements to existing and delivery of new open space.</li> <li>- Sites: Numerous sites as included within the South Kilburn Regeneration Masterplan which is Council-led regeneration.</li> </ul> <p>Alperton (BSWGA1)</p> <ul style="list-style-type: none"> <li>- Infrastructure: Improvements to and delivery of new open space and play areas, health facilities, community facilities, nursery, road/ junction improvements.</li> </ul>

KEY QUESTIONS		<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> <li>- Sites: Numerous large sites, notably Alperton Industrial sites (BSWSA1), Sainsbury’s Alperton (BSWSA2), and Northfields (BSWSA7) which already has outline permission.</li> </ul>				
1.	<p><b>Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?</b></p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
<p><b>Reason for score: +2.</b> Yes, the plan clearly articulates the strategy for where and how development will be delivered. It is positively prepared, aiming to meet objectively assessed housing and employment needs. The Plan is well structured, being broken down into 7 ‘Places’ to make it more relevant/understandable for local communities. Each Place is supported by a specific Place policy. This seeks to address each Place’s main challenges and opportunities. Places contain relevant Growth areas and site allocations. Other than the Growth Areas and allocations, the Plan directs growth toward the Intensification Corridors, Town Centres, and high PTAL areas to encourage sustainable development. The remainder of the borough is not likely to change so significantly due to other factors including designated heritage assets and limited potential for good levels of public transport accessibility. The policies to this effect have been assessed throughout the Plan process via the Integrated Impact Assessment; an iterative process, intended to draw out the most sustainable policy outcomes.</p>		<p><b>Implications of taking no further action:</b> The Plan, in its current form, is seen as sound. Therefore, there should be no implications of taking no further action.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: no action required</b></p>				
		<p><b>Reviewer Comments:</b> The Plan seeks to positively address the significant challenges and opportunities to provide for the borough’s predicted population growth and the strategic policies of the London Plan. It focuses development in areas which have or have the potential to have good public transport and currently lower efficiency land use and seeks to intensify them on a scale that provides the potential to create sustainable communities with appropriate levels of supporting infrastructure.</p>				
2.	<p><b>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</b></p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +1.</b> The plan includes a number of site allocations, which are considered to have the potential to make a significant positive contribution to the borough’s housing and employment needs and are likely to come forward for development during the lifetime of the plan. Each of the Place chapters (5.1-5.7) include associated site</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
<p><b>3.</b></p> <p><b>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</b></p> <p><b>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</b></p> <p><b>Does the level of housing provide for an appropriate and justified buffer?</b></p>		<p>allocation policies which provide further detail on the council’s aspirations for development along with indicative capacities and timeframes. The methodology used for assessing site capacity is based on the London SHLAA to ensure consistency across sites. Some strategic sites will be subject to further detailed masterplanning e.g. Neasden Stations Growth Area, Church End and Staples Corner. As part of this, further work is being undertaken to assess site capacities and deliverability and to set out aspirations in greater detail.</p> <p><b>Implications of taking no further action:</b> None</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a</p> <p><b>Reviewer Comments:</b> The assessment of capacity has been largely based on standard methodologies together with information provided by site owners/ developers. The complex nature of some of the sites means that more masterplanning work will have to be undertaken to firm up specific capacities of residential and industrial floorspace in particular that will require further analysis of social and physical infrastructure required.</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> +1. Consistent with national planning policy, Brent is subject to general conformity with the London Plan. The London Plan sets the borough’s housing target taking account of objectively assessed needs and the capacity to deliver them. The London Plan has been going through review and uses London demographic information to identify housing needs. This is considered to better address London’s characteristics than ONS data which is used in the standard national method. The London Plan also takes account of the capacity of the boroughs to be able to meet the London target overall, through a relatively detailed assessment of delivery sources. Policy BH1 Increasing Housing Supply in Brent sets out the Council’s housing requirement based on the draft London Plan target minimum target of 23,250 dwellings for its first 10 year period and then beyond the Brent’s Strategic Housing Market Assessment 2018 (SHMA) for the period to 2041. This SHMA took account of national guidance/ practice at the time, including the emerging national methodology. The SHMA objectively assessed need is below that of the national methodology, principally as a result of the standard methodology’s application of the market adjustment figure. Taking account of the work that it has done to identify capacity, the Council believes it has identified the maximum that it reasonably can for the years beyond 2028/29. What it is providing is a step change in delivery from London Plan targets that informed the Core Strategy (1065 dwellings per annum) and current London Plan targets (1525 dwellings per annum). The monitoring targets in relation to phases of the Plan is outlined in the Plan’s Appendix 3 and an associated supporting document of the housing trajectory. The Council has sufficient evidence to</p>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		show delivery of the 23,250 10-year target as greater than 10% buffer has been identified in its housing delivery trajectory that provides flexibility should sites for whatever reason not come forward as anticipated.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right: More sites and greater certainty that delivery can be achieved.</b>				
		<b>Reviewer Comments:</b> Within London, where there is a strategic plan, which views London’s housing market as a whole, the borough’s Plan takes its target from the London Plan. This target for Brent is subject to verification through an examination process. It takes account of needs and then the capacity to deliver them, through for example the London SHLAA. The borough has sought to maximise identifying deliverable sites to achieve higher targets, as the draft London Plan originally had a target of 29,150 dwellings for the first ten years. The Plan was not able to show how it could deliver this higher target. The Local Plan process and call for sites has not identified any significant capacity sources that the Council has not already considered. Nearly all sites identified in the ‘call for sites’ have been identified as allocations, with those not being subject to significant environmental constraints, or other policy designations (such as industrial).				
4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. Green Belt releases is not a matter for Brent’s Local Plan.				
		<b>Implications of taking no further action:</b> No greenbelt within Brent and therefore no implications.				
		<b>Mitigation / Action required (if necessary) to move scale to right: n/a</b>				
		<b>Reviewer Comments:</b> Brent has no Green Belt.				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. Sites identified within the Brent Local Plan have arisen through numerous avenues. First those yet to be delivered, but are distinctly deliverable in planning terms, from the previous version of the Local Plan have been carried over to the new document. The London Plan SHLAA 2017 went through a rigorous Call for Sites process,				

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>which identified sites in collaboration with the boroughs, land owners, and stakeholders using a consistent approach. Brent also undertook its own Call for Sites in April 2017 which helped identify a number of other sites which have now been allocated, using the same approach as the London Plan SHLAA as is compatible with the NPPF. Each site allocation (and those rejected) has gone through a sustainability appraisal, assessing them holistically against a range of criteria. Industrial land allocations have been supported by West London and Brent Employment Land Assessments, taking account of London Plan policy of Brent’s ‘provide capacity’ status. A viability Assessment (Core_Gen_01) has been undertaken. It assesses the cumulative requirements as outlined within Local, regional, and national plan policy. The Plan policies will allow development to be viable. Where site-specific issues come up, viability assessments will allow for flexibility on policy requirements, such as the proportion of affordable housing so as to not undermine the sites delivery.</p>				
		<p><b>Implications of taking no further action:</b> No action required.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p>				
		<p><b>Reviewer Comments:</b> Brent does not have extensive areas of greenfield land to call upon for site allocations. Neither does it have extensive tracts of vacant previously developed land sitting idle. Most land is in use, although potentially, not being used as efficiently as possible. The Council has undertaken a call for sites and worked closely with the GLA on the SHLAA, with the GLA in particular pushing the potential for housing capacity on many sites. Documents such as the Tall Buildings Strategy which identifies extensive areas, with the capacity to go above 10 storeys, indicate the positive approach. The Sustainability Assessment of the sites shows a consistent and justified approach to allocation.</p>				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> +2 The borough has been subject to limited interest in neighbourhood planning. Two neighbourhood plans have been made to date and one forum is in the early stages of taking forward a plan. The Council considers that strategic borough wide policies which it has identified in Appendix 6 of the Plan for the purposes of neighbourhood planning, such as growth areas, site allocations and intensification corridors provide a sufficient positive framework for ensuring that neighbourhood areas support the delivery of homes.</p>				
		<p><b>Implications of taking no further action:</b> None</p>				
<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p>						



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p><b>Reviewer Comments:</b> The approach is considered proportionate. No forum has sought to take forward a plan that seeks to limit delivery of new homes, indeed Harlesden Neighbourhood Plan allocated some sites and was keen to ensure increased delivery of new homes to meet needs.</p>				
<b>7.</b>	<b>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2.</b> Each site allocation (outlined in chapters 5.1-5.7 of the Plan) includes the following sections: existing use; allocated use; indicative capacity; timeframe for delivery; address; area; site description; ownership; planning history; PTAL; planning considerations; risks; design principles; infrastructure requirements; and justification. Combined, these sections provide some flexibility along with prescriptive detail on what the council would like to see delivered. The design principles and planning considerations helps prospective developers understand which matters require specific attention on site. The allocated use, indicative capacity, infrastructure requirements and delivery timeframes outline what is required to bring the site forward sustainably.</p>				
		<p><b>Implications of taking no further action: None</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move score to right: More detailed masterplanning on the sites/ greater level of site investigation.</b></p>				
<p><b>Reviewer Comments:</b> The allocations vary in scale and delivery timetable. For some of the larger, more long-term ones, the broad principles are set out, whilst there is an expectation that supplemental masterplanning will occur, this can either be led by the borough, or by the developer. In some cases, this may well identify greater capacity (usually this is the case between allocation and then planning application/permission), or in exceptional circumstances, could highlight significant issues that reduce it.</p>						
<b>D</b>	<p><b>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</b></p> <p><b>List these targets and the evidence source for this 'need' target?</b></p>	<p>Brent is identified within the London Plan as a 'Provide Capacity' borough for industrial land, and needs to secure an additional 49ha equivalent (according to GLA statement of conformity representation) to assist London in meeting its strategic employment targets and in maintaining its position as a global city. The West London Employment Land Review however identifies a need of 0.6 additional hectares of industrial land for Brent. The Council does not set a target in the Local Plan, but uses the London Plan policy framework to set minimum floorspace requirements in development of industrial uses.</p> <p>The Brent Retail and Leisure Needs Assessment 2019 identifies limited additional retailing and leisure floorspace needs across the borough. Given the limited scale of these needs and limited interest shown more recently in retail development in the borough, the Council does not identify any specific targets for town centres or places.</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
<b>8.</b>	<p><b>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: -1. The Plan provides a positive framework to accommodate employment growth.</b>                      London Plan policy states that development on SIL and LSIS land should be intensified to a plot ratio of 0.65 or no net loss, whichever is greater. Brent Local Plan policy BE2 supports this, and identifies which employment sites are appropriate for industrial intensification, or intensification through co-location. To assist in meeting both the housing and employment land targets set by the Mayor, sites within both SIL and LSIS have been allocated. To achieve this some of the site allocations, including Staples Corner SIL and Neasden Stations areas will be subject to masterplanning. This will ensure that the overall quantum of employment floorspace is achieved across the site, whilst assisting Brent in achieving its housing target. Each site allocation (in chapters 5.1-5.7) includes within it a requirement for the provision of certain floorspace, either re-provision or new facilities. The Council through its evidence base can show a theoretical physical capacity to meet the target if applying London Plan policies, it does not however have the confidence that this delivery will occur. Recent history and its own evidence base (Brent viability assessment and West London Employment Land Study) indicate that viability is a significant issue. The London Plan policies are untested in terms of deliverable schemes to date, particularly in relation to multi-storey development, or providing replacement industrial floorspace before any dwellings can be built/occupied on intensification sites. Brent's evidence base indicates in all but the strongest performing areas (Park Royal which is now in OPDC area), that cross-subsidy from other development is required. In addition to this a significant part of Brent's benchmark of 49 hectares as identified by GLA is derived from Park Royal SIL which is within the OPDC area. Brent will have to work with OPDC to identify what can be delivered in that area.</p>				
		<p><b>Implications of taking no further action:</b> risk of not meet both housing and employment floorspace targets.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Design masterplans associated viability assessment for large site allocations to demonstrate how capacity can be met.</p>				
<p><b>Reviewer Comments:</b> The evidence base on this matter is mixed in terms of identified needs/ deliverability. There is no dispute in the evidence over the fact that industrial capacity is now needed in West London, it is more the specifics of how much and how it will be delivered. As yet, much of the GLA work identifying capacity is theoretical, whilst recent delivery within Brent suggests that industrial intensification on its own is not currently a viable prospect, but can be delivered if supported by residential enabling development.</p>						
		-2	-1	0	+1	+2

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +1 i) An Infrastructure Delivery Plan (EB_I_01) has been produced in support of the Local Plan. As far as practicable, it identifies what type of infrastructure/infrastructure projects are required, who will deliver them and when and how they will be funded. The IDP has informed relevant site allocation policies in terms of particular infrastructure requirements e.g. the need for a new school in Wembley Park. Relevant site allocation policies and Policy BSI1 enable infrastructure provision. The IDP is viewed very much as a rolling work in-progress, taking account of inputs from the various infrastructure providers over time, rather than a static document. This will inform and be informed by for example funding allocations/ spend such as CIL.				
		<b>Implications of taking no further action:</b> No further action is not proposed. As identified the study will be updated on a rolling basis.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
		<b>Reviewer Comments:</b> The document is considered to be appropriate given that it has been informed by discussions with providers, some of who do not have long-term infrastructure planning approaches and have only been able to identify short term projects. There is clearly a significant gap across London as identified by the Mayor in terms of the availability of funding pots to match the delivery of required infrastructure when taking account of what development can reasonably be expected to deliver through CIL or S106. The Council has been clear with communities that at this stage it cannot resolve all infrastructure needs as a result of increased population through development. It is likely to require substantial increases in funding from central government, either directly to the Council/other providers such as CCG, or the Mayor. The IDP is a document that will assist in bids for funding.				
10.	Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?  Have you identified the extent of any funding gap? If so, are you able to explain	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +1. i) The Infrastructure Delivery Plan (EB_I_01) supports the Local Plan, identifying the necessary infrastructure to support growth within the borough. This includes social infrastructure such as schools and healthcare, transport, utilities etc. This was produced in liaison with Council service providers and the relevant infrastructure providers. It also identifies potential funding sources, allocated funding and the funding gap. This is a live document, which the Council will update on an on-going basis as, and when new relevant information presents itself, ensuring the first 5 years of the plan in particular, are deliverable. Some transport improvements, such as at Northwick Park have been supported by national funding pots such as GIF (£10 million). Others such as the West				

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
	<p><b>why you are confident that any gap can be addressed?</b></p>	<p>London Orbital are going through the processes necessary for them to become recognised projects. This will take time and funding at this stage is not certain. Transport for London have commented on/ been engaged throughout the Plan process. With the exception of Northwick Park where the transport improvements are regarded as necessary before development can commence/ be delivered, for other sites there are no significant pieces of infrastructure that are so fundamental that they will result in the development not coming forward. The Council together with providers will seek to identify/ secure funding through recognised, or new funding mechanisms when they become available to support delivery.</p>
		<p><b>Implications of taking no further action: Not proposed</b></p>
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Greater clarity at a national and regional level on the amounts of funding that will be available to service providers to support capital and revenue investment to support increased population growth.</p>
		<p><b>Reviewer Comments:</b> The approach is pragmatic and reflects the realities of funding for public sector projects in particular. The substantial rise in house building/ population increases that the Government expects the GLA/ London boroughs to accommodate and plan for will require similar levels of commitment centrally in terms of financial support to make up the balance between what development can achieve and infrastructure requirements it generates.</p>
	<p align="center"><b>Process and Outcomes (see also Toolkit Parts 2 and 3)</b></p>	
<p><b>E</b></p>	<p><b>What are the cross boundary strategic matters affecting your local plan policies update? List these.</b></p>	<p>The following issues have been addressed in the Statement of Common Ground for London Boroughs &amp; the GLA (EB_SOCG_01):</p> <ul style="list-style-type: none"> <li>- Housing</li> <li>- Tall buildings</li> <li>- Protected views</li> <li>- Employment</li> <li>- Transport</li> <li>- Green infrastructure and sports facilities</li> <li>- District heating</li> <li>- Waste</li> <li>- Schools</li> </ul>

	<b>KEY QUESTIONS</b>	<b>Assessment</b> <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> <li>- Industrial Land</li> </ul> <p>Other strategic issues which have been addressed with strategic stakeholders are:</p> <ul style="list-style-type: none"> <li>- TFL (EB_SOCG_02): WLO, buses, station accessibility, station capacity, cycle network, freight, electric vehicle charging points, existing infrastructure, Transport for London Road Network.</li> <li>- Canal &amp; River Trust (EB_SOCG_03): active transport route, open space and biodiversity, freight, heating and cooling, boating, welsh harp.</li> <li>- Environment Agency (EB_SOCG_04): air quality, open space, biodiversity, flood risk.</li> <li>- Thames and Affinity Water (EB_SOCG_05): water.</li> </ul>				
<b>11.</b>	<b>Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: 2+.</b> i) Yes, each of the listed issues has been addressed in our suite of SOCG documents (EB_SOCG_01-05) and supported through cross referencing in the DtC statement (CORE_GEN_06). ii) Yes, the bodies have been listed, and separate statements produced specifically for key strategic partners. iii) The SOCG for London boroughs and the GLA clearly lists where agreement/ disagreement is held, and seeks the sign off from signatories to confirm outlined stances. The statements for the strategic partner organisations reference representations made at Reg 18 stage by the associated organisation, and how the Council has addressed this within the document. Each statement states the known position of the organisation, and how the Council is working to address this</p>				
		<p><b>Implications of taking no further action: Inevitably there are still some matters that will require resolution throughout the examination process and beyond. The Council will seek to resolve these issues, such as industrial capacity (with the GLA), flooding (with the Environment Agency) and national strategic road network (with Highways England).</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: Continued engagement.</b></p> <p><b>Reviewer Comments:</b> The Council has actively engaged with stakeholders and neighbouring boroughs/ OPDC on an on-going basis and for the most part there are no substantive areas on which there are disagreements. Matters outstanding are the conformity with the emerging London Plan, where dialogue is on-going, but there is still a difference of opinion on the extent to which Brent is considered to be delivering on industrial intensification. The Council has updated its sequential and exceptions test, SFRA Level 2 and IIA to address matters raised by the EA at Regulation 19 stage. Once the EA have had time to digest the contents, further work will take place, areas/ of agreement/ disagreement will be clarified. For Highways England (HE), the Council considers that the matter is also</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		of strategic importance to London and so has sought to work with TfL and HE to identify the extent to which modelling of the strategic road network already exists and how growth (which for the most part will be car free/ car lite) will impact on HE assets.				
<b>F</b>	<p><b>Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</b></p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	Draft London Plan Policy H2 on small sites notes that London boroughs may request financial contributions for off-site provision of affordable housing on developments with fewer than 10 dwellings. The Council in BH2 is seeking to require financial contributions from small sites (between 5-9 dwellings) in lieu of provision on site. This reflects the need for affordable housing (as evidenced through the Brent SHMA 2018 and representations received/ Council Housing Strategy), the Local Plan viability assessment which shows it can be sought without affecting viability and the number of homes that are anticipated to come forward from small sites.				
<b>12.</b>	<p><b>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +1.</b> The Local Plan identifies land currently designated as Strategic Industrial Land (SIL) at both Neasden and Staples Corner for co-location of residential and industrial. The London Plan does not allow co-location on SIL. It requires separation of uses and intensification of sections of SIL purely for industrial use prior to delivery of residential to ensure no overall loss of industrial floorspace capacity occurs. Land is then taken out of SIL for other uses. This is not seen as feasible by the Council in helping deliver both housing and industrial land targets and does not take sufficient account of the opportunities that two sites offer through existing and improved transport infrastructure potential. At Neasden, the Council proposes to allocate SIL as Locally Significant Industrial Site, on which the London Plan allows co-location. It considers that the SIL in this location is functionally distinct from the remainder of the Wembley SIL, being separated from it by a railway line. On Staples Corner it is seeking the flexibility to deliver intensification of industrial through mixed-use co-location if shown as a better outcome through</p>				

KEY QUESTIONS		<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>masterplanning. The aim in both scenarios is to be London Plan compliant in terms of quantum of industrial floorspace delivered to be consistent with London Plan policy.</p> <p>In addition to this the London Plan also identifies Brent as a Provide Capacity borough, needing to delivery an additional 43ha of industrial land or equivalent floorspace (this amount is identified in supporting London Plan evidence base, rather than the Plan). GLA identify that an additional 6ha is required to make up for the loss of Northfields SIL land, which now has permission for a mixed-use development, which wasn't included in the 43 hectares. The GLA do not believe the Local Plan effectively plans for the meeting of this target. They wish to see specific amounts identified for each industrial area and demonstration of specific measures, such as site allocations, that the target can be met strategically. The Council has consistently identified that the GLA's policy is very ambitious and does not reflect local viability, historic delivery or industry sector ambitions, for example multi-storey large scale industrial is essentially an untested contemporary product for a notoriously conservative development sector. The London Plan Examination Panel identified in the report misgivings about the GLA's policy to deliver. They considered that the GLA should potentially identify more boroughs as 'provide capacity' in the short term, and in the next review of the London Plan consider looking at green belt review to potentially deliver to meet needs. The Mayor rejected these options.</p> <p>As it stands, the Council and GLA are unlikely to agree on this matter. As such, the Council feels it has the evidence that for Brent will allow a local approach, broadly consistent with the aim of London Plan policies E4-7 in meeting for industrial occupiers needs, albeit in a different way and this is in general conformity with the London Plan.</p> <p><b>Implications of taking no further action: Dialogue will continue with GLA</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right: Change in either London Plan policies/ GLA interpretation of them, or Brent Local Plan policies</b></p> <p><b>Reviewer Comments:</b> The review is a fair assessment of where the Council considers it is.</p>				
13.	<p><b>Is the local plan policies update:</b></p> <ul style="list-style-type: none"> <li>• <b>in conformity with any 'higher level' plans prepared by the Council; and</b></li> <li>• <b>properly reflecting provisions of any made neighbourhood plan?</b></li> </ul>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2.</b> The Local Plan will replace the existing hierarchy of development plan documents headed up by the Core Strategy. The Local Plan is aligned with the aims of the Brent Borough Plan 2019. It has also been positively produced in conjunction with a number of other associated evidence base documents produced by other service providers within the council, such as the Local Implementation Plan and Long Term Transport Plan. The Local Plan provides a framework to guide future neighbourhood plans – clearly identifying in Appendix 6 which are strategic policies they need to follow. The Plan makes reference to existing Neighbourhood Plans.</p>				

<p><b>KEY QUESTIONS</b></p>		<p><b>Assessment</b></p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
				<p><b>Implications of taking no further action: none</b></p>		
<p><b>Mitigation / Action required (if necessary) to move scale to right: None</b></p>						
		<p><b>Reviewer Comments:</b> In developing the Council’s Local Plan policies there has been a significant amount of engagement internally within the Council. The Plan has informed the Council’s corporate Plan/ vision for the borough and vice-versa. In relation to neighbourhood planning, the Sudbury Neighbourhood Forum considers that the Local Plan is inconsistent with the Sudbury Neighbourhood Plan. This is due to the impact of ‘intensification corridors’ on the character of Sudbury, site allocations being inconsistent with the neighbourhood plan and Vale Farm, a local green space, being identified as having the potential as a regional leisure facility. The Council does not consider this to be the case. The Sudbury Plan has no policies on protecting suburban character, has no policies related to the proposed site allocations and for Vale Farm, the Council has summarised the neighbourhood plan’s contents, rather than reproducing them verbatim. There is no specific allocation for Vale Farm in the draft Brent Local Plan. The Vale Farm leisure centre is a facility that is approaching its end of life and the Council’s agreement with its current provider terminates within the next 5 years. As yet there are no clear plans on what the Council might seek to do with this facility.</p>				
<p>14.</p>	<p><b>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</b></p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p><b>Reason for score: +2.</b> The Statement of Community Involvement (CORE_GEN_05) has been produced in accordance with TCP regulations and is compliant with them. At various stages of its production, the Local Plan has gone beyond the requirements as outlined within the SCI. The engagement to date is set out within the Statement of Consultation.</p>				
		<p><b>Implications of taking no further action: none</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: n/a</b></p>				
		<p><b>Reviewer Comments:</b> There has been a significant amount of engagement on the Local Plan. This is thoroughly addressed in the consultation statement related to each stage. Regulation 18 was extensive in seeking to set out the issues and options for people to understand and for them to identify how to address preferred outcomes. The Council sought to engage extensively with neighbouring boroughs, OPDC and Mayor/GLA. Organisations such as the Environment Agency (EA) were invited to sit on the steering group for the West London SFRA, which Brent the commissioning of. The EA along with other bodies like the CCG, Director of Public Health were instrumental in</p>				



<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		appraising the Integrated Impact Assessment objectives setting and measures on which policies should be assessed. The Council on the preferred options document leafleted every home in the borough to advertise the consultation.				
<b>15.</b>	<b>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?</b>	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. This has been addressed within the Integrated Impact Assessment (CORE_GEN_02). In this document each policy has been assessed holistically against a range of criteria. Each policy is accompanied by at least 2 alternative policies, which have also gone through the same assessment. In addition, a detailed appraisal against the IIA assessment framework assessed the likely significant cumulative effects of the plan as a whole.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> The Council undertook the IIA, with officers on their respective topics considering the IIA objectives when drafting the policies/ assessing impacts, rather than the document being given to a third party consultant to complete. The Issues and Options document set out options for policy. It was clear that reasonable alternatives were considered. As such it considered that the IIA has been used as a positive tool to shape/ be integrated into the Plan and improve its outcomes.						
<b>16.</b>	<b>Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?</b>	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. As stated above, this has been addressed within the Integrated Impact Assessment (CORE_GEN_02). Each policy having been addressed against a range of criteria. The established criteria and associated metrics were drawn up in collaboration with stakeholders, including the Environment Agency. This has facilitated their effective assessment, enabling the Council to identify the most sustainable policy solutions.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> As for above.						

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>17.</b>	<b>Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +1. The IIA demonstrates how policies have been assessed, and how this has influenced which policies have been chosen for the final document. This is an iterative process, which has been followed throughout the Plan, with comments on how the resulting favoured policies have been reached.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> As identified above, the consideration of the objectives within the IIA allowed officers to consider the potential of the policy to wider address issues and consider impacts in the round.				
<b>18.</b>	<b>Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> The IIA clearly sets out how each policy has been assessed. An EQIA explains the methodology the council used in its equalities assessment. Like the IIA, this too was an iterative process followed through the production of the Plan, providing comments as to how the policies have been reached through the consideration of protected characteristics.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> none				
		<b>Reviewer Comments:</b> Similar to the above, officers considered impacts on groups with protected characteristics within the policy which allowed amendment/ shaping policies to better support outcomes.				
<b>19.</b>	<b>Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p><b>Reason for score:</b> +2. The HRA has been appended within the IIA (CORE_GEN_02), but is separate to it. The HRA has considered the local plan policies in conjunction with other connected plans/ projects where relevant.</p> <p><b>Implications of taking no further action:</b> None</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p> <p><b>Reviewer Comments:</b> The HRA has been undertaken and early engagement occurred with Natural England to agree this assessment.</p>				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> +2. The policies have been screened, and a 'finding of no significant effect report' has been produced. Therefore, it is not required to move onto stage 2, appropriate assessment.</p>				
		<p><b>Implications of taking no further action:</b> None</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p>				
		<p><b>Reviewer Comments:</b> Stage not necessary as scoped out through the Assessment.</p>				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> +2. The HRA concluded that a comprehensive assessment of the plans potential impacts was not required, and therefore did not impact upon the direction of the preferred policies.</p>				
		<p><b>Implications of taking no further action:</b> N/A</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> N/A</p>				
		<p><b>Reviewer Comments:</b> N/A</p>				
<b>Housing Strategy</b>						

KEY QUESTIONS		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>22.</b>	<b>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +1.</b> The Housing trajectory demonstrates that we have the capacity required, including for a greater than 10% buffer, to meet our housing need in the period to 2028/29 as set out in the emerging London Plan. It should be recognised that this is a substantial increase on existing London Plan policy (1525 dwellings) which itself was significantly higher than the 10665 dwellings that informed the Core Strategy. For the years beyond 28/29 the Council has identified sufficient sites to deliver more than has been identified in the Brent SHMA 2018 as objectively assessed housing need for the borough. There is a small buffer in relation to longer-term needs of nearly 10%. The Council has sought to maximise delivery and does not consider that any other alternatives would be sound. Sites that have been identified by those making representations have either been included, or the few that have been excluded have been so on the basis of their conflict with other policy requirements, such as London Plan industrial land policies.				
		<b>Implications of taking no further action for local plan soundness and/or effectiveness:</b> None.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Review site capacities and sources of supply taking account of delivery in the early years of this Plan.				
<b>Reviewer Comments:</b> The Council had a higher initial target set in the December 2017 London Plan. It sought to use all reasonable alternatives to achieve that target, yet still could not achieve it despite positively planning for growth. Representations on the Plan have not been able to identify realistic deliverable alternatives. The need to identify sites is one component of delivery. The scale of development required to meet London's/country's overall needs is vast and comparable to post war years of significant state intervention in direct delivery. Notwithstanding the need, affordability is a significant issue, which in particular for the market, which is the main deliverer currently of new homes, may prove to be one of the most significant limiting factors.						
<b>G</b>	<b>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</b>	No, see the Statement of Common Ground. Each London Borough adjacent is seeking to provide for its London Plan target as a minimum, whilst some boroughs such as Barnet and Westminster are seeking to go slightly higher taking account of their own evidence on objectively assessed needs.				
		-2	-1	0	+1	+2

<p><b>KEY QUESTIONS</b></p>		<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
<p align="center"><b>23.</b></p>	<p><b>Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?</b></p>	<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p><b>Reason for score:</b> Does not apply therefore +2.</p>				
		<p><b>Implications of taking no further action:</b> NA</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> NA</p>				
		<p><b>Reviewer Comments:</b> NA</p>				
<p align="center"><b>24.</b></p>	<p><b>Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</b></p> <p><b>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</b></p>	<p align="center">-2</p>	<p align="center">-1</p>	<p align="center">0</p>	<p align="center">+1</p>	<p align="center"><b>+2</b></p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p><b>Reason for score:</b> +2. The London Plan sets a housing target for the Council of 2,325 units per annum. Appendix 3 of the Local Plan, which is supported by the Housing Trajectory, states the following for the four 5 year periods of the Plan to 2041: Period 1 2,325 units; period 2 2,325 units; period 3 2,543 units; period 4 1,268 units. The trajectory reflects the fact that there is more certainty in the short to medium term due to the sites that are known to be likely to be available, and therefore we can have more confidence in the sites, which can come forward. IN the intervening period more sites are likely to be identified before the end of the Plan period due to windfalls, where sites currently in existing alternative uses come forward for variety of reasons.</p> <p>The strategy for delivery is clearly articulated within policy BH1, stating our housing target, strategy and reference to the housing trajectory; and policy BH2 in identifying priority areas for additional housing provision, including growth areas, site allocations, town centres, high PTAL areas, and intensification corridors.</p>				
		<p><b>Implications of taking no further action:</b> None</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> none</p>				
		<p><b>Reviewer Comments:</b> The strategy reflects delivery levels that have been consulted upon and have had the input of the many site owners/ developers. A key element of delivery is market appetite. As most development is private sector led or will seek to provide for a significant amount of private sector need, it is highly dependent on the economic cycle and developers and occupiers having finance available to sustain prices and demand to occupy. If</p>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		this tails off significantly, then there is a risk of delivery being affected, unless the state can intervene to replace the demand/ financial certainty.				
<b>25.</b>	<b>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. i) Specific deliverable sites identified which pertains to a full 5 year housing land supply on adoption of the plan. ii) Beyond the initial 5 year period there are additional sites providing significant supply going forward for the remainder of the plan period as identified above. iii) To date the Council has performed well in terms of the delivery tests. It is not subject to the 20% buffer. It has a greater than 10% buffer for the first 10 years, which gives greater confidence that sites should be available to deliver, subject to the market being able to support sustained delivery.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> The Council has sought to provide a buffer so that it does not fall foul of the housing delivery test.				
<b>26.</b>	<b>Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +1. See above in relation to the first 10 years. For the latter period to 2041 there is more than the 2018 SHMA objectively assessed needs identified. There is a buffer above the 5%, but just below the 10%.				
		<b>Implications of taking no further action:</b> May not have sufficient capacity under unforeseen changes in circumstances.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Monitor delivery in the early years of the Plan to see if there are any consistent circumstances in which delivery is above that from identified sources of capacity in the existing Local Plan. This may allow better identification of opportunities than currently exists.				
		<b>Reviewer Comments:</b>				

KEY QUESTIONS		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The Council has sought to go beyond the minimum provision in what should be acknowledged as a significant increase in a short space of time on targets set. Changes in policy and developer solutions to delivery and occupier preferences will alter with the changes in circumstances, much as they have done in the past, e.g. tower developments of apartments are the norm, whereas 10 years ago they were atypical.				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +1.</b> The plan figure does rely on the continued provision of windfall sites (sites not allocated and below 25 units). The draft London Plan initially made some bold assumptions on small site delivery from windfalls. Ultimately the Panel did not accept these figures, but suggested an alternative that they considered more reasonable. The Council along with other West London boroughs commissioned a consultant to review the London Plan assumptions. This evidence was critical in informing the Panel's recommendations. Although the draft London Plan has been amended to include a standard windfall delivery assumption, the Council considers this to still be optimistic. It therefore in its housing delivery trajectory has assumed a stepped approach to delivery consistent with the West London small sites potential evidence base document. This delivers London Plan assumed rates after the first 10 years of the Plan. As such if the London Plan Panel's assumptions are correct, there will be significantly more dwellings delivered from windfalls than the Council has identified in its trajectory.				
		<b>Implications of taking no further action: The Council may have underestimated delivery of overall levels of housing in its trajectory.</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Review early implications of small sites policy to see if the trajectory needs amending to increase delivery from the windfall source when the Plan is reviewed.				
<b>Reviewer Comments:</b> The Council's approach is considered pragmatic and reasonable. It limits the risk of under-delivery against the trajectory and places greater emphasis on identifying specific sites to deliver the capacity needed to meet London Plan minimum targets/ objectively assessed needs for the longer term.						
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> Yes, this is done through overarching policies: BH3 (build to rent), BH5 (affordable housing), BH6 (housing size mix), BH7 (accommodation with shared facilities or additional support), BH8 (specialist older				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		persons housing), BH9 (gypsy and traveller accommodation). The individual site allocation policies outline their specific requirements, if this includes non conventional delivery etc..				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: none</b>				
		<b>Reviewer Comments:</b> The Council has sought to address these needs as best as it can, recognising that in some cases the mechanisms for delivery are subject to change/limited certainty, such as older peoples or specialised housing, or are at an early stage in their development, e.g. build to rent. The Plan seeks to provide opportunities to meet the housing needs of groups identified above where possible, but in some cases allows flexibility to not deliver where this would otherwise slow down delivery or render a development unviable.				
<b>29.</b>	<b>Does the local plan policies update specifically address the needs of different groups in the community?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> The Plan has a range of policies which seek to meet the specific needs of different communities within the Borough. This includes policy BH7 which lists requirements for accommodation with shared facilities or additional support. Policy BH8 which seeks to deliver greater specialist housing for older people, and meet the associated London Plan target of 230 dwellings. As well as policy BH9, which seeks to deliver pitches for Gypsy and Travellers.				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: None</b>				
		<b>Reviewer Comments:</b> Similar to the question above. The Council has sought to address these needs as best as it can, recognising that in some cases the mechanisms for delivery are subject to change/limited certainty, such as older peoples or specialised housing, or are at an early stage in their development, e.g. build to rent. The Plan seeks to provide opportunities to meet the housing needs of groups identified above where possible, but in some cases allows flexibility to not deliver where this would otherwise slow down delivery or render a development unviable.				
<b>30.</b>	<b>Can your affordable housing requirements, including any geographical variations, be justified?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Does the local plan policies update provide for the delivery of the full need for</b>				
<b>Reason for score: +2.</b> The strategic aims of affordable housing for London Boroughs is outlined within the Mayor’s new London Plan. This has been evidenced by a viability assessment. Where the London Plan allows for boroughs to						



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<b>affordable housing? If not, can you explain and justify why?</b>	<p>address local circumstances, the Brent Local Plan provides policies to cover these matters. The overwhelming need, as outlined within the Brent and West London SHMA is for genuinely affordable housing products, such as social rent and London affordable rent. Therefore the discretionary 40% for affordable housing tenure, as to be decided by London boroughs, has been allocated to this. These requirements are set out within policy BH5, which makes reference to the London Plan threshold approach. Its ability to be provided along with other policy requirements within the plan has been drawn out within the viability assessment.</p> <p>The need for affordable housing in Brent, and the Greater London Area is substantial. It is not feasible to meet this requirement over the plan period. National policy requires that affordable housing requirements be realistic, with particular regard to viability. In accordance with the new London Plan, and the Brent Viability Assessment, the final proposed requirements have been arrived at. Although these are ambitious, they still do not meet the objectively assessed need. We find this strikes a balance between ensuring viability and therefore delivery, and enabling a significant proportion of our affordable housing need to be met.</p>				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: N/A</b>				
		<b>Reviewer Comments:</b> The response of the Council is considered proportionate, related to evidenced needs and viability impacts.				
<b>31.</b>	<b>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</b>  <b>Does the local plan policies update make adequate provision for the identified needs?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: 1+.</b> The London Plan uses a revised definition for Travellers and Travelling showpeople. The West London Gypsy and Traveller and Travelling Show People Accommodation assessment used the NPPF definition of Gypsy and Travellers and the alternate emerging London Plan version. For the London Plan definition the need is for 90 pitches, as opposed to 0 under the NPPF definition. The Council is awaiting clarity on the definition as the Mayor has ignored the Panel’s recommendation to use the NPPF definition. Policy BH9 seeks to meet this identified need. To do this, sites for residential development within Growth Areas that are over 1ha will need to robustly consider the potential for the incorporation of Gypsy and Traveller sites within their application.				
		<b>Implications of taking no further action:</b> If the London Plan definition prevails there is the potential for needs to not specifically be met.				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> Identify specific sites for delivery.				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p><b>Reviewer Comments:</b> The current differences in definition creates very different needs, which it is assumed the Secretary of State will provide clarity on. If the London Plan policy prevails, then the Council considers that the Plan has a sufficiently robust policy to allow for delivery on a range of identified potential sites and to also allow assessment of any applications for travellers and gypsy accommodation on sites outside these areas.</p>				
<b>32.</b>	<b>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score:</b> 0. The uncertainty is related to what constitutes defined need. Against the national definition, there is no need, against the Mayor’s definition there is significant need.</p>				
		<p><b>Implications of taking no further action:</b> Specified need is not met locally.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Secretary of State directs the Mayor to accept the national definition. Or the Council works to specifically identify allocations.</p>				
		<p><b>Reviewer Comments:</b> The current differences in definition creates very different needs, which it is assumed the Secretary of State will provide clarity on. If the London Plan policy prevails, then the Council considers that the Plan has a sufficiently robust policy to allow for delivery on a range of identified potential sites and to also allow assessment of any applications for travellers and gypsy accommodation on sites outside these areas.</p>				
<b>H</b>	<b>List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery</b>	<p>There is one site, Lynton Road (30 pitches), which is to be retained within Brent. No additional sites have been identified. The Council is working with the community on site to increase capacity. In reality this likely to move towards more permanent structures of more than a single storey as occupiers undertake limited travel.</p>				
<b>Justified approaches to plan policy and content</b>						
<b>33.</b>	<b>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	<b>KEY QUESTIONS</b>	<b>Assessment</b>				
	<p><b>[You may wish to check each policy setting a threshold]</b></p>	<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> <p><b>Reason for score: +1.</b> The below policies include thresholds which trigger required delivery. These are based on evidence and have been tested within the Viability Assessment (CORE_GEN_01).</p> <ul style="list-style-type: none"> <li>- BH3 Build to Rent. Threshold of 500 dwellings or more for sites outside of Growth Areas will be expected to deliver Build to Rent units.</li> <li>- BH5 Affordable Housing. Contributions toward off-site affordable housing required on sites delivering 5-9 units.</li> <li>- BH8 Specialist Older Persons Housing. Sites within Growth Areas, taken together, will need to provide 10% of units for older people, and elsewhere on sites over 500 units.</li> <li>- Policy BH9 Gypsy and Traveller Accommodation. Housing sites of 1ha or more will be required to consider the provision of pitches on site.</li> <li>- BE1 Economic Growth and Employment Opportunities for all. On schemes proposing over 3000sqm, 10% of floorspace should be affordable workspace.</li> </ul> <p>The above policies have been subject to viability assessment, with the exception of the last one which has only tested employment developments. This is being rectified in a revisit of the viability assessment which will support the Plan.</p>				
		<p><b>Implications of taking no further action:</b> Without sufficient justification the policy will lose its weight and be open to abuse from developers who do not wish to comply with this policy.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Provide the updated evidence base to support policy BE1 in particular.</p>				
		<p><b>Reviewer Comments:</b> The policies are considered appropriate, reflecting the need for housing developments to consider a wider range of needs, but offering the flexibility should developers show that despite best endeavours their site cannot accommodate these needs, development will be able to continue. On affordable workspace the policy reflects a desire to provide consistency across developments, which is not there in the current Local Plan, which has a variety of solutions to the provision of affordable workspace in developments, either through its requirement in site specific allocations policies, or when addressing the potential loss of an existing small scale employment use. (policy DMP14).</p>				
<b>34.</b>	<p><b>Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other Development Plan Documents or</b></p>	-2	-1	0	<b>+1</b>	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<b>Supplementary Planning Documents and why this is appropriate?</b>	<b>Reason for score:</b> +1. The plan references documents when outlining key details, but does not defer detail on strategic matters to other documents. The Plan does refer to forthcoming documents such as masterplans and SPDs which aim to provide detail on matters which would be inappropriate to include within the Plan itself. This is considered appropriate.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> The approach to masterplans and other supporting documents is considered appropriate. The Plan's policies are succinct but provide sufficient clarity on most matters. On site specifics there needs to be further analysis and engagement to go into further appropriate detail. The timescales for delivery in the trajectory reflect this factor in particular.				
<b>35.</b>	<b>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</b>  [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> 2+. There is a clear hierarchy of town centres outlined in para 6.4.27, heritage assets, and conservation areas, however, this does not have any particular implications on the policies within the Plan.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> The Local Plan has to be considered in the round. Most policies do not reference other policies that should also be considered. Nevertheless, where for example clarity on the relationship with other parts of the Plan is considered appropriate, this has been undertaken, e.g. BD2 refers to the need for acceptable heights to take account of designated heritage assets.						
<b>36.</b>	<b>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
<b>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p><b>Reason for score: +2.</b> Policy BE4 seeks to maintain the proportion of A1 and A2 uses to 65% within primary frontages, with A4 and A5 uses being prohibited entirely. This approach has been justified within the text as sufficiently flexible, being evidenced by the Brent Retail and Leisure Needs Assessment (EB_E_01-07). The assessment reviewed the town centre designations with an aim to consolidate, creating flexibility which will support the function of the primary frontage, and the town centre as a whole. The Retail and Leisure Needs Assessment has also been used to direct policy BE5 in limiting the proliferation of undesirable uses, including: betting shops, pawnbrokers. Payday loan shops, takeaways, shisha cafes, and adult gaming centres</p>				
		<p><b>Implications of taking no further action: none</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: n/a</b></p>				
<b>37. Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</b>  <b>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</b>		<p><b>Reviewer Comments:</b> This approach is considered appropriate and for the most part reflects existing policy, but also takes account of the specific recommendations to the Needs Assessment in relation to identifying primary frontages and the range of uses appropriate within specific parts of town centres.</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2.</b></p> <ul style="list-style-type: none"> <li>- Policy BH13 requires developments provide 20sqm of private amenity per flat, and 50sqm for family housing (incl. ground for flats). This is above the London plan baseline requirement of 5 sqm for 1-2 bed, and an additional 1 sqm for each additional occupant. Brent policy is reflective of locally distinct conditions, the provision of which has been established, with many successful examples of such provision.. This policy therefore seeks to make good this deficit to improve the lives of residents.</li> <li>- This also goes for policy BGI1 which seeks to increase the provision of public open space within the borough and proposes major developments outside growth areas provide 0.81sqm of open space per resident. This has been supported by the Viability Assessment (CORE_GEN_01), with assumed densities leaving sufficient space for this to be met effectively.</li> <li>- Policy BSUI1 seeks to increase the sustainability of buildings and reduce their overall carbon footprint. This is done by requiring a sustainability statement, demonstrating that everything that can be done, has been done. All major non-residential developments will be required to meet a BREAM standard of Excellent.</li> </ul>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Brent, and the UK have announced a climate emergency. In accordance, Brent has recently adopted a Climate Change Report and Action Plan which states the importance of ensuring the sustainable development of all new buildings. It is therefore seen as justified that these measures are ensured under policy.				
		<b>Implications of taking no further action: none</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: n/a</b>				
		<b>Reviewer Comments:</b> The standards are considered appropriate and supported by the evidence base, both in terms of need and impact on viability.				
<b>Deliverability</b>						
<b>38.</b>	<b>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> The Brent Viability Assessment (2019) has considered the impact of all proposed policies cumulatively on the viability of delivery. This includes impact of affordable housing and implications of Mayoral and Brent CIL. To take account of representations made at Regulation 19 stage a further review of some elements has been commissioned. This will be provided prior to examination.				
		<b>Implications of taking no further action: Policies unjustified/ not considered sufficiently in terms of viability impacts</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: Commission appropriate update of assessment.</b>				
		<b>Reviewer Comments:</b> The study has been undertaken by a well-regarded company with significant experience of viability assessments of policy and sites. A verbal update has indicated no significant issues in relation to comments raised at Regulation 19 stage. However, more detailed analysis will be provided in an update to the viability assessment.				
<b>39.</b>	<b>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<b>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</b>	<b>Reason for score:</b> +2. Yes, the Plan does reflect the conclusions and recommendations outlined within the Viability Assessment. For instance, it has been advised that some sites will not be capable of meeting the affordable housing requirements, and that financial contributions from small sites of 5-9 units will help absorb this. The Council has therefore included the requirement of small sites of 5-9 units to provide financial contributions to assist in overall delivery. The requirements within the Plan will not risk delivery. This is especially true given the built in flexibility of the plan when dealing with sites which may not be able to deliver all policy objectives simultaneously, and without grant.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
		<b>Reviewer Comments:</b> The Plan policies take account of the viability assessment. Early discussion/engagement occurred with the Council's viability expert who provides advice also on individual site assessments on an on-going basis and also reviewed the last Local Plan.				
<b>40.</b>	<b>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</b>	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. Yes, Figure 39 of the Local Plan lists matters to be monitored and which indicators will be used. These metrics are measurable and will be captured within the London Development Database for extraction and inclusion within the Annual Authority Monitoring Report.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> none				
<b>Reviewer Comments:</b> The monitoring proposed is considered proportionate and well related to the policies. The range of indicators has been expanded to take account of representations received at all stages of consultation.						
<b>41.</b>	<b>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</b>	-2	-1	0	<b>+1</b>	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. The monitoring targets and indicators for policy review have been included within the plan. The framework for plan review has been included within the Local Development Scheme which states how the document				

KEY QUESTIONS		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Where triggers for plan review and/or update are identified are they justified and proportionate?	will be planned, monitored and managed. The primary process of review will be through the AMR, which will involve the assessment of all targets and the publishing of findings. This will feed into the management of the Plan, assisting the policy team in identifying any required change in direction.				
		<b>Implications of taking no further action: None the Council has a track delivery of reviewing plans and keeping them up to date. National policy now expects such reviews to take place.</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: Set out a clear timetable for review.</b>				
		<b>Reviewer Comments:</b> The Council considers the current framework acceptable. It does not believe that it has ducked difficult questions, thus necessitating the identification of the need to do a very early review.				
<b>Plan effectiveness (and associated policy clarity)</b>						
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> Yes, the Local Plan covers the period 2020 – 2041. The strategic implications of local plan policies have been outlined within the Statements of Common Ground. As a London Borough, strategic matters are generally deferred to the Mayor through the London Plan. Policy BH5, in accordance with the new London Plan, states that the strategic aim for the provision of affordable housing is 50% to 2041. This is a 21 year period from adoption. This has been supported by the Brent SHMA which covers the period 2016 – 2041. It is also supported by the West London SHMA, and the GLA’s SHMA. Each Growth Area is accompanied by a Growth Area policy which sets out the strategic number of homes to be delivered to 2041. This has been evidenced by the Housing Trajectory and the deliverable sites within it.				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: none</b>				
<b>Reviewer Comments:</b> The Council started the review with the intention of planning for at least 20 years ahead, and if not going into as much detail on the latter years, seeking to at least identify potential significant site allocations/ directions of travel for the future of Brent to ensure that in the longer term sustained delivery of housing, etc. would be more achievable, rather than only thinking of the shorter term. The evidence base was commissioned on this basis. It is recognised that for many topic areas however such long term planning reduces the accuracy of evidence beyond the initial plan period, e.g. retail and leisure needs. As such the Council will review these evidence base						



<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		documents on a more frequent basis and as is likely will start a review of elements of the Plan, if not all within the next 5 years after adoption.				
<b>43.</b>	<b>Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. Yes, paragraph 2.10 of the introduction and appendix 1 clearly lay out which documents are set to be superseded by the adoption of this document.				
		<b>Implications of taking no further action:</b> None				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> None				
<b>Reviewer Comments:</b> The draft Local Plan now proposes to replace all existing policies as there have been minor amendments to some existing policies which the Council initially thought that it would retain as is.						
<b>44.</b>	<b>Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b> +2. Yes, the Plan sets a very clear framework and vision supported by robust policies and site allocations suitable for decision-making purposes. Each policy has a clear objective and followed by concise, supporting text, and those which require quantifying are measurable with appropriate targets in place. They can be easily applied for development management purposes.				
		<b>Implications of taking no further action:</b> none				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b> n/a				
<b>Reviewer Comments:</b> The objectives are clear, the policies can be easily used and understood for decision making. The Council has amended policies on the basis of comments received through the consultation where this has not been the case previously. The Plan and its policies have sought to be succinct and not duplicate higher tier policies, or provide slightly different wording to address similar matters to reduce the potential for confusion.						
		-2	-1	0	+1	+2

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>45.</b>	<p><b>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map?</b></p> <p><b>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</b></p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> Yes. For each policy theme, the Plan includes a section on ‘where are we?’ and ‘where do we want to be?’ In addition, a paragraph for each theme is included within each place to summarise the distinctive qualities within each area. Spatial areas have been denoted on the policies map where relevant, being laid out clearly and using a Key to assist navigation. All maps and graphics included within the plan are there to provide clarity, and help navigate the document, as well as improve readability through visual intrigue. All maps included within the Plan have a comparable layer on the policies map, which should be used when identifying spatial designations.				
		<b>Implications of taking no further action: none</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: None</b>				
		<b>Reviewer Comments:</b> The Plan has sought to be presented in the best way possible to assist with legibility. Where there have been issues identified with the graphics, the Council has sought to improve them and will be mindful of these points when the final document is adopted and the graphic designers/ printers commissioned to produce the final document.				
<b>46.</b>	<p><b>Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?</b></p>	-2	-1	0	+1	<b>+2</b>
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2.</b> Yes, clarity is given as to what types of development are required. This is done specifically via site allocations, and generally through policies DMP1 and BD1. Appropriate development is also guided by spatial policies such as BD2, stating where tall buildings are deemed appropriate, and through the specification of policies on growth areas etc. The Plan uses positive wording to enable development.				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: None</b>				
<b>Reviewer Comments:</b> The Plan has sought to positively address growth and development within the borough. As such its policies seek to encourage positive outcomes, rather than focussing on what should not occur.						
		-2	-1	0	+1	<b>+2</b>

<b>KEY QUESTIONS</b>		<b>Assessment</b> <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<b>47.</b>	<p><b>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</b></p> <p>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	<p><b>Reason for score:</b> +2. Yes. Where relevant we have included reference to the appropriate locations, scale and uses which should be considered under policy. For instance, in a number of policies are either only to be applied within Growth Areas, or outside of Growth Areas, with many specifically not applicable to the South Kilburn Growth Area due to the established regeneration masterplan for the area. Some reference scale, such as the policy for Gypsy and Traveller accommodation provision, which should be considered on sites over 1ha. Others mention use, such as the policy seeking to limit undesirable uses such as betting shops and take-aways.</p> <p><b>Implications of taking no further action:</b> None</p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b> None</p> <p><b>Reviewer Comments:</b> It is considered that the policies relate to an appropriate scale of development and are clear in outlining when it is expected that they will apply.</p>				
<b>I</b>	<p><b>State how many policies are in your local plan update?</b></p> <p><b>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</b></p>	<p>The plan includes 54 policies (excluding the good growth page) and 109 site allocation policies, including 58 detailed strategic SA’s and 51 less detailed SA’s, including 6 SA’s from Harlesden NP.</p> <ul style="list-style-type: none"> <li>- BD2 (tall buildings in Brent) states: ‘They should be of exceptional design quality, consistent with <b>London Plan</b> Policy requirements...’</li> <li>- BH4 (small sites) states: ‘Planning Permission for Small Sites will be determined in accordance with <b>London Plan</b> Policy H2A with the exception of: Criterion A2, which in Brent will only apply within PTAL 3-6 locations.’</li> <li>- BH5 (affordable housing) references the <b>London Plan</b> Policy H6 Threshold Approach.</li> <li>- BH8 (specialist older persons housing) references the <b>London Plan</b> benchmark requirement.</li> <li>- BH9 (Gypsy and traveller accommodation) states: ‘The council will seek to accommodate the identified needs for any additional pitches in its latest study that is consistent with the most up to date <b>national or adopted London Plan definition</b> of Gypsy and Travellers and associated needs assessment methodology.</li> <li>- BE2 (SIL and LSIS) references conformity with <b>London Plan</b> policy E7.</li> <li>- BHC4 (night time economy) states: ‘The <b>London Plan</b> identifies the Night Time Economy of Wembley of National/International Importance and Kilburn, Cricklewood and Wembley Park as of more than local importance.’</li> <li>- BGI1 (blue green infrastructure) references the <b>London Plan</b> UGF.</li> </ul>				
		-2	-1	0	+1	+2

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>48.</b>	<p><b>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</b></p> <p><b>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</b></p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2.</b> To keep the document concise, and the avoid any potential confusion, the document does not replicate any policies at national or regional level. The Plan does include policies which overlap with national and regional policy, however, these seek to refine such policies so as to be appropriate considering local context. When referencing either national or regional policy above, the Plan seeks to explain the rationale, or future proof policies, as is the case within policy BH9. The plan does not cross reference its own policies on a consistent basis, regarding the Plan as a whole which the decision maker take into account and consider how much weight they apply to particular policies consistent with the circumstances of the site and the proposed development.</p>				
		<p><b>Implications of taking no further action: None</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: None</b></p>				
		<p><b>Reviewer Comments:</b> The Plan has sought to not be any longer than it needs to be. In the context of an emerging London Plan, this has been difficult to sustain as the upper tier policy has in some cases been subject to substantial change and may well be once the Secretary of State gives his decision on the 'Intend to Publish' version. Nevertheless, the Council considers that it has taken the right approach to focus on the Brent specific issues.</p>				
<b>49.</b>	<p><b>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2.</b> The Plan does not duplicate regulatory requirements. It does reference SPDs and BGI2 references certain tree standards such as BS3998:2010, but this is because such standards are not enforced by law, and therefore benefit from the weight of being written into policy.</p>				
		<p><b>Implications of taking no further action: None</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right: None</b></p>				
<p><b>Reviewer Comments:</b> Again the Council considers that it has taken a proportionate approach. This has not been popular in respect of some issues such as basement development. Nevertheless, its approach is justified.</p>						
		-2	-1	0	+1	+2

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>50.</b>	<b>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</b>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
	<b>[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]</b>	<b>Reason for score:</b> +2. Yes, ambiguity has been avoided. Statements such as ‘to the Council’s satisfaction’ have not been used. The policy wording does however include within it some flexibility so as to allow exception. For instance, instead of ‘must’, the word ‘should’ is often used. The Plan has been drafted to ensure it is accessible and clear for both applicant and decision maker.				
		<b>Implications of taking no further action: None</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right: None</b>				
		<b>Reviewer Comments:</b> The policies are considered to be clear.				

<b>Date of assessment:</b>	27/11/2019
<b>Assessed by:</b>	Jordan Henderson
<b>Checked by:</b>	Paul Lewin. March 2020.
<b>Overall Score:</b>	83
<b>Comments:</b>	<p>The appraisal is considered to provide a fair assessment of where the Plan is at proposed submission stage. There are still some issues to address with partners, such as the GLA and Environment Agency, and the Council is still awaiting some evidence base such as the updated viability assessment. In addition the Secretary of State's response on the Intend to Publish London Plan, given that the Mayor went against the Panels' recommendations on a number of matters is likely to result in some amendments to the London Plan prior to its adoption and the Brent Local Plan's examination.</p>